

## Responses from Other State Leagues on the Expiring License Issue for Shared Branching

This is our response in **Oklahoma**:

Our decision for the standalones is as follows:

In response: CUSC standalone locations will temporarily allow accept expired IDs on a case by case basis.

Meaning: If a member has an expired ID the teller needs to confirm with a supervisor/manager prior to accepting the ID as "valid". DO NOT announce this to the members. Simply inform your tellers that if a member has an ID that expired between Feb 1 – April 30<sup>th</sup> it could be acceptable as long another supervisor/manager looks over it. If a supervisor approves this type of ID, please have everyone involved initial the DTR for backup.

Again, DO NOT announce this or post it anywhere members can see/ hear and make sure EVERYONE knows they must have another supervisor/manager examine the ID for legitimacy before accepting.

If this situation continues, we will provide an update before April 30<sup>th</sup> on how CUSC will continue to handle expired IDs.

For our outlet locations:

CO-OP has not issued a response releasing shared branching to override the valid ID rule. However, in their rule amendment, they did state:

Following an in-depth conversation with the Task Force members, a unanimous decision has been made that during this exceptional crisis, the network will **empower each credit union to make their own decisions** regarding branch operations and Shared Branch service offerings. As local conditions vary greatly and the situation may change significantly with short notice, **we recognize the need for autonomy and respect your credit union decisions** in order to help ensure the health and safety of credit union staff, members and the greater community at large. **We understand that this situation will create variation in services and branch policy.**

Thus, as the Oklahoma SNP, we are allowing you to decide how your CU wishes to approach the expired ID. Since, this rule is put into place by CO-OP, which holds you accountable, you can state: While you recognize that the State of Oklahoma has issued an extension this applied to how the state will handle violations with the DPS laws this doesn't override your internal mandates. As a business owner you still have the right to refuse the transaction.

### TEXAS

Yes, we ran into this last month. The Texas Governor imposed a mandate in Texas for Drivers License and ID's that expired March 13 2020 and beyond (at this point in time) due to the current COVID-19 environment we are in. That said, I reached out to COOP and was given the same response. However,

here in Texas we have had a caveat for some time now in that the Texas Concealed Handgun License is an acceptable form of Identification as well. So based on the fact that federal or local government rules/regs/mandates supersede COOP's ORRs, we have handled this current acceptance of an expired TX DL/ID in the same manner, with the disclaimer (of course) that we highly recommend and advise that qualifying identifiers be included, i.e. verification of DOB, joint owners, additional accounts, last deposit when and amount, etc., etc., etc. And adding that (just as COOP stated), if, the transaction proves to be fraudulent the onus on the loss will be on the Acquirer.

All that said, we did have a CU ask about out of state. The response to that question was posed to COOP as we have no way of knowing which states have imposed/mandated/implemented options for expiring IDs. They were going to check into that and get back with me on it. Ultimately, because of the "not knowing" about other states I had to advise my client to handle it like any other pre-COVID-19 transaction.

## **Maine**

We had a few credit unions inquire about this. I am uncertain whether the State of Maine is sending a similar letter; however, many of the credit unions who have run into this challenge have required a second form of identification to use in conjunction with the required form on ID. They have also been following the same guidelines as the TSA where they are only accepting IDs that expired after March 1, 2020.

We have not prescribed what the secondary form of ID needs to be and have not received a lot of feedback regarding what they are accepting. We are fortunate that most of our transactions occur within our state network and that many credit unions are familiar with the guest members they service so it hasn't been a huge challenge for us.

One lesson we have learned is that we are going to create a task force of credit unions within our network and come up with some solid guidelines/rules to follow at our local network level. The fact that CO-OP has provided little or no guidance through this situation and essentially is allowing everyone to do what they want to do isn't helpful in setting a precedence. We are going to take this upon ourselves so that we can have some ubiquity going forward especially in instances such as this one.

## **Ohio**

Our Ohio governor has advised due to BMV agencies being closed, expired Ohio driver's license will still be valid during this period of quarantine.

I have communicated this to my network credit unions but also mentioned this applies to "only expired Ohio driver's license" when the expiration date coincides with the quarantine dates and or the guest member is known to the Outlet. If it's an expired out of state driver's license make sure to follow ORR.

