

# **Chapter 13: Re-Establish Policy Transactions**

## **Insurance Policy Management (IPM) Program Manual**

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## Re-Establish Policy Transactions

In **ATLAS**, a unique policy is determined by the Policy Number, Policy Type, Company, and Policy Term Effective Date. When providing a Policy Number for New Business or a Policy Renewal Transaction in **ATLAS**, the Policy Number is only accepted from a carrier when the coverage for this Policy Number is continuous with the same Company. In order to accommodate the instances where a Policy Number needs to be reused where there is a gap in coverage, the **Re-Establish Policy Transaction** must be used. This transaction allows an insurance carrier to reuse a Policy Number in any circumstances where there is a gap in coverage. Examples of common cases that would cause a gap include:

- A carrier has a policy with a Policy Number and, either via a cancellation or an expiration, there is a subsequent re-issue of that policy using the same Policy Number and type but with a different Effective Date. This could occur within the same calendar year or over several different years.
- A carrier has a policy for a customer who changed carriers for a period of time and is now returning to original carrier which, to **ATLAS**, results in an apparent gap in coverage. The New Business transaction does not allow for the reuse in Policy Number in these instances, so the **Re-Establish Policy Transaction** must be used.

In addition, **ATLAS** does not allow any overlap in coverage, e.g., there cannot be two (2) policies from the same carrier with the same Policy Number active at the same moment in time. For example, one cannot have policy 123 for Company ABC with an Effective Date of 1/1/2020-12/31/2020 cancelled on 4/1/2020 and policy 123 for Company ABC with an Effective Date of 3/31/2020-3/31/2021. The 3/31/2020 day results in two policies for the same Company and Policy Number active at the same time.

A **Re-Establish Policy Transaction** is available as a **Batch** transaction, a **Web Services Transaction** and via the **eServices Insurance Portal**. The **Re-Establish Policy Transaction** expects to find an existing Policy Record (same Company and Policy Number) on **ATLAS** and then adds a new policy term record that reflects the new Policy Effective and Expiration Dates. All **Re-Establish Policy Transactions** must be reported within 23 calendar days of the Registration Effective Date. Note that in the case where the **Re-Establish Policy Transaction** is being used to re-issue a policy and the Registration is either Pending Revocation or has already been Revoked, if the Policy Effective Date is equal to or precedes the Revocation Date, the posting of the Policy Record will automatically reinstate the Registration. In these cases, the posting of the Policy Record as soon as possible is in the insured's best interest.

The **Web Services Re-Establish Policy Transaction** functions slightly differently than the batch version in that the Web Service requires the identification of the specific existing Policy Record and uses the Policy Term Key as the input. The batch transaction allows the use of the Company Number and Policy Number to accomplish the same thing. Note that this transaction cannot be used to re-establish a policy with the same Policy Effective and Expiration Dates for a Policy that already exists in **ATLAS**. The **eServices Insurance Portal** also supports the **Re-Establish Policy Transaction** in a manner that is similar to the **Web Service**. This manual covers the **Batch** and **Web Service Transactions**. The **eServices Insurance Portal Transactions** are

addressed in the [eServices Reference Manual for Insurance Industry Users](#), and also via the [ATLAS Training - Computer Based Training \(CBT\) Videos](#).

### Batch Transactions

The **Batch Re-Establish Policy Transactions** follow the same basic process, edits and business rules as **New Business Transactions**, with one major exception. For a **Re-Establish Policy Transaction**, the Company/Policy Number (the basic Policy Record) must be on file in **ATLAS** and the policy term for the re-established policy cannot overlap with the policy term for the existing policy term record. A **Re-Establish Policy Transaction** is Transaction Type 9. Below is a matrix of the **Action Code** options for the **Re-Establish Policy Transaction**.

Transaction Type	Action Code	Description
9	1	Re-Establish Policy – Add Vehicle
9	0	Re-Establish Policy – Add Policy Only
9	4	Re-Establish Policy – Section 5

For **Batch** processing of a **Re-Establish Policy Transaction**, there are two options:

- **Option 1:** Submit Transaction Type 9, Action Code 1 (**Re-Establish Policy – Add Vehicle**) for all vehicles that are being added to that policy.
  - If a single record results in an error, all vehicles associated with that policy will be rejected.
- **Option 2:** Submit Transaction Type 9, Action Code 0 (**Re-Establish Policy – Add Policy only**). Submit Transaction Type 4, Action Code 1 (**Amend Policy – Add Vehicle**) for all vehicles
  - Assuming the **Re-Establish Policy Transaction** processes successfully, the Policy posts to the RMV database.
  - Each **Amend Policy** (Transaction Type 4), **Add Vehicle Transaction** Action Code 1, is processed separately:
    - One record in error does not result in other records being in error.
    - The **Re-Establish Policy** and **Amend Policy Transactions** can be submitted in the same file.

