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 ■ 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	■

Consumer Financial Protection Bureau

* 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.