

Office of
Mortgage Settlement
Oversight

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,

A handwritten signature in black ink, appearing to read "Joseph A. Smith, Jr.".

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.

¹ The Court separately entered a consent judgment between Ocwen and government parties on February 26, 2014, as part of the NMS, thereby subjecting Ocwen's entire portfolio to the Settlement's requirements. Accordingly, beginning the third quarter of 2014, Ocwen's entire portfolio is subject to the Settlement's requirements

Oversight Process

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.

Introduction

**Oversight
Process**

Bank of
America

Chase

Citi

Dietech

SunTrust

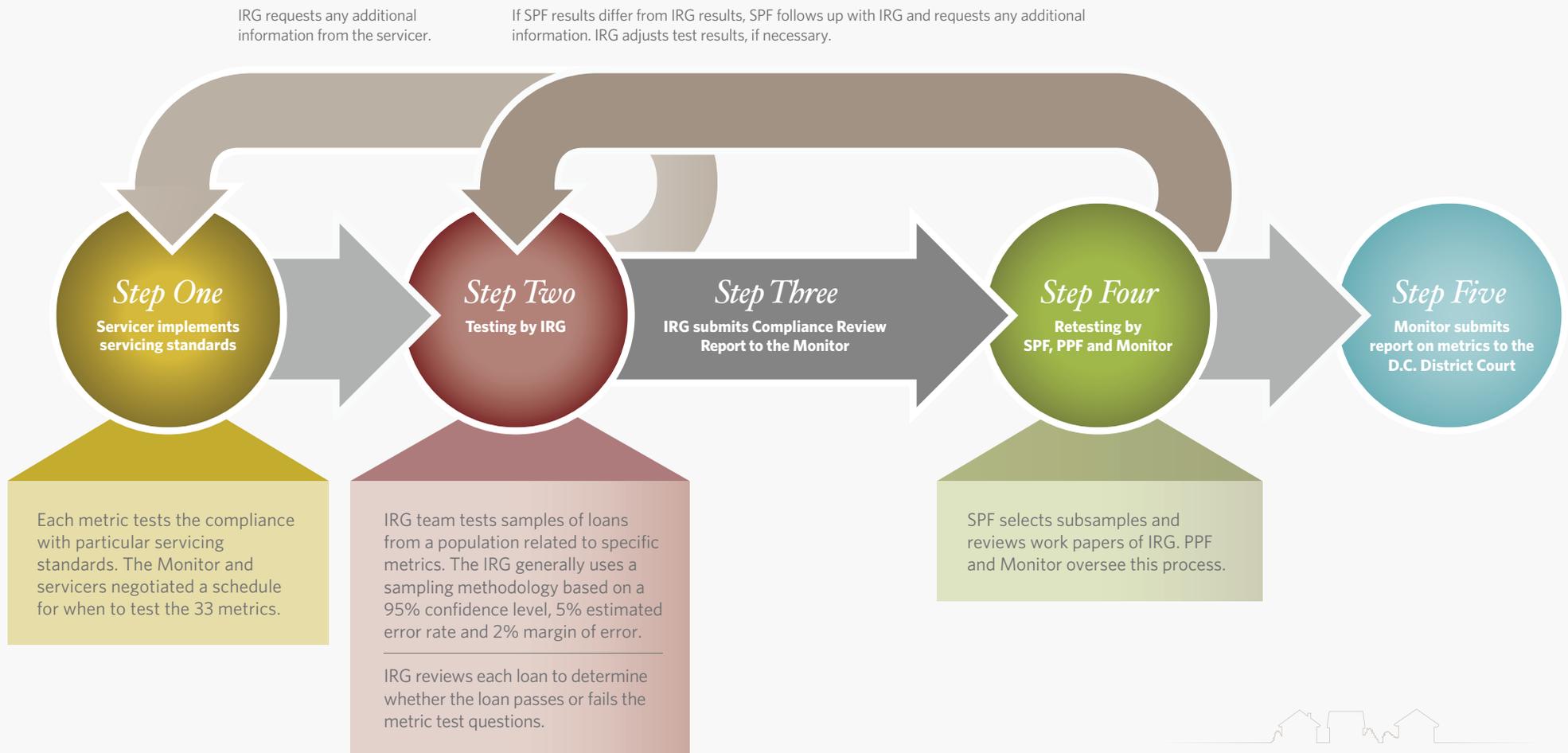
Wells Fargo

Conclusion

MONITOR'S ROLE:

