

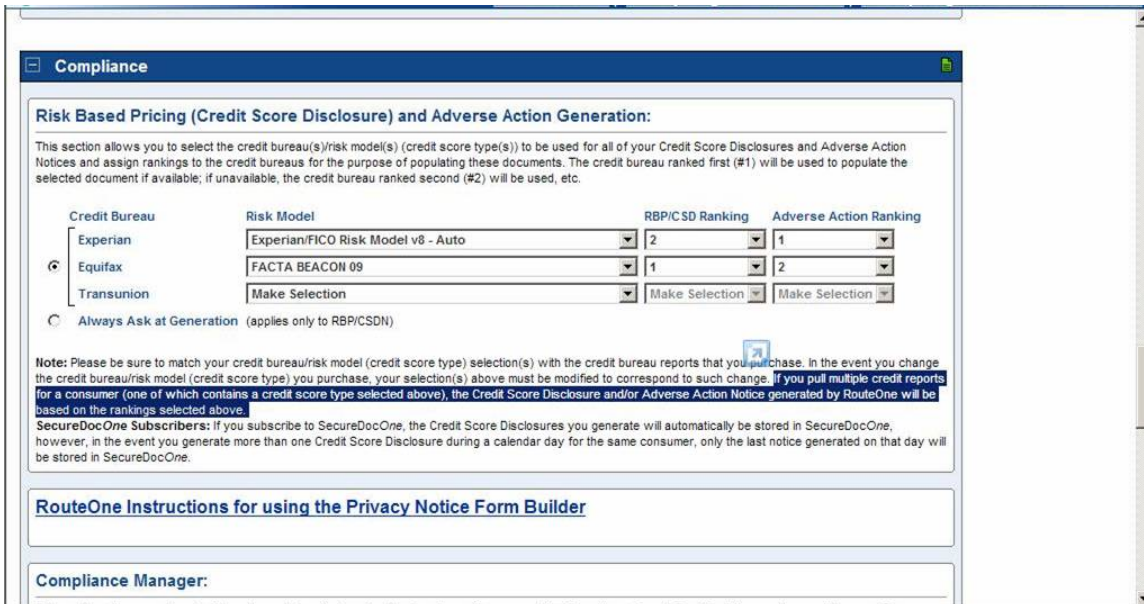
**On July 21, 2011, the Adverse Action component (Section 1100F) of the Dodd-Frank Wall Street Reform and Consumer Protection Act takes effect.** The Dodd-Frank Act (Section 1100F) amends the Adverse Action requirements under the FCRA. It requires additional information disclosure on the Adverse Action Notice, similar to the information disclosed on the cRedit Score Disclosure Notice of the Risk Based Pricing Rule which went into effect on January 1, 2011. The additional requirement is due to the perceived value of the disclosures to the consumer. The existing Credit Score Disclosure Exception Notice is not affected.

**THE ROUTEONE SOLUTION**

RouteOne offers dealers a complimentary, intuitive solution which enhances the existing Adverse Action functions and capabilities previously offered. However, it does require the dealer perform some simple configuration in the Admin...Dealer Info...Compliance dealership setup pages. These settings must be performed by a Dealer Systems Administrator (DSA). A user is a DSA if they see an "Admin" tab in RouteOne when they are logged in. Users can see a listing of DSA's for their dealership by clicking the My RouteOne link in the top right of each page in RouteOne.

**Setup**

Dealers utilizing more than one credit bureau within RouteOne may rank the various credit bureaus for use on their CSDN and Adverse Action notices. This selection is available within the 'Admin', tab under the 'Dealer Info' sub-tab in the Compliance section. Setup must be performed by your Dealership System Administrator (DSA).



## INSTRUCTIONS TO SELECT CREDIT BUREAU REPORTS AND CREDIT SCORES:

Please be sure to match the credit bureau report/risk model (and related credit score) selection above with **each** credit bureau report and credit score that you purchase and use to evaluate consumer credit applications and/or generate credit score disclosure notices. **If you are uncertain as to the credit bureau report(s)/risk model(s) (and related credit scores) that you purchase, please review a copy of each credit bureau report that you purchase.** Each risk model (and related credit score) you select above **must correspond to the first risk model** (and related credit score) displayed on the corresponding credit bureau report. After you have done this, the easiest way to make sure it is correct is to generate an adverse action notice on an existing deal. The score on the notice should match the score in RouteOne CB manager and it should also match with the score of the first risk model on the credit report.

## RANKING MULTIPLE CREDIT BUREAU REPORTS (CSDN/AAN):

It is the Dealer's responsibility to ensure that the credit score disclosure and adverse action notices are populated with the appropriate score disclosures. This feature allows you to select a risk model (and related credit scores) that corresponds to the credit bureaus/risk models (and related credit scores) that you purchase. It will assign ranking to the credit bureaus/risk models (and related credit scores) for the purpose of populating the credit score disclosure and adverse action notices. The credit bureau/risk model (and related credit score) ranked number one (#1) will be used to populate the selected document if available; if unavailable, the credit bureau/risk model (and related credit score) ranked number two (#2) will be used, etc.

## Using the Tool




The dealer may generate the Adverse Action Notice within RouteOne as they always have by selecting the 'Create Adverse Action Notice' dropdown from the Edit/More button within the Actions column in either the Deal Manager or the Compliance Manager. A red "A/A" icon will appear next to the customer name (in the Deal Manager) when a Credit Score Disclosure Notice has been sent and the appropriate columns in Compliance Manager will also be updated.

## Deal Manager

SEARCH: Applicant Last/Business Name  GO Advanced Search Clear Search

NOW SHOWING: 30 Days of All vehicles and Last Updated By All

Update Print Unlock

APPLICANT (CO-APPLICANT) ▼	ACTIONS	USER ▼	LOG ▼
<b>ADACOMMON, JOSE</b> N/A IDV <b>A/A</b>  This icon indicates a notice has been created	+FS <b>Edit/More</b>	CBONDY33	07/20 6:51 AM
<b>ElevanSix, Final</b> N/A IDV <b>A/A</b> <b>RBP</b> FMCTst: ↑ R1TST4MQ: ↑ Primus eC Test FS: ↑ April's Desk - Dlr Fax-FAX:  TFStst: ↑ ROUTE1: ↑	<ul style="list-style-type: none"><li>Edit this Application</li><li>Add Co-Applicant</li><li>View/Print Finance Source Decision</li><li>View/Print Signed Application</li><li>View/Print Unsigned Application</li><li>Sign this Application</li><li>Sign Dealer Privacy Policy</li><li>View/Print Signed Documents</li><li><b>Create Adverse Action Notice</b></li><li>Create Credit Score Disclosure</li><li>View IDOne Results</li></ul>	AYASREEDLR	07/20 6:27 AM
<b>Lively, TK</b> (Lively, SJ) TFStst: ↑		KEGSDEALER	07/20 6:24 AM
<b>Kramer, John</b> (Kramer, Larry) \$ <input checked="" type="checkbox"/> ROUTE1: ↑ Test RouteOne lite - FS: Contract Rejected 		PRILWEISBESKI	07/20 6:21 AM