2026-2027 Automobile Dealer Training Association Nebraska Motor Vehicle Dealer Compliance Checklist

Use this checklist as a practical review tool for your Nebraska dealership. It is based on the compliance topics covered in your dealer education training, including Nebraska Motor Vehicle Industry Licensing Board requirements, DMV procedures, Federal Trade Commission advertising rules, dealer plate requirements, title requirements, Buyers Guide requirements, and license renewal.

Please be sure to complete your new mandated 4-hour dealer continuing education course and submit your dealer license renewal before December 31, 2026, or you may be required to take the 8-hour pre-license course.

Important: This checklist is an educational resource, not legal advice. Laws, regulations, forms, fees, and agency procedures can change. When you have a specific compliance question, verify the current requirement with the Nebraska Motor Vehicle Industry Licensing Board, Nebraska DMV, FTC, or qualified legal counsel.

1. Advertising Compliance

Pricing & Fees

- Make sure the advertised vehicle price includes **all mandatory fees and charges** required to purchase the vehicle.
- Include mandatory document or processing fees in the advertised price.
- Do not include conditional rebates or discounts in the advertised price unless every consumer qualifies for them.
- Clearly disclose any conditions attached to rebates or discounts.
- Do not require an additional mandatory down payment that is omitted from the advertised price.
- Do not condition an advertised price on the customer using dealer financing.
- Do not require customers to purchase additional products or services that are omitted from the advertised price.
- Do not advertise warranties that do not actually exist or are unavailable.
- Remember that hidden or undisclosed mandatory fees can create serious compliance problems.

General Advertising Standards

- Make every advertisement **accurate, clear, and conspicuous**.
- Ensure advertisements are not false, deceptive, or misleading.
- Apply the same compliance standards to print, radio, television, direct mail, websites, social media, online marketplaces, and other advertising.
- Make sure advertised photographs accurately represent the actual vehicle being advertised.
- Avoid abbreviations that the average consumer may not readily understand.
- Make all disclosures and disclaimers readable.
- Do not use asterisks or fine print to contradict the primary advertising message.
- Make sure audio disclaimers can actually be heard and understood.
- Avoid unsupported claims that dealership size, inventory, or sales volume allows you to offer lower prices than competitors.
- Do not use deceptive terms such as "specially selected" or "valued customer" unless the description is accurate and legitimately applies to the targeted consumer.
- Keep disclaimers and qualifications conspicuous and in a reasonably comparable format to the primary offer.

2. Prohibited or High-Risk Advertising Claims

- Do not advertise "Write Your Own Deal."
- Do not advertise "Name Your Own Price."
- Do not advertise "Name Your Own Monthly Payments."
- Do not advertise "Everyone Financed."
- Do not advertise "No Credit Rejected."
- Do not advertise "We Finance Anyone."
- Do not advertise "All Applications Accepted."
- Do not advertise "No Credit Application Refused."
- Use financing language accurately; avoid absolute promises about credit approval.
- Do not claim that no other dealer can give a customer more for their trade unless you can substantiate the claim.
- Do not claim you sell vehicles at lower prices than other dealers unless the claim can be substantiated.
- Do not use "Internet Price," "e-Price," or similar terminology in a misleading manner.
- Do not advertise vehicles "at cost," "below cost," "below invoice," or using "invoice pricing" unless the claim satisfies applicable Nebraska requirements.

- Do not advertise illustrations of invoices in a misleading manner.
- Do not advertise guaranteed trade-in allowances.
- Do not advertise guaranteed amounts over Blue Book, Black Book, or another pricing guide.
- Do not advertise a "free" item if the customer must make a purchase or perform another condition to receive it.
- If you advertise something as free, make sure it is actually available on the advertised terms.
- Make sure any "meet or beat" guarantee has clearly written terms.
- Avoid unsupported "lowest price guaranteed" or similar claims.

3. Used Vehicle Advertising

- Identify advertised used vehicles as **"Used" or "Pre-Owned."**
- Never advertise a used vehicle as "New."
- Remember that mileage alone does not make a vehicle new.
- Do not advertise a vehicle as new unless you are legally authorized to sell new motor vehicles.
- Make sure the dealership's identity is clearly disclosed in advertisements.
- Do not make advertisements appear to be private-party vehicle sales when the seller is a dealership.
- Advertise only vehicles that are actually in your possession or otherwise meet the applicable Nebraska advertising requirements.
- Unless your advertisement clearly states otherwise, make sure advertised vehicles meet applicable operability requirements.
- Accurately describe the vehicle's year, make, model, equipment, price, terms, and other material details.
- Make sure warranty claims accurately describe the warranty actually available.
- If referring to a manufacturer's warranty, verify that the manufacturer's warranty is still active and accurately describe any remaining coverage.
- Keep documentation supporting material advertising claims and price representations.

