

Office of
Mortgage Settlement
Oversight

*Update on HSBC and
SunTrust's Compliance*

A Report from the Monitor of the National Mortgage Settlement



December 15, 2016

Executive Summary

I have filed a set of two compliance reports with the United States District Court for the District of Columbia as Monitor of the National Mortgage Settlement (NMS or Settlement). These reports detail my review of HSBC and SunTrust's performance on the Settlement's servicing standards.

This report is a summary and includes:

- An overview of the process through which my team and I reviewed the servicers' work.
- Summaries of each servicer's performance for the first and second the second quarter 2016.
- Updates on the corrective steps servicers have taken to address failed metrics.

This is my first report on HSBC's compliance with the NMS. HSBC entered into a consent judgment in March 2016 requiring the company to provide \$370 million in consumer relief and comply with the NMS servicing standards.

I have concluded that HSBC did not fail any metrics for the first and second quarters 2016. SunTrust failed one metric, Metric 8.

Sincerely,



Joseph A. Smith, Jr.

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Introduction

As required by the Settlement, I filed compliance reports with the United States District Court for the District of Columbia (the Court) for two servicers subject to the Settlement: HSBC and SunTrust.

The reports I filed provide my results from testing compliance with the NMS servicing standards from the first and second quarters 2016. These reports are the first for HSBC and third for SunTrust. Copies of all the reports are available on my website, mortgageoversight.com.

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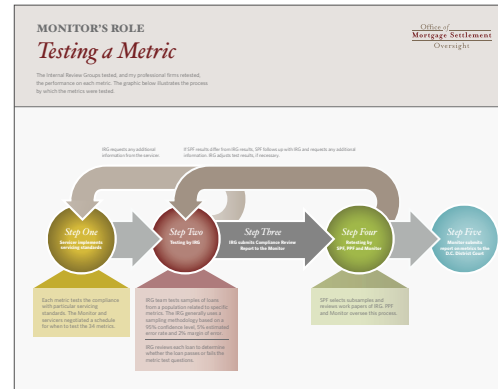
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As Monitor, I evaluate the servicers using the 34 metrics, or tests, enumerated in the Settlement. These metrics determine whether the servicers adhere to the 304 servicing standards, or rules, contained in the NMS.

To evaluate the servicers, I work with a team of professionals. Each servicer follows work plans in which an internal review group (IRG) determines whether the servicer complied with the Settlement terms. My professionals and I then review the work of each servicer's IRG. I determine if the IRG's work was satisfactory and report my findings to the Court and the public. For more information about the oversight and review process, please see my [previous reports](#).



See **Appendix i** for larger version

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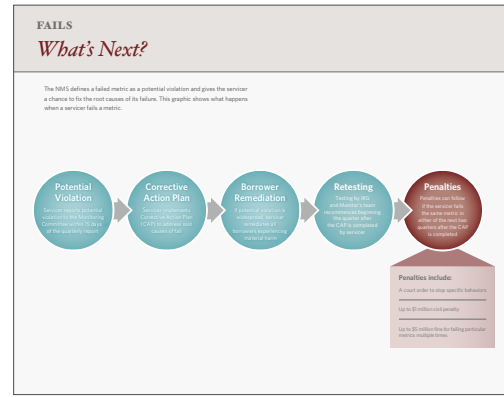
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The NMS defines a failed metric as a potential violation and gives the servicer a chance to fix the root causes of its failure. For more information on what happens when a servicer fails a metric, see the graphic in the Appendix. I also included information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

This report covers the first and second quarters 2016, and I tested each of the servicers on up to 34 metrics.

The work to test the servicers in the first and second quarters 2016 involved 73 professionals, including my primary professional firms, secondary professional firms and other professionals who dedicated approximately 30,410 hours.



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Neither HSBC's IRG nor my professionals found evidence of fails of any of the metrics tested in the first and second quarters 2016.

