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DATE: October 11, 2019

TO: All Insurance Companies Authorized to Issue Motor Vehicle Policies in Florida

FROM: William R. Graves, Chief
               Bureau of Motorist Compliance

SUBJECT: Florida Financial Responsibility Insurance Data Exchange – XML Conversion
               Production Book of Business Reload Bypass – October 2019

As a follow up to our letter dated April 4, 2019 and discussed during the insurance industry conference call on August 14, 2019, , the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) is providing written instructions regarding the filing process for the upcoming XML production book of business (BOB) reload bypass beginning October 2019. We will begin scheduling and accepting the BOB reload from companies in anticipation of the XML conversion in March 2020. This will be a one-time BOB reload, which will not require reconciling cancellations or missing policies. To send the BOB reload, the company must have successfully completed XML structural testing.

Each company will be assigned a liaison to assist with questions and concerns until the BOB reload has been successfully completed. By the end of this month, a liaison will contact each company and/or vendor with their BOB reload submission date. At this time, we don't know how long it will take to get every company through their reload; however, we will make every effort possible to give you sufficient notice. Understandably, this will take more than a few weeks to accomplish. It is imperative that FLHSMV receives your total number of active policies and any updates to your technical contact information by October 18, 2019, in order to finalize the submission schedule. If your company has not done so already, please email FRFTPXML@flhsmv.gov with this information.

The BOB reload must contain all of your company's active policies. Each policy record must contain the following:

- Transaction 20 (Initiation of Insurance)
- Transaction 31 (Add Vehicle to Policy)
- Transaction 34 (Add Policyholder to Policy)

The BOB reload will be submitted in the production environment using the new XML format. Until further notified, please do not submit any other BOB reloads to production while we get everyone through this initial BOB reload bypass.

- The BOB reload file will be placed in the **Reload Bypass** folder in the production directory. The folder will be created prior to the company's scheduled BOB reload submission. The companies will be notified when this folder is created, and we will ask each company to confirm the folder is visible to ensure companies know exactly where the production file should be uploaded.

- **The BOB reload file must be uploaded to the Reload Bypass folder no later than 4pm EST on your scheduled date to be processed**. If the file is not uploaded to the folder by that time, it may not be processed.

- If the BOB reload file has less than a 5% error rate, the reload will pass and be loaded into production. **Please suspend all daily reporting until the reload is successfully imported and loaded into production.** After submitting the BOB reload, you will receive a transaction report. If the BOB reload did not pass, you will see an error rate of 5% or more and you must correct the errors and resend the BOB reload within 1 week. If the transaction report does not display an error rate, then the reload successfully imported and will be loaded into production. However, **do not send any daily files until your liaison notifies you the files were successfully loaded into production.**

  If the error rate is 5% or more, then none of the transactions will be imported**.** In order to successfully import the reload, you will have to:

  1. Re-submit the corrections in a BOB reload within 1 week after the transaction report has been returned, until the file has less than a 5% error rate.

  2. If multiple Company/NAIC codes are submitted in a file and the total error rate of the file is 5% or more, this will prevent the BOB reload from passing and uploading. For example, if ten company codes are submitted in one file and each of those company codes have a 1% error rate, the entire file will fail because the error rate is 10%.

To further assist in preparation of the BOB reload, attached is a list of possible errors that can be returned in the BOB reload transaction report**.** The bulk policy cancelled, and missing error files will not be returned from this BOB reload submission. **Please note, the effective date for the policies must be the initial policy effective date only if there has been no lapse in coverage. If there has been a lapse of coverage, the policy effective date should be the date the policy was recalled/reinstated.**

Frequently Asked Questions

1. **How many times can a BOB reload be submitted?** It can be continuously resubmitted until the reload successfully imports. If the initial BOB reload did not pass the error threshold, the records in the file which are creating the errors must be corrected and the file must be re-submitted. Please let your FLHSMV liaison know before resending a BOB reload.

