

Update on Compliance

A Report from the Monitor of the National Mortgage Settlement



December 17, 2015



I have filed a set of six compliance reports with the United States District Court for the District of Columbia as Monitor of the National Mortgage Settlement (NMS or Settlement). This document summarizes these reports, which detail my review of each servicer's performance on the Settlement's servicing reforms. This report includes:

- An overview of the process through which my colleagues and I have reviewed the servicers' performances on the Settlement's servicing reforms;
- An update on the one servicer's implementation of corrective action plans and related borrower remediation, first mentioned in prior reports
- Summaries of each servicer's compliance for the first and second calendar quarters of 2015.

Seven servicers are now subject to the National Mortgage Settlement. This is my sixth report on the original servicers: Bank of America, Chase, Citi, Wells Fargo and the ResCap Parties, whose servicing assets were sold to Ocwen and Ditech (formerly Green Tree), as explained below. This is the first report to include SunTrust's compliance. SunTrust entered into a separate consent judgment in September 2014 requiring the company to provide \$500 million in consumer relief and comply with the NMS servicing standards.

This report does not include an update on Ocwen's compliance. My team is still reviewing Ocwen's compliance testing results for the first half of 2015. I will report my findings to the Court and to the public as soon as I am confident they are complete.

My review of Bank of America, Chase, Citi, Ditech, SunTrust and Wells Fargo did not uncover any failed metrics in the first half of 2015.

Sincerely,

Joseph A. Smith, Jr.

Introduction

As required by the National Mortgage Settlement (Settlement or NMS), I filed compliance reports with the United States District Court for the District of Columbia (the Court) for each servicer that is a party to the Settlement. The servicers include four of the original parties – Bank of America, N.A. (Bank of America), JP Morgan Chase Bank, N.A. (Chase), CitiMortgage, Inc. (Citi) and Wells Fargo & Company (Wells Fargo). Essentially all of the servicing assets of the fifth original servicer party, the ResCap Parties, were sold to and divided between Ocwen Financial Corporation (Ocwen) and Green Tree Servicing, LLC (Green Tree), pursuant to a February 5, 2013, bankruptcy court order. Accordingly, Ocwen and Green Tree, now Ditech Financial LLC (Ditech), are now subject to the NMS for the portions of their portfolios acquired from the ResCap Parties estate.¹

In September 2014, the United States District Court for the District of Columbia entered a new consent judgment reflecting the agreement reached among SunTrust Mortgage, Inc. (SunTrust), the Consumer Financial Protection Bureau (CFPB), 49 states and the District of Columbia.

The reports I filed provide the results of my testing on compliance with the NMS servicing standards during the first and second quarters 2015. They are the sixth set of reports on the original four servicers, the fourth report on Ditech, and the first report on SunTrust. Copies of all the reports filed with the Court are available on my website, **mortgageoversight.com**.

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> > Chase

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As Monitor, I evaluate the servicers using the 29 original metrics, or tests, enumerated in the Settlement and four additional metrics I negotiated with the servicers and the Monitoring Committee. These metrics determine whether the servicers adhered to the 304 servicing standards, or rules, outlined in the NMS. The Monitoring Committee comprises representatives from 15 states, the United States Department of Housing and Urban Development and the United States Department of Justice.

I continue to work closely with a team of professional firms to oversee the servicers' compliance with the servicing standards. For more information about these professional firms and their roles in the monitoring process, please see my previous reports.

The servicers each follow work plans that I approved and to which the Monitoring Committee did not object. In these work plans, an internal review group (IRG) determines whether the servicers' activities comply with the Settlement terms. More information on the IRGs and work plans can be found in my previous reports. I then work with my professionals to review the work of each servicer's IRG. I determine if the IRG's work is satisfactory and report my findings to the Court and the public.

Oversight Process

Bank of America

Chase

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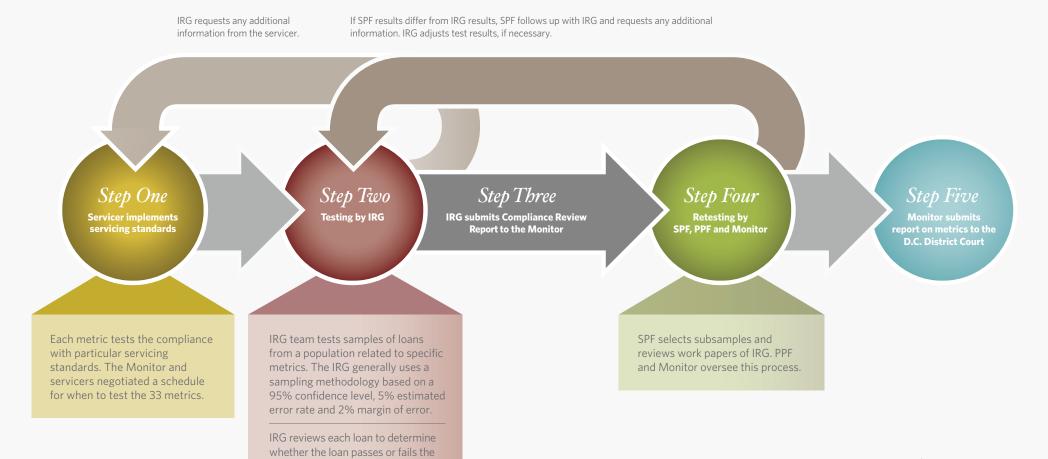
MONITOR'S ROLE:

Office of Mortgage Settlement Oversight

Testing a Metric

The Internal Review Groups tested, and my professional firms retested, the servicers' performance on each metric. The graphic below illustrates the process by which the metrics for each servicer were tested.

metric test questions.



FAILS:

What's Next?

The NMS defines a failed metric as a potential violation and gives the servicer a chance to fix the root causes of its failure. For more information on what happens when a servicer fails a metric, see the graphic below. I also included information on metric fails and corrective action plans (CAPs) in my previous reports.

Potential Violation

Servicer reports potential violation to the Monitoring Committee within 15 days of

Corrective Action Plan

Servicer implements Corrective Action Plan (CAP) to address root

Borrower Remediation

If potential violation is widespread, servicer remediates all borrowers experiencing material harm

Retesting

by IRG and Monitor's team beginning the quarter after the CAP is completed by servicer

Penalties

Penalties can follow
if the servicer fails
the same metric in
either of the next two
quarters after the CAP
is completed

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



This report covers the first and second quarters 2015. During these periods, my professionals and I tested each of the servicers on up to 33 metrics.

Introduction

I allowed SunTrust to begin its compliance testing in phases as the bank implemented the servicing standards. My professionals tested SunTrust on nine metrics in the first quarter and thirteen in the second quarter 2015. For the third quarter 2015 and after, SunTrust will be subject to testing on all metrics.

secondary professional firms and other professionals who dedicated approximately 78,975 hours over a six-month period.

Oversight Process

The work to test the servicers in the first and second quarters 2015 involved 254 professionals, including my primary professional firms,

Bank of America

Chase

Citi

Dietech

SunTrust

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NMS Test Period	1	2	3	4	5	6	7	8	9	10	11	12
Calendar Ouarter	03 2012	04 2012	01 2013	02 2013	03 2013	04 2013	01 2014	02 2014	03 2014	04 2014	01 2015	O2 2015