4. Spot Delivery & Financing

- Do not represent that a customer's financing is finally approved when approval is not actually final.
- Do not mislead customers about the status of their financing.
- If financing is not secured, follow applicable requirements concerning return of the customer's down payment.

- If financing is not secured, follow applicable requirements concerning return of a vehicle traded by the customer.
- Do not advertise "No Money Down" if the customer must pay money to the dealership or lienholder.
- Only use "No Money Down" or similar language when customers can actually take delivery without out-of-pocket expenses under the advertised terms.
- Complete required deal and financing documents before vehicle delivery.

5. Nebraska Sales Location Requirements

- Conduct sales activity at your **licensed dealership location**.
- Do not take vehicles to an off-site location to complete a sale.
- Do not meet a customer in a parking lot or private location to complete an off-site vehicle sale.
- Do not show a vehicle at a customer's home.
- Remember that electronic document signing may be used when permitted.
- Complete required documentation electronically in advance when appropriate.
- Complete the sale in compliance with Nebraska's licensed-location requirements before delivering the vehicle.

6. Dealer Plate Compliance

- Use dealer plates only on vehicles owned or otherwise properly held by the dealership under applicable rules.
- Use dealer plates for authorized transportation to and from dealer auctions.
- Use dealer plates for authorized dealership business.
- Use dealer plates for customer test drives.
- Follow the applicable rules when allowing qualified dealership employees to use dealer-plated vehicles.
- Maintain payroll records establishing employee eligibility when required.
- Do not place a dealer plate on a vehicle simply because the driver is a family member or friend.
- Do not use dealer plates to haul general freight or non-automotive products.
- Do not use dealer plates on unauthorized service or commercial vehicles.
- Never use dealer plates on a vehicle after it has been sold.
- Never use dealer plates on a vehicle that the dealership does not properly own or possess.
- For demonstration drives, follow the applicable time limit and documentation requirements.

- For temporary service loaners, follow the applicable time limit and documentation requirements.
- Provide the required card or certificate identifying the dealership, customer, and release date/time.
- Make sure the driver carries the required documentation in the vehicle during the authorized period.

7. Personal-Use Dealer Plates

- Determine whether you qualify for a Nebraska personal-use dealer plate.
- Submit the application through the appropriate county treasurer.
- Pay the applicable annual fee.
- Use the personal-use plate only as permitted under Nebraska law.
- Make sure the vehicle qualifies under the applicable weight restrictions.
- Remember that personal-use dealer plates may have additional authorized users, including qualifying immediate family members or genuine employees.
- Keep required documentation supporting eligibility.

8. Title Compliance

- Make sure every seller properly signs the title.
- Make sure the buyer's name and required signature are completed at the time of sale.
- Never accept or possess an open or blank title.
- Never leave purchaser information blank on an assigned title.
- Never alter a title improperly.
- Remember that alterations can invalidate a title.
- Complete assignments and reassignments in the required manner.
- Do not use erasable ink where prohibited.
- If a deal falls through, follow the applicable title reassignment requirements.
- If reassignments are exhausted, obtain a new title in the dealership's name as required.
- Do not attach unauthorized dealer reassignment forms to Nebraska titles.
- Make sure all required title information is complete and accurate.

9. Title Application Requirements

- Include the full legal name of each owner as required.

- Include the appropriate Nebraska driver's license or state identification information.
- Include the appropriate EIN/TIN for businesses, nonprofits, estates, trusts, or other applicable organizations.
- Include a completed title application when submitting paperwork to the county treasurer.
- Include the correct PLID information for lienholders.
- Include required trust documentation when the application is made in the name of a trust.
- Verify who is authorized to sign the application.
- Obtain required original signatures.
- Use digital signatures only where authorized.
- Use online notarization only where permitted.

10. Vehicle Registration & Delivery

- Remember that the customer generally has **30 days to register** the vehicle.
- Provide required in-transit documentation or applicable plates.
- Make sure the vehicle has the required bill of sale/title paperwork.
- Make sure title and registration paperwork is complete before delivery.
- Follow applicable electronic title and lien procedures.