Testing a Metric

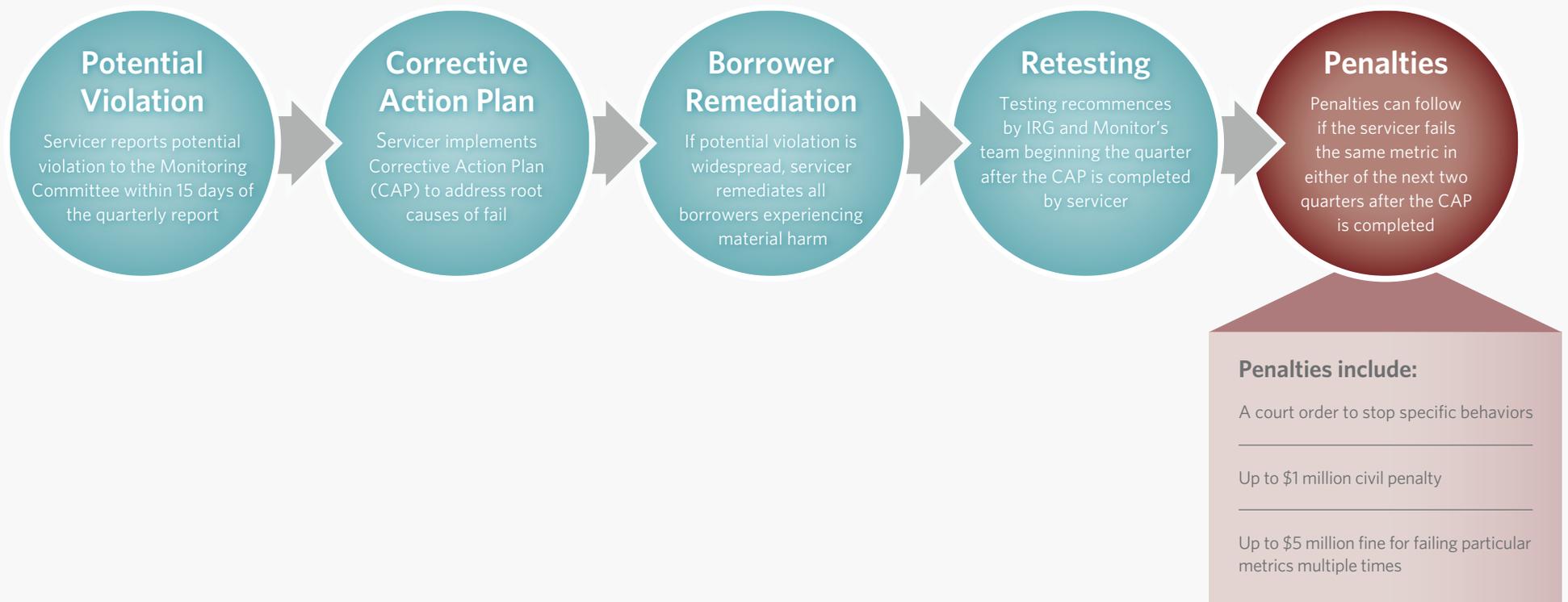
The Internal Review Groups tested, and my professional firms retested, the servicers' performance on each metric. The graphic below illustrates the process by which the metrics for each servicer were tested.



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.



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.

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.

The work to test the servicers in the first and second quarters 2015 involved 254 professionals, including my primary professional firms, secondary professional firms and other professionals who dedicated approximately 78,975 hours over a six-month period.

