EPA Vehicle Import Compliance

Audit Scorecard

A 15-point compliance assessment for EPA import requirements, emissions eligibility, documentation, exemptions, declarations, and import records

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 Import Compliance 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 vehicle import non-compliance carries significant financial penalties and can result in US Customs refusing entry or requiring export at the importer's cost. The most common errors occur at the declaration stage — an incorrect compliance basis claimed on EPA Form 3520-1, or a vehicle released from customs before a non-conforming vehicle modification program is completed. Confirm the compliance basis in writing before import, not after the vehicle has entered the country.

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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
IMPORT ELIGIBILITY & CLASSIFICATION							
1	Is each imported vehicle, engine, or piece of nonroad equipment correctly classified under EPA's import rules — distinguishing between light-duty, heavy-duty, recreational, and nonroad categories, each of which carries different compliance requirements?	○	○	○	○	○	
2	Is the vehicle or engine confirmed as either originally certified for the US market (EPA Certificate of Conformity holder is the original manufacturer) or eligible for importation under an applicable exemption or modification program?	○	○	○	○	○	
3	Where a heavy-duty engine is imported separately from the vehicle, are the engine-specific certification and import requirements addressed independently from any vehicle-level certification?	○	○	○	○	○	
4	Are imported recreational vehicles and nonroad engines assessed for compliance with the applicable EPA emission standards for their category and model year before importation?	○	○	○	○	○	
EPA IMPORT DECLARATION & DOCUMENTATION							
5	Is an EPA Declaration Form (EPA Form 3520-1 or equivalent current form) completed accurately for every imported motor vehicle or engine, declaring the applicable EPA compliance basis?	○	○	○	○	○	
6	Is the EPA Declaration Form submitted to US Customs and Border Protection at the time of entry, not retrospectively after the vehicle or engine has been released from customs?	○	○	○	○	○	
7	Is the basis for the EPA declaration (e.g., 'originally certified for sale in the US', 'non-conforming vehicle imported under an ICI exemption') confirmed by documentary evidence at the time of import?	○	○	○	○	○	
8	Are import declaration records retained for the period required by EPA regulations, retrievable if the EPA or Customs requests documentation to verify the declaration?	○	○	○	○	○	
EXEMPTIONS & SPECIAL IMPORT RULES							
9	Where a vehicle is imported under the 25-year exemption (vehicles manufactured at least 25 years before the date of importation), is the vehicle's manufacture date confirmed by documentary evidence before the exemption is claimed?	○	○	○	○	○	

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10	Where a vehicle is imported by an Independent Commercial Importer (ICI) for modification to US standards, is the ICI's EPA certificate on file and the required modifications confirmed as completed before the vehicle is sold?	○	○	○	○	○	
11	Are personal use exemptions (one-time importation for personal use, not for sale) applied only to vehicles that genuinely meet the exemption criteria — with no exemption claimed for vehicles intended for commercial sale?	○	○	○	○	○	
IMPORT RECORDS & GOVERNANCE							
12	Is a complete import file maintained for every imported vehicle or engine — covering the EPA declaration, customs entry, certification basis, and any exemption documentation — retained for the required period?	○	○	○	○	○	
13	Is a process in place to identify and resolve any EPA import declaration discrepancy before a vehicle is offered for sale — with no vehicle sold under an unresolved import compliance question?	○	○	○	○	○	
14	Is EPA import compliance reviewed as part of the pre-import due diligence for every new sourcing arrangement involving vehicles or engines from non-US markets?	○	○	○	○	○	
15	Is a named person responsible for EPA import compliance, with direct access to import records and authority to halt a sale if the EPA compliance basis for a specific vehicle cannot be confirmed?	○	○	○	○	○	
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
Import Eligibility & Classification	/20			
EPA Import Declaration & Documentation	/20			
Exemptions & Special Import Rules	/15			
Import Records & 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 Import Compliance — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close EPA Vehicle Import Compliance 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 Import Compliance 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 Import Compliance / 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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