11. Electronic Lien & Title (ELT)

- Understand when a paper title is not required because of an electronic title transaction.
- Follow applicable ELT procedures for repossessions.
- Follow applicable ELT procedures for owner name changes.
- Follow applicable ELT procedures for adding or removing owners or TOD information.
- Follow applicable procedures for owner-retained salvage situations.
- Understand that an electronic title may have different duplicate-title procedures.
- Use the appropriate electronic title correction procedures.

12. Secure Power of Attorney

- Use a Secure Power of Attorney when legally authorized for mileage certification.
- Use it when authorized to sign as both transferor and transferee.

- Use a General Power of Attorney when appropriate for a duplicate-title application.
- Make sure the dealership—not an unauthorized employee—is properly authorized when required.
- Attach required POA documentation to the title.
- Remember that a POA may expire upon the death of the grantor.

13. FTC Buyers Guide

- Display the Buyers Guide on most vehicles **before the vehicle is offered for sale or made available for inspection for purchase**.
- Display the Buyers Guide on applicable consignment and power-of-attorney vehicles.
- Verify that the vehicle falls within the applicable FTC Buyers Guide requirements.
- Make sure the Buyers Guide is prominently and conspicuously displayed.
- Make sure both sides of the Buyers Guide are visible.
- Place the Guide on the rear-view mirror, side-view mirror, or appropriate side window.
- Do not leave the Guide in a glove box, trunk, or under a seat.
- If you temporarily remove the Guide for a test drive because it obstructs visibility, replace it immediately afterward.
- Verify the year, make, model, and VIN on the Buyers Guide.
- Make sure the warranty disclosure accurately reflects the vehicle's warranty status.
- Complete the **AS IS – NO WARRANTY** disclosure when selling a vehicle without a dealer warranty where permitted.
- If providing a warranty, clearly identify whether it is full or limited.
- Clearly identify systems covered by a limited warranty.
- State the duration of warranty coverage.
- State applicable dealer responsibility for parts and labor.
- Provide required warranty documentation.
- Clearly disclose exclusions and repair obligations.
- Identify any remaining manufacturer's warranty accurately.
- Consider having the customer sign the Buyers Guide at sale.
- Provide the customer with a copy of the completed Buyers Guide.
- Retain required federal forms and odometer records for the applicable retention period.
- Provide a Spanish-language Buyers Guide when required for a Spanish-language transaction.

14. FTC Buyers Guide Audit Preparation

- Conduct regular lot-wide Buyers Guide inspections.
- Check every applicable vehicle—not just the vehicles at the front of the lot.
- Make sure vehicles not yet fully prepared for delivery are handled according to applicable Buyers Guide requirements.
- Check vehicles held under consignment or power-of-attorney arrangements.
- Replace missing, damaged, or incorrect Buyers Guides immediately.
- Train employees to understand that each applicable vehicle must have the correct Guide.
- Keep sufficient blank Buyers Guides available.
- Periodically conduct an internal "FTC Buyers Guide audit" of your own inventory.

15. Deal Jacket & Recordkeeping

- Provide the customer with required copies of transaction documents.
- Maintain a dealership copy of required documents.
- Keep a complete deal jacket for each transaction.
- Maintain required odometer disclosure records.
- Retain federal forms for the applicable required period.
- Keep documentation supporting advertising claims and pricing representations.
- Maintain payroll records when required to establish dealer-plate eligibility.
- Maintain warranty documentation when warranties are provided.
- Maintain documentation supporting title, financing, and registration transactions.

16. Unfair Trade Practices & Consumer Information

- Do not make false claims about a vehicle's origin, condition, history, or characteristics.
- Do not make deceptive statements about vehicles or dealership services.
- Never participate in price fixing with competing dealers.
- Do not agree with competitors to establish artificial prices.
- Protect customer personal and financial information.
- Secure dealership computers and networks.
- Use strong network security practices.
- Limit access to customer information to authorized personnel.
- Review cybersecurity practices regularly.
- Train employees on protecting consumer information.

17. Consumer Complaint Awareness

- Understand that consumers can file complaints with the Nebraska Motor Vehicle Industry Licensing Board.
- Understand that consumers can also report suspected deceptive advertising or sales practices to the FTC.
- Review dealership advertising before publication.
- Keep records supporting advertised prices, claims, discounts, warranties, and other representations.
- Respond promptly and professionally to consumer complaints.
- Consult legal counsel when a complaint raises a significant legal or regulatory issue.

18. Out-of-State Customers

- Inform out-of-state customers about potentially different title and emissions requirements in their home state.
- Be aware that emissions modifications or deletions may cause problems when the vehicle is registered elsewhere.
- Understand that a Nebraska title may not receive the same treatment in another state.
- Be cautious when representing that a vehicle will receive a particular title status in another state.
- Encourage customers to verify their state's registration, emissions, and title requirements.

