

Auto Lending Exams: Factors for Evaluation

	Number of Consumers Affected (annualized)	Magnitude of the Risk, Harm, or Loss to Consumers				Variety of Violations (Impacted channels)	Ability and Willingness to Take Corrective Actions	Self-Identified	Prior Regulatory Action
		Range of calculated mark-up disparities ²	Overpayments per affected consumer	Est. annual direct damages	Est. total direct damages (through 2013)				
█	31,551	36-37 bps	\$242	\$7.65M	\$31.4M (2010-13)	Across portfolio	Medium: Ramped up program prior to exam, but waited to fully implement	Yes	█
█	4,124	25bps	\$206	\$0.85M	\$1.3M (2011-13)	Across portfolio	Medium: Significantly improved CMS for █ willing to include proactive remuneration.	No	█
█	213,535	14-29 bps	\$192	\$41.1M	\$116.4M (2011-13)	Across portfolio	Low: No CMS during exam; reluctantly implemented weak program following PARR	No	█
█	9,003	18-42 bps	\$165	\$1.5M	\$9.3M (2008-13)	Across portfolio	Medium: Basic CMS from █ and shift to markdown policy in █ likely due to regulatory pressure	No	█
█	73,861	15-23 bps	\$134	\$9.9M	\$34.2M (2010-13)	Limited to prime and near-prime	High: No CMS during exam, but rolled out █ CMS in response to Bureau concerns	No	█
█	9,188	16-42bps	\$130	\$1.2M	\$2.0M (2010-13)	Across portfolio	High: Moderate CMS, with recent improvements; may be willing to shift to █ system.	Yes	█
█	36,808	11-19 bps	\$89	\$3.3M	\$13.0M (2010-13)	Limited to prime	High: Longstanding CMS; with minor tweaks, capable of identifying and addressing risks	Yes	█



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1 - Disparity and damage estimates for █ and █ are highly preliminary, and the institutions have not yet had the opportunity to respond to our preliminary findings.

2 - Disparities may vary by year, prohibited basis group, and/or channel. The full range is presented for each institution, though the average disparity may lie at different points in the range depending on the institution.