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		Q2 2016	1.00%	Pass			Q2 2016	5.00%	X*
Incorrect modification denial	2 (1.B)	Q1 2016	5.00%	X	Loan modification document collection timeline compliance	19 (6.B.i)	Q1 2016	5.00%	X
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	Q1 2016	5.00%	Pass	Loan modification decision/notification timeline compliance	20 (6.B.ii)	Q1 2016	10.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	Q1 2016	5.00%	X	Loan modification appeal timeline compliance	21 (6.B.iii)	Q1 2016	10.00%	Pass
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Motion for Relief from Stay (MRS) affidavits	5 (2.C)	Q1 2016	5.00%	X*	Short Sale decision timeline compliance	22 (6.B.iv)	Q1 2016	10.00%	Pass
		Q2 2016	5.00%	X*			Q2 2016	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	Q1 2016	5.00%	X	Short Sale document collection timeline compliance	23 (6.B.v)	Q1 2016	5.00%	X*
Pre-foreclosure initiation notifications	7 (3.B)	Q2 2016	5.00%	Pass	Change of application fees for loss mitigation	24 (6.B.vi)	Q1 2016	1.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	1.00%	Pass
Fee adherence to guidance	8 (4.A)	Q1 2016	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	Q1 2016	5.00%	X
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	Q1 2016	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	Q1 2016	5.00%	X
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	Q1 2016	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	Q1 2016	5.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	Q1 2016	5.00%	X	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2016	5.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Third-party vendor management	12 (5.A)	Q1 2016	N/A	X	Force-placed insurance termination	29 (6.C.ii)	Q1 2016	5.00%	X
		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
Customer portal	13 (5.B)	Q1 2016	N/A	Pass	Loan modification process	30 (7.A)	Q1 2016	5.00%	X
		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
Single Point of Contact (SPOC)**	14 (5.C)	Q1 2016	5.00%	X	Loan modification denial notice disclosure	31 (7.B)	Q1 2016	5.00%	X
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Workforce management	15 (5.D)**	Q1 2016	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	Q1 2016	5.00%	X
		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	Q1 2016	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2016	5.00%	X
		Q2 2016	N/A	X			Q2 2016	5.00%	Pass
Account status activity	17 (5.F)**	Q1 2016	N/A	Pass	Disclosure of Personally Identifiable Information in POC	34 (2.D)	Q1 2016	3.50%	Pass
		Q2 2016	N/A	X			Q2 2016	3.50%	Pass

* Test question 4 only. ** Policy and procedure metric that is tested once a year. *** Test Question 1 only. N/A: Threshold error rate not applicable. X: Metric was not tested in that specific test period.
 X*: The eligible population was less than 100 loans. In accordance with Exhibit E-1, the Metric was excluded from testing.

See **Appendix iii** for larger version

SunTrust Results

During the first and second quarters 2016, SunTrust failed one metric in Q1 2016, Metric 8.

SCORECARD					Office of Mortgage Settlement Oversight				
<i>SunTrust</i>									
The Monitor's Secondary Professional Firm (SPF) assigned to SunTrust, Crowe Horwath LLP, tested the IRG's work on 34 metrics during the first quarter 2016 and 30 metrics during the second quarter 2016. This chart 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)
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		Q2 2016	5.00%	Pass			Q2 2016	10.00%	Pass
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Pre-foreclosure initiation	6 (3.A)	Q1 2016	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	Q1 2016	5.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	Q1 2016	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2016	1.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	1.00%	Pass
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		Q2 2016	5.00%	CAP Pending			Q2 2016	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	Q1 2016	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	Q1 2016	5.00%	Pass
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		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	Q1 2016	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2016	5.00%	Pass
		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Third-party vendor management	12 (5.A)	Q1 2016	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	Q1 2016	5.00%	Pass
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Customer portal	13 (5.B)	Q1 2016	N/A	Pass	Loan modification process	30 (7.A)	Q1 2016	5.00%	Pass
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Workforce management	15 (5.D)**	Q1 2016	N/A	Pass	SPOC implementation and effectiveness***	32 (7.C)	Q1 2016	5.00%	Pass
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Update on SunTrust's Corrective Actions

Metric 8

This metric tests whether SunTrust properly collected default-related fees from borrowers. Those fees include property preservation fees, valuation fees and attorneys' fees.

