NHTSA Recall Compliance

Audit Scorecard

A 15-point compliance assessment for defect identification, recall decision, owner notification, remedy process, completion tracking, dealer communication, and NHTSA reporting

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 NHTSA Recall 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: NHTSA recall compliance is one of the few regulatory obligations where the timing of the decision is as important as the quality of the remedy. The 5-business-day reporting clock starts from the date the manufacturer decides a safety defect exists — not from when NHTSA opens an investigation, not from when the remedy is developed. Ensure internal investigation processes have a clear decision gate, so the 5-day clock is not missed because the organisation was still deliberating.

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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
DEFECT IDENTIFICATION & RECALL DECISION							
1	Is a defect monitoring process in place — covering warranty claims, field reports, customer complaints, and technical investigations — allowing the organisation to identify a potential safety defect or noncompliance with minimum delay?	○	○	○	○	○	
2	Is the NHTSA definition of a safety recall understood — that it applies when a vehicle, equipment, car seat, or tire creates an unreasonable safety risk or fails to meet a minimum safety standard — and is this definition applied consistently in defect investigations?	○	○	○	○	○	
3	Is a recall decision documented formally — including the basis for the decision, the population of affected vehicles or equipment, and the planned remedy — with the decision record retained?	○	○	○	○	○	
4	Is the 5-business-day reporting requirement to NHTSA (under 49 CFR Part 573) met from the date the manufacturer decides a safety defect or noncompliance exists?	○	○	○	○	○	
OWNER NOTIFICATION & REMEDY PROCESS							
5	Is owner notification mailed within 60 days of the recall decision (as required by 49 USC 30119) using the notification letter template approved or reviewed in accordance with NHTSA's notification requirements?	○	○	○	○	○	
6	Is the remedy offered to owners consistent with 49 USC 30120 — repair at no cost to the owner, replacement with an identical or reasonably equivalent vehicle, or refund of the purchase price less reasonable depreciation?	○	○	○	○	○	
7	Is the remedy available through the dealer network before or within a reasonable period of owner notification — preventing a situation where owners receive recall letters but cannot get the remedy performed?	○	○	○	○	○	
8	Are second notices sent to owners who have not responded within the required timeframe, as required by NHTSA's owner notification regulation?	○	○	○	○	○	
COMPLETION TRACKING & DEALER COMMUNICATION							
9	Is recall completion rate tracked by VIN — covering vehicles remedied at dealerships, vehicles not yet remedied, and vehicles that are unregistered or unlocatable — with reporting to	○	○	○	○	○	

	NHTSA on the required schedule?						
10	Are dealers equipped with the remedy parts, repair instructions, and claim reimbursement process before owner notifications are mailed — preventing owners from arriving at dealers who cannot perform the remedy?	○	○	○	○	○	
11	Is a VIN lookup tool available to dealers and the public, allowing any person to check whether a specific vehicle has an open recall?	○	○	○	○	○	
NHTSA REPORTING & GOVERNANCE							
12	Are quarterly recall reports submitted to NHTSA within the required deadlines, accurately reflecting current completion rates and the number of vehicles remaining unremedied?	○	○	○	○	○	
13	Is a recall file maintained for each campaign — covering the defect report, owner notification, remedy description, parts supply, dealer instructions, and quarterly reports — retrievable for NHTSA review?	○	○	○	○	○	
14	Is the Early Warning Reporting (EWR) system monitored — with reports submitted on the required schedule — allowing early identification of potential safety issues before a formal recall decision is required?	○	○	○	○	○	
15	Is a named person designated as the NHTSA recall compliance contact, with the authority and process to initiate a recall decision, manage the remedy, and interface with NHTSA on the organisation's behalf?	○	○	○	○	○	
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
Defect Identification & Recall Decision	/20			
Owner Notification & Remedy Process	/20			
Completion Tracking & Dealer Communication	/15			
NHTSA Reporting & 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

NHTSA Recall Compliance — Gap Closure Framework

A structured four-stage workflow to assign, track, verify, and close NHTSA Recall 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 NHTSA Recall 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	NHTSA Recall 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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