

COMPLIANCE SCORECARD:



The Monitor’s Secondary Professional Firm (SPF) assigned to Citi, BKD, LLP, spent approximately 10,115 hours over a seven month period performing testing for the 26 metrics tested during periods three and four. The chart below illustrates the results of the SPF’s tests. The potential violations reported are now undergoing corrective action plans.

Office of

Mortgage Settlement

Oversight

Metric Name	Metric Number	Test Period	Threshold Error Rate	Result (Error Rate if failed)
Foreclosure sale in error	1 (1.A)	3 4	1.00% 1.00%	PASS PASS
Incorrect modification denial	2 (1.B)	3 4	5.00% 5.00%	PASS PASS
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	3 4	5.00% 5.00%	PASS PASS
Proof of Claim (POC)	4 (2.B)	3 4	5.00% 5.00%	PASS PASS
Motion for Relief from Stay (MRS)	5 (2.C)	3 4	5.00% 5.00%	PASS PASS
Pre-foreclosure initiation	6 (3.A)	3 4	5.00% X	FAIL - 7.40% X
Pre-foreclosure initiation notifications	7 (3.B)	3 4	5.00% 5.00%	PASS PASS
Fee adherence to guidance	8 (4.A)	3 4	5.00% 5.00%	PASS PASS
Adherence to customer payment processing	9 (4.B)	3 4	5.00% 5.00%	PASS PASS
Reconciliation of certain waived fees	10 (4.C)	3 4	5.00% 5.00%	PASS PASS
Late fees adherence to guidance	11 (4.D)	3 4	5.00% 5.00%	PASS PASS
Third party vendor management	12 (5.A)	3 4	N/A N/A	PASS PASS
Customer portal	13 (5.B)	3 4	N/A N/A	PASS PASS
Single Point of Contact (SPOC)	14 (5.C)	3 4	5.00%* 5.00%*	PASS PASS
Workforce management	15 (5.D) **	3 4	N/A N/A	X X
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	3 4	N/A N/A	X X
Account status activity	17 (5.F) **	3 4	N/A N/A	X X
Complaint response timeliness	18 (6.A)	3 4	5.00% 5.00%	PASS PASS

Metric Name	Metric Number	Test Period	Threshold Error Rate	Result (Error Rate if failed)
Loan modification document collection timeline compliance	19 (6.B.i)	3 4	X 5.00%	X PASS***
Loan modification decision/ notification timeline compliance	20 (6.B.ii)	3 4	10.00% 10.00%	PASS PASS
Loan modification appeal timeline compliance	21 (6.B.iii)	3 4	10.00% 10.00%	PASS PASS
Short sale decision timeline compliance	22 (6.B.iv)	3 4	10.00% 10.00%	PASS PASS
Short sale document collection timeline compliance	23 (6.B.v)	3 4	5.00% X	FAIL - 25.32% X
Charge of application fees for loss mitigation	24 (6.B.vi)	3 4	1.00% 1.00%	PASS PASS
Short sale inclusion notice for deficiency	25 (6.B.vii.a)	3 4	5.00% 5.00%	PASS PASS
Dual track referred to foreclosure	26 (6.B.viii.a)	3 4	5.00% 5.00%	PASS PASS
Dual track failure to postpone foreclosure	27 (6.B.viii.b)	3 4	5.00% 5.00%	PASS PASS
Force-placed insurance timeliness of notices	28 (6.C.i)	3 4	5.00% 5.00%	PASS PASS
Force-placed insurance termination	29 (6.C.ii)	3 4	5.00% 5.00%	PASS PASS

* Test question 4 only
** Policy and procedure metric that is tested once a year
*** Metric 19 results are currently under review by the Monitor’s team
N/A Threshold error rate not applicable
X Metric was not tested in that specific test period

Citi Corrective Action Plan (CAP) for Metric 19

Citi developed a CAP that outlines steps it is taking to prevent future fails.

The CAP included:

- Developing a process to identify agent errors and provide additional training to agents
- Reducing the timeline for vendor to mail letters from 48 hours to 24-36 hours
- Reworking letter formats to include missing document types
- Changing the document workflow process to trigger file delivery at 9:00 AM CST instead of 11:00 AM CST
- Adding offshore staff to expand document review hours of operation to 24 hours
- Initiating daily remediation calls
- Increasing document review staff from 125 to 225 full-time employees
- Implementing a letter quality control and tracking process
- Performing comprehensive quality assurance testing



Citi failed Metric 19 in 2012. As a result, the NMS required Citi to develop a Corrective Action Plan (CAP) to ensure future compliance with the metric, which measures whether the servicer is complying with the requirement to notify the borrower of any missing documents in the borrower's loan modification application within five days of receipt.

Citi met with the Monitoring Committee to report its failure of Metric 19.

The Monitor approved the CAP, and Citi began implementing the plan.

- The Monitor determined that the CAP implementation was complete.
- Testing of Metric 19 resumed during test period four, which was the cure period.
- Citi reported a "pass" for Metric 19 in test period four (the cure period), which is under review by the Monitor.

Citi Corrective Action Plan (CAP) for Metric 6

Citi developed a CAP that outlines steps it is taking to prevent future fails.

The CAP included:

- Implementing enhancements to existing processes to accurately validate last payment date and balances due
- Implementing holds to prevent incorrect notices from being mailed to borrowers
- Developing reporting procedures to assist with identifying errors
- Implementing system enhancements to replace existing manual controls



Citi failed Metric 6 in 2013. As a result, the NMS required Citi to develop a CAP to ensure future compliance with the metric, which tests whether loans were delinquent at the time foreclosure was initiated and whether the servicer provided the borrower with accurate information in a pre-foreclosure letter required by the Settlement.

Citi met with the Monitoring Committee to report its failure of Metric 6.

The Monitor approved the CAP, and Citi began implementing the plan.

- The Monitor is in the process of determining whether the CAP is complete.
- Testing of Metric 6 is expected to resume as of test period five, which would be the cure period.

Citi Corrective Action Plan (CAP) for Metric 23

Citi developed a CAP that outlines steps it is taking to prevent future fails.

The CAP included:

- Developing a generic notice of incomplete information to be sent to certain borrowers within 30 days of a request for a short sale
- Developing a new daily exception report to identify any borrowers who have not been sent a notice of incomplete information in a timely manner
- Enhancing training of document review agents to ensure that notices of incomplete information are sent in a timely manner
- Creating a new system indexing code specifically for purchase agreements to ensure notices of incomplete information are sent promptly to applicable borrowers



Citi failed Metric 23 in 2013. As a result, the NMS required Citi to develop a CAP to ensure future compliance with the metric, which tests the servicer's compliance with requirement to notify borrowers of any missing documents within 30 days of a borrower's request for a short sale.

Citi met with the Monitoring Committee to report its failure of Metric 23.

The Monitor approved the CAP, and Citi began implementing the plan.

- The Monitor is in the process of determining whether the CAP is complete.
- Testing of Metric 23 is expected to resume as of test period five, which would be the cure period.