

COMPLIANCE SURVEY

Dealership: _____

Person completing survey/Title: _____

Date: _____

1. Who is your Compliance Officer? _____

2. What is your most pressing compliance issue/need?

3. On which of the following topics does your dealership train the employees to whom they apply?

- | | |
|---|--|
| <input type="checkbox"/> Adverse Action Notices | <input type="checkbox"/> OFAC |
| <input type="checkbox"/> Cash Reporting | <input type="checkbox"/> OSHA Regulations |
| <input type="checkbox"/> Conditional Delivery | <input type="checkbox"/> Privacy Rule |
| <input type="checkbox"/> Credit Applications | <input type="checkbox"/> Product Knowledge |
| <input type="checkbox"/> Deceptive Trade Practices | <input type="checkbox"/> Quoting Payments |
| <input type="checkbox"/> Discrimination | <input type="checkbox"/> Red Flags Rule |
| <input type="checkbox"/> DOT Regulations | <input type="checkbox"/> Regulation M |
| <input type="checkbox"/> Drug and Alcohol policy | <input type="checkbox"/> Regulation Z |
| <input type="checkbox"/> EPA Regulations | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Equal Credit Opportunity Act | <input type="checkbox"/> Risk-Based Pricing Rule |
| <input type="checkbox"/> Ethics | <input type="checkbox"/> Safeguards Rule |
| <input type="checkbox"/> Fair Credit Reporting Act | <input type="checkbox"/> Sexual Harassment |
| <input type="checkbox"/> Installment Sale Contracts | <input type="checkbox"/> Signature Issues |
| <input type="checkbox"/> Magnuson-Moss Warranty Act | <input type="checkbox"/> Truth-in-Lending Act |
| <input type="checkbox"/> Negative Equity | <input type="checkbox"/> Used Car Rule |

4. How does your dealership accomplish the above training?

5. Can you produce written records of Risk Assessments under the Safeguards Rule and Red Flags Rule?

- Yes No

6. Can you produce written records of periodic audit and review of your ISP and ITPP?

- Yes No

7. Can you produce annual written reports signed by senior management confirming compliance with the Safeguards Rule and Red Flags Rule?

- Yes No

8. Do you have the following mandatory written policies in place?

- | | | |
|--|------------------------------|-----------------------------|
| Privacy Policy (Privacy Rule) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Information Security Program (Safeguards Rule) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Identity Theft Prevention Program (Red Flags Rule) | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

9. Which of the following policies does your dealership have in place?

- Employee Handbook
- Fair Credit/Fair Pricing
- F&I Policy & Procedures
- Sales Policy & Procedures
- Site-Specific Hazard Communication Plan
- Site-Specific Emergency Response Plan
- Site-Specific Fire Prevention Plan
- Site-Specific Bloodborne Pathogen Plan
- Site-Specific Respiratory Policy (if indicated)

10. How does your dealership deploy policy documents?

11. How does your dealership verify policy understanding and consent?

12. How does your dealership publish changes to policy documents?

13. How does your dealership address the Red Flags Rule’s requirement to mitigate the effects of identity theft?

14. How does your dealership deploy Safety Data Sheets (“SDS”)?

15. How does your dealership update and maintain its SDS database?

16. Does your dealership have a verifiable Complaint Resolution System?

Yes No

If Yes, please describe:

17. Does your dealership conduct periodic independent compliance audits?

Yes No

If Yes, when did the last such audit occur? _____

18. Does your dealership conduct periodic independent EH&S audits?

Yes No

If Yes, when did the last such audit occur? _____

19. Has your dealership ever been sued? Yes No

20. Has your dealership ever been asked to provide information to the CFPB/FTC or other governmental agency?

Yes No

21. Has your dealership ever been asked to provide information to a finance source in connection with a CFPB inquiry or policy?

Yes No