EPA Vehicle Emissions Certification

Audit Scorecard

A 15-point compliance assessment for emissions standards, test groups, Certificates of Conformity, EV-CIS records, and introduction into US commerce

Dealer / Center Name	
Dealer Code	
Region / Zone	
Auditor Name	
Audit Date	
Cycle / Period	

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How to Use This Scorecard

This scorecard evaluates EPA Vehicle Emissions Certification compliance across 15 criteria grouped into 4 categories. For each criterion, circle a score from 1 (not in place) to 5 (fully embedded and sustained). Do not rate where you aspire to be — rate what you observe on the day.

Score Scale

Score	Level	What it means
1	**Not in place**	Standard does not exist or has never been implemented at this dealership.
2	**Attempted**	Some effort made but inconsistent — visible gaps remain in most areas.
3	**Defined**	Standard is documented and partially followed. Some areas compliant, others not.
4	**Managed**	Standard is followed consistently. Minor exceptions occur.
5	**Fully Sustained**	Fully embedded. Evidence of ongoing compliance between audits without prompting.

RAG Status Guide

Status	Overall Score	Action
Green	60–75 (80–100%)	Compliant. Maintain current standards.
Amber	38–59 (50–79%)	Improvement required. Structured action plan within 30 days.
Red	0–37 (0–49%)	Non-compliant. Priority intervention. Escalate to regional management.

AutoSmart Tip: EPA emissions certification is a precondition of legal sale in the US — introduction of a vehicle or engine without a valid Certificate of Conformity for its test group is a violation of the Clean Air Act, subject to civil penalties per vehicle per day of violation. The most common compliance gap is model-year changeover: confirm that the new model year's certificate is received and valid before the first vehicle of that year is sold.

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Scorecard

Circle a score 1–5 for each criterion. Record observations in the Notes column.

No.	Criterion / Question	1	2	3	4	5	Notes
EMISSIONS STANDARDS & TEST GROUPS							
1	Are the applicable EPA emissions standards (Tier 3, Light-Duty Greenhouse Gas, or Heavy-Duty as applicable) identified for every vehicle or engine model year placed on the US market?	○	○	○	○	○	
2	Are vehicles grouped into test groups (formerly engine families) as required by EPA certification regulations, with each test group covered by a valid Certificate of Conformity before any vehicle in that group is sold?	○	○	○	○	○	
3	Is emissions test data on file for each test group — confirming the emission levels demonstrated during EPA certification testing are within the applicable standard for each regulated pollutant?	○	○	○	○	○	
4	Are model year changes and carryover test groups managed correctly — confirming whether a new Certificate of Conformity is required for the new model year or whether a carryover certification is applicable?	○	○	○	○	○	
CERTIFICATE OF CONFORMITY							
5	Is a valid EPA Certificate of Conformity held for every test group of vehicles or engines introduced into US commerce, accessible for review if requested by EPA?	○	○	○	○	○	
6	Is the Certificate of Conformity coverage confirmed to include all engine configurations, fuel types, and optional equipment combinations actually offered for sale in the US market?	○	○	○	○	○	
7	Are Certificates of Conformity retained for the period required by EPA regulations, in a format that remains retrievable for the duration of the retention obligation?	○	○	○	○	○	
8	Where a Certificate of Conformity has been amended or superseded, is the current version clearly identified and the prior version archived — preventing a superseded certificate from being relied upon in error?	○	○	○	○	○	
EV-CIS RECORDS & REPORTING							
9	Is the EPA's Emissions and Vehicle Information System (ELVIS or equivalent current system) used to submit required certification data, with submissions completed within the required timeframes before introduction into commerce?	○	○	○	○	○	
10	Are annual in-use compliance testing and deterioration factor obligations monitored, with testing completed and results submitted as	○	○	○	○	○	