		TEST PERIOD 11 (January 1, 2015 - March 31, 2015) TEST PERIOD 12 (Agril 1, 2015 - June 30, 2015)									15)
METRIC NO	. TITLE/DESCRIPTION	BOFA	CHASE	CITI	DITECH	WELLS	BOFA	CHASE	CITI	DITECH	WELLS
1	Foreclosure sale in error (1.A)	•	•			•	•	•	•	•	•
2	Incorrect modification denial (1.8)			•		•	•	•			•
3	Affidavit of Indebtedness (AOI) preparation (2.A)	•		•		•	•	•	•		•
4	Proof of Claim (POC) (2.8)	•		•		•	•	•	•		•
5	Motion for Relief from Stay (MRS) affidavits (2.C)	•	•	•		•	•	•	•	•	•
6	Pre-foreclosure initiation (3.A)	•	•	•		•	•	•	•	•	•
7	Pre-foreclosure initiation notifications (3.8)	•	•	•		•	•	•	•	•	•
8	Fee adherence to guidance (4.A)	•	•	•		•	•	•	•	•	•
9	Adherence to customer payment processing (4.8)	•	•	•		•	•	•	•	•	•
10	Reconciliation of certain waived fees (4.C)	•	•	•		•	•	•	•		•
11	Late fees adherence to guidance (4.D)	•		•		•	•	•	•	•	•
12	Third-party vendor management (5.A)	•	•	•	•	•	•	•	•	•	•
13	Customer portal (5.8)	•	•	•	•	•	•	•	•	•	•
14	Single Point of Contact (SPOC) (5.C)	•	•	•		•	•	•	•		•
15	Workforce management (S.D)*							•			
16	Affidavit of Indebtedness (AOI) integrity (5.E)*						•	•			
17	Account status activity (5.F)*							•			
18	Complaint response timeliness (6.A)	•		•		•	•	•	•	•	•
19	Loan modification document collection timeline compliance (6.B.i)			•		•	•	•			•
20	Loan modification decision/notification timeline compliance (6.8.ii)	•	•	•	•	•	•	•	•	•	•
21	Loan modification appeal timeline compliance (6.8.ii)			•		•	•	•	٠	•	•
22	Short sale decision timeline compliance (6.8.iv)	•	•	•	•	•	•	•	•		•
23	Short sale document collection timeline compliance (6.8.v)	•		•	•	•	•	•	٠	•	•
24	Charge of application fees for loss mitigation (6.8.vi)	•	•	•	•	•	•	•	•	•	•
25	Short sale inclusion notice for deficiency (6.8.vii.a)	•		•	•	•	•	•	•	•	•
26	Dual track referred to foreclosure (6.8.viii.a)		•	•		•	•	•			•
27	Dual track failure to postpone foreclosure (6.8.viii.b)	•		•		•	•	•	•	•	•
28	Force-placed insurance timeliness of notices (6.C.i)					•					
29	Force-placed insurance termination (6.C.ii)			•			-	٠	•	-	•
30	Loan Modification Process (7.A)										•
31	Loan Modification Denial Notice Disclosure (7.8)	- :		•				-		-	
32 33	SPOC Implementation and Effectiveness (7.C)					•		•			
33	Billing Statement Accuracy (7.D)	•		,		•	•	•			

Metric		ested, and my professional firms retested, the service the time periods in which the metrics for the servicer		ometrics. Office of Mortgage Settlement Oversight
		FIRST QUARTER 2015 (January 1, 2015 - March 31, 2015)	SECOND QUARTER 2015 (April 1, 2014 - June 30, 2015)	NOT YET TESTED: THIRD QUARTER 2015 (July 1, 2015 - September 30, 2015)
AFTRIC NO.	TITLE/DESCRIPTION	SunTrust		SunTrust
1	Foreclosure sale in error (1.A)			•
2	Incorrect modification denial (1.8)			•
3	Affidavit of Indebtedness (AOI) preparation (2.A)		•	
4	Proof of Claim (POC) (2.8)			
5	Motion for Relief from Stay (MRS) affidavits (2.C)		•	•
6	Pre-foreclosure initiation (3.A)			•
7	Pre-foreclosure initiation notifications (3.8)			
8	Fee adherence to suidance (4.A)			•
9	Adherence to customer payment processing (4.8)		•	•
10	Reconciliation of certain waived fees (4.C)			•
11	Late fees adherence to guidance (4.D)			
12	Third-party vendor management (5.A)		•	•
13	Customer portal (5.8)		•	•
14	Single Point of Contact (SPOC) (5.C)	•	•	•
15	Workforce management (5.D)*	•		
16	Affidavit of Indebtedness (AOI) integrity (5.E)*	•		
17	Account status activity (5.F)*	•		
18	Complaint response timeliness (6.A)	•	•	•
19	Loan modification document collection timeline compliance (6.8.i)		•	•
20	Loan modification decision/notification timeline compliance (6.8.ii)		•	•
21	Loan modification appeal timeline compliance (6.8.ii)		•	•
22	Short sale decision timeline compliance (6.8.iv)			•
23	Short sale document collection timeline compliance (6.8.v)			•
24	Charge of application fees for loss mitigation (6.8.xi)	•	•	•
25	Short sale inclusion notice for deficiency (6.8.vii.a)			•
26	Dual track referred to foreclosure (6.8.viii.a)			•
27	Dual track failure to postpone foreclosure (6.8.vii.b)			•
28	Force-placed insurance timeliness of notices (6.C.i)			•
29	Force-placed insurance termination (6.C.ii)			•
30	Loan Modification Process (7.A)			•
31	Loan Modification Denial Notice Disclosure (7.8)			•
32	SPOC Implementation and Effectiveness (7.C)	•	•	•
33	Billing Statement Accuracy (7.D)	•	•	•
34	Disclosure of Personally Identifiablte Information in POC (2.D)			•
TOTALS		9	13	31

See **Appendix i** for larger version

See **Appendix ii** for larger version



Bank of America Results

for the first half of 2015.

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> Bank of America

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Chase Citi Dietech SunTrust Wells Fargo Conclusion

							i	Office of Mortgage Se	ttlement
	rofessional Fi	irm (SPF) as	signed to Bank o		Chizek LLP, tested the IRG's work ustrates the results of the IRG's t			Oversi	
METRIC NAME	METRIC NUMBER	TEST	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR
oreclosure sale in error	10.60	11	1.00%	Pass Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass Pass
ncorrect modification denial	2 (1.8)	11	5.00%	Pass Pass	Loan modification document collection timeline compliance	19 (6.8.i)	11	5.00%	Pass Pass
Affidavit of Indebtedness AOI) preparation	3 (2.A)	11	5.00%	Pass Pass	Loan modification decision/ notification timeline compliance	20 (6.8.i)	11	10.00%	Pass Pass
roof of Claim (POC)	4 (2.8)	17	5.00%	Pass Pass	Loan modification appeal timeline compliance	21 (6.8.11)	11	10.00%	Pass Pass
Motion for Relief from Stay (MRS) affidavits	500	11	5.00%	Pass Pass	Short Sale decision timeline compliance	22 (6.8.w)	11	10.00%	Pass Pass
re-foreclosure initiation	6 (3.A)	11	5.00%	Pass Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	500%	Pass Pass
re-foreclosure initiation	7 (3.8)	11 12	5.00%	Pass Pass	Charge of application fees for loss mitigation	24 (6.8.vi)	11	100%	Pass Pass
ee adherence to guidance	8 (4.A)	11	5.00%	Pass Pass	Short Sale inclusion notice for deficiency	25 (6.8 vil.a)	11	500%	Pass Pass
dherence to customer	9 (4.8)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6 B.vii.a)	11 12	5.00%	Pass
ayment processing teconciliation of certain valved fees	10 (4.C)	11 12	5.00% 5.00%	Pass Pass Pass	Dual track failure to postpone foreclosure	27 (6.8 vinb)	11	5.00% 5.00%	Pass Pass
ate fees adherence to guidance	11 (4.D)	11	5.00%	Pass Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass Pass
hird-party vendor management	12 (5.A)	11	N/A N/A	Pass Pass	Force-placed insurance termination	29 (6.C.li)	11	500%	Pass Pass
ustomer portal	13 (5.8)	11	N/A N/A	Pass Pass	Loan modification process	30 (7A)	11	5,00%	Pass Pass
ingle Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass Pass Pass	Loan modification denial notice disclosure	31 (7.8)	11	5.00%	Pass Pass
Vorkforce management	15 (5.D) **	11 12	N/A N/A	×	SPOC implementation and effectiveness***	32 (7.0)	11	5.00%	Pass Pass
Affidavit of Indebtedness	16 (5.E) **	11	N/A	×	Billing statement accuracy	33 (7.0)		5.00%	Pass
(AOI) integrity Account status activity	17 (5.5) **	12 11 12	N/A N/A N/A	Pass X X	*Test question 4 only, **Policy and proces		12 ested once a we	500%	Pass Appen

Neither Bank of America's IRG nor my professionals found evidence of fails in any of the metrics tested

See Appendix iii for larger version

Chase Results

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Neither Chase's IRG nor my professionals found evidence of fails in any of the metrics tested for the first half of 2015.