Introduction

Oversight Process

Bank of America

Chase

Citi

Diotech

SunTrust

Wells Fargo

Conclusion

NMS Test Period	1	2	3	4	5	6	7	8	9	10	11	12
Calendar Quarter	Q3 2012	Q4 2012	Q1 2013	Q2 2013	Q3 2013	Q4 2013	Q1 2014	Q2 2014	Q3 2014	Q4 2014	Q1 2015	Q2 2015

Metric Testing Timeline

The Internal Review Groups tested, and my professional firms retested, the servicers on the servicing standards associated with the metrics. The graphic below illustrates the time periods in which the metrics for each servicer were tested.

Office of Mortgage Settlement Oversight

METRIC NO.	TITLE/DESCRIPTION	TEST PERIOD 11 (January 1, 2015 - March 31, 2015)					TEST PERIOD 12 (April 1, 2015 - June 30, 2015)				
		B of A	CHASE	CITI	DITECH	WELLS	B of A	CHASE	CITI	DITECH	WELLS
1	Foreclosure sale in error (5.A)	•	•	•	•	•	•	•	•	•	•
2	Account modification denial (5.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 fee 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 timeliness compliance (6.B.i)	•	•	•	•	•	•	•	•	•	•
20	Loan modification decision/justification timeliness compliance (6.B.ii)	•	•	•	•	•	•	•	•	•	•
21	Loan modification appeal timeliness compliance (6.B.iii)	•	•	•	•	•	•	•	•	•	•
22	Short sale decision timeliness compliance (6.B.iv)	•	•	•	•	•	•	•	•	•	•
23	Short sale document collection timeliness 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.vii.b)	•	•	•	•	•	•	•	•	•	•
27	Dual track failure to postpone foreclosure (6.B.vii.c)	•	•	•	•	•	•	•	•	•	•
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 metrics that is tested once a year.

See **Appendix i** for larger version

Metric Testing Timeline

The Internal Review Groups tested, and my professional firms retested, the servicer on the servicing standards associated with the metrics. The graphic below illustrates the time periods in which the metrics for the servicer were tested.

Office of Mortgage Settlement Oversight

METRIC NO.	TITLE/DESCRIPTION	FIRST QUARTER 2015 (Overall Q1 2015 - March 31, 2015)	SECOND QUARTER 2015 (April 1, 2015 - June 30, 2015)	NOT YET TESTED THIRD QUARTER 2015 (July 1, 2015 - September 30, 2015)
		SunTrust	SunTrust	SunTrust
1	Foreclosure sale in error (5.A)			•
2	Account modification denial (5.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 fee 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 timeliness compliance (6.B.i)			•
20	Loan modification decision/justification timeliness compliance (6.B.ii)			•
21	Loan modification appeal timeliness compliance (6.B.iii)			•
22	Short sale decision timeliness compliance (6.B.iv)			•
23	Short sale document collection timeliness 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.vii.b)			•
27	Dual track failure to postpone foreclosure (6.B.vii.c)			•
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 Identifiable Information in POC (2.D)			•
TOTALS		9	13	31

*Policy and procedure metrics that is tested once a year.

See **Appendix ii** for larger version

Bank of America Results

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

SCORECARD:					Office of Mortgage Settlement Oversight				
<i>Bank of America</i>									
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)
Foreclosure sale in error	1 (1.A)	11	100%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	100%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D)**	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Account status activity	17 (5.F)**	11	N/A	X					
		12	N/A	X					

*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. Appendix ii

See **Appendix iii** for larger version

Chase Results

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

SCORECARD:

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.

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)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.vii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.vii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)**	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D)**	11	N/A	X	SPOC Implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Account status activity	17 (5.F)**	11	N/A	X					
		12	N/A	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.

Appendix iii

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 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.

