

Consent Order Response –  
Single Point of Contact (Section 6)

# Consent Order Response

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## Single Point of Contact

(Consent Order Section 6)

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# 1. Single Point of Contact

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## 1.1 Overview

### *About SunTrust and SunTrust Mortgage*

SunTrust Banks, Inc., headquartered in Atlanta, GA, is one of the nation's largest banking organizations, serving a broad range of consumer, commercial, corporate and institutional clients. As of June 30, 2011, SunTrust had total assets of \$172.3 billion and total deposits of \$121.9.0 billion. SunTrust Mortgage, Inc., headquartered in Richmond, VA, ranks as the eighth largest servicer in the mortgage industry with 1.5% of the residential mortgage loan servicing market share, and services approximately 950,000 loans of which 94% are current. SunTrust Mortgage is licensed to operate in 49 states (excluding Hawaii).

### *The SunTrust Mortgage Program*

During the early stages of the economic crisis, SunTrust recognized that the mortgage industry in general, and SunTrust Mortgage in particular, was facing unprecedented challenges. This was further evidenced by historical levels of delinquencies, loss mitigation and foreclosure activity. These challenges required significant changes in business practices, controls, infrastructure, existing processes, products and systems, resulting in significant redesign and enhancement to meet the demands of the changing environment.

As a result, since 2007, SunTrust has aggressively been adding staff, developing enhanced processes, improving controls, and investing in systems and reporting capabilities across all areas of the mortgage business. This work is collectively referred to as "The Mortgage Program," and it continues today with significant investments that are providing improved levels of service to our clients and the assurance of quality execution and delivery. The focus of The Mortgage Program can be broadly categorized into three areas: Strategy and Leadership, Originations, and Servicing and Default.

### *Strategy and Leadership*

The purpose of our Strategy and Leadership efforts is to redefine the strategic vision for the mortgage company and instill a culture of quality throughout the organization. We have engaged an independent third party to assist us in the definition of our strategic vision and to confirm our actions are aligned with the direction of the mortgage industry. Through this initiative, we are committed to improving all aspects of the mortgage company including our people, our processes and our technology.

A significant milestone in this effort began with an organizational restructuring that was announced on April 1, 2010. We created a new Consumer Banking organization reporting to [REDACTED] a Corporate Executive Vice President and now Head of Consumer Banking. The Consumer Banking structure includes our mortgage business as well as credit card, consumer lending and branch banking businesses. All of the origination, underwriting, servicing and operations for the lending areas within Consumer Banking, including our mortgage business, now report to [REDACTED]. Additionally, all of the risk functions that were part of SunTrust Mortgage are now part of the Consumer Banking organization. Further, we have added significant resources to the Credit, Operational Risk, Compliance and Modeling and Analytics teams that support our mortgage business. Another key advantage of this new organizational structure is that risk, underwriting and other key operational areas are managed independently of the sales and production area.

In addition to [REDACTED] appointment, in April 2011, Jerome Lienhard was named as the President and Chief Executive Officer of SunTrust Mortgage, Inc. Mr. Lienhard is a seasoned banking veteran with extensive experience in the mortgage industry. Mr. Lienhard is currently conducting an internal management assessment, within SunTrust Mortgage, to identify the appropriate leaders necessary to enact the desired cultural change. This assessment is informed by the work previously performed by an independent third party regarding the organizational structure of the mortgage company.

#### *Originations*

Over the past eighteen months, SunTrust and SunTrust Mortgage have made significant investments in the areas of mortgage originations and fulfillment to stabilize the environment and define the strategy for the future. In the third quarter of 2009, SunTrust launched a foundational mortgage origination and fulfillment transformation program called [REDACTED] ([REDACTED]). [REDACTED] defines a new, industrialized future state originations process that positions SunTrust to successfully compete in the evolving mortgage originations environment. [REDACTED] represents a fundamental cultural shift from a distributed, disparate, manual originations process to a standardized, centralized, automated process. The result is a strategic initiative that will deliver faster, more predictable results at a lower cost, improve loan quality and investor relationships, and provide better quality service for our clients, teammates and partners.

#### *Servicing and Default*

Beginning in 2007, in response to deteriorating economic conditions and the historically unprecedented

stress in the mortgage portfolio, SunTrust launched a large-scale transformational program focused on applying a more disciplined approach to default management. This transformational program is known as the Default Program. The Default Program defined a common vision for default management across our consumer loan products and centralized the organization. This single default organization comprises all default activities, including Collections, a greatly enhanced Loss Mitigation function, Foreclosure, Bankruptcy, Real Estate Owned (REO) Management, Recovery, the newly created analytics group (Default Operations, Reporting and Strategy – DORS) and the Default Operational Risk and Compliance team.