SCORECARD:							ĵ	Office of Mortgage S	ettlement
Chase The Monitor's Secondary Fouring test period 11 and 3:					P, tested the IRG's work on 30 m e results of the IRG's tests.	etrics		Overs	ight
METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR
Foreclosure sale in error	(AD)	11	1.00%	Pass Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass Pass
incorrect modification denial	2 (1.8)	11	5.00% 5.00%	Pass Pass	Loan modification document collection timeline compliance	19 (6.8.)	11	5.00% 5.00%	Pass Pass
Affidavit of Indebtedness (AOI) preparation	3 (2 A)	11	5.00%	Pass Pass	Loan modification decision/ notification timeline compliance	20 (6.830	11 12	10.00%	Pass Pass
Proof of Claim (POC)	4 (28)	11	5.00%	Pass Pass	Loan modification appeal timeline compliance	21 (6.8 iii)	11	10.00%	Pass Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.0)	11	5.00%	Pass Pass	Short Sale decision timeline compliance	22 (6.8.iv)	15	10.00%	Pass Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass Pass	Short Sale document collection timeline compliance	23 (6.8 v)	11	500% 500%	Pass Pass
Pre-foreclosure initiation notifications	7 (3.8)	11	5.00%	Pass Pass	Charge of application fees for loss mitigation	24 (6.8 vi)	11	1.00%	Pass Pass
Fee adherence to guidance	8 (4.A)	11 12	5.00%	Pass Pass	Short Sale inclusion notice for deficiency	25 (6.8 vii.a)	11	5.00% 5.00%	Pass Pass
Adherence to customer payment processing	9 (4.8)	11	5.00%	Pass Pass	Dual track referred to foreclosure	26 (6.8 vii.a)	11	500%	Pass Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass Pass	Dual track failure to postpone foreclosure	27 (6.8 wilb)	11 12	5.00%	Pass Pass
Late fees adherence to guidance	11 (4.0)	11	5.00%	Pass Pass	Force-placed insurance timeliness of notices	28 (6 C i)	11	5.00% 5.00%	Pass Pass
Third-party vendor management	12 (5.A)	11 12	N/A N/A	Pass Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00% 5.00%	Pass Pass
Customer portal	13 (5.8)	11	N/A N/A	Pass Pass	Loan modification process	30 (7.A)	11	5.00%	Pass Pass
Single Point of Contact (SPOC)*	14 (5.C)	112	5.00%	Pass Pass	Loan modification denial notice disclosure	31 (7.8)	11	5.00%	Pass Pass
Workforce management	15 (5.0) **	12	N/A N/A	X Pass	SPOC Implementation and effectiveness***	32 (7.C)	11	5.00%	Pass Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.1) **	11	N/A N/A	X Pass	Billing statement accuracy	33 (7.0)	11	5.00% 5.00%	Pass Pass
Account status activity	17 (5.7) **	11	N/A N/A	X Pass	,		V.F.	250000	ab. Append

See **Appendix iv** for larger version

Citi Results

Neither Citi's IRG nor my professionals found evidence of fails in any of the metrics tested for the first half of 2015.

SCORECARD: Citi The Monitor's Secondary Furing test period 11 and 30							į	Office of Mortgage S	
METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
oreclosure sale in error	1(LA)	31	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
oreclosure sale in error	17000	12	1.00%	Pass	Complaint response timeliness	10 (0.70	12	5.00%	Pass
ncorrect modification denial	2 (1.8)	11	5.00%	Pass.	Loan modification document	19 (6.8.i)	31	500%	Pass
neoneet mountation deman	2.41.07	12	5.00%	Pass	collection timeline compliance		12	5.00%	Pass
Affidavit of Indebtedness	3 (2.A)	11	5.00%	Pass	Loan modification decision/	20 (6.830)	- 11	10.00%	Pass
AOI) preparation		12	5.00%	Pass	notification timeline compliance		12	10.00%	Pass
Proof of Claim (POC)	4 (2.8)	- 11	5.00%	Pass	Loan modification	21 (6.8 iii)	11	10.00%	Pass.
		12	5.00%	Pass	appeal timeline compliance		12	10.00%	Pass
Motion for Relief from	5(2.0)	- 11	5.00%	Pass	Short Sale decision	22 (6.B.iv)	. 11	10:00%	Pess
Stay (MRS) affidavits		12	5.00%	Pass	timeline compliance		12	10.00%	Pass
Pre-foreclosure initiation	6 (3 A)	- 11	5.00%	Pass	Short Sale document	23 (6.8v)	- 11	5.00%	Pass
		12	5.00%	Pass	collection timeline compliance		12	5.00%	Pass
Pre-foreclosure initiation	7 (3.8)	- 11	5.00%	Pass	Charge of application fees	24 (6.8xi)	- 11	1.00%	Pasis
notifications		12	5,00%	Pass	for loss mitigation		12	1.00%	Pass
ee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.8 vii.a)	112	500%	Pass
24 CAN CONTRACTOR AND		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.8)	12	5,00%	Pass	Dual track referred to foreclosure	26 (6.8 vii.a)	12	5.00%	Pass Pass
115 MINUS 11 PROPERTY 1		77	5.00%	Pass Pass			11	5.00%	Pass
Reconciliation of certain valved fees	10 (4.C)	12	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.8 vii.b)	12	5.00%	Pass
		11	5.00%	Pass	A4000000000000000000000000000000000000		11	500%	Pass
ate fees adherence to guidance	11 (4.D)	12	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	12	5.00%	Pags
22		11	N/A	Pass			- 11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	12	5.00%	Pass
		77	N/A	Pass	417147111111111111111111111111111111111		11	5.00%	Pass
Sustomer portal	13 (5.8)	12	N/A	Pass	Loan modification process	30 (7A)	12	5.00%	Pass
		11	5.00%	Pass	Loan modification denial		11	500%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	12	5.00%	Pass	notice disclosure	31 (7.8)	12	5.00%	Pass
2002 CO. C.		11	N/A	×	SPOC implementation		11	5.00%	Pass
Workforce management	15 (5.0) **	12	N/A	×	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness		11	N/A	×			11	5.00%	Pass
AOI) integrity	16 (5.E) **	12	N/A	×	Billing statement accuracy	33 (7.D)	12	5.00%	Pasis
AOI) integrity									
Account status activity	17 (5.F) **	11	N/A	X					

See **Appendix v** for larger version

Oversight Process

Bank of America

Chase

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Ditech Results

Oversight Process

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Conclusion

Neither Ditech's IRG nor my professionals found evidence of fails in any of the metrics tested for the first half of 2015.

By January 1, 2015, Ditech had completed corrective action plans and remediation of all previous fails except Metrics 6, 10 and 19. These three fails have been cured, and the remediation for Metric 10 is complete. Remediation for Metric 6 is ongoing, and my professionals are in the process of reviewing Ditech's remediation for Metric 19. More information can be found on the corrective action plans for all of Ditech's fails in my previous report.

I will provide an update on Ditech's remediation efforts for Metrics 6 and 19 in my next report.