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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)	11 12	100% 100%	Pass Pass	Complaint response timeliness	18 (6.A)	11 12	5.00% 5.00%	Pass Pass
Incorrect modification denial	2 (1.B)	11 12	5.00% 5.00%	Pass Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11 12	5.00% 5.00%	Pass Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11 12	5.00% 5.00%	Pass Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11 12	10.00% 10.00%	Pass Pass
Proof of Claim (POC)	4 (2.B)	11 12	5.00% 5.00%	Pass Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11 12	10.00% 10.00%	Pass Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11 12	5.00% 5.00%	Pass Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11 12	10.00% 10.00%	Pass Pass
Pre-foreclosure initiation	6 (3.A)	11 12	5.00% 5.00%	Pass Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11 12	5.00% 5.00%	Pass Pass
Pre-foreclosure initiation notifications	7 (3.B)	11 12	5.00% 5.00%	Pass Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11 12	1.00% 1.00%	Pass Pass
Fee adherence to guidance	8 (4.A)	11 12	5.00% 5.00%	Pass Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11 12	5.00% 5.00%	Pass Pass
Adherence to customer payment processing	9 (4.B)	11 12	5.00% 5.00%	Pass Pass	Dual track referred to foreclosure	26 (6.B.vii.a)	11 12	5.00% 5.00%	Pass Pass
Reconciliation of certain waived fees	10 (4.C)	11 12	5.00% 5.00%	Pass Pass	Dual track failure to postpone foreclosure	27 (6.B.vii.b)	11 12	5.00% 5.00%	Pass Pass
Late fees adherence to guidance	11 (4.D)	11 12	5.00% 5.00%	Pass Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11 12	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 12	5.00% 5.00%	Pass Pass
Customer portal	13 (5.B)	11 12	N/A N/A	Pass Pass	Loan modification process	30 (7.A)	11 12	5.00% 5.00%	Pass Pass
Single Point of Contact (SPOC)*	14 (5.C)	11 12	5.00% 5.00%	Pass Pass	Loan modification denial notice disclosure	31 (7.B)	11 12	5.00% 5.00%	Pass Pass
Workforce management	15 (5.D)**	11 12	N/A N/A	X X	SPOC implementation and effectiveness***	32 (7.C)	11 12	5.00% 5.00%	Pass Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	11 12	N/A N/A	X X	Billing statement accuracy	33 (7.D)	11 12	5.00% 5.00%	Pass Pass
Account status activity	17 (5.F)**	11 12	N/A N/A	X X					

*Test question 4 only. **Policy and procedure metric that is tested once a year. ***Test Question 3 only.
N/A: Threshold error rate not applicable. X: Metric was not tested in that specific test period.

Appendix iv

See **Appendix v** for larger version

Ditech Results

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.

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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)
Foreclosure sale in error	101(A)	9	100%	Pass	Complaint response timeliness	1612(A)	9	500%	Pass
Incorrect modification denial	211(B)	12	100%	Pass	Loan modification document collection timeliness compliance	1912(B)	12	500%	Pass
Affidavit of indebtedness (AOD) preparation	312(A)	9	500%	Pass	Loan modification decision/modification timeliness compliance	2012(B)	12	1000%	Pass
Proof of Claim (POC)	412(B)	9	500%	Pass	Loan modification appeal timeliness compliance	2112(B)	9	500%	Pass
Motion for Relief from Stay (MRS) affidavits	512(C)	9	500%	Pass	Short Sale decision timeliness compliance	2212(B)	12	500%	Pass
Pre-foreclosure initiation	612(A)	9	500%	Pass	Short Sale document collection timeliness compliance	2312(A)	12	500%	Pass
Pre-foreclosure initiation notifications	712(B)	9	500%	Pass	Change of application fees for loss mitigation	2412(A)	9	100%	Pass
Fee adherence to guidance	812(A)	12	500%	Pass	Short Sale inclusion notice for deficiency	2512(A)	12	500%	Pass
Adherence to customer payment processing	912(B)	9	500%	Pass	Dual track referred to foreclosure	2612(A)	12	500%	Pass
Reconciliation of certain waived fees	1012(C)	9	500%	Pass	Dual track failure to postpone foreclosure	2712(A)	12	500%	Pass
Late fees adherence to guidance	1112(C)	9	500%	Pass	Force-placed insurance timeliness of notice	2812(C)	12	500%	Pass
Third-party vendor management	1212(A)	9	N/A	Pass	Force-placed insurance termination	2912(A)	12	500%	Pass
Customer portal	1312(B)	9	N/A	Pass	Loan modification process	3012(A)	12	500%	Pass
Single Point of Contact (SPOC)*	1412(C)	12	100%	Pass	Loan modification denial notice disclosure	3112(B)	12	500%	Pass
Workforce management	1512(D)**	9	N/A	X	SPOC implementation and effectiveness***	3212(D)	9	500%	Pass
Affidavit of indebtedness (AOD) integrity	1612(E)**	12	N/A	X	Billing statement accuracy	3312(D)	12	500%	Pass
Account status activity	1712(F)**	9	N/A	X					