SunTrust submitted its proposed Corrective Action Plan in December 2016. My professionals and I are reviewing it and will determine if the CAP is sufficient to address the root causes of the failure, then SunTrust will implement the CAP before testing resumes.

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I will continue to monitor the compliance of HSBC and SunTrust with the NMS Servicing Standards. I will report on my review of the next two test periods to the Court and the public in early 2017.

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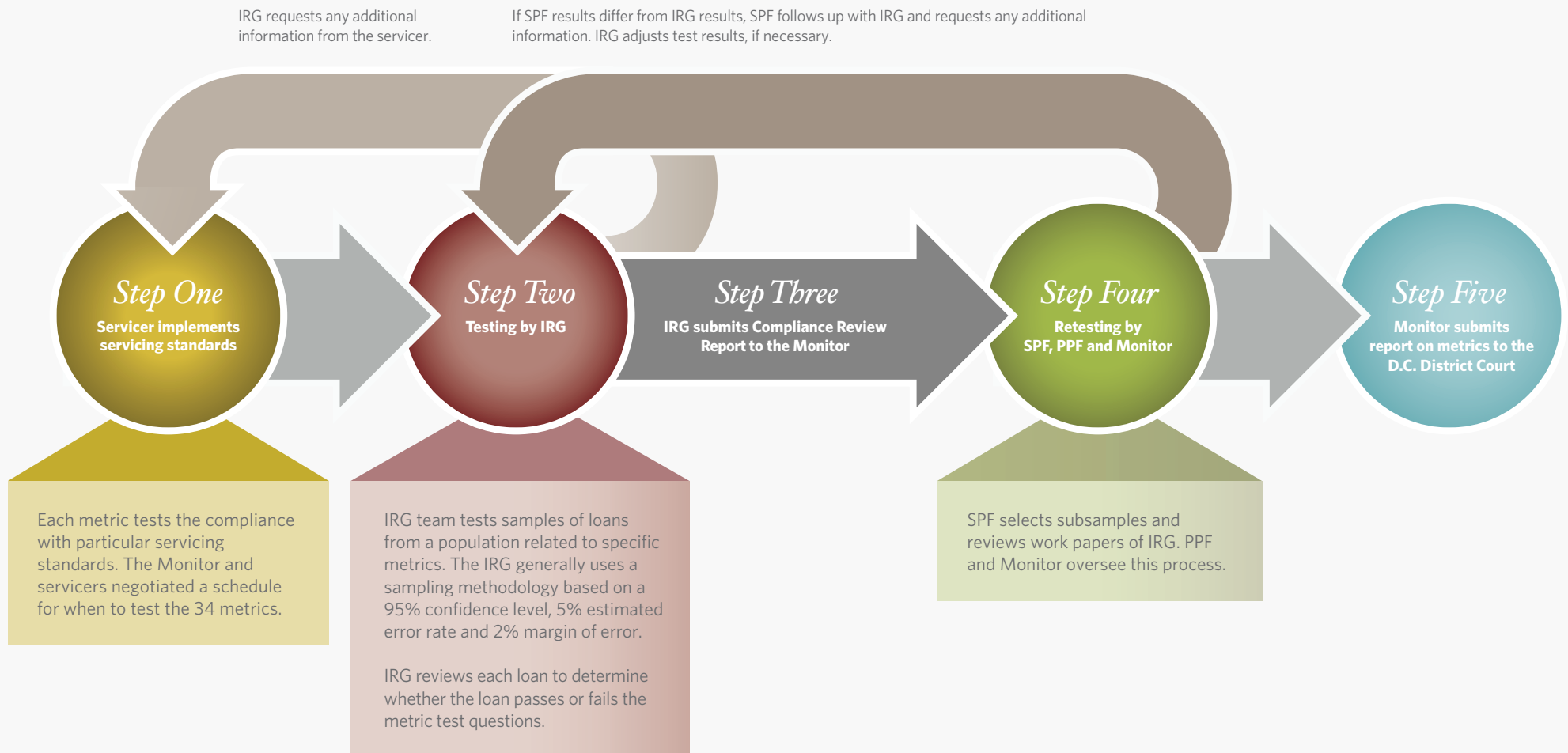
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MONITOR'S ROLE