					w Krause, LLP, tested the IRG's w Bustrates the results of the IRG's		į	Office of Mortgage S	
METRIC NAME	METRIC NUMBER	TEST	THRESHOLD ERROR RATE	RESULT CERROR RATE IF FAILED)	METRIC HAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE OF FAILED
Foreclosure sale in error	tetas	-	100%	Per	Complaint response timeliness	19.(9.8)	100	5.00%	Fee
		10	100%	Plet			- 12	5.00%	Pers
Incorrect modification denial	2118	- 11	100%	Pint	Lean modification document collection timeline compliance	NAME	17	500% 500%	Pers
		781	100%	Face Face	MANUFACTURE OF THE PARTY OF THE		Q I	500%	Pers
Affidavit of Indebtedness (AOI) preparation	3(2.0)	10	100%	Peri	Lean modification decision/ notification timeline compliance	20 (8 8 /)	- 0	10,00%	Para
		10.	100%	Peri	Lean modification		1	10000	Desi
Proof of Claim (POC)	4 (2.8)	- 1	500%	Paul	appeal timeline compliance	21.06840	- 12	80,000	Pesi
Motion for Relief from		11	£00%	Fans.	Short Sale decision		- 19 1	1000%	Pers
Stay (MRS) affidavits	100	- 12	500%	Penn	timeline compliance	22.06,8340	- 12	1000%	Pen
		- 11	300%	Part	Short Sale document		- 11	500%	Peni
Pre-foreclosure initiation	ACAL	17	500%	Fee	collection timeline compliance	22 (6.05)	12	500%	Pers
Pre-fareclesure initiation		- 11	100% Past Charge of application fees	NORM	- 11	1.00%	Test		
netifications	7(38)		500%	Peri	for loss mitigation	Section 1	101	1,00%	Peri.
Fee adherence to guidance	81680	- 11	100%	Yes	Short Sale inclusion notice	2516.0 (14)	100	100%	Pass
ree agnerence to galdance	-11/61	12	100%	Feet	for deficiency	animatical	D.	580%	Pens
Adherence to customer	9048	31	100%	Pain	Dual track referred	2600.840.40	18	500%	Peri
payment processing	-2/1983	14	100%	Peri	to fereclesiure	100000000000000000000000000000000000000	- 12	5-00%	Pain
Reconciliation of certain	10.04.03		100%	Fini	Dual track failure to	2715 Build	11.	5.00%	Pans
valved fees			100%	Fine	postpone foreclosure		12	500%	Paul
Late fees adherence to guidance	- W0000	- 1	500%	First	Force-placed insurance timeliness of notices	280600	- 11	5.00%	Pesi
		ti.	500%	Pers			107	500%	Peri
Third-party wender management	12 (5.6)	12	No.14	Para San	Force-placed insurance termination	29-61-C.11	- 12	500%	Pass
		10	F6.93	Para	MANUFACTURE CO.		- 191	1,00%	Perio
Customer portal	9.65.0	12-	F0.55	Pers	Lean modification process	SECTAL	10	500%	Pens
VII. 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		- 1	100%	Para .	Lean modification denial		1	1.00%	Peri
Single Point of Contact (SPOC)*	14/5/0	10	100%	Pleas	notice disclosure	31 (730)		100%	Para
		- 8	- PN/A	(X)	SPOC implementation		- 11	5.00%	Feet
Workforce management	.B12:01-1		N/A	100	and effectiveness***	31(1)(1)	0	5.00%	Pass
Affidavit of Indebtedness	NOD-	30	7676	- X		70.000	118	500%	Peni
(AOI) integrity	MORE	10	96/8	X	Billing statement accuracy	33 (10)	12	5.00%	Para
Account status activity		- 11	NA.	- X					
		12:	90/A	- 10				e - fest Question to	Accend

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SunTrust Results

half of 2015.

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SCORECARD: Sun Trus The Monitor's Secondary P the first quarter of 2015 an	Office of Mortgage Settlement Oversight								
METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
		Q12015	1.00%	X			Q1 2015	5.00%	Pass
oreclosure sale in error	1 (LA)	Q2 2015	1.00%	×	Complaint response timeliness	18 (6.A)	Q2 2015	5.00%	Pass
ncorrect modification denial	2 (1.8)	Q12015	5.00%	×	Loan modification document	19 (6.8.)	Q1 2015	5.00%	X
ncorrect modification denial	2 (10)	Q2 2015	5.00%	×	collection timeline compliance	19 (0.8.1)	Q2 2015	5.00%	Pass
iffidavit of Indebtedness	3 (2.A)	Q1 2015	500%	×	Loan modification decision/	20 (6.830)	Q1 2015	10.00%	×
AOI) preparation	31270	Q2 2015	5.00%	Pass	notification timeline compliance	LO (U.L.)	Q2 2015	10.00%	Pass
roof of Claim (POC)	4 (2.8)	Q1 2015	5.00%	×	Loan modification	21 (6.B.iii)	Q1 2015	10.00%	×
		Q2-2015	5.00%	×	appeal timeline compliance		Q2 2015	10.00%	Pass
Notion for Relief from Hay (MRS) affidavits	5(2.0)	Q1 2015	5.00%	×	Short Sale decision	22 (6.B.iv)	Q1 2015	10:00%	X
tay (MRS) affidavits		Q2 2015	5.00%	Pass	timeline compliance		Q2 2015	10.00%	X.
re-foreclosure initiation	6 (3.A)	Q1 2015	5.00%	×	Short Sale document collection timeline compliance	23 (6.8.v)	Q1 2015	5.00%	×
		Q2 2015	5.00%	X			Q2 2015	5.00%	x
re-foreclosure initiation otifications	7 (3.8)	Q1 2015	5.00%	×	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2015 Q2 2015	1.00%	Pass Pass
otinications		Q2 2015 Q1 2015	5,00%	×	ADDITION OF THE PARTY OF THE PA		Q1 2015	500%	Pass X
ee adherence to guidance	8 (4.A)	02 2015	5.00%	*	Short Sale inclusion notice for deficiency	25 (6.8 vii.a)	02 2015	500%	×
dherence to customer		01 2015	5,00%	Pass	Dual track referred		Q2 2015 Q1 2015	5.00%	Ŷ
ayment processing	9 (4.8)	02 2015	500%	Pass	to foreclosure	26 (6.Bvii.a)	Q2 2015	5.00%	×
econciliation of certain		Q1 2015	500%	X	Dual track failure to		Q1 2015	5.00%	X
raived fees	10 (4.C)	Q2 2015	5.00%	×	postpone foreclosure	27 (6.8 vii.b)	Q2 2015	5.00%	×
		Q1 2015	5.00%	×	Force-placed insurance		Q1 2015	5.00%	×
ate fees adherence to guidance	11 (4.0)	Q2 2015	5.00%	X	timeliness of notices	28 (6 Ci)	Q2 2015	5.00%	×
	2010000	Q1 2015	N/A	X.	Force-placed insurance	22.000.00	Q1 2015	5.00%	×
hird-party vendor management	12 (5.A)	Q2 2015	N/A	Pass	termination	29 (6.C.ii)	Q2 2015	5.00%	X
	22 of 20	Q1 2015	N/A	×	POST CONTRACTOR CONTRA	20.02.63	Q1 2015	5.00%	×
ustomer portal	13 (5.B)	Q2 2015	N/A	Pass	Loan modification process	30 (7.A)	Q2 2015	5.00%	×
	The second	Q1 2015	5.00%	Pass	Loan modification denial	20.4780	Q1 2015	5.00%	×
ingle Point of Contact (SPOC)*	14 (5.C)	Q2 2015	5.00%	Pass	notice disclosure	31 (7.8)	Q2 2015	5.00%	X
Vorkforce management	15 (5.0) **	Q1 2015	N/A	Pass	SPOC implementation	32 (7.C)	Q1 2015	5.00%	Pass
Torking or management	9.0944	Q2 2015	N/A	×	and effectiveness***	36 17 (-7)	Q2 2015	5.00%	Pass
iffidavit of Indebtedness	16 (5.E) **	Q1 2015	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2015	5.00%	Pass
AOI) integrity	CONTRACTOR OF THE PARTY OF THE	Q2 2015	N/A	Х.		25.50	Q2 2015	5.00%	Pass.
ccount status activity	17 (5 F) **	Q12015	N/A	Pass	Disclosure of personally	34 (2.0)	Q1 2015	3.50%	×
		Q2 2015	N/A	¥.	identifiable information in POC		Q2 2015	3.50%	×

"Test question 4 only. ""Policy and procedure metric that is tested once a year," "Test Question 1 only. N/As Threshold error rate not applicable. Xs Metric was not tested in that specific test period.

Neither SunTrust's IRG nor my professionals found evidence of fails in any of the metrics tested for the first

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Wells Fargo Results

first half of 2015.

