

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**. Executive Summary

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Oversight Process

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**.

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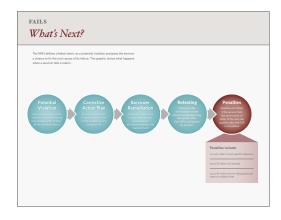


Oversight Process

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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HSBC Results

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

		sfessional Firm (SPF) assigned to HSBC, RSM US LLP, tested the IRG's work on 14 metrics during) metrics during the second quarter 2016. This chart illustrates the results of the IRG's tests.					Office of Mortgage Settleme Oversight				
METRIC NAME	METRIC	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERROR RATE IF FAILED)	METRIC NAME	METRIC	TEST PERIOD	THRESHOLD ERROR RATE	RESULT (ERRO RATE IF FAILED		
Foreclosure sale in error	1 (1.A)	Q1 2016	1.00%	×	Complaint response timeliness	18 (6.A)	Q1 2016	5.00%	Х*		
Incorrect modification denial	2 (1.8)	Q2 2016 Q1 2016 Q2 2016	1.00% 5.00% 5.00%	Pass X Pass	Loan modification document collection timeline compliance	19 (6.B.i)	Q2 2016 Q1 2016 Q2 2016	5.00% 5.00% 5.00%	X* X Pass		
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	Q1 2016 Q2 2016	5.00%	Pass Pass	Loan modification decision/ notification timeline compliance	20 (6.8.ii)	Q1 2016 Q2 2016	10.00%	Pass		
Proof of Claim (POC)	4 (2.B)	Q1 2016 Q2 2016	5.00%	X Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	Q1 2016 Q2 2016	10.00%	Pass Pass		
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	Q1 2016 Q2 2016	5.00%	X* X*	Short Sale decision timeline compliance	22 (6.B.iv)	Q1 2016 Q2 2016	10.00%	Pass Pass		
Pre-foreclosure initiation	6 (3.A)	Q1 2016 Q2 2016	5.00%	X Pass	Short Sale document collection timeline compliance	23 (6.8.v)	Q1 2016 Q2 2016	5.00%	X* Pass		
Pre-foreclosure initiation notifications	7 (3.B)	Q1 2016 Q2 2016	5.00%	X Pass	Charge of application fees for loss mitigation	24 (6.8.vi)	Q1 2016 Q2 2016	1.00%	Pass Pass		
Fee adherence to guidance	8 (4.A)	Q1 2016 Q2 2016	5.00%	Pass Pass	Short Sale inclusion notice for deficiency	25 (6.8.vii.a)	Q1 2016 Q2 2016	5.00%	X Pass		
Adherence to customer payment processing	9 (4.B)	Q1 2016 Q2 2016	5.00%	Pass Pass	Dual track referred to foreclosure	26 (6.B.vii.a)	Q1 2016 Q2 2016	5.00%	X Pass		
Reconciliation of certain waived fees	10 (4.C)	Q1 2016 Q2 2016	5.00%	Pass Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	Q1 2016 Q2 2016	5.00%	Pass Pass		
Late fees adherence to guidance	11 (4.D)	Q1 2016 Q2 2016	5.00%	X Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2016 Q2 2016	5.00%	Pass Pass		
Third-party vendor management	12 (5.A)	Q1 2016 Q2 2016	N/A N/A	X Pass	Force-placed insurance termination	29 (6.C.ii)	Q1 2016 Q2 2016	5.00%	X Pass		
Customer portal	13 (5.B)	Q1 2016 Q2 2016	N/A N/A	Pass Pass	Loan modification process	30 (7.A)	Q1 2016 Q2 2016	5.00%	X Pass		
Single Point of Contact (SPOC)*	14 (5.C)	Q1 2016 Q2 2016	5.00% 5.00%	X Pass	Loan modification denial notice disclosure	31 (7.B)	Q1 2016 Q2 2016	5.00%	X Pass		
Workforce management	15 (5.D) **	Q1 2016 Q2 2016	N/A N/A	X Pass	SPOC implementation and effectiveness***	32 (7.C)	Q1 2016 Q2 2016	5.00% 5.00%	X Pass		
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	Q1 2016 Q2 2016	N/A N/A	Pass X	Billing statement accuracy	33 (7.D)	Q1 2016 Q2 2016	5.00% 5.00%	X Pass		
Account status activity	17 (5.F) **	Q1 2016	N/A N/A	Pass	Disclosure of Personally Identifiable Information in POC	34 (2.D)	Q1 2016	3.50%	Pass Pass		