Within the Default Program, an important project we have underway is the implementation of enhanced processes supported by the [REDACTED] workflow system as our end-to-end default management solution. The new solution is intended to improve the efficiency of handoffs between collections, loss mitigation and foreclosure, enhance loss mitigation eligibility and the decisioning process, and enable SunTrust to more rapidly adjust to changes in the regulatory environment. The [REDACTED] project began in late 2008 and to date we have invested more than [REDACTED] to customize and install the system. We have applied a phased approach to the installation, with our own portfolio converted in July 2010, which accounted for 15% of loans serviced, and the Fannie Mae and Freddie Mac portfolios converted in October 2010, which accounts for another 70% of loans serviced. The remainder of the servicing portfolio, which includes Federal Housing Authority (FHA), Veterans Affairs (VA) (Government) and private investors, is scheduled for conversion during the fourth quarter of 2011. Work continues with this system to implement various enhancements, as well as modifications necessary to comply with the new single point of contact requirements.

#### *The SunTrust Consent Order Response Program*

SunTrust's Consent Order (Order) became effective on April 13, 2011. In anticipation of the Order, SunTrust created a formal program organization, comprised of individual working teams for each section of the Order, to respond to the concerns and actions cited in the Order. A senior executive from SunTrust was designated as the sponsor for each working team and another executive was identified as the program lead for each working team. The overall program sponsor is [REDACTED], Corporate Executive Vice President and Head of Consumer Banking. The program executive manager and day-to-day supervisor is [REDACTED] Senior Vice President, Consumer Banking Administration. Both have significant experience in leading large, transformational programs. Not including the independent third parties engaged to perform the Risk Assessment and Foreclosure Review, more than fifty dedicated resources have been focused on the Consent Order.

SunTrust's Order response program is supported by a formal governance structure, including a Steering Committee comprised of the Chief Risk Officer, Head of Consumer Banking, President and Chief Executive Officer (CEO) of the Mortgage Company, Chief Legal Counsel and Corporate Compliance Officer. The Steering Committee meets on a weekly basis to review the status of the program, provide direction to the individual work teams and address any escalated issues or risks. The General Auditor of SunTrust also attends these meetings. In addition to the Steering Committee, the program is supported by a Program Management Office (PMO), which facilitates a weekly cross-work team meeting to share program direction and feedback from the Steering Committee or Federal Reserve Bank, manage dependencies between working teams, discuss common issues and risks, and confirm adherence to program operating principles and processes. Finally, each of the working teams is supported by a full-time project manager who is responsible for facilitating working team meetings, at minimum, on a weekly basis. The working team project managers are required to submit weekly progress reports and maintain a high-level project plan for both the Order response and their defined action plan to remediate any identified gaps.

## **1.2 Work Stream Overview**

This document provides SunTrust's plan to deliver a Single Point of Contact (SPC) to improve communication between SunTrust Mortgage and our clients during Loss Mitigation (Loss Mitigation as defined in the .Order) and foreclosure activities. The creation of the SPC role will be accomplished by implementing a new strategic, client-interaction model that will deliver clear and effective communications between us and our client, providing our client access to a Loss Mitigation specialist knowledgeable about the client's loan condition, and providing timely and efficient decisioning of the client's Loss Mitigation request.

The SPC role will be established as a new position within the Loss Mitigation department. The SPC will be a dedicated individual supporting specifically assigned clients throughout the Loss Mitigation and foreclosure processes. The SPC will be primarily responsible for communication with the client to provide continuity, reduce confusion, and reduce complexity about Loss Mitigation and foreclosure processes.

Each SPC will be a member of a team of other SPCs who can serve as a secondary point of contact if the SPC is not available. A secondary SPC team member will be able to serve the client with the same level of service in the event the primary SPC is not available. SPCs will be supported by existing Loss



Mitigation and foreclosure team members conducting such activities as decisioning of the Loss Mitigation file and processing activities (document preparation and fulfillment). Under the new client-interaction model the existing Loss Mitigation and foreclosure team members will become back-office support functions as they will no longer have access to nor be responsible for interaction with the client.

In order to ensure the success of this new role, SunTrust must review existing processes, define the new role and its responsibilities, and incorporate the new role into the existing organization. The SPC team will need to be staffed and trained on new policies and procedures, and have access to an enhanced technology platform with new client communication capabilities (written and oral). SunTrust must also provide the client and the SPC, if necessary, access to an escalation process where concerns and complaints can be reviewed and resolved in a timely manner.

### 1.3 Background

The creation of the SPC role is the next step in an ongoing effort by SunTrust to improve its default management capabilities. A brief summary of prior efforts and programs is beneficial to understand where we have come from and are moving towards.