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	rofessional Fi				tested the IRG's work on 30 trates the results of the IRG's test	5.	Ī	Office of Mortgage So Oversi	
METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST	THRESHOLD ERROR RATE	RESULT (ERROF
Foreclosure sale in error	710A)	11	1.00%	Pass	Complaint response timeliness	38 (6.A)	- 11	5.00%	Pass.
Incorrect modification denial	2 (1.8)	12 11 12	1.00% 5.00%	Pass Pass Pass	Loan modification document collection timeline compliance	19 (6.B.i)	12	500% 500% 500%	Pass Pass Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass Pass	Loan modification decision/ notification timeline compliance	20 (6.8.ii)	11	10.00% 10.00%	Pass Pass
Proof of Claim (POC)	4 (2.8)	11	5.00% 5.00%	Pass Pass	Loan modification appeal timeline compliance	21 (6.8.8)	11	10.00%	Pass Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass Pass	Short Sale decision timeline compliance	22 (6.8 iv)	11	10.00%	Pass Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass Pass	Short Sale document collection timeline compliance	23 (6.8 v)	11	5.00%	Pass Pass
Pre-foreclosure initiation notifications	7(38)	11	500%	Pass Pass	Charge of application fees for loss mitigation	24 (6.8.vi)	11	1.00%	Pass Pass
Fee adherence to guidance	8 (4.A)	11 12	5.00%	Pass Pass	Short Sale inclusion notice for deficiency	25 (6.8 vii.a)	11	5.00%	Pass Pass
Adherence to customer payment processing	9 (4.8)	11	5.00%	Pass Pass	Dual track referred to foreclosure	26 (6.8 vii.a)	11	5.00%	Pass Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass Pass	Dual track failure to postpone foreclosure	27 (6.8 vii.b)	11 12	5.00%	Pass Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass Pass
Third-party vendor management	12 (5.A)	11	N/A N/A	Pass Pass	Force-placed insurance termination	29 (6.C.ii)	12	500%	Pass Pass
Customer portal	13 (5.8)	11	N/A N/A	Pass Pass	Loan modification process	30 (7.A)	11	5.00% 5.00%	Pass Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass Pass	Loan modification denial notice disclosure	31 (7.8)	11 12	5.00%	Pass Pass
Workforce management	15 (5.D) **	11	N/A N/A	X X	SPOC implementation and effectiveness***	32 (7,C)	12	5.00%	Pass Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11 12	N/A N/A	×	Billing statement accuracy	33 (7.0)	11 12	5.00% 5.00%	Pass Pass
Account status activity	17 (5.F) **	11 12	N/A N/A	×	"Test guestion 4 only. ""Policy and proce	Summatric that is t	sated ooze a usi	er *** Text Outstino I on	du Append

Neither Wells Fargo's IRG nor my professionals found evidence of fails in any of the metrics tested for the

See **Appendix viii** for larger version

Conclusion

As of the end of the third quarter 2015, the obligations of Bank of America, Chase, Citi, Ditech and Wells Fargo under the NMS sunset. The servicers are still required to follow similar rules under CFPB review, but the reviews I conduct will conclude after I report on my findings through that time, as the Settlement prescribes. I will report additional thoughts and findings on the Settlement's work in the future.

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		т	EST PERIOD	11 (January 1	l, 2015 - March 31, 2	015)	T	EST PERIOD	12 (April 1	, 2015 - June 30, 20°	15)
METRIC NO.	TITLE/DESCRIPTION	B OF A	CHASE	CITI	DITECH	WELLS	B OF A	CHASE	CITI	DITECH	WELLS
1	Foreclosure sale in error (1.A)	•	•	•	•	•	•	•	•	•	•
2	Incorrect modification denial (1.B)	•	•	•	•	•	•	•	•	•	•
3	Affidavit of Indebtedness (AOI) preparation (2.A)	•	•	•	•	•	•	•	•	•	•
4	Proof of Claim (POC) (2.B)	•	•	•	•	•	•	•	•	•	•
5	Motion for Relief from Stay (MRS) affidavits (2.C)	•	•	•	•	•	•	•	•	•	•
6	Pre-foreclosure initiation (3.A)	•	•	•	•	•	•	•	•	•	•
7	Pre-foreclosure initiation notifications (3.B)	•	•	•	•	•	•	•	•	•	•
8	Fee adherence to guidance (4.A)	•	•	•	•	•	•	•	•	•	•
9	Adherence to customer payment processing (4.B)	•	•	•	•	•	•	•	•	•	•
10	Reconciliation of certain waived fees (4.C)	•	•	•	•	•	•	•	•	•	•
11	Late fees adherence to guidance (4.D)	•	•	•	•	•	•	•	•	•	•
12	Third-party vendor management (5.A)	•	•	•	•	•	•	•	•	•	•
13	Customer portal (5.B)	•	•	•	•	•	•	•	•	•	•
14	Single Point of Contact (SPOC) (5.C)	•	•	•	•	•	•	•	•	•	•
15	Workforce management (5.D)*							•			
16	Affidavit of Indebtedness (AOI) integrity (5.E)*						•	•			
17	Account status activity (5.F)*							•			
18	Complaint response timeliness (6.A)	•	•	•	•	•	•	•	•	•	•
19	Loan modification document collection timeline compliance (6.B.i)	•	•	•	•	•	•	•	•	•	•
20	Loan modification decision/notification timeline compliance (6.B.ii)	•	•	•	•	•	•	•	•	•	•
21	Loan modification appeal timeline compliance (6.B.iii)	•	•	•	•	•	•	•	•	•	•
22	Short sale decision timeline compliance (6.B.iv)	•	•	•	•	•	•	•	•	•	•
23	Short sale document collection timeline compliance (6.B.v)	•	•	•	•	•	•	•	•	•	•
24	Charge of application fees for loss mitigation (6.B.vi)	•	•	•	•	•	•	•	•	•	•
25	Short sale inclusion notice for deficiency (6.B.vii.a)	•	•	•	•	•	•	•	•	•	•
26	Dual track referred to foreclosure (6.B.viii.a)	•	•	•	•	•	•	•	•	•	•
27	Dual track failure to postpone foreclosure (6.B.viii.b)	•	•	•	•	•	•	•	•	•	•
28	Force-placed insurance timeliness of notices (6.C.i)	•	•	•	•	•	•	•	•	•	•
29	Force-placed insurance termination (6.C.ii)	•	•	•	•	•	•	•	•	•	•
30	Loan Modification Process (7.A)	•	•	•	•	•	•	•	•	•	•
31	Loan Modification Denial Notice Disclosure (7.B)	•	•	•	•	•	•	•	•	•	•
32	SPOC Implementation and Effectiveness (7.C)	•	•	•	•	•	•	•	•	•	•
33	Billing Statement Accuracy (7.D)	•	•	•	•	•	•	•	•	•	•
TOTALS		30	30	30	30	30	31	33	30	30	30

^{*}Policy and procedure metric that is tested once a year.



		FIRST QUARTER 2015 (January 1, 2015 - March 31, 2015)	SECOND QUARTER 2015 (April 1, 2014 - June 30, 2015)	NOT YET TESTED: THIRD QUARTER 2015 (July 1, 2015 - September 30, 2015)
METRIC NO.	TITLE/DESCRIPTION	SunTrust	SunTrust	SunTrust
1	Foreclosure sale in error (1.A)			•
2	Incorrect modification denial (1.B)			•
3	Affidavit of Indebtedness (AOI) preparation (2.A)		•	•
4	Proof of Claim (POC) (2.B)			•
5	Motion for Relief from Stay (MRS) affidavits (2.C)		•	•
6	Pre-foreclosure initiation (3.A)			•
7	Pre-foreclosure initiation notifications (3.B)			•
8	Fee adherence to guidance (4.A)			•
9	Adherence to customer payment processing (4.B)	•	•	•
10	Reconciliation of certain waived fees (4.C)			•
11	Late fees adherence to guidance (4.D)			•
12	Third-party vendor management (5.A)		•	•
13	Customer portal (5.B)		•	•
14	Single Point of Contact (SPOC) (5.C)	•	•	•
15	Workforce management (5.D)*	•		
16	Affidavit of Indebtedness (AOI) integrity (5.E)*	•		
17	Account status activity (5.F)*	•		
18	Complaint response timeliness (6.A)	•	•	•
19	Loan modification document collection timeline compliance (6.B.i)		•	•
20	Loan modification decision/notification timeline compliance (6.B.ii)		•	•
21	Loan modification appeal timeline compliance (6.B.iii)		•	•
22	Short sale decision timeline compliance (6.B.iv)			•
23	Short sale document collection timeline compliance (6.B.v)			•
24	Charge of application fees for loss mitigation (6.B.vi)	•	•	•
25	Short sale inclusion notice for deficiency (6.B.vii.a)			•
26	Dual track referred to foreclosure (6.B.viii.a)			•
27	Dual track failure to postpone foreclosure (6.B.viii.b)			•
28	Force-placed insurance timeliness of notices (6.C.i)			•
29	Force-placed insurance termination (6.C.ii)			•
30	Loan Modification Process (7.A)			•
31	Loan Modification Denial Notice Disclosure (7.B)			•
32	SPOC Implementation and Effectiveness (7.C)	•	•	•
33	Billing Statement Accuracy (7.D)	•	•	•
34	Disclosure of Personally Identifiablte Information in POC (2.D)			•
TOTALS		9	13	31

^{*}Policy and procedure metric that is tested once a year.

