F&I Compliance

Audit Scorecard

A 15-point compliance assessment for credit applications, disclosures, lender communication, add-on products, customer consent, adverse action notices, menu selling, and deal documentation

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 F&I 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: F&I compliance carries the highest regulatory penalty exposure of any dealership function — CFPB, FTC, DOJ, and state AG enforcement actions in automotive F&I have resulted in multimillion-dollar settlements. The three most common enforcement triggers are dealer reserve disparate impact, undisclosed add-on products, and ECOA adverse action notice failures. All three are preventable through consistent menu selling, documented consent, and timely adverse action notice processes.

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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
CREDIT APPLICATION & DISCLOSURES							
1	Is a completed credit application retained for every financed transaction — with all required fields completed by the customer, not pre-filled by the F&I manager?	○	○	○	○	○	
2	Is the RISC (Retail Installment Sales Contract) or equivalent financing disclosure document reviewed with the customer line-by-line before signing — with the customer given adequate time to read and ask questions?	○	○	○	○	○	
3	Are all required federal and state disclosures (Truth in Lending Act TILA disclosures, state-specific credit disclosures) included in every financed deal jacket?	○	○	○	○	○	
4	Is the dealer markup over the buy rate (dealer reserve) within the dealership's written policy limits — with any exception requiring documented management approval?	○	○	○	○	○	
LENDER COMMUNICATION & ADD-ON PRODUCTS							
5	Are add-on products (GAP, credit insurance, extended warranty, paint protection) presented using a disclosed menu — showing each product individually with its price, so the customer can see and choose each item separately?	○	○	○	○	○	
6	Are add-on products presented consistently to all customers — not selectively offered based on customer demographic characteristics in a manner that could create fair lending exposure?	○	○	○	○	○	
7	Are the prices of add-on products submitted to the lender on the deal exactly as disclosed to the customer — with no products added to the lender contract without the customer's documented consent?	○	○	○	○	○	
8	Is the lender's credit decision documented in the deal jacket — including the approved rate, approved amount, and any conditions — with no changes to the approved terms without the customer's knowledge and consent?	○	○	○	○	○	
CUSTOMER CONSENT & ADVERSE ACTION							
9	Is the customer's signed consent obtained for each add-on product sold — on the menu or on a separate product consent form — confirming the customer chose to include the product?	○	○	○	○	○	
10	Where a credit application is denied or the customer is offered less favourable terms than requested (adverse action), is an adverse action notice sent to the customer within the timeframe	○	○	○	○	○	

	required by the Equal Credit Opportunity Act?						
11	Is the Credit Score Disclosure Notice (Risk-Based Pricing Notice) provided to customers who receive a higher rate than others based on credit score, as required by FCRA?	○	○	○	○	○	
MENU SELLING & DEAL JACKET							
12	Is the F&I product menu dated, signed by the customer, and retained in the deal jacket — with the menu showing both the payment with and without each product?	○	○	○	○	○	
13	Is the deal jacket complete — containing the credit application, RISC, product consent forms, menu, lender approval, adverse action notice if applicable, and all required disclosures — before the deal is funded?	○	○	○	○	○	
14	Are deal jackets reviewed by the F&I Manager or compliance officer for a random sample each month — confirming all required documents are present and correctly completed?	○	○	○	○	○	
15	Is F&I compliance training current for all F&I staff — covering TILA, ECOA, FCRA, GLB/Safeguards, and state-specific requirements — with training documented and refreshed annually?	○	○	○	○	○	
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
Credit Application & Disclosures	/20			
Lender Communication & Add-On Products	/20			
Customer Consent & Adverse Action	/15			
Menu Selling & Deal Jacket	/20			
OVERALL SCORE	**/75**			

Sign-Off

Auditor Name	
Auditor Signature	
Date	
Finance and Insurance Manager Name	
Finance and Insurance Manager Signature	
Next Audit Date	

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Action Plan Tracker

F&I Compliance — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close F&I 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 F&I 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	F&I Compliance / Dealer Team	Begin remediation. Update status. Upload progress evidence as work is completed.	In-progress photos, supporting documents, records.
COMPLETED	Finance and Insurance 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 Finance and Insurance 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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