FTC Used Car Rule

Audit Scorecard

A 15-point compliance assessment for Buyers Guide display, warranty disclosure, as-is terms, dealer warranty terms, customer acknowledgement, and used vehicle sales 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 FTC Used Car Rule 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: FTC Used Car Rule compliance is straightforward but frequently non-compliant in practice — the most common failures are Buyers Guides missing from vehicles, Buyers Guides using outdated forms, and 'as is' vehicles where sales staff make verbal warranty representations that contradict the displayed Buyers Guide. Conduct an unannounced lot audit at least monthly: walk the used vehicle lot and check every displayed Buyers Guide for presence, correct format, and accurate completion.

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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
BUYERS GUIDE DISPLAY & CONTENT							
1	Is a completed Buyers Guide displayed in the side window of every used vehicle offered for sale on the dealer's lot, as required by the FTC Used Car Rule?	○	○	○	○	○	
2	Is the Buyers Guide using the current FTC-required format — including the updated Spanish-language option for Spanish-speaking customers — rather than an outdated version predating recent rule amendments?	○	○	○	○	○	
3	Is the Buyers Guide visible and legible from outside the vehicle, displayed in the window so the required disclosures can be read without entering the vehicle?	○	○	○	○	○	
4	Are Buyers Guides removed from vehicles only after a sale is finalised — not removed during test drives or customer inspections in a way that creates a gap in compliance during the sales process?	○	○	○	○	○	
WARRANTY & AS-IS DISCLOSURE							
5	Where a vehicle is sold 'as is', is the 'As Is — No Warranty' box on the Buyers Guide correctly checked, with no implied or verbal warranty statements made by sales staff that contradict the as-is disclosure?	○	○	○	○	○	
6	Where the dealer offers a warranty, is the warranty box on the Buyers Guide checked and the specific warranty terms described — covering systems covered, duration, and the percentage of repair costs covered by the dealer?	○	○	○	○	○	
7	Where a manufacturer's warranty is still in effect on the used vehicle, is the Buyers Guide accurately reflecting this — with staff able to explain the remaining coverage to the customer?	○	○	○	○	○	
8	Is the Buyers Guide consistent with any written warranty document provided at the time of sale — with no discrepancy between what the Buyers Guide discloses and what the customer's written warranty document says?	○	○	○	○	○	
CUSTOMER ACKNOWLEDGEMENT							
9	Is the customer given a copy of the Buyers Guide to keep at the point of sale — with the customer's signature confirming receipt obtained on the dealer's copy?	○	○	○	○	○	
10	Is the customer's signed copy of the Buyers Guide retained in the deal file — providing	○	○	○	○	○	

	evidence of compliance if a dispute or FTC inquiry arises?						
11	Where the sale terms differ from what the Buyers Guide originally disclosed (e.g., dealer agrees to provide a warranty on a vehicle initially listed as-is), is the Buyers Guide updated and re-signed before the sale is finalised?	○	○	○	○	○	
DOCUMENTATION & GOVERNANCE							
12	Is the completed Buyers Guide retained in the deal file for every used vehicle sold, with the vehicle's VIN, sale date, and dealer's warranty terms confirmed as matching the deal documentation?	○	○	○	○	○	
13	Are used vehicle sales staff trained on the FTC Used Car Rule requirements — specifically on when a Buyers Guide must be displayed, what must be disclosed, and the consequences of non-compliance?	○	○	○	○	○	
14	Is Buyers Guide compliance reviewed through a periodic lot audit — physically checking that every used vehicle on the lot has a correctly completed Buyers Guide displayed in the required position?	○	○	○	○	○	
15	Is FTC Used Car Rule compliance included in the dealership's regular compliance calendar, reviewed at defined intervals rather than only when a complaint or FTC inquiry is received?	○	○	○	○	○	
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
Buyers Guide Display & Content	/20			
Warranty & As-Is Disclosure	/20			
Customer Acknowledgement	/15			
Documentation & Governance	/20			
OVERALL SCORE	**/75**			

Sign-Off

Auditor Name	
Auditor Signature	
Date	
Sales Manager Name	
Sales Manager Signature	
Next Audit Date	

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Action Plan Tracker

FTC Used Car Rule — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close FTC Used Car Rule 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 FTC Used Car Rule 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	FTC Used Car Rule / Dealer Team	Begin remediation. Update status. Upload progress evidence as work is completed.	In-progress photos, supporting documents, records.
COMPLETED	Sales 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 Sales 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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