Office of Mortgage Settlement Oversight

Bank of America

The Monitor's Secondary Professional Firm (SPF) assigned to Bank of America, Crowe Chizek LLP, tested the IRG's work on 30 metrics during test period 11 and 31 metrics during test period 12. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
	474.73	11	1.00%	Pass		10 / Z A \	11	5.00%	Pass
Foreclosure sale in error	1 (1.A)	12	1.00%	Pass	Complaint response timeliness	18 (6.A)	12	5.00%	Pass
ncorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document	19 (6.B.i)	-11	5.00%	Pass
		12	5.00%	Pass	collection timeline compliance	19 (0.0.1)	12	5.00%	Pass
Affidavit of Indebtedness	3 (2.A)	-11	5.00%	Pass	Loan modification decision/	20 (6.B.ii)	11	10.00%	Pass
AOI) preparation	3 (Z.A)	12	5.00%	Pass	notification timeline compliance		12	10.00%	Pass
2	4 (2.0)	- 11	5.00%	Pass	Loan modification	21.66 P.113	11	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	12	5.00%	Pass	appeal timeline compliance	21 (6.B.iii)	12	10.00%	Pass
Motion for Relief from 5 (2.C) Stay (MRS) affidavits	F / P / P	11	5.00%	Pass	Short Sale decision	MANAGE BOOK	11	10.00%	Pass
	5 (Z.C)	12	5.00%	Pass	timeline compliance	22 (6.B.iv)	12	10.00%	Pass
Pre-foreclosure initiation 6 (3	.varagravav	11	5.00%	Pass	Short Sale document	23 (6.B.v)	-11	5.00%	Pass
	6 (3.A)	12	5.00%	Pass	collection timeline compliance	23 (0.0.7)	12	5.00%	Pass
Pre-foreclosure initiation notifications	474.40	11	5.00%	Pass	Charge of application fees	27.22.2 1	-11	1.00%	Pass
	7 (3.B)	12	5.00%	Pass	for loss mitigation	24 (6.B.vi)	12	1,00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice	ALCO A LLV	11	5.00%	Pass
		12	5.00%	Pass	for deficiency	25 (6.B.vii.a)	12	5.00%	Pass
Adherence to customer	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	**************************************	11	5.00%	Pass
payment processing		12	5.00%	Pass		26 (6.B.viii.a)	12	5.00%	Pass
Reconciliation of certain	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	A	-11	5.00%	Pass
vaived fees		12	5.00%	Pass		27 (6.B.viii.b)	12	5.00%	Pass
2 6 9 2 67	11 (4.D)	11	5.00%	Pass	Force-placed insurance	28 (6.C.i)	-11	5.00%	Pass
ate fees adherence to guidance		12	5.00%	Pass	timeliness of notices		12	5.00%	Pass
2000	AW K	11	N/A	Pass	Force-placed insurance	29 (6,C.ii)	11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	termination		12	5.00%	Pass
	22.72	11	N/A	Pass			11	5.00%	Pass
Customer portal	13 (5.B)	12	N/A	Pass	Loan modification process	30 (7.A)	12	5.00%	Pass
	transarian.	11	5.00%	Pass	Loan modification denial		-11	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5,C)	12	5.00%	Pass	notice disclosure	31 (7.B)	12	5.00%	Pass
		11	N/A	X	SPOC implementation		-11	5.00%	Pass
Norkforce management	15 (5.D) **	12	N/A	X	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness		11	N/A	X	2		11	5.00%	Pass
AOI) integrity	16 (5.E) **	12	N/A	Pass	Billing statement accuracy	33 (7.D)	12	5.00%	Pass
	and the second	11	N/A	X					de .
Account status activity	17 (5.F) **	12	N/A	×	*Test question 4 only. **Policy and proced	and and an experience of		a ***Test Ourselies 1 and	SG

Chase



The Monitor's Secondary Professional Firm (SPF) assigned to Chase, Grant Thornton LLP, tested the IRG's work on 30 metrics during test period 11 and 33 metrics during test period 12. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROF RATE IF FAILED
	1 (1.A)	11	1.00%	Pass		10 / C A \	11	5.00%	Pass
Foreclosure sale in error		12	1.00%	Pass	Complaint response timeliness	18 (6.A)	12	5.00%	Pass
	20124 2007	11	5.00%	Pass	Loan modification document	40 (C D I)	-11	5.00%	Pass
ncorrect modification denial	2 (1.B)	12	5.00%	Pass	collection timeline compliance	19 (6.B.i)	12	5.00%	Pass
Affidavit of Indebtedness	2 (2 1)	11	5.00%	Pass	Loan modification decision/	20 // 8 //	11	10.00%	Pass
(AOI) preparation	3 (2.A)	12	5.00%	Pass	notification timeline compliance	20 (6.B.ii)	12	10.00%	Pass
	1/0.53	11	5.00%	Pass	Loan modification	n. / c. n	11	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	12	5.00%	Pass	appeal timeline compliance	21 (6.B.iii)	12	10.00%	Pass
Motion for Relief from 5 (2.C)	Tar star save	11	5.00%	Pass	Short Sale decision	*****	11	10.00%	Pass
	5 (2.C)	12	5.00%	Pass	timeline compliance	22 (6.B.iv)	12	10.00%	Pass
Pre-foreclosure initiation 6 (3.A)	Sulvania Control Control	11	5.00%	Pass	Short Sale document	NUMBER OF STREET	-11	5.00%	Pass
	6 (3.A)	12	5.00%	Pass	collection timeline compliance	23 (6.B.v)	12	5.00%	Pass
Pre-foreclosure initiation	10000000	-11	5.00%	Pass	Charge of application fees	23 C 120 C 120 C 120	11	1.00%	Pass
	7 (3.B)	12	5.00%	Pass	for loss mitigation	24 (6.B.vi)	12	1,00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice	100 MODEL TO 80	11	5.00%	Pass
		12	5.00%	Pass	for deficiency	25 (6.B.vii.a)	12	5.00%	Pass
Adherence to customer	9 (4.8)	11	5.00%	Pass	Dual track referred to foreclosure		11	5.00%	Pass
payment processing		12	5.00%	Pass		26 (6.B.viii.a)	12	5.00%	Pass
Reconciliation of certain	T CARL TALKAT A LITT IN	11	5.00%	Pass	Dual track failure to	Auditorial Control Control	11	5.00%	Pass
vaived fees	10 (4.C)	12	5.00%	Pass	postpone foreclosure	27 (6.B.viii.b)	12	5.00%	Pass
14 W W P2 VIV	11 (4.D)	-11	5.00%	Pass	Force-placed insurance	28 (6.C.i)	-11	5.00%	Pass
ate fees adherence to guidance		12	5.00%	Pass	timeliness of notices		12	5.00%	Pass
	are a	11	N/A	Pass	Force-placed insurance	29 (6.C.ii)	11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	termination		12	5.00%	Pass
		11	N/A	Pass			11	5.00%	Pass
Customer portal	13 (5.B)	12	N/A	Pass	Loan modification process	30 (7.A)	12	5.00%	Pass
		11	5.00%	Pass	Loan modification denial		-11	5.00%	Pass
ingle Point of Contact (SPOC)*	14 (5.C)	12	5.00%	Pass	notice disclosure	31 (7.B)	12	5.00%	Pass
EN SWEET		11	N/A	X	SPOC Implementation		11	5.00%	Pass
Vorkforce management	15 (5.D) **	12	N/A	Pass	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness		11	N/A	X	(20)	100000000	11	5.00%	Pass
(AOI) integrity	16 (5.E) **	12	N/A	Pass	Billing statement accuracy	33 (7.D)	12	5.00%	Pass
		11	N/A	X					1000
Account status activity	17 (5.F) **	12	N/A	Pass	PARTICULAR PARTICULAR PROPERTY AND ARREST AND ARREST AND ARREST AND ARREST ARRE			ar. ***Test Question 1 onl	