SunTrust launched a business transformation project in 2008 to address the evolving economic and credit crisis. This program was initially focused on consolidating the majority of collections, Loss Mitigation, foreclosure, and bankruptcy activities into one organization that would leverage a single technology platform. After analyzing the existing technology capabilities, it was determined that a new platform would need to be built or obtained. After evaluating several software providers, SunTrust chose to install the [REDACTED] platform, which provides an automated workflow and automated loan modification eligibility capabilities. (Additional details regarding [REDACTED] capabilities are provided later in this document.)

The deployment of [REDACTED] was scheduled in three releases. The first release was to convert the SunTrust Portfolio (Portfolio) onto the platform and was completed in July 2010. The second release included loans serviced on behalf of Fannie Mae and Freddie Mac (Agency) and was completed in October 2010. With the completion of the second release, [REDACTED] now supports 85% of the mortgages serviced by SunTrust Mortgage. The third release (Pipeline) will convert FHA/VA (Government) and private investor (Privates) loans and is scheduled for completion by December 2011. All requirements

have been documented and software development is now underway. Once completed, SunTrust will have completed its initial goal of providing all default management activities on a single technology platform.

After the completion of the first two releases of [REDACTED] we realized that the program was essentially complete and it was time to re-focus our efforts. We initiated the Default Evolution program, which is characterized by a new focus on process, people, and technology. The outcome of the Default Evolution initiative will be the realization of a future state which will ensure compliance with investor, regulatory, and legal requirements. The new default management process will include the following:

- An operating model & organization aligned to future state design
- A technology solution ([REDACTED]) aligned with processes and organization
- Consistent regulatory compliance through robust operational controls
- Processes with inherent operational efficiencies embedded within them
- Improved process documentation and training materials

The Default Evolution program currently has two specific work streams: [REDACTED] which supports Pipeline conversion and business as usual activities; and Future State Design which will include the SPC plan outlined in this document. While we are defining the requirements and operating model for the SPC, we are diligently focused upon completing the Pipeline conversion. We believe the Pipeline conversion is a pre-requisite for successfully implementing the SPC role and the other requirements of the Consent Order.

## 1.4 Approach

### Methodology

SunTrust began the examination of the Order requirements to establish a SPC for clients in Loss Mitigation or foreclosure activities by comparing the requirements of the Order to the work being conducted as part of the Default Evolution program, which is focused on current state operations, future state capabilities design, and completing the conversion of the Government and Private loan portfolios onto the [REDACTED] platform. We have concluded that the goals of the SPC role are closely aligned to the goals of Default Evolution with similar expected outcomes for more effective interaction with our clients,





greater controls and transparency of the process, more clearly defined roles and responsibilities, and expanded procedures and training for our team members.

Default Evolution is principled upon improving process, people, and technology with the goal of creating capabilities to execute and meet legal, regulatory, and investor requirements (collectively Requirements). Our methodology is to document current state activities, design future state capabilities based upon the Requirements, and then design processes necessary to deliver the future state design. SunTrust will use this approach to design and deliver the SPC roles and capabilities within the Default organization.

### Vision

SunTrust will implement the SPC role using a team approach that provides primary and secondary contacts for the client. The SPC team approach is required in order to provide consistent and timely service to the client in the event the Primary SPC is assisting other clients, out sick, or is not scheduled to work when the client calls due to work schedule or vacation.

The Primary SPC is the dedicated individual assigned to support the client throughout the Loss Mitigation and foreclosure processes. The Primary SPC is responsible for communication with the client to provide continuity for the client and reduce confusion and complexity about the process. The Primary SPC is a member of a team comprised of no more than ten (10) other SPCs. As part of this team, the Primary SPC's teammates will serve as a Secondary point of contact in the event that the Primary SPC is not available to the client. If the Primary SPC is not available, the client will have the option to leave a message for the Primary SPC or to speak to a Secondary SPC who will be enabled, via [REDACTED] to provide the client with the same level of service as the Primary SPC.

Each SPC is expected serve a specific number of clients with a high degree of availability and knowledge, which is highly dependent upon the number of accounts assigned to the SPC at any one time. The SPC will require time each month to review the client's account and status, speak with the client during the Loss Mitigation process, and conduct foreclosure certification reviews. (Note: These requirements are discussed in more detail under Section 1.6 Servicer Alignment Initiative.) Based upon discussions with peers and Default management's direct experience with relationship based collections, we anticipate the SPC will be able to manage no more than seventy-five (75) active accounts at any one time. An active account is defined as one either in Loss Mitigation or in the process of foreclosure during



the months where a certification is required. In particular, we believe this is appropriate for foreclosures because of the various state timelines and the duration of time between the referral and foreclosure sale date.

