

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*	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	█
█	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	█
█	4,124	22-23bps	\$189	\$0.78M	\$2.3M (2011-13)	Across portfolio	Medium: Significantly improved CMS for █ committed to providing remuneration, both past and future.	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	█
█	9,333	11-42bps	\$129	\$1.2M	\$4.8M (2010-13)	Across portfolio	High: Moderate CMS, with recent improvements; shifted to █ system in █.	Yes	█
█	32,308	11-19 bps	\$101	\$3.3M	\$13.0M (2010-13)	Limited to prime	High: Longstanding CMS; with minor tweaks, capable of identifying and addressing risks	Yes	█



* 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.

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	93,944	13-25 bps	\$150	\$14.1 M	\$28.1M (2012-13)	Across portfolio; underwriting disparities, too	Medium: Weak CMS during review, but recently improved to include dealer and portfolio-wide analysis and reduction in maximum cap (	No	
	10,739	14-20 bps	\$146	\$1.6 M	\$3.1 M (2012-13)	Only in some channels	Low: Weak CMS, focused largely on identifying contracts in excess of caps; limited analysis of portfolio-wide disparities. But  recently reduced maximum cap 	No	
	49,057	7-15 bps	\$83	\$4.1 M	\$8.2 M (2012-13)	Across portfolio	High: Robust CMS (including remediation), with only minor deficiencies; previously lowered maximum cap (	No	



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