The Monitor's Secondary Professional Firm (SPF) assigned to Citi, BKD, LLP, tested the IRG's work on 30 metrics during test period 11 and 30 metrics during test period 12. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
	4 74 88	11	1.00%	Pass	Constitution of the state of th	10 / Z A \	11	5.00%	Pass
Foreclosure sale in error	1 (1,A)	12	1.00%	Pass	Complaint response timeliness	18 (6.A)	12	5.00%	Pass
Incorrect modification denial	2 (1.8)	11	5.00%	Pass	Loan modification document	10 (C D I)	-11	5.00%	Pass
	2 (1.0)	12	5.00%	Pass	collection timeline compliance	19 (6.B.i)	12	5.00%	Pass
Affidavit of Indebtedness	272.41	-11	5.00%	Pass	Loan modification decision/	20 (6 8 %)	11	10.00%	Pass
(AOI) preparation	3 (2.A)	12	5.00%	Pass	notification timeline compliance	20 (6.B.ii)	12	10.00%	Pass
2	4 (2.0)	- 11	5.00%	Pass	Loan modification	21.77.0 (12)	11	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	12	5.00%	Pass	appeal timeline compliance	21 (6.B.iii)	12	10.00%	Pass
Motion for Relief from 5 (2.C) Stay (MRS) affidavits	E /2 /2	11	5.00%	Pass	Short Sale decision	22.22.513	11	10.00%	Pass
	5 (2.0)	12	5.00%	Pass	timeline compliance	22 (6.B.iv)	12	10.00%	Pass
Pre-foreclosure initiation 6 (3	2 22 43	11	5.00%	Pass	Short Sale document	23 (6.B.v)	-11	5.00%	Pass
	6 (3.A)	12	5.00%	Pass	collection timeline compliance	23 (0.0.7)	12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees	21/21/21	11	1.00%	Pass
		12	5.00%	Pass	for loss mitigation	24 (6.B.vi)	12	1,00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (4 5)	11	5.00%	Pass
		12	5.00%	Pass		25 (6.B.vii.a)	12	5.00%	Pass
Adherence to customer	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure 26 (6.	02/2/ D	11	5.00%	Pass
payment processing		12	5.00%	Pass		26 (6.B.viii.a)	12	5.00%	Pass
Reconciliation of certain	10 (1 (2)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 // B L X	-11	5.00%	Pass
vaived fees	10 (4.C)	12	5.00%	Pass		27 (6.B.viii.b)	12	5.00%	Pass
9 6 9 9 9 9 FF	11 (4.D)	- 11	5.00%	Pass	Force-placed insurance	20/402	11	5.00%	Pass
ate fees adherence to guidance		12	5.00%	Pass	timeliness of notices	28 (6.C.i)	12	5.00%	Pass
	10 (5.4)	11	N/A	Pass	Force-placed insurance	29 (6,C.ii)	11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	termination		12	5.00%	Pass
	10 / 5 0	11	N/A	Pass	100	20/7/	11	5.00%	Pass
Customer portal	13 (5.B)	12	N/A	Pass	Loan modification process	30 (7.A)	12	5.00%	Pass
	11250	11	5.00%	Pass	Loan modification denial	21 (7.0)	-11	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	12	5.00%	Pass	notice disclosure	31 (7.B)	12	5.00%	Pass
V. 16	4E (E D) ++	11	N/A	×	SPOC implementation	22 (7.6)	11	5.00%	Pass
Norkforce management	15 (5.D) **	12	N/A	×	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness	37 /5 53 44	11	N/A	×	Pilli	22 (75)	11	5.00%	Pass
(AOI) integrity	16 (5.E) **	12	N/A	X	Billing statement accuracy	33 (7.D)	12	5.00%	Pass
	And the last	11	N/A	X					
Account status activity	17 (5.F) **	12	N/A	X	*Test question 4 only. **Policy and proced	government grant garden og g		*****	N

Ditech



The Monitor's Secondary Professional Firm (SPF) assigned to Ditech, Baker Tilly Virchow Krause, LLP, tested the IRG's work on 30 metrics during test period 11 and 30 metrics during test period 12. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
	1 (1.A)	11	1.00%	Pass		10 / Z A \	11	5.00%	Pass
Foreclosure sale in error		12	1.00%	Pass	Complaint response timeliness	18 (6.A)	12	5.00%	Pass
ncorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document	10 (6 0 1)	-11	5.00%	Pass
		12	5.00%	Pass	collection timeline compliance	19 (6.B.i)	12	5.00%	Pass
Affidavit of Indebtedness	2 (2 4)	-11	5.00%	Pass	Loan modification decision/	22.22.23	11	10.00%	Pass
AOI) preparation	3 (2.A)	12	5.00%	Pass	notification timeline compliance	20 (6.B.ii)	12	10.00%	Pass
	4 (0.0)	11	5.00%	Pass	Loan modification	21 (4 0)	11	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	12	5.00%	Pass	appeal timeline compliance	21 (6.B.iii)	12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	F / D / D	11	5.00%	Pass	Short Sale decision	22.22.512	11	10.00%	Pass
	5 (2.C)	12	5.00%	Pass	timeline compliance	22 (6.B.iv)	12	10.00%	Pass
Pre-foreclosure initiation 6 (3	. Variabria V	11	5.00%	Pass	Short Sale document	WA 22 K Y	-11	5.00%	Pass
	6 (3.A)	12	5.00%	Pass	collection timeline compliance	23 (6.B.v)	12	5.00%	Pass
Pre-foreclosure initiation obtifications	472.40	11	5.00%	Pass	Charge of application fees	27322 8	-11	1.00%	Pass
	7 (3.B)	12	5.00%	Pass	for loss mitigation	24 (6.B.vi)	12	1,00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	A. 12 A. 11 V	11	5.00%	Pass
		12	5.00%	Pass		25 (6.B.vii.a)	12	5.00%	Pass
Adherence to customer	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure 26 (6.		11	5.00%	Pass
payment processing		12	5.00%	Pass		26 (6.B.viii.a)	12	5.00%	Pass
Reconciliation of certain	TENER SET	11	5.00%	Pass	Dual track failure to	ALCO DE CONTROL DE CON	-11	5.00%	Pass
vaived fees	10 (4.C)	12	5.00%	Pass	postpone foreclosure	27 (6.B.viii.b)	12	5.00%	Pass
0 2 4 0 2 22	-0.0000000	-11	5.00%	Pass	Force-placed insurance	22222	11	5.00%	Pass
ate fees adherence to guidance	11 (4.D)	12	5.00%	Pass	timeliness of notices	28 (6.C.i)	12	5.00%	Pass
200.00	AWK	11	N/A	Pass	Force-placed insurance	29 (6,C.ii)	11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	termination		12	5.00%	Pass
		- 11	N/A	Pass			11	5.00%	Pass
Customer portal	13 (5.B)	12	N/A	Pass	Loan modification process	30 (7.A)	12	5.00%	Pass
	THE PROPERTY AND THE	11	5.00%	Pass	Loan modification denial	oraner.	-11	5.00%	Pass
ingle Point of Contact (SPOC)*	14 (5.C)	12	5.00%	Pass	notice disclosure	31 (7.B)	12	5.00%	Pass
22 Mar.		- 11	N/A	X	SPOC implementation	22.02520	11	5.00%	Pass
Norkforce management	15 (5.D) **	12	N/A	×	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness	17. 22.22	11	N/A	×	6000	223558	11	5.00%	Pass
AOI) integrity	16 (5.E) **	12	N/A	×	Billing statement accuracy	33 (7.D)	12	5.00%	Pass
		11	N/A	×					
Account status activity	17 (5.F) **	12	N/A	×	*Test question 4 only **Policy and proces			The selection of the se	1