Organizationally, the SPC teams will be aligned primarily by investor, which will allow a greater degree of specialization by each SPC. Next, we will align the teams by geography and time zone to improve accessibility of the SPC across the different time zones. Last, we will consider foreclosure timelines when assigning work to each SPC. We believe states such as Georgia with very short foreclosure timelines (under 120 days) constitute very different workloads than states such as Florida and New York with very long foreclosure timelines (over 2 years). Our intention is that the SPCs on a specific team will have similar knowledge and can effectively serve as a Secondary SPC when necessary.

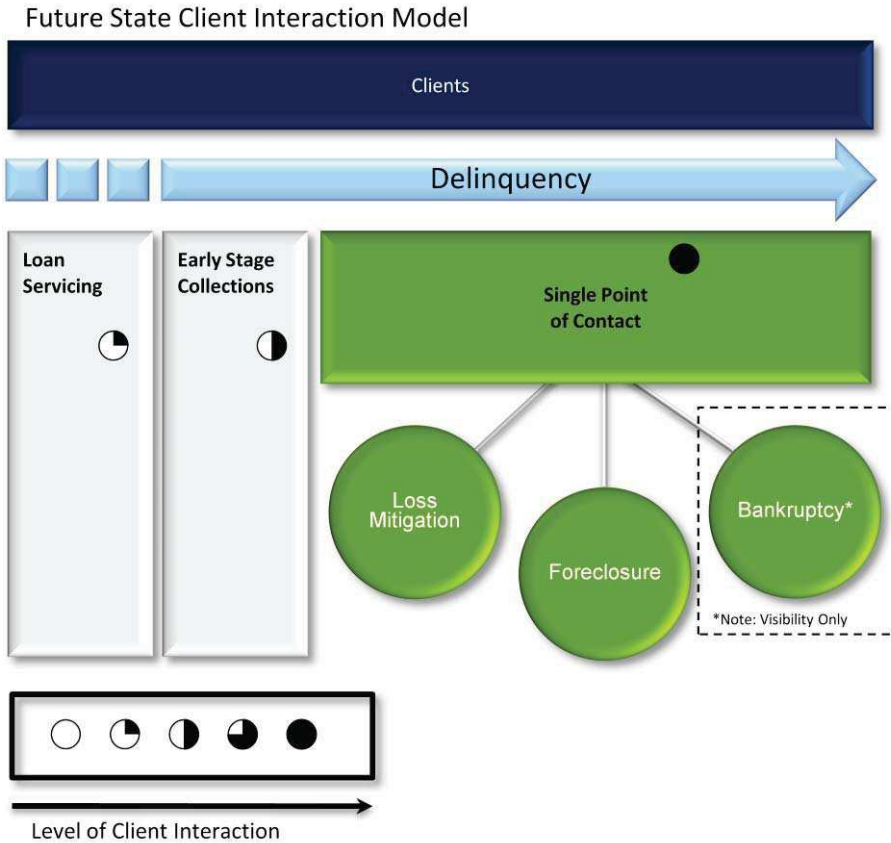
The Primary SPC is supported by other team members with specific roles for document preparation and tracking, evaluation and decisioning of the Loss Mitigation file, and fulfillment of the completed modification on the loan accounting system. The SPC teams will report into the Loss Mitigation function in order to maximize the interaction with the client to promote Loss Mitigation opportunities and options to preserve homeownership.

In the current state, each functional group has established group specific client interaction models. As shown in Figure 1-1: Current State Client Interaction Model, there are varying degrees of client interaction with Collections having a high degree of client interaction while Bankruptcy is extremely limited.



**Figure 1-1: Current State Client Interaction Model**

The future state client interaction model, Figure 1-2: Future State Client Interaction Model will require the SPC to have responsibility for client interaction for Loss Mitigation and foreclosure activities. While the SPC will not have responsibility for client interaction for bankruptcy, they must have visibility into accounts under bankruptcy protection to ensure compliance with existing bankruptcy laws. Under this new model, only Collections and SPC will have responsibility for client interaction.



**Figure 1-2: Current State Client Interaction Model**

In order to enable the SPC role, SunTrust will utilize the [REDACTED] platform to deliver the necessary capabilities for Loss Mitigation and foreclosure activities. [REDACTED] will provide the SPC with the ability to follow and monitor the progress of Loss Mitigation activities, verify that further foreclosure actions are not pursued when an active Loss Mitigation is in place, track documents provided to and from the client, and provide transparency into client complaints about the process.