*Not question 4 only - Policy and procedure metrics that is tested once a year **Not Question 4 only
 N/A: Threshold error rate not applicable. X: Metrics were not tested in that specific test period. Appendix 1

See **Appendix vi** for larger version

SunTrust Results

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

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SCORECARD:					Office of Mortgage Settlement Oversight				
<i>SunTrust</i>									
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 (ERROR RATE IF FAILED)
Foreclosure sale in error	1 (1.A)	Q1 2015	100%	X	Complaint response timeliness	18 (6.A)	Q1 2015	5.00%	Pass
		Q2 2015	100%	X			Q2 2015	5.00%	Pass
Incorrect modification denial	2 (1.B)	Q1 2015	5.00%	X	Loan modification document collection timeline compliance	19 (6.B.i)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	Q1 2015	5.00%	X	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	Q1 2015	10.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	Q1 2015	5.00%	X	Loan modification appeal timeline compliance	21 (6.B.iii)	Q1 2015	10.00%	X
		Q2 2015	5.00%	X			Q2 2015	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	Q1 2015	5.00%	X	Short Sale decision timeline compliance	22 (6.B.iv)	Q1 2015	10.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	10.00%	X
Pre-foreclosure initiation	6 (3.A)	Q1 2015	5.00%	X	Short Sale document collection timeline compliance	23 (6.B.v)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Pre-foreclosure initiation notifications	7 (3.B)	Q1 2015	5.00%	X	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2015	1.00%	Pass
		Q2 2015	5.00%	X			Q2 2015	1.00%	Pass
Fee adherence to guidance	8 (4.A)	Q1 2015	5.00%	X	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Adherence to customer payment processing	9 (4.B)	Q1 2015	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.vii.a)	Q1 2015	5.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	5.00%	X
Reconciliation of certain waived fees	10 (4.C)	Q1 2015	5.00%	X	Dual track failure to postpone foreclosure	27 (6.B.vii.b)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Late fees adherence to guidance	11 (4.D)	Q1 2015	5.00%	X	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Third-party vendor management	12 (5.A)	Q1 2015	N/A	X	Force-placed insurance termination	29 (6.C.ii)	Q1 2015	5.00%	X
		Q2 2015	N/A	Pass			Q2 2015	5.00%	X
Customer portal	13 (5.B)	Q1 2015	N/A	X	Loan modification process	30 (7.A)	Q1 2015	5.00%	X
		Q2 2015	N/A	Pass			Q2 2015	5.00%	X
Single Point of Contact (SPOC)*	14 (5.C)	Q1 2015	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	Q1 2015	5.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	5.00%	X
Workforce management	15 (5.D)**	Q1 2015	N/A	Pass	SPOC implementation and effectiveness***	32 (7.C)	Q1 2015	5.00%	Pass
		Q2 2015	N/A	X			Q2 2015	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	Q1 2015	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2015	5.00%	Pass
		Q2 2015	N/A	X			Q2 2015	5.00%	Pass
Account status activity	17 (5.F)**	Q1 2015	N/A	Pass	Disclosure of personally identifiable information in POC	34 (2.D)	Q1 2015	3.50%	X
		Q2 2015	N/A	X			Q2 2015	3.50%	X

*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. Appendix vii

See [Appendix vii](#) for larger version

Wells Fargo Results

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

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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.