The primary goal with this approach is to limit the number of errors. If an error occurs when adding vehicles with a **Re-Establish Policy Transaction** (9, 1), a single error rejects the entire transaction (along with all other vehicles on the Policy). **Re-Establish Policy** using the **Add Policy Only** option (9,) posts the Policy first and, from there, each **Amend Policy/Add Vehicle Transaction** (9,1) processes separately. That way an error on one vehicle record does not affect other vehicle records.

### Section 5 Re-Establish Policy Transactions

For the **Batch Processing** of **Section 5 Re-Establish Policy Transactions**, the Transaction Code is 9 and the Action Code is 4. Since Section 5 Registrations do not have any vehicles associated with them, the match is by owner/business name and Plate Type/Registration. The

number of plates the insurer is reporting is compared to the number of plates the RMV has on record. If the number matches, the transaction processes, if the insurer's plate count is less, the transaction fails with error code 6102 and if the insurer's plate count is greater, the transaction processes but informational error code 6103 will be set. In the last case, the RMV plate count is returned in the response record.

### Policy Information

The submitting Service Provider or carrier and the insurer Company Codes are checked for validity and security to ensure the Service Provider/carrier is allowed to submit for the insurer. IPM Policy Identification consists of the following:

- Insurer's Insurance Company Code
- Unique Policy Number previously recorded in **ATLAS**
- Policy Type (P=Private Passenger, C=Commercial)
- Policy Effective Date

If the Policy Number does not match an existing Policy Number in **ATLAS** (e.g., unable to locate an existing Policy Term record on **ATLAS**), the transaction will fail with error code 0303. If the Policy Effective and Policy Expiration Dates provided on the **Re-Establish Policy Transaction** result in an overlap in active coverage, the transaction will fail with error code 0305.

### Policyholder Edits

For a **Re-Establish Policy Transaction**, the RMV attempts to match the policyholder information supplied with the records on the RMV file. If the policyholder information does not match any record on the RMV file, the RMV posts the Policy Record with the policyholder information as supplied by the carrier. See the discussion below for the specific edits. The result is the policy has been posted, but the carrier cannot post an unpaid premium against this Policy Record.

The RMV performs no edits to determine if the policyholder is also a registrant, the only edit is to determine if the Individual or Company already exists on the RMV **ATLAS** file. In Massachusetts, the registrant and owner are always the same and the vehicle must be registered in the name of the owner. Thus, for a leased vehicle, the owner is the Leasing Company. In this case, the policyholder might be lessee, the lessor or someone else as determined by the Individual carrier's rules. None of the IPM edits attempt to determine if the policyholder and owner/lessee are related. The only reason the RMV has any interest in the policyholder is to effectively record and adjudicate any unpaid premium.

There are two types of policyholders: Individual and Company. The processing for each is outlined in the sections below.

### Policyholder Edits – Individual

**Driver's License Numbers:** There are three different license number scenarios outlined below:

- **Massachusetts License Information:** When the policyholder's license state is Massachusetts, **ATLAS** compares the submitted license number to the license information

on our license file. The transaction is rejected if there is no matching record for an RMV licensed driver.

- **Out of State License Information:** When the policyholder's license state is a valid state code other than MA, the license number is compared to out-of-state license information residing on **ATLAS**. If there is a match, the policy is posted with the matched **ATLAS** record as the policyholder. If there is no match, the policyholder record is posted with the policyholder information as provided. Note, in this instance and in the No License Number case below, the reporting of unpaid premium is not allowed. If, at some future date the carrier wanted to post unpaid premium, they would have to process an amendment transaction to change the policyholder to a record that already exists on **ATLAS**.
- **No License Number:** Unlicensed policyholders are reported to **IPM** by indicating N in the Policyholder License Indicator field. (This alternative should only be employed for truly unlicensed drivers.) In these cases, the RMV *will* record the policyholder information, but, because it does not match any record on **ATLAS**, the RMV *will not* allow the recording of unpaid premium.

### Policyholder Surname and Date of Birth (DOB)

For policyholders licensed in Massachusetts, the surname and date of birth (DOB) recorded on our license file are compared to that supplied by the insurance companies in the **Re-Establish Policy Transaction**.

Edits include:

- At least three of the first five characters must match the last name associated with the license number on **ATLAS**, and at least two of the three component data elements comprising the date of birth (MM/DD/YYYY) are required for acceptance. For records processed in **Batch**, **ATLAS** returns the appropriate error message indicating the field in error for records which fail the Policyholder Edits (1302, POLICYHOLDER SURNAME DOES NOT MATCH).