Client Complaints and Escalation Process

Clients may escalate via any number of methods including, phone calls, emails, and letters, in person at a branch or directly to their SPC. In order to advise the client that they can escalate a concern or issue, our welcome letter will include the following statement;

**Please Note - If at any time you are not satisfied with the service you have received from us, please let me know and I will try to resolve your concerns. If I am unable to address them, I will connect you with my Supervisor.**

This statement will inform the client they can escalate to a higher level. In addition we will advise the client of the ability to escalate during the welcome call. If a complaint / escalation is received, the SPC will escalate to their immediate Supervisor. From that point the Supervisor will attempt to resolve the issue. If the Supervisor is not able to resolve the issue, it will then be escalated to our Client Resolution Team (CRT). The CRT team handles all default-related escalations. If the client is still not satisfied, CRT can further escalate the issue to the Executive Services Office (ESO). An escalation is a complaint or dispute from the borrower, the borrower's trusted advisor, housing counselor, federal agency, or elected official that includes, but is not limited to, the following;

- Allegations the servicer did not evaluate the borrower for foreclosure prevention alternatives according to the Loss Mitigation program or the borrower was inappropriately denied a foreclosure prevention alternative;
- Allegations of fraudulent servicing practices;
- Inappropriate initiation or failure to suspend foreclosure actions in violation of investor guidelines;
- Complaints threatening litigation;
- Violation of investor policy time frames for borrower outreach, evaluation, or the time permitted for borrower response.

The complaint can be escalated by the borrower using a number of communication mediums: email, phone, mail, the branch network, executive correspondence, social media, the Federal Reserve Board (via our SunTrust Executive Services Office), or 3<sup>rd</sup> party consumer advocate groups such as the Better Business Bureau. The CRT is a standalone department that utilizes a network of Subject Matter Experts (SMEs) embedded within the line of business. This SME network has extensive knowledge of the business and acts to research and respond to the borrower's concern within a target time period of 30 days or less after receipt of notification.

Incoming escalated issues are entered and tracked via a case file in the [REDACTED] database, powered by [REDACTED]. Escalations handled by the immediate Supervisor are not entered into [REDACTED] but are noted in the system by the Supervisor. Once an escalation reaches the CRT level, each case is assigned a unique tracking number tying the borrower and loan information to the escalated issue. Acknowledgement letters are auto-generated within 24 hours after the case is created in the system. The case is then assigned to a SME who is responsible for reviewing and identifying a resolution. If the SME requires additional assistance, they are empowered to leverage additional resources from inside (or outside) the business. Updates to the case are recorded in the case notes of

the [REDACTED] CRT database. Cases are tracked from input through resolution using robust systematic reporting capabilities. The SME continues to provide updates to the borrower directly every seven days until the issue is resolved. Once an issue is resolved, a comprehensive resolution letter is crafted, with associated internal and legal review, and sent to the borrower outlining the issue and detailing the resolution. Escalations that are not resolved by the CRT but then continue on to Executive Services Office (ESO) are tracked in the [REDACTED] system as they move from CRT to ESO.

Resolution, research notes and documentation are retained in the case file in the [REDACTED] CRT database. Case details are also noted in the [REDACTED] ([REDACTED]). When the issues have been resolved and the resolution letter sent, the case is closed in the [REDACTED] CRT database.

The [REDACTED] platform for the CRT and the [REDACTED] platform for the SPC will not have an automated interface and will be considered as part of a future date enhancement. In order to ensure that all complaints are escalated correctly and both parties remain informed of any escalations, SunTrust must establish a reconciliation process that will be based upon management reports to reconcile the systems. The requirements for the reconciliation process must be evaluated as both of these capabilities are new to the organization. Our initial thought for responsibility of the process will reside with the business owner of the CRT team and will be supported by the business owner for the SPC teams. This alignment ensures that the CRT team will have oversight of the SPC activities and will ensure the proper follow-up and resolution.

#### SPC Enablement - [REDACTED]

[REDACTED] is a software application that provides workflow management and a rules-based decision engine to support Default management activities. SunTrust uses [REDACTED] as one integrated platform to manage its Default activities for Collections, Loss Mitigation, Foreclosure, and Bankruptcy. The end-user, in this case the SPC, will be able to access an account via [REDACTED] and will have visibility into the status of the loan in any functional area. The SPC will also be able to provide the client with real-time updates as to activities on the account.

The [REDACTED] [REDACTED] application is the foundation application for Default operations, including Collections, Loss Mitigation, Foreclosure and Bankruptcy. As part of the SPC initiative, it will be expanded to incorporate the SPC business area. The initial installation of [REDACTED] into the SunTrust

environment in Q1 2010 included the migration of SunTrust portfolio loans (~15% of SunTrust's default servicing volume) onto the new platform. In Q4 2010, a second conversion effort was executed to migrate the GSE (FNMA, FHLMC) loans, representing approximately ~70% of the SunTrust default servicing portfolio, onto the [REDACTED] platform. The remaining ~15% of loans (FHA, VA, private investors) will be converted onto the [REDACTED] platform in Q4 2011. (The remaining conversion is discussed in more detail below.) The [REDACTED] platform is currently used by 994 personnel (93%) within Default operations.