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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)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.i)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D)**	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E)**	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Account status activity	17 (5.F)**	11	N/A	X					
		12	N/A	X					

*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.

Appendix v

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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Metric Testing Timeline

The Internal Review Groups tested, and my professional firms retested, the servicers on the servicing standards associated with the metrics. The graphic below illustrates the time periods in which the metrics for each servicer were tested.

METRIC NO.	TITLE/DESCRIPTION	TEST PERIOD 11 (January 1, 2015 - March 31, 2015)					TEST PERIOD 12 (April 1, 2015 - June 30, 2015)				
		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.

Metric Testing Timeline

The Internal Review Groups tested, and my professional firms retested, the servicer on the servicing standards associated with the metrics. The graphic below illustrates the time periods in which the metrics for the servicer were tested.

METRIC NO.	TITLE/DESCRIPTION	FIRST QUARTER 2015 (January 1, 2015 - March 31, 2015)	SECOND QUARTER 2015 (April 1, 2015 - June 30, 2015)	NOT YET TESTED: THIRD QUARTER 2015 (July 1, 2015 - September 30, 2015)
		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 Identifiable Information in POC (2.D)			•
TOTALS		9	13	31

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

SCORECARD:

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)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D) **	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Account status activity	17 (5.F) **	11	N/A	X					
		12	N/A	X					

*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.

SCORECARD:

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 (ERROR RATE IF FAILED)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D) **	11	N/A	X	SPOC Implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Account status activity	17 (5.F) **	11	N/A	X					
		12	N/A	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.

SCORECARD:



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)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D) **	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Account status activity	17 (5.F) **	11	N/A	X					
		12	N/A	X					

*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.

SCORECARD:

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)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D) **	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Account status activity	17 (5.F) **	11	N/A	X					
		12	N/A	X					

*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.

SCORECARD:

Wells Fargo

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)
Foreclosure sale in error	1 (1.A)	11	1.00%	Pass	Complaint response timeliness	18 (6.A)	11	5.00%	Pass
		12	1.00%	Pass			12	5.00%	Pass
Incorrect modification denial	2 (1.B)	11	5.00%	Pass	Loan modification document collection timeline compliance	19 (6.B.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	11	5.00%	Pass	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	11	5.00%	Pass	Loan modification appeal timeline compliance	21 (6.B.iii)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	11	5.00%	Pass	Short Sale decision timeline compliance	22 (6.B.iv)	11	10.00%	Pass
		12	5.00%	Pass			12	10.00%	Pass
Pre-foreclosure initiation	6 (3.A)	11	5.00%	Pass	Short Sale document collection timeline compliance	23 (6.B.v)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Pre-foreclosure initiation notifications	7 (3.B)	11	5.00%	Pass	Charge of application fees for loss mitigation	24 (6.B.vi)	11	1.00%	Pass
		12	5.00%	Pass			12	1.00%	Pass
Fee adherence to guidance	8 (4.A)	11	5.00%	Pass	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Adherence to customer payment processing	9 (4.B)	11	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Reconciliation of certain waived fees	10 (4.C)	11	5.00%	Pass	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Late fees adherence to guidance	11 (4.D)	11	5.00%	Pass	Force-placed insurance timeliness of notices	28 (6.C.i)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Third-party vendor management	12 (5.A)	11	N/A	Pass	Force-placed insurance termination	29 (6.C.ii)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Customer portal	13 (5.B)	11	N/A	Pass	Loan modification process	30 (7.A)	11	5.00%	Pass
		12	N/A	Pass			12	5.00%	Pass
Single Point of Contact (SPOC)*	14 (5.C)	11	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	11	5.00%	Pass
		12	5.00%	Pass			12	5.00%	Pass
Workforce management	15 (5.D) **	11	N/A	X	SPOC implementation and effectiveness***	32 (7.C)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	11	N/A	X	Billing statement accuracy	33 (7.D)	11	5.00%	Pass
		12	N/A	X			12	5.00%	Pass
Account status activity	17 (5.F) **	11	N/A	X					
		12	N/A	X					

*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.