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SunTrust Results

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

scorecard SunTrus	st							Office of Mortgage Settlement Oversight		
					LLP, tested the IRG's work on 34 illustrates the results of the IRG's METRIC NAME		TEST	THRESHOLD ERROR RATE	RESULT (ERRO	
			1.00%	Pass				5.00%	Pass	
oreclosure sale in error	1 (1.A)	Q1 2016	1.00%	Pass	Complaint response timeliness	18 (6.A)	Q1 2016	5.00%	Pass	
		Q2 2016 01 2016					Q2 2016 01 2016			
correct modification denial	2 (1.B)	Q1 2016 02 2016	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	02 2016	5.00%	Pass	
fidavit of Indebtedness	3 (2.A)	Q1 2016	5.00%	Pass	Loan modification decision/	20 (6.B.ii)	Q1 2016	10.00%	Pass	
AOI) preparation		Q2 2016	5.00%	Pass	notification timeline compliance		Q2 2016	10.00%	Pass	
Proof of Claim (POC)	4 (2.B)	Q1 2016	5.00%	Pass	Loan modification	21 (6.B.iii)	Q1 2016	10.00%	Pass	
Motion for Relief from	5 (2.C)	Q2 2016	5.00%	Pass	appeal timeline compliance Short Sale decision timeline compliance	22 (6.B.iv)	Q2 2016	10.00%	Pass	
		Q1 2016	5.00%	Pass			Q1 2016	10.00%	Pass	
Stay (MRS) affidavits		Q2 2016	5.00%	Pass			Q2 2016	10.00%	Pass	
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	7 (3.B)	Q1 2016	5.00%	Pass	Charge of application fees	24 (6.B.vi)	Q1 2016	1.00%	Pass	
otifications		Q2 2016	5.00%	Pass	for loss mitigation		Q2 2016	1.00%	Pass	
ee adherence to guidance	8 (4.A)	Q1 2016	5.00%	FAIL - 7.88%	Short Sale inclusion notice for deficiency	25 (6.8.vii.a)	Q1 2016	5.00%	Pass	
-		Q2 2016	5.00%	CAP Pending			Q2 2016	5.00%	Pass	
Adherence to customer	9 (4.B)	Q1 2016	5.00%	Pass	Dual track referred	26 (6.B.vii.a)	Q1 2016	5.00%	Pass	
payment processing		Q2 2016	5.00%	Pass	to foreclosure		Q2 2016	5.00%	Pass	
Reconciliation of certain vaived fees	10 (4.C)	Q1 2016	5.00%	Pass	Dual track failure to	27 (6.8.viii.b)	Q1 2016	5.00%	Pass	
vaived tees		Q2 2016	5.00%	Pass	postpone foreclosure		Q2 2016	5.00%	Pass	
ate fees adherence to guidance	11 (4.D)	Q1 2016	5.00%	Pass	Force-placed insurance	28 (6.C.i)	Q1 2016	5.00%	Pass	
		Q2 2016	5.00%	Pass	timeliness of notices		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	
		Q2 2016	N/A	Pass	termination		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%	Pass	
		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass	
Single Point of Contact (SPOC)*	14 (5.C)	Q1 2016	5.00%	Pass	Loan modification denial notice disclosure SPOC implementation and effectiveness***	31 (7.B) 32 (7.C)	Q1 2016 02 2016	5.00%	Pass	
				Pass					Pass	
Norkforce management	15 (5.D) **	Q1 2016	N/A N/A	Pass			Q1 2016 02 2016	5.00%	Pass	
					and effectiveness					
Affidavit of Indebtedness	16 (5.E) **	Q1 2016	N/A N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2016 Q2 2016	5.00%	Pass	
AOI) integrity		Q2 2016 O1 2016	N/A N/A							
				Pass	Disclosure of Personally Identifiable Information in POC	34 (2.D)	O1 2016	3.50%	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. Executive Summary