[REDACTED] provides SunTrust with the ability to implement rules-based deadlines that enable time-based triggers to flag activities on accounts to meet the requirements. An example of this capability is setting a flag to verify the timely decisioning of a loan modification request. [REDACTED] provides document management tracking capabilities by integrating with our internal imaging platform [REDACTED] which will allow us to comply with the requirement that clients do not receive multiple requests for the same information. [REDACTED] will also enhance role clarity by enabling specific role-based capabilities that will allow us to provide future training and procedures specific to each role and activity. Finally, [REDACTED] will provide for greater operational controls, compliance, and risk monitoring through process standardization and will provide for enhanced audit plans and reviews.

Currently, we are assessing enhancements to [REDACTED] that will provide the capabilities and transparency into the loss mitigation and foreclosure functions necessary for the SPC to perform the role. The SPC role within the [REDACTED] application will be a combination of new actions and tasks and the transfer of existing actions and tasks from other roles in the function. This work is complex as we must confirm the SPC has the necessary authority within the application to perform the role while maintaining visibility into the actions that others are responsible to perform. This is expected to be completed as part of the requirements and design phase of the project (see Action Plan below for additional details).

#### Loss Mitigation – [REDACTED]

A key component of SunTrust's Loss Mitigation operation is the [REDACTED]. The [REDACTED] [REDACTED] is a loan modification evaluation tool used to evaluate a client's eligibility for a modification. While the [REDACTED] supports multiple investor modification programs, it is certified by Fannie Mae for the accuracy of the analysis it provides.

When a client communicates that he/she is experiencing financial hardship, a collection agent or SPC will work with the borrower to understand his/her particular situation and will then enter information about



the client's circumstances and financials into the [REDACTED]. Once completed, the [REDACTED] will evaluate the information entered and produces the best available workout options based on the investor's Loss Mitigation Workout Hierarchy.

The [REDACTED] is structured to evaluate the client for a number of loan modification programs based upon specific waterfall logic determined by each investor: Agency loans (those serviced under the requirements of Fannie Mae and Freddie Mac) position the HAMP (Home Affordable Modification Program) as the first offering within their waterfall. Government loans (those insured by the FHA/VA) position the HAMP modification as the last option in their waterfall. SunTrust and other private investors that do not participate in HAMP would not have this program in their specific waterfall. (See Section 1.5 Making Home Affordable for more information regarding SunTrust and HAMP.) If the client is ineligible for HAMP, other loan programs described below may be available.

With the exception for unemployed borrowers, the first workout option generally offered to borrowers under Agency guidelines is HAMP. These borrowers comprise approximately 65% of SunTrust's servicing portfolio. As described by Fannie Mae, this program is designed to help at risk homeowners, both those who are in default and those at imminent risk of default, by providing the borrower with affordable and sustainable monthly payments. The loan is modified only after the borrower successfully completes a trial payment period.

For Agency borrowers deemed ineligible for HAMP, the borrower may be eligible for additional workout options based on the combination of the Agencies' workout hierarchy and the borrower's hardship classification (temporary or long-term). A temporary hardship is a situation where a borrower experiences a loss of income but the circumstances are expected to be of a limited duration such as a natural disaster or a medical condition that temporarily prevents him/her from working. Conversely, a long-term hardship is a situation where the borrower may experience a prolonged loss of income such as a medical disability or job layoff.

Borrowers experiencing a temporary hardship who are not eligible for HAMP will first be evaluated for a Forbearance plan, which is a temporary reduction or suspension of payments that is immediately followed by an arrangement to cure the delinquency. If a Forbearance is not feasible, the borrower may be placed on a Repayment Plan, an arrangement in which the borrower agrees to repay past due amounts while still making regularly scheduled payments.



For all other instances where a borrower is ineligible for HAMP and is experiencing a long-term hardship, the borrower will be evaluated for a Modification under the terms allowable by the investor.

If eligible for HAMP, but unable to qualify or unwilling to participate, the borrower will be evaluated for a HAFA (Home Affordable Foreclosure Alternative) option. HAFA provides two options as an alternative to Foreclosure: a short sale and a deed-in-lieu.

If a borrower is ineligible for HAMP and has been considered for all home retention options, a Non-HAFA Preforeclosure/Short Sale may be offered. If that option is not feasible, then a Non-HAFA Deed-in-Lieu may be offered as a final alternative.

The SPC has visibility into each of the program results and will assist the client through the process of completing the loan modification option determined by the [REDACTED]. In the event the client does not want the modification offered but would prefer a different option (such as a short sale), the SPC is empowered to update [REDACTED] to the solution the client requests. The client would still be subject to qualification of the requested solution.