2. **Will the BOB reload submission with multiple companies receive an error transaction report for each company?** No, there will only be one error transaction report per BOB reload file submission.

3. **What is the process to correct returned errors?** Resubmit the corrections in a new BOB reload until the file has an error rate less than the 5% threshold. **Do not submit a daily file to correct errors during this BOB reload bypass process.**

4. **What is the deadline for error corrections to be completed, and error percentage brought under the 5% error threshold?** Errors should be corrected within 1 week after the transaction report has been returned. Please note, the department's resources will be assisting several hundred insurance companies, so we appreciate your patience as we respond to inquiries regarding the BOB reload process and assist companies in resolving errors.

5. **Will the FLHSMV maintain records of all active and cancelled policies?** When a BOB reload is submitted and it passes the 5% error rate, all active policies for the company code(s) are removed from the Department's

current database, no matches are performed on those, and the active policies submitted in the reload are uploaded. A cancelled policy will be replaced with an active policy, if the Florida company/NAIC code(s) and the policy number(s) are an exact match. If the cancelled policy number and the company/NAIC code does not match with a policy submitted in the BOB reload, the cancelled policy remains on the Department's database for historical purposes.

6. **Will verifications for the level of coverage be generated after the BOB reload once daily reporting commences?** Verifications will continue to generate for all reporting companies just as they do currently if proper coverage cannot be located on the database for a Financial Responsibility sanction that requires bodily injury coverage.

7. **After companies send the BOB reload in the new XML format, will they continue reporting dailies in current XML and flat file format?** Yes, companies will continue to submit daily files in their current format until we go live in March 2020. In the meantime, the data in these daily files is being updated to the production database.

8. **Why can't a company send the BOB reload using their current filing format such as flat file or current XML?** As previously communicated, the schema has changed, and we are now requiring level of coverage and the ability to add multiple policy holders and additional vehicles.

9. **The deployment "go-live" date for the financial responsibility XML conversion is planned for March 2020. Will companies need to send another reload after the "go-live" to update the level of coverage and policy holders for companies that currently report in flat file? If not, what are the consequences?**
No, it is not required for a company to submit another BOB reload to update the level of coverage or policyholders for policies issued or modified after the BOB reload beginning in October. However, if a company wants to update the level of coverage or policy holders in production after we go live with the XML conversion, you can send via the XML daily files with the appropriate transactions or in a new BOB reload at a later date. However, this new BOB reload will include reconciling errors.
After go-live, if FLHSMV does not have the level of coverage on the database for a policy, the insurance company will receive verification requests and customers will continue to be mailed notices requesting proof of the required coverage at the time of an event such as an accident with injuries or sanctions requiring BIL/PIP/PDL coverage. This is what occurs in today's environment. Modernization is designed to reduce these requests since we will have the level of coverage on file.

10. **If a company does not submit the BOB reload, what are the risks?** Our goal when we go live in March 2020 is to have the most up-to-date and clean policy information from all the companies in our database. The only way to accomplish this goal is through the BOB reload process. By doing so, we can reduce the number of errors and notices being mailed to customers requiring them to provide proof of coverage at the time of an event. If a customer does not respond to our notice, their driving privilege and/or motor vehicle registration(s) will be suspended. The BOB reload process will also benefit insurance companies by reducing the number of verification requests received from FLHSMV.

The financial responsibility XML conversion is only one component in the overall Motorist Modernization Project, which encompasses other system applications to be deployed and tested before we go live. Financial Responsibility has scheduled resources to assist companies with the BOB reload process and error correction during this timeframe to make certain we have enough time to get all insurance companies through the process, and correct any resulting errors. We must work in conjunction with other system applications to stay on schedule as well. If a company does not submit the BOB reload during their scheduled timeframe, we will have limited resources to assist with a BOB reload when the modernization project goes lives in March

2020. Although we will be available to assist as time permits, we may not have technical staff available to monitor a reload.