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Conclusion

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. Summary Introduction

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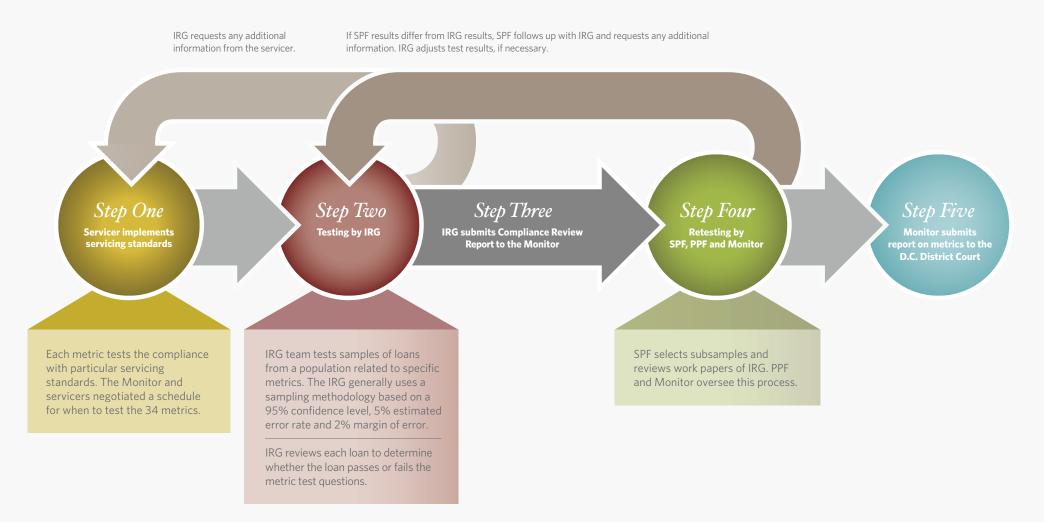


Appendix

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. Office of Mortgage Settlement Oversight



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.

Potential Violation

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

Corrective Action Plan

Servicer implements Corrective Action Plan (CAP) to address root causes of fail

Borrower Remediation

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

Retesting

Testing by IRG and Monitor's team recommences 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

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HSBC

The Monitor's Secondary Professional Firm (SPF) assigned to HSBC, RSM US LLP, tested the IRG's work on 14 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)
Foreclosure sale in error	1 (1.A)	Q1 2016	1.00%	Х	Complaint response timeliness	10 (6 A)	Q1 2016	5.00%	X*
Foreclosure sale in error		Q2 2016	1.00%	Pass		18 (6.A)	Q2 2016	5.00%	X*
Incorrect modification denial	2 (1.B)	Q1 2016	5.00%	Х	Loan modification document collection timeline compliance	19 (6.B.i)	Q1 2016	5.00%	Х
incorrect modification demai		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Affidavit of Indebtedness	3 (2.A)	Q1 2016	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	Q1 2016	10.00%	Pass
(AOI) preparation	5 (Z.A)	Q2 2016	5.00%	Pass			Q2 2016	10.00%	Pass
Proof of Claim (POC)	4 (2 5)	Q1 2016	5.00%	Х	Loan modification appeal timeline compliance	21 (C D)	Q1 2016	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	Q2 2016	5.00%	Pass		21 (6.B.iii)	Q2 2016	10.00%	Pass
Motion for Relief from	5 (2.C)	Q1 2016	5.00%	X*	Short Sale decision	22 (C D :)	Q1 2016	10.00%	Pass
Stay (MRS) affidavits	5 (2.C)	Q2 2016	5.00%	X*	timeline compliance	22 (6.B.iv)	Q2 2016	10.00%	Pass
Due formalismus totation	((2,4))	Q1 2016	5.00%	Х	Short Sale document	23 (6.B.v)	Q1 2016	5.00%	X*
Pre-foreclosure initiation	6 (3.A)	Q2 2016	5.00%	Pass	collection timeline compliance		Q2 2016	5.00%	Pass
Pre-foreclosure initiation	7 (2 D)	Q1 2016	5.00%	Х	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2016	1.00%	Pass
notifications	7 (3.B)	Q2 2016	5.00%	Pass			Q2 2016	1.00%	Pass
For all success to success	0(4.4)	Q1 2016	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	Q1 2016	5.00%	Х
Fee adherence to guidance	8 (4.A)	Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Adherence to customer	0(4 P)	Q1 2016	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	Q1 2016	5.00%	Х
payment processing	9 (4.B)	Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Reconciliation of certain	10 (4.C)	Q1 2016	5.00%	Pass	Dual track failure to postpone foreclosure	27 ((D	Q1 2016	5.00%	Pass
waived fees		Q2 2016	5.00%	Pass		27 (6.B.viii.b)	Q2 2016	5.00%	Pass
	11 (4.D)	Q1 2016	5.00%	Х	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2016	5.00%	Pass
Late fees adherence to guidance		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Third mental and an anomalous and	12 (5.A)	Q1 2016	N/A	Х	Force-placed insurance termination	29 (6.C.ii)	Q1 2016	5.00%	Х
Third-party vendor management		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
Containing and all	12 (5 0)	Q1 2016	N/A	Pass		30 (7.A)	Q1 2016	5.00%	Х
Customer portal	13 (5.B)	Q2 2016	N/A	Pass	Loan modification process		Q2 2016	5.00%	Pass
	14 (5.C)	Q1 2016	5.00%	Х	Loan modification denial notice disclosure	31 (7.B)	Q1 2016	5.00%	Х
Single Point of Contact (SPOC)*		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Mouldana management	15 (5.D) **	Q1 2016	N/A	Х	SPOC implementation and effectiveness***	32 (7.C)	Q1 2016	5.00%	Х
Workforce management		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
Affidavit of Indebtedness		Q1 2016	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2016	5.00%	Х
(AOI) integrity	16 (5.E) **	Q2 2016	N/A	Х			Q2 2016	5.00%	Pass
		Q1 2016	N/A	Pass	Disclosure of Personally	24(2.5)	Q1 2016	3.50%	Pass
Account status activity	17 (5.F) **	Q2 2016	N/A	Х	Identifiable Information in POC	34 (2.D)	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.