19. Buy Here Pay Here

- Review and comply with applicable Nebraska Buy Here Pay Here requirements.
- Understand the requirements of Nebraska Statute §45-1050 and related rules.
- Maintain complete financing documentation.
- Maintain complete repossession documentation.
- Follow applicable requirements for notices and documentation.
- Consider certified mail when required or recommended for important BHPH documentation.
- Follow applicable electronic lien and title procedures.
- Do not retain or transfer title contrary to applicable Nebraska requirements.

20. Dealer License Renewal

- Watch for your dealer license renewal notice beginning around October 1.
- Check your email junk/spam folder.
- Prepare your dealer bond.
- Prepare your certificate of liability insurance.
- Prepare your workers' compensation documentation or waiver, if applicable.
- Prepare proof of required continuing education.
- Submit the **bond for the upcoming licensure year**, not the expiring/current year's bond.
- Make sure the bond will remain effective throughout the upcoming license period.
- Make sure all required partners sign the bond.
- Follow current instructions regarding notarization and the Power of Attorney attached to the bond.
- Submit the documents required by the Board rather than unnecessary attachments.
- Be sure to complete dealer continuing education course and submit dealer license application renewal well before December 31.

21. Insurance Compliance

- Verify the exact legal dealership name on the insurance certificate.
- Verify the dealership address.
- Include the insurance company's name and address.
- Include the policy number.
- Include the policy effective date.
- Include the policy expiration date.
- Make sure coverage does not expire during the applicable license period.
- Verify that the policy identifies the appropriate automobile/garage liability coverage.
- Confirm applicable "any auto" and/or "all owned autos" language.
- Verify that the Nebraska Motor Vehicle Industry Licensing Board is correctly identified as certificate holder when required.
- Obtain workers' compensation coverage or the applicable waiver if you qualify for one.

22. Dealer Automated Services (DAS)

- Determine whether Dealer Automated Services can simplify your dealership's title transactions.
- Submit the required DAS enrollment application.

- Obtain the required eDMV authorization.
- Learn which transaction types are eligible for electronic submission.
- Enter title and transfer information accurately.
- Scan and upload required front and back title documents.
- Understand applicable transaction fees.
- Select the appropriate title delivery option.
- Understand which responsibilities remain with the county treasurer.
- Train employees who will use DAS.
- Keep your DAS access information secure.
- Contact the Nebraska DMV Help Desk when you have DAS questions.

23. Final Daily/Weekly Compliance Review

- Are all advertised prices accurate?
- Are all mandatory fees included in advertised prices?
- Are all advertised vehicles accurately represented?
- Does every applicable used vehicle have a properly completed and displayed Buyers Guide?
- Are dealer plates being used only for authorized purposes?
- Are all titles complete and free from improper alterations?
- Are all deal documents complete before delivery?
- Are customer and lienholder signatures properly obtained?
- Are customer records and personal information secure?
- Are all sales activities occurring at the licensed dealership location?
- Are financing representations accurate?
- Are warranties accurately described and documented?
- Are required records being retained?
- Are employees following current dealership compliance procedures?
- Have you reviewed your advertising for potentially misleading claims?
- Have you checked your inventory for missing or incorrect compliance documents?

Most Important Takeaways

Before advertising: Make sure your price, vehicle, terms, fees, rebates, warranties, and claims are accurate.
Before displaying a used vehicle: Make sure the required **FTC Buyers Guide** is properly completed and prominently displayed.
Before completing a sale: Make sure your titles, buyer information, financing documents, disclosures, and other required paperwork are complete.

Before delivering a vehicle: Make sure the transaction is properly completed and complies with Nebraska's sales-location requirements.
Before using dealer plates: Confirm that the vehicle and the purpose of the trip qualify under Nebraska dealer-plate rules.
Before renewing your license: Have your upcoming bond, insurance, workers' compensation documentation or waiver, and continuing education certificate of completion ready.
At all times: Protect customer information, avoid deceptive advertising, disclose required fees, maintain accurate records, and verify current requirements when you are unsure.

Compliance Reminder

Dealer compliance is an ongoing process—not something you check only once a year. Review your advertising, inventory, deal jackets, titles, Buyers Guides, dealer plates, insurance, bonds, and employee procedures regularly.

When a compliance issue is unclear or potentially significant, **verify the current requirement with the Nebraska Motor Vehicle Industry Licensing Board or Nebraska DMV and consider consulting qualified legal counsel**