## **1.5 Making Home Affordable**

Section 6(b) of the Consent Order requires SunTrust to comply with timelines for decisioning Loss Mitigation requests such that the timelines are not “less responsive than ... HAMP”.

Note: As a servicer, SunTrust is not a participant in the HAMP program; however SunTrust does execute HAMP modifications on behalf of its investors who are participants in the program. This participation is at the direction of the specific investor, and does enable the borrower and SunTrust to participate in incentives.

We believe, the MHA Supplemental Directive (Directive) for the establishment of a Single Point of Contact for Borrower Assistance, issued May 18, 2011, provides incremental guidance for the SPC role and capabilities. Although SunTrust is not a Home Affordable Modification Program (HAMP) participant and is not subject to this guidance, we believe the Directive provides valuable input into the design of our SPC role and client-interaction model.

The Directive provides guidance for the following:

- Requirements to determine when an SPC is to be provided to a client
- Standards for assigning and re-assigning an SPC
- Communication scenarios and appropriate outcomes
- SPC access to team members to halt foreclosure activities
- Timelines for completion of specific Loss Mitigation activities (Section 6(b))
- Definition of Servicer’s “reasonable efforts” to comply with exhausting Loss Mitigation efforts
- Requirements for acceptable staffing and caseload management

SunTrust will augment and incorporate elements of the Directive as applicable into our plan to deliver the SPC role and will ensure that timelines for activities do not exceed or are not less responsive than those required by MHA.

#### Assignment of a Relationship Manager / SPC

SunTrust will establish the SPC role within the Default organization. This role will serve as the primary contact for the borrower throughout the home retention, non-foreclosure liquidation, and foreclosure processes. The assignment of the role will occur in Loss Mitigation when the client requests assistance with a loan modification, regardless of delinquency status (i.e., including borrower’s in imminent default), or requests assistance with a non-foreclosure liquidation option. If an account reaches a point where foreclosure actions are required and no SPC assignment has occurred through Loss Mitigation efforts, then a SPC will be assigned to the account prior to the referral to the attorney.

Once assigned to the account, the SPC will be required to certify all prior collection and Loss Mitigation activities to ensure all efforts to assist the client have been completed. The SPC review, or certification, will serve as a control to ensure foreclosure actions are not initiated until Loss Mitigation actions have been exhausted. In addition to the pre-referral review, the SPC will conduct a second certification prior to foreclosure sale to ensure the actual foreclosure action is warranted.

#### SPC Client Notification

MHA requires that SunTrust notify the client upon assignment of an SPC. This written notification must occur within five (5) business days of the assignment and will include the SPC name, phone number,



email address, and physical address. The SPC will attempt to contact the client, via telephone, for introductions to the process, the SPC role, and client expectations to complete a Loss Mitigation review. The SPC will also advise the client of the possibility that a foreclosure may result unless the account can be brought current through payments, a loan modification, or a non-foreclosure alternative.

SunTrust will leverage its existing [REDACTED] to assist to maximize contact with the client. We have designed the client contact process such that the [REDACTED] will be used to contact the client via telephone and then transfer the call to the SPC. The benefit of this approach is that the SPC will not be required to spend valuable time on dialing efforts to contact clients.

In the event it becomes necessary to reassign a client to another SPC, SunTrust will follow the same process and treat the new SPC and client relationship as a new one, following the same written and telephone processes as required during the initial SPC assignment.

#### Client Contact for Loss Mitigation

SunTrust will implement the Agency client solicitation process (discussed later under the Servicer Alignment Initiative section) for all accounts serviced. This process requires SunTrust to send the client a solicitation package when the account is 31-35 days past due (dpd) and 61-65 dpd. This package will include an application for Loss Mitigation, information about client outreach options such as the MHA website, and other documents (4506T, checklist) to support a loan modification or non-foreclosure alternative. Each solicitation package will include a pre-paid envelope to return the solicitation package. These two solicitation packages will meet the MHA requirement for two written notices for Loss Mitigation and additionally exceed MHA requirements (a MHA package is only required after determining a client's interest in a Loss Mitigation review).

The borrower will be advised that the completed response package (the returned solicitation package is called a response package) must be returned within thirty (30) days, which exceeds the MHA requirement that the client have no less than fifteen (15) days to return the package. The client will be sent a letter acknowledging the receipt of a full response package within three (3) days, which is shorter than the ten (10) days required under MHA. If the package is not complete, SunTrust will provide notice to the borrower within an additional five (5) business days.



SunTrust will complete a Loss Mitigation evaluation for modification or non-foreclosure alternatives within thirty (30) days, which is compliant with MHA requirements. Upon a final decision, SunTrust will provide written notification of the decision to the client within five (5) business days in accordance with MHA and Agency requirements. Along with the notice of written approval, the SPC will contact the client to advise them of the decision and the next steps in the process. Upon offer and notification of a Loss Mitigation option, the borrower will have fifteen (15) days to respond to the approval by accepting the offer and completing and returning the required documents.