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SunTrust

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)
Foreclosure sale in error	1 (1 A)	Q1 2016	1.00%	Pass	Complaint response timeliness	10 (6 A)	Q1 2016	5.00%	Pass
Foreclosure sale in error	1 (1.A)	Q2 2016	1.00%	Pass		18 (6.A)	Q2 2016	5.00%	Pass
Incorrect modification denial	2 (1.B)	Q1 2016	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	Q1 2016	5.00%	Pass
incorrect modification demai	2 (I.D)	Q2 2016	5.00%	Pass		19 (O.D.I)	Q2 2016	5.00%	Pass
Affidavit of Indebtedness	3 (2.A)	Q1 2016	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	Q1 2016	10.00%	Pass
(AOI) preparation		Q2 2016	5.00%	Pass			Q2 2016	10.00%	Pass
Due of of Claim (DOC)	4 (2 5)	Q1 2016	5.00%	Pass	Loan modification appeal timeline compliance	21 ((D)	Q1 2016	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	Q2 2016	5.00%	Pass		21 (6.B.iii)	Q2 2016	10.00%	Pass
Motion for Relief from	F (2 C)	Q1 2016	5.00%	Pass	Short Sale decision	22 (C D :)	Q1 2016	10.00%	Pass
Stay (MRS) affidavits	5 (2.C)	Q2 2016	5.00%	Pass	timeline compliance	22 (6.B.iv)	Q2 2016	10.00%	Pass
	((Q A)	Q1 2016	5.00%	Pass	Short Sale document		Q1 2016	5.00%	Pass
Pre-foreclosure initiation	6 (3.A)	Q2 2016	5.00%	Pass	collection timeline compliance	23 (6.B.v)	Q2 2016	5.00%	Pass
Pre-foreclosure initiation	7 (2 0)	Q1 2016	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2016	1.00%	Pass
notifications	7 (3.B)	Q2 2016	5.00%	Pass			Q2 2016	1.00%	Pass
Fee adherence to guidance	8 (4.A)	Q1 2016	5.00%	FAIL - 7.88%	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	Q1 2016	5.00%	Pass
		Q2 2016	5.00%	CAP Pending			Q2 2016	5.00%	Pass
Adherence to customer payment processing	0 (4.5)	Q1 2016	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	Q1 2016	5.00%	Pass
	9 (4.B)	Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Reconciliation of certain	10 (4.C)	Q1 2016	5.00%	Pass	Dual track failure to postpone foreclosure		Q1 2016	5.00%	Pass
waived fees		Q2 2016	5.00%	Pass		27 (6.B.viii.b)	Q2 2016	5.00%	Pass
	11 (4.D)	Q1 2016	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2016	5.00%	Pass
Late fees adherence to guidance		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
	12 (5.A)	Q1 2016	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	Q1 2016	5.00%	Pass
Third-party vendor management		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
	13 (5.B)	Q1 2016	N/A	Pass	Loan modification process	30 (7.A)	Q1 2016	5.00%	Pass
Customer portal		Q2 2016	N/A	Pass			Q2 2016	5.00%	Pass
	14 (5.C)	Q1 2016	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	Q1 2016	5.00%	Pass
Single Point of Contact (SPOC)*		Q2 2016	5.00%	Pass			Q2 2016	5.00%	Pass
Workforce management	15 (5.D) **	Q1 2016	N/A	Pass	SPOC implementation and effectiveness***	32 (7.C)	Q1 2016	5.00%	Pass
		Q2 2016	N/A	Х			Q2 2016	5.00%	Pass
Affidavit of Indebtedness		Q1 2016	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2016	5.00%	Pass
(AOI) integrity	16 (5.E) **	Q2 2016	N/A	Х			Q2 2016	5.00%	Pass
		Q1 2016	N/A	Pass	Disclosure of Personally		Q1 2016	3.50%	Pass
Account status activity	17 (5.F) **	Q2 2016	N/A	X	Identifiable Information in POC	34 (2.D)	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. Under CAP Metric was not tested in that specific test period since it was under CAP.