SCORECARD:

SunTrust

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 (ERROR RATE IF FAILED)
Foreclosure sale in error	1 (1.A)	Q1 2015	1.00%	X	Complaint response timeliness	18 (6.A)	Q1 2015	5.00%	Pass
		Q2 2015	1.00%	X			Q2 2015	5.00%	Pass
Incorrect modification denial	2 (1.B)	Q1 2015	5.00%	X	Loan modification document collection timeline compliance	19 (6.B.i)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	Pass
Affidavit of Indebtedness (AOI) preparation	3 (2.A)	Q1 2015	5.00%	X	Loan modification decision/ notification timeline compliance	20 (6.B.ii)	Q1 2015	10.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	10.00%	Pass
Proof of Claim (POC)	4 (2.B)	Q1 2015	5.00%	X	Loan modification appeal timeline compliance	21 (6.B.iii)	Q1 2015	10.00%	X
		Q2 2015	5.00%	X			Q2 2015	10.00%	Pass
Motion for Relief from Stay (MRS) affidavits	5 (2.C)	Q1 2015	5.00%	X	Short Sale decision timeline compliance	22 (6.B.iv)	Q1 2015	10.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	10.00%	X
Pre-foreclosure initiation	6 (3.A)	Q1 2015	5.00%	X	Short Sale document collection timeline compliance	23 (6.B.v)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Pre-foreclosure initiation notifications	7 (3.B)	Q1 2015	5.00%	X	Charge of application fees for loss mitigation	24 (6.B.vi)	Q1 2015	1.00%	Pass
		Q2 2015	5.00%	X			Q2 2015	1.00%	Pass
Fee adherence to guidance	8 (4.A)	Q1 2015	5.00%	X	Short Sale inclusion notice for deficiency	25 (6.B.vii.a)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Adherence to customer payment processing	9 (4.B)	Q1 2015	5.00%	Pass	Dual track referred to foreclosure	26 (6.B.viii.a)	Q1 2015	5.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	5.00%	X
Reconciliation of certain waived fees	10 (4.C)	Q1 2015	5.00%	X	Dual track failure to postpone foreclosure	27 (6.B.viii.b)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Late fees adherence to guidance	11 (4.D)	Q1 2015	5.00%	X	Force-placed insurance timeliness of notices	28 (6.C.i)	Q1 2015	5.00%	X
		Q2 2015	5.00%	X			Q2 2015	5.00%	X
Third-party vendor management	12 (5.A)	Q1 2015	N/A	X	Force-placed insurance termination	29 (6.C.ii)	Q1 2015	5.00%	X
		Q2 2015	N/A	Pass			Q2 2015	5.00%	X
Customer portal	13 (5.B)	Q1 2015	N/A	X	Loan modification process	30 (7.A)	Q1 2015	5.00%	X
		Q2 2015	N/A	Pass			Q2 2015	5.00%	X
Single Point of Contact (SPOC)*	14 (5.C)	Q1 2015	5.00%	Pass	Loan modification denial notice disclosure	31 (7.B)	Q1 2015	5.00%	X
		Q2 2015	5.00%	Pass			Q2 2015	5.00%	X
Workforce management	15 (5.D) **	Q1 2015	N/A	Pass	SPOC implementation and effectiveness***	32 (7.C)	Q1 2015	5.00%	Pass
		Q2 2015	N/A	X			Q2 2015	5.00%	Pass
Affidavit of Indebtedness (AOI) integrity	16 (5.E) **	Q1 2015	N/A	Pass	Billing statement accuracy	33 (7.D)	Q1 2015	5.00%	Pass
		Q2 2015	N/A	X			Q2 2015	5.00%	Pass
Account status activity	17 (5.F) **	Q1 2015	N/A	Pass	Disclosure of personally identifiable information in POC	34 (2.D)	Q1 2015	3.50%	X
		Q2 2015	N/A	X			Q2 2015	3.50%	X

*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.