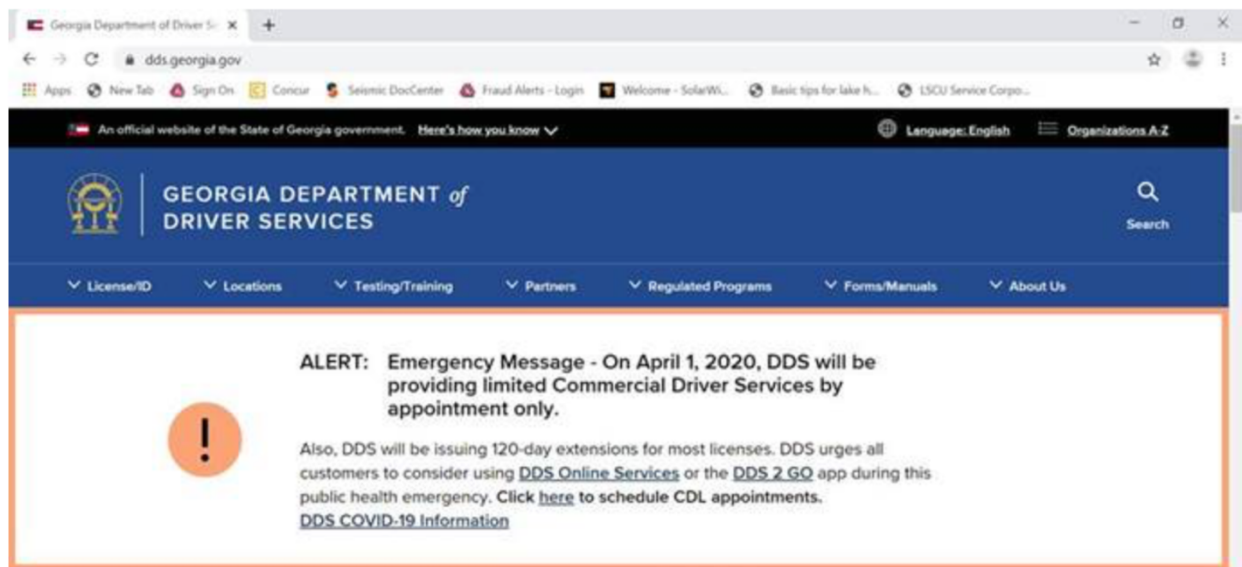
## Alabama

The Alabama Law Enforcement Driver License Department is referring consumers to the online option and has not made any extensions other than the 60-day grace period that was already in place:

**All Alabama driver licenses and non-driver IDs holders have a 60-day grace period following expiration date (Code of Alabama, Title 32-6-1)**

## Georgia

The **Georgia** Department of Driver Services will be issuing 120-day extensions for most licenses:



It does not appear as though either of our states are issuing any type of letter. We are preparing a communication to our credit unions, in case they are not aware of the current policies.

## Colorado

We got the same info from CO-OP and it's fairly good advice. We remind our credit unions that ORRs are always over-riden by federal, state and local laws/regulations. Since many states have COVID-19 rules about license renewals currently in effect, credit unions need to follow those. Nobody expects a teller to know what the rules are in every state, but they should know if their own state has come out with a temporary rule about expired IDs; and if the ID presented is from their state and the expiration date qualifies, they should take the ID and note the exception.

The problem, of course, is with out of state licenses. Ultimately, It's up to the credit union to choose whether they want to take on the liability. We're recommending everyone just use common sense.

These are extraordinary circumstances. I don't know how things are in your part of the country, but many of our credit unions have chosen to stop acquiring temporarily which is putting additional pressure on those that are still serving guest members – mostly through extremely busy drive-ups. I

would definitely rule for that acquirer over an issuer with a grievance about a license with an expiration date of January 2020 or later.

## **Kentucky**

For Immediate Release Contact: Jamie Neal, Public Information Specialist, Administrative Office of the Courts Phone 502-573-2350, [jamieneal@kycourts.net](mailto:jamieneal@kycourts.net)

Driver's license offices statewide closing for social distancing 3-month extension granted for renewing licenses FRANKFORT, Ky., March 17, 2020 — In keeping with Governor Andy Beshear's order to cancel in-person government services, driver's licensing offices statewide will be closed by 5 p.m. EDT/CDT today. Citizens who are due to renew a motor vehicle license, including commercial driver's licenses, will have an additional three months to obtain the renewal. Offices of Circuit Court Clerk handle driver's licensing in all 120 counties for the Kentucky Transportation Cabinet. Offices of Circuit Court Clerk will remain open other than the driver's license portion.

**The following states are reporting they have not seen any issues with an expired license at shared branching locations at this time.**

**Wisconsin**

**Utah**