

# *Fails: What's Next?*

Office of  
**Mortgage Settlement**  
Oversight

## **Corrective Action Plan:**

Bank implements  
Corrective Action Plan  
(CAP)

## **Borrower Compensation:**

If potential violation is  
widespread, bank compensates  
all borrowers experiencing  
material harm

## **Retesting:**

Testing recommences by  
IRG and Monitor beginning  
the quarter after the CAP  
is completed by bank

## **Penalties:**

If bank fails metric again in  
either of next two quarters,  
Monitoring Committee and  
Monitor may file  
enforcement action

### **Penalties include:**

- A court order to stop specific behaviors
- Up to \$1 million civil penalty
- Up to \$5 million fine for failing particular metrics multiple times