

March 29, 2022

Brian Fincheltub, Director of Consular Affairs  
Embassy of the Bolivarian Republic of Venezuela to the United States  
1099 30th Street  
Washington D.C., 20007

Re: Renewal of Venezuelan Identification Documents

Dear Mr. Fincheltub:

[Your letter of March 9 to the American Bankers Association](#) (ABA) was forwarded to me for response. We sympathize with the plight of Venezuelan citizens here in the United States and are happy to offer what assistance we can. However, it is important to understand our role and the relationship we have with our members.

ABA is a trade association and not a regulatory agency or government body. We do not have any authority over our members. Instead, our members which are commercial banks of all sizes across the United States, look to us to represent them before different government authorities, including the legislature and different regulatory agencies. It is our members who guide us in various policy positions. And so, while we cannot instruct them on a specific course of action, we can alert them to the steps the Venezuelan government has taken with respect to identification documents that have otherwise expired.

We did reach out to the United States Treasury which oversees the type of documentation that financial institutions can accept to verify a customer's identity. They suggested that the issue you have raised is analogous to the situation many U.S. citizens faced at the onset of the pandemic and their inability to renew driver's licenses. Since a driver's license is the most common form of identification used in the United States, this presented a serious challenge. However, even though no U.S. federal agency issued guidance in writing, financial institutions were able to follow what state authorities had established regarding driver's licenses in that state. Similarly here, financial institutions can follow the guidance from Venezuela and the Department of State.

While ABA cannot instruct our members on accepting any particular means to verify identity, we can educate them about the steps that have been taken by Venezuela to extend expiration dates as well as the U.S. Department of State's willingness to accept that for diplomatic and consular services. We can then point out that an existing passport or consular card can be accepted for identification purposes. ABA can alert our members through our different newsletters and also post the information online so it's available to them.

Thank you for reaching out.

Best regards,



Robert G. Rowe, III  
Vice President & Senior Counsel, Regulatory Compliance and Policy