Testing a Metric

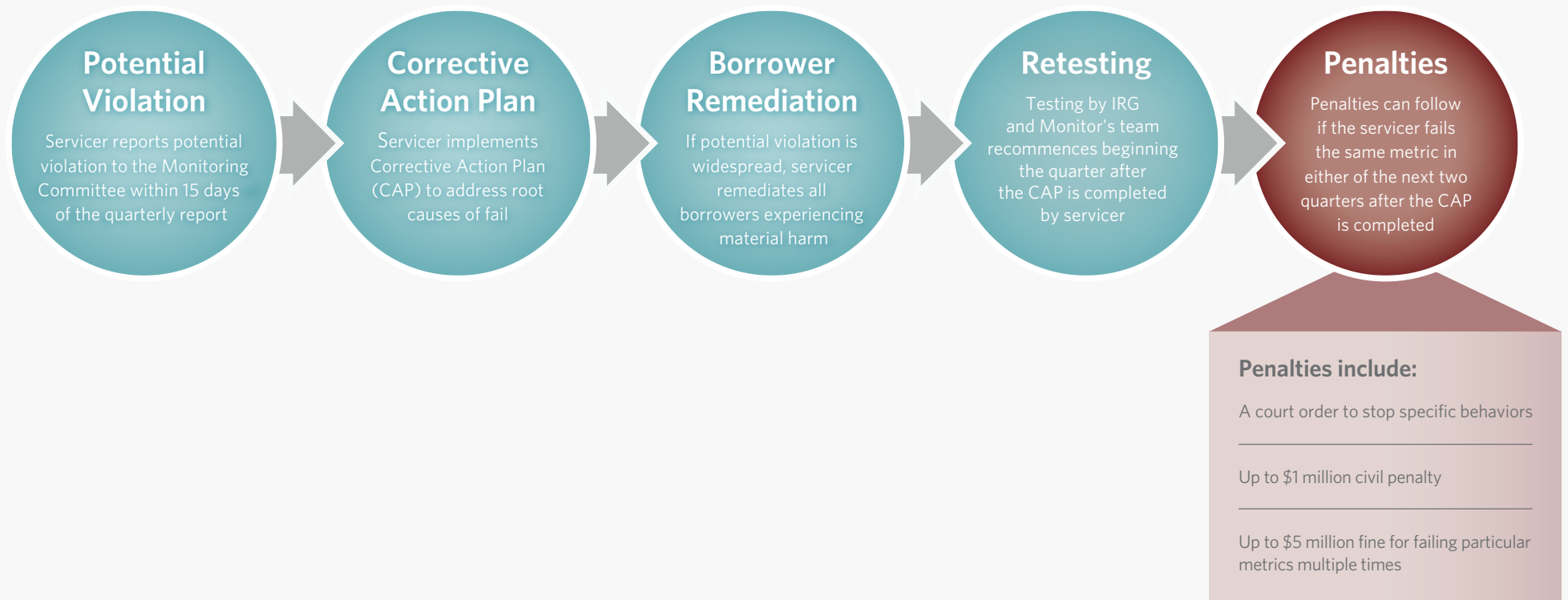
The Internal Review Groups tested, and my professional firms retested, the performance on each metric. The graphic below illustrates the process by which the metrics were tested.



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. This graphic shows what happens when a servicer fails a metric.



SCORECARD

HSBC

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