The Monitor's Secondary Professional Firm (SPF) assigned to Wells Fargo, RSM US LLP, tested the IRG's work on 30 metrics during test period 11 and 30 metrics during test period 12. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)
	1 (1.A)	11	1.00%	Pass		10 / Z A \	11	5.00%	Pass
Foreclosure sale in error		12	1.00%	Pass	Complaint response timeliness	18 (6.A)	12	5.00%	Pass
ncorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document	10 (6 0 1)	-11	5.00%	Pass
		12	5.00%	Pass	collection timeline compliance	19 (6.B.i)	12	5.00%	Pass
Affidavit of Indebtedness	272.41	- 11	5.00%	Pass	Loan modification decision/	22.22.23	-11	10.00%	Pass
AOI) preparation	3 (2.A)	12	5.00%	Pass	notification timeline compliance	20 (6.B.ii)	12	10.00%	Pass
2 2 2 3 3 3 32223	1 (0.0)	11	5.00%	Pass	Loan modification	21.66 0.00	11	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	12	5.00%	Pass	appeal timeline compliance	21 (6.B.iii)	12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	16.29.293	11	5.00%	Pass	Short Sale decision	WW.22.00.00	11	10.00%	Pass
	5 (2.C)	12	5.00%	Pass	timeline compliance	22 (6.B.iv)	12	10.00%	Pass
Pre-foreclosure initiation 6 (3	. Variabria V	11	5.00%	Pass	Short Sale document	WA 22 K Y	-11	5.00%	Pass
	6 (3.A)	12	5.00%	Pass	collection timeline compliance	23 (6.B.v)	12	5.00%	Pass
Pre-foreclosure initiation 7	474.60	- 11	5.00%	Pass	Charge of application fees	27222 8	-11	1.00%	Pass
	7 (3.B)	12	5.00%	Pass	for loss mitigation	24 (6.B.vi)	12	1,00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	A. 12 A	11	5.00%	Pass
		12	5.00%	Pass		25 (6.B.vii.a)	12	5.00%	Pass
Adherence to customer	9 (4.B)	- 11	5.00%	Pass	Dual track referred to foreclosure 26 (6.		11	5.00%	Pass
payment processing		12	5.00%	Pass		26 (6.B.viii.a)	12	5.00%	Pass
Reconciliation of certain	TENER SET	11	5.00%	Pass	Dual track failure to	ALCO DE CONTROL DE CON	-11	5.00%	Pass
vaived fees	10 (4.C)	12	5.00%	Pass	postpone foreclosure	27 (6.B.viii.b)	12	5.00%	Pass
0 2 4 0 2 22		- 11	5.00%	Pass	Force-placed insurance	222222	11	5.00%	Pass
ate fees adherence to guidance	11 (4.D)	12	5.00%	Pass	timeliness of notices	28 (6.C.i)	12	5.00%	Pass
200.00	AUG S	11	N/A	Pass	Force-placed insurance	29 (6,C.ii)	11	5.00%	Pass
Third-party vendor management	12 (5.A)	12	N/A	Pass	termination		12	5.00%	Pass
		11	N/A	Pass			11	5.00%	Pass
Customer portal	13 (5.B)	12	N/A	Pass	Loan modification process	30 (7.A)	12	5.00%	Pass
	CHANGEREE	11	5.00%	Pass	Loan modification denial	oraner.	-11	5.00%	Pass
ingle Point of Contact (SPOC)*	14 (5.C)	12	5.00%	Pass	notice disclosure	31 (7.B)	12	5.00%	Pass
er mae		- 11	N/A	×	SPOC implementation	2232	11	5.00%	Pass
Norkforce management	15 (5.D) **	12	N/A	×	and effectiveness***	32 (7.C)	12	5.00%	Pass
Affidavit of Indebtedness	15 00-15	11	N/A	×	6000	223558	11	5.00%	Pass
AOI) integrity	16 (5.E) **	12	N/A	×	Billing statement accuracy	33 (7.D)	12	5.00%	Pass
		11	N/A	×					
Account status activity	17 (5.F) **	12	N/A	×	*Test question 4 only **Policy and proces	g contraction of property		The selection of the se	1

SunTrust

Office of Settlement Oversight

The Monitor's Secondary Professional Firm (SPF) assigned to SunTrust, Crowe Chizek, LLP, tested the IRG's work on 9 metrics during the first quarter of 2015 and 13 metrics during the second quarter of 2015. The chart below illustrates the results of the IRG's tests.

METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC NUMBER	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROF RATE IF FAILED)
	4.994.994	Q1 2015	1.00%	X		*****	Q1 2015	5.00%	Pass
Foreclosure sale in error	1 (1.A)	Q2 2015	1.00%	X	Complaint response timeliness	18 (6.A)	Q2 2015	5.00%	Pass
	2 (1.B)	Q1 2015	5.00%	×	Loan modification document	19 (6.B.i)	Q1 2015	5.00%	X
Incorrect modification denial		Q2 2015	5.00%	×	collection timeline compliance		Q2 2015	5.00%	Pass
Affidavit of Indebtedness	4.44.44	Q1 2015	5.00%	X	Loan modification decision/	(20 (20 (20))	Q1 2015	10.00%	×
(AOI) preparation	3 (2.A)	Q2 2015	5.00%	Pass	notification timeline compliance	20 (6.B.ii)	Q2 2015	10.00%	Pass
n / (s): (nos)	4 (0.0)	Q1 2015	5.00%	×	Loan modification	21.46.0.00	Q1 2015	10.00%	×
Proof of Claim (POC)	4 (2.B)	Q2 2015	5.00%	X	appeal timeline compliance	21 (6.B.iii)	Q2 2015	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	F 20 20	Q1 2015	5.00%	X	Short Sale decision	NAME OF STREET	Q1 2015	10.00%	×
	5 (2.C)	Q2 2015	5.00%	Pass	timeline compliance	22 (6.B.iv)	Q2 2015	10.00%	X
Pre-foreclosure initiation	6 (2 A)	Q1 2015	5.00%	×	Short Sale document	22 (6 0.4)	Q1 2015	5.00%	×
	6 (3.A)	Q2 2015	5.00%	×	collection timeline compliance	23 (6.B.v)	Q2 2015	5.00%	X
Pre-foreclosure initiation	7 (2 0)	Q1 2015	5.00%	×	Charge of application fees	24 (6 P. 0	Q1 2015	1.00%	Pass
notifications	7 (3.B)	Q2 2015	5.00%	×	for loss mitigation	24 (6.B.vi)	Q2 2015	1,00%	Pass
Fee adherence to guidance	8 (4.A)	Q1 2015	5.00%	×	Short Sale inclusion notice	25 (6.B.vii.a)	Q1 2015	5.00%	×
		Q2 2015	5.00%	×	for deficiency	23 (0.D.VII.a)	Q2 2015	5.00%	×
Adherence to customer	9 (4.B)	Q1 2015	5.00%	Pass	Dual track referred	26 (6.B.viii.a)	Q1 2015	5.00%	X
payment processing		Q2 2015	5.00%	Pass	to foreclosure	20 (0.D.VIII.d)	Q2 2015	5.00%	X
Reconciliation of certain	10 (4.C)	Q1 2015	5.00%	×	Dual track failure to postpone foreclosure 27 (6.8 vi	27.// P h)	Q1 2015	5.00%	×
waived fees		Q2 2015	5.00%	×		27 (6.D.VIII,D)	Q2 2015	5.00%	X
Late fees adherence to guidance	11 (4.D)	Q1 2015	5.00%	×	Force-placed insurance	28 (6.C.i)	Q1 2015	5.00%	×
Late lees aunerence to guidance	11 (4.0)	Q2 2015	5.00%	X	timeliness of notices	20 (0.0.1)	Q2 2015	5.00%	×
Third-party vendor management	12 (5.A)	Q1 2015	N/A	X	Force-placed insurance	29 (6.C.ii)	Q1 2015	5.00%	×
inira-party vendor management	12 (3.A)	Q2 2015	N/A	Pass	termination	29 (6,C.II)	Q2 2015	5.00%	×
Customer portal	13 (5.B)	Q1 2015	N/A	X	Loan modification process	30 (7.A)	Q1 2015	5.00%	X
customer portar	13 (3.0)	Q2 2015	N/A	Pass	Loan mounication process	30 (7.4)	Q2 2015	5.00%	X
Single Point of Contact (SPOC)*	14 (5.C)	Q1 2015	5.00%	Pass	Loan modification denial	31 (7.B)	Q1 2015	5.00%	×
single Fourt of Contact (SFOC)	19 (3.02	Q2 2015	5.00%	Pass	notice disclosure	51 (7.0)	Q2 2015	5.00%	X
Workforce management	15 (5.D) **	Q1 2015	N/A	Pass	SPOC implementation	32 (7.C)	Q1 2015	5.00%	Pass
worktorce management	13 (3.0)	Q2 2015	N/A	X	and effectiveness***	32 (7.0)	Q2 2015	5.00%	Pass
Affidavit of Indebtedness	16 (5.E) **	Q1 2015	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2015	5.00%	Pass
(AOI) integrity	10 (3.12)	Q2 2015	N/A	X	Billing statement accuracy	33 (7.17)	Q2 2015	5.00%	Pass
Account status activity	17 (5.F) **	Q1 2015	N/A	Pass	Disclosure of personally	34 (2.D)	Q1 2015	3.50%	×
Account Status activity	17 (3.7)	Q2 2015	N/A	×	identifiable information in POC	34 (2.0)	Q2 2015	3.50%	X