	required by the Certificate of Conformity conditions?						
11	Are in-use surveillance program obligations (random vehicle selection, testing, and reporting) understood and managed as part of ongoing post-certification compliance?	○	○	○	○	○	
MARKET INTRODUCTION & GOVERNANCE							
12	Is a process in place to prevent any vehicle from being introduced into US commerce before its test group's Certificate of Conformity is confirmed as valid and in force?	○	○	○	○	○	
13	Are emission control system label requirements (under hood label, VECI) confirmed as correct and affixed to every vehicle before it leaves the manufacturer's or importer's control?	○	○	○	○	○	
14	Is a named person designated as responsible for EPA emissions certification compliance, with authority to halt market introduction if certification documentation is incomplete?	○	○	○	○	○	
15	Are EPA certification obligations reviewed when new engines, powertrain changes, or emissions control system modifications are introduced — confirming whether a new or amended Certificate of Conformity is required before production or importation begins?	○	○	○	○	○	
OVERALL SCORE →	/ 75 = %						

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Category Summary & RAG Status

Transfer category totals from the scorecard. Assign RAG status and record the priority action for each category.

Category	Score	%	RAG	Priority Action
Emissions Standards & Test Groups	/20			
Certificate of Conformity	/20			
EV-CIS Records & Reporting	/15			
Market Introduction & Governance	/20			
OVERALL SCORE	**/75**			

Sign-Off

Auditor Name	
Auditor Signature	
Date	
Compliance Manager Name	
Compliance Manager Signature	
Next Audit Date	

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Action Plan Tracker

EPA Vehicle Emissions Certification — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close EPA Vehicle Emissions Certification non-compliances

Dealer / Center Name	
Dealer Code	
Region / Zone	
Audit Cycle / Period	
Tracker Owner (ASM / ZSM)	
Date Opened	
Target Close Date	

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How to Use This Tracker

This tracker is designed to be completed immediately following a EPA Vehicle Emissions Certification audit. Every non-compliance recorded must be logged here as an action item and progressed through all four stages before it is considered resolved.

Four-Stage Workflow

1. PENDING	2. IN PROGRESS	3. COMPLETED	4. APPROVED
Finding assigned. Owner & date set.	Work underway. Evidence being gathered.	Dealer submits evidence for review.	Auditor verifies and closes the item.

Stage Rules

Stage	Actioned by	Required action	Evidence required
PENDING	ASM / Auditor	Assign a named responsible party. Set a close date. Log the non-compliance description.	No evidence required at this stage.
IN PROGRESS	EPA Vehicle Emissions Certification / Dealer Team	Begin remediation. Update status. Upload progress evidence as work is completed.	In-progress photos, supporting documents, records.
COMPLETED	Compliance Manager	Mark item complete and submit for review. Evidence must be attached before submission.	Photo of rectified item, signed procedure, supporting evidence.
APPROVED	ASM / ZSM / Auditor	Review evidence. Verify compliance on next site visit if required. Approve and close.	Auditor sign-off. Date of verification recorded.

Tracker Summary

Fill in after completing each audit cycle.

Stage	Description	Count	Notes
PENDING	Not yet started		
IN PROGRESS	Work underway		
COMPLETED	Awaiting approval		
APPROVED	Verified & closed		

AutoSmart Tip: With AutoSmart Audit, every non-compliance is automatically converted into an action item at the point of audit — with owner assignment, close dates, evidence upload, and a four-stage approval workflow built in. No spreadsheets. No manual follow-up.

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Action Plan Tracker

Log every non-compliance from the audit below. Progress each item through all four stages before closure.

STAGE — PENDING						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
P-01						
P-02						
P-03						
P-04						
P-05						
P-06						
P-07						
P-08						
P-09						
P-10						

STAGE — IN PROGRESS						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
I-01						
I-02						
I-03						
I-04						
I-05						
I-06						
I-07						
I-08						

STAGE — COMPLETED						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
C-01						

C-02						
C-03						
C-04						
C-05						
C-06						

STAGE — APPROVED						
Ref	**Non-Compliance / Gap Description**	**Category**	**Responsible Party**	**Target Date**	**Status**	**Evidence / Notes**
A-01						
A-02						
A-03						
A-04						
A-05						
A-06						

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Cycle Sign-Off

To be completed once all action items in this cycle are Approved. Both the Compliance Manager and the Regional Auditor must sign.

Dealer Principal Name	
Dealer Principal Signature	
Regional Auditor / ASM Name	
Auditor Signature	
Date of Review	
Next Review Date	

Cycle Notes

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