We thank everyone for their assistance as we continue to work towards a successful XML conversion in March 2020. Please let us know if you have any questions.

WG/pp

Cc: Amy Groszos, Director, FL Office of Insurance Regulation

Reload Error Messages

Transaction Errors

Error Code	Error Message – Transaction Errors
049	Cannot add driver or vehicle, initiation record had an error
007	Company code is not registered with FL DHSMV
008	Company code must be 5 digits
030	In a reload, cannot submit a transaction type 31 without submitting a 20
036	In a reload, cannot submit a transaction type 34 without submitting a 20
00A	Transaction type contains invalid characters
009	Transaction type is not valid for reloads, transaction type must be set to 20, 31 or 34

Policy Errors

Error Code	Error Message – Policy Errors
014	Cancellation Date is not a valid date (MMDDYYYY) (will not import)
00U	Effective Date cannot be in the future
00T	Effective Date must be a valid date
00E	Insurance policy number required
013	Policy Cancellation Date cannot be prior to Policy Effective Date (will not import)
029	Policy number contains invalid characters

Policy Holder Errors

Error Code	Error Message – Policy Holder Errors
00O *	Company FED_TIN is missing
00P *	Company FED_TIN must be 9 digits
00S	Company indicator is invalid, please choose Y or N
00R	Company name is missing
00M *	DLN is not required on Fleet policy
00W	DOB cannot be in the future
00V	DOB must be a valid date (MMDDYYYY)
00K *	Florida Driver License not in correct format
00X	Gender must be M or F or Blank
052	Invalid Transaction Type

* Note: Error Codes Marked with an Asterisk (*) are Soft Error and Will Import. All other Errors will not Import.

Reload Error Messages

Error Code	Error Message – Policy Holder Errors
00Q *	No matching FED_TIN number found
016	On an Initiation at least one policy holder is required
039	Policyholder effective date cannot be in the future
038	Policyholder Effective Date is required on 34 transaction types
037	Policyholder Effective Date must be a valid date (MMDDYYYY) (will not import)
019	Policyholder first name contains invalid characters
00F	Policyholder first name required (will not import)
023	Policyholder last name contains invalid characters
00G	Policyholder last name required
00B	Policyholder middle name contains invalid characters
00H	Policyholder state is not valid
00J *	Policyholder zip code is not complete
00I	Policyholder zip code not valid

Vehicle Errors

Error Code	Error Message – Vehicle Errors
00Z	Fleet indicator is invalid, please choose Y or N
052	Invalid Transaction Type
069	Level of Coverage insufficient, Level of Coverage must be set to 08
066	Level of Coverage insufficient, must have at least a 04 Level of Coverage
067	Level of Coverage insufficient, must have at least a 05 Level of Coverage
068	Level of Coverage insufficient, must have at least a 06 Level of Coverage
017	Level of Coverage is not in the correct format
033	On an Initiation at least one vehicle is required
002 *	Partial 15 digit match on VIN
00A	Transaction type contains invalid characters
003	Unable to locate single VIN match; Multiple partial matches found
024	Vehicle effective date cannot be in the future
012	Vehicle Effective Date is required on 31 transaction types
025	Vehicle effective date must be a valid date (MMDDYYYY)
042	Vehicle Make is required
00C	Vehicle Year not valid year

* Note: Error Codes Marked with an Asterisk (*) are Soft Error and Will Import. All other Errors will not Import.

Reload Error Messages

Error Code	Error Message – Vehicle Errors
00D	Vehicle Year required when VIN is present
018	VIN contains invalid characters
004	VIN is not valid
006	VIN is required for non-fleet policies
005	VIN must be at least 17 characters for a vehicle year greater than 1980 (will not import)
001 *	VIN not registered with FL DHSMV. HSMV will attempt to validate the VIN, as registered, again in 30 days

* Note: Error Codes Marked with an Asterisk (*) are Soft Error and Will Import. All other Errors will not Import.