Transactions that pass the IPM Policyholder Edits return relevant license information as recorded in **ATLAS**. Given the matching algorithm, it is possible that the name/DOB information is different than what is being maintained by the carrier. There is no requirement for the carrier to adopt the information as maintained by the RMV.

### Policyholder Edits – Company

**ATLAS** maintains a hierarchical structure for companies where it is possible and common for one FID to have several different Company names. For example, municipalities may be noted as Town of X or City of X (which is referred to as the Customer Record) but they have a variety of subdivisions they need to track (referred to as the Account Record). The account records normally have the municipal name present in them (X Public Works Department or X Water Department) but not in any predictable order (Trustees of X Cemetery or Long Island Hospital). The RMV tries to maintain a semblance of order with these names, but carriers are advised to always request a copy of a Registration and/or to look the Company up to see how it is recorded on **ATLAS**. For Company policyholders, the FID number (Federal Identification number) is the

primary key and is recorded in the Business FID field. The Company name is entered in the policyholder business name field. The RMV finds the records associated with the provided FID and match the first eight characters of the supplied owner name with the Company name on **ATLAS**. For this match, spaces and any special characters are removed. A match on five of the eight characters is considered a match. In cases where they do not resolve to a single record, the RMV chooses the first record in the string of duplicates. In the case where no matching record is found, the policy posts with the information as supplied by the carrier.

### Vehicle Registration Edits

The **New Business, Policy Renewal, Re-Establish Policy**, and **Add/Delete Vehicle Transactions** require a unique Vehicle Identification Number (VIN). The VIN must already exist on the RMV database.

#### VIN Edits

For **Batch Transactions**: The VIN supplied is verified against the information on the **ATLAS** Registration file. IPM requires that all vehicles reported on a **New Business, Renewal, Re-Establish Policy** or Vehicle **Amend Policy Transaction** must already be recorded on **ATLAS** and be associated with the proposed registrant/owner. If the VIN does not exist on **ATLAS**, the transaction is rejected. In this circumstance If the RMV finds more than one occurrence of that VIN on **ATLAS** (which should be a rare occurrence), it uses the provided Registration number and/or owner information to determine the correct record to associate to the transaction.

**NOTE:** For specifics regarding Trailer Registrations, review [Chapter 10: Trailer Reporting](#).

### Registration/Owner Edits

Once a VIN is determined to be valid, IPM compares the Plate Type and Registration and/or the vehicle owner information stored on **ATLAS** to the information supplied by the insurance Company. IPM requires that either the supplied Registration or vehicle owner information matches the information recorded on **ATLAS** for the vehicle.

#### Registration Edits

IPM checks the Plate Type and Registration number supplied by the insurance Company and compares it to the current Plate Type and Registration recorded on **ATLAS** for that vehicle. If the Plate Type and Registration number match, the record is accepted. When the Plate Type and Registration number do not match, the vehicle owner information is verified against the information residing in **ATLAS**.

### Vehicle Owner Information

The vehicle owner information is only edited if the vehicle Registration information is missing or invalid. The supplied vehicle owner type (Individual or Company) is examined and the appropriate vehicle owner edits are applied.



### Individual Vehicle Owners

The vehicle owner's license number supplied is compared to the vehicle owner license number stored on the Registration record. A match on license number results in the acceptance of the record. Mismatches on license number initiate the owner surname and date of birth (DOB) edits. These edits are identical to those used for verifying policyholder information. The surname and date of birth supplied are compared to the information stored on **ATLAS** for all owners. Matches result in acceptance of the record, miss-matches result in a rejection with error code 2105.

### Company Vehicle Owners

Transactions received with a Company/business owner type are matched by comparing the vehicle owner's provided Federal Identification (FID) number with the FID recorded on **ATLAS** Registration record. If the FID matches, the record is accepted. If it does not match, the record is rejected with error code 2105. Refer to [Chapter 12: Technical Specifications](#) for further information regarding input records.

### Response Record

For each **Re-Establish Policy Record** received, there is a corresponding response record that contains:

- A mirror image of the record as sent by the insurer, and
- The record as it appears on **ATLAS**. The specific details for the response record are noted in [Chapter 12: Technical Specifications](#).

### Web Services Transactions

The **Web Services Re-Establish Policy Transaction** functions differently than the **Batch** version of this transaction. First difference is that **Web Services** supports the use of unique keys to identify certain combinations of data as noted below. By using these keys, many of the edits and resulting errors can be avoided. However, this also means that one must inquire and obtain the key(s) for the data in question prior to processing the **Re-Establish Policy Transaction**. The unique keys are noted below and change anytime one of the components of the key changes.

Key Name	Description/Key Components
<b>ATLAS Ownership Key</b>	Combination of Registration (number, type), vehicle, and registrant(s) owner(s). This key value persists between Registration periods (Renewals), but changes if the ownership structure of a vehicle changes, e.g., previously registered vehicle sold to a new owner who registers the vehicle.
<b>ATLAS Vehicle Key</b>	Vehicle (VIN). Each vehicle in the <b>ATLAS</b> is assigned a unique vehicle key. This value never changes once assigned to a vehicle.



<b>ATLAS Entity Key</b>	Individual (DLN and State) or Business (FID). Each entity in <b>ATLAS</b> is assigned a unique entity key. This value never changes once assigned to an entity.
<b>ATLAS Policy Term Key</b>	An <b>ATLAS</b> assigned unique key that is a combination of: the Insurance Company Code, Policy Type, Policy Number, Policy Effective Date, and Policy Expiration Date. This value differs for each policy term.
<b>ATLAS Registration Key</b>	An <b>ATLAS</b> assigned unique key is the combination of: the registrants (owners), Registration Number, Registration Type, Registration Effective Date, and Registration Expiration Date. This value changes with each Re-Establish Policy.

The second difference is that the **Web Services** is much more conversational, thus processing on a one-up basis makes much more sense. In order to process a **Re-EstablishPolicy** operation, the submitter needs only to supply the existing **ATLAS Policy Term Key** and the new Policy Effective and Expiration Dates. If the Policy Effective and Policy Expiration Dates provided on the **Re-Establish Policy Transaction** result in an overlap in active coverage, the transaction will fail with error code ERROR\_POLICYTERM\_OVERLAP.

**Section 5 Re-Establish Policy Transactions:** In order to re-establish a policy insuring Section 5 Registrations, the submitter would send the existing **ATLAS Policy Term Key**, the new Effective and Expiration Dates of the policy, the **ATLAS Ownership Key** for the Section 5 Registration and the number of plates that are being insured. If any other policy data is changing, the **Re-EstablishPolicy** would have to be processed as **New Business Transaction**.

As part of processing the **Re-EstablishPolicy** operation, the number of plates the insurer is reporting is compared to the number of plates the RMV has recorded for the Section 5 Registration, if the number matches, the transaction processes. If the insurer's plate count is less, the transaction fails with error code ERROR\_NUMBEROFPLATES\_TOOLOW. If the insurer's plate count is greater, the transaction processes, but informational error code INFOONLY\_NUMBEROFPLATES\_TOOHIGH is set. In the cases of a plate count mismatch, the insurer processes a **GetRegistrationRecordByRegistration** transaction to obtain the correct plate count.

## Response Record

For each **Re-Establish Policy Record** received, there is a corresponding response record that contains:

- A time stamp,
- A unique **ATLAS Transaction Key**, and
- An indicator for whether or not the transaction was accepted.

If the transaction was accepted. The RMV will also return:

- The **ATLAS Policy Term Key**, and
- The policyholder **ATLAS Entity Key** (if applicable).

In the last case, if the indicator is set to **NO**, an additional error response record is sent that contains all of the error codes and their description.

### Timing Issues

**Re-Establish Policy Transaction** must be submitted within 23 calendar days of the Registration Effective Date.

The RMV currently does not take any action when a carrier fails to report a policy in a timely manner. However, the plan is that later in 2020, the RMV will implement the revocation logic that will result in the generation of a Revocation Notice on the evening of the 23<sup>rd</sup> calendar day after the initial Registration or Registration Reinstatement Date.

If 23 calendar days passes without the insurance carrier reporting a policy and the RMV issues a Revocation Notice (these always have a 10 calendar day grace period), the status of the Registration record states **VRGVAL** (or active). On 12:01a.m. on the 11<sup>th</sup> day, the status changes to **VRGREV** (or revoked).

If, at any time during this process and even after the revocation, the carrier files or re-establishes a policy with a Policy Effective Date prior to the Revocation Effective Date; the RMV immediately and automatically reinstates the effected Registration(s) at no fee to the customer. If the Policy Effective Date is on or after the Revocation Effective Date, the customer owes a \$50 reinstatement fee per Registration.

In addition, the customer can obtain a stamped [Registration and Title Application \(RTA\) Form](#) and manually file this with the RMV. This is the least desirable option as it is a lot of manual work for everyone involved. If this option is employed, it restarts the 23-day clock and this process is repeated.

### References

[RMV Business Partners Website](#)

[IPM Program](#)

[IPM Program Documents](#)