In addition to the written solicitation process, SunTrust is also adopting the Agency client telephone contact strategy, which requires SunTrust phone the client no less than once every three (3) days, at differing times, to determine the client's situation and their intentions, and advise them of Loss Mitigation options. By calling once every three (3) days, SunTrust will make up to ten (10) phone attempts within thirty (30) days to the client. This strategy will exceed the MHA requirements for four (4) phone attempts within a thirty (30) day period.

#### Foreclosure Responsibilities

As defined above, if an SPC assignment for an account has not occurred as a result of Loss Mitigation efforts including imminent default, for example, if we have been unsuccessful in reaching the client, an SPC will be assigned prior to the referral for legal action for foreclosure. The SPC will be required to review the efforts to date and determine whether SunTrust has complied with regulatory and investor requirements for collection and Loss Mitigation solicitation efforts. If not, the referral to foreclosure will not occur until Loss Mitigation efforts are exhausted.

Additionally, the SPC will be required to complete a foreclosure certification review at least seven (7) days prior and no more than fifteen (15) days prior to a scheduled foreclosure sale date. The SPC must also ensure that any last minute, fully-completed borrower response packages are reviewed when they are provided seven business days prior to the sale date. Upon receipt of a fully completed borrower response package, the SPC must notify the foreclosure department to halt the sale until such time as the response package can be decisioned.

## **1.6 Agency Service Alignment Initiative**

As a servicer, SunTrust can be expected to receive new default servicing requirements from its investors that may impact the SPC role. This is a "business as usual" activity that requires us to incorporate

different requirements into our processes to meet legal, regulatory, and investor requirements.

In compliance with Federal Housing Finance Authority (FHFA) guidance, the Agencies have issued the Servicer Alignment Initiative (SAI), which results in both Fannie Mae and Freddie Mac aligning their default servicing processes and requirements. The Agency announcements were provided in June of this year and are to be implemented no later than October 1, 2011. The requirements are closely aligned with the Order and MHA requirements to improve client default management standards, ensure timely communication and Loss Mitigation evaluations, and to protect against foreclosure activity when a loan is in Loss Mitigation.

### **SAI Requirements**

#### **Quality Right Party Contact (QRPC)**

According to the SAI, a Quality Right Party Contact (QRPC) is *“a uniform standard for communicating with the borrower, co-borrower or a trusted advisor (collectively referred to as “borrower”) about resolution of the mortgage delinquency. When the servicer is in discussions with the borrower, the servicer must make every attempt to achieve QRPC by:*

- *establishing a rapport with the borrower, expressing empathy and communicating a desire to help;*
- *determining the reason for delinquency and whether such reason is temporary or permanent in nature;*
- *determining whether the borrower has vacated or plans to vacate the property;*
- *determining the borrower’s current perception of their financial circumstances and ability to repay the mortgage debt;*
- *setting payment expectations and educating the borrower on the availability of foreclosure prevention alternatives as appropriate; and*
- *obtaining a commitment from the borrower to either resolve the delinquency through traditional methods (paying the total delinquency amount) or engaging in a foreclosure prevention alternative.”*

The QRPC will assist SunTrust to evaluate a client’s condition, their intentions for the property, and assist in identifying the appropriate resolution to assist the client in addressing their needs.

#### **Outbound Call Attempts**

The SAI establishes new standards for outbound telephone contact attempts and requires SunTrust to call a delinquent client at least once every three days until one of the following outcomes is achieved:

- the loan is paid current
- a QRPC is achieved – all SAI criteria must be met
- a foreclosure sale date is scheduled and is no more than
  - 30 days in the future for non-judicial foreclosure states
  - 60 days in the future for judicial foreclosure states

SunTrust's current outbound strategies already meet this directive for timeline calling but processes will be modified to continue calling until either a QRPC is achieved for the foreclosure timeline is reached.

#### Borrower Solicitation for Loss Mitigation

The SAI has established new standards for written solicitation to a delinquent client to receive a review for Loss Mitigation. The new standard requires SunTrust to mail a "borrower solicitation package" (BSP) to a delinquent client each time the account is between 31 to 35 days past due (31 day BSP) and 61 to 65 days past due (61 day BSP). Respectively, these packages are sent when an account is two and/or three payments delinquent. The BSP package contains information to advise the client of various Loss Mitigation options, outreach and online support such as HAMP, Uniform Borrower Assistance Form, and authorization to execute an Internal Revenue Service (IRS) Tax Transcript (4506-T).

SunTrust has evaluated the need to assign the SPC at the time the BSP is sent and has determined that the SPC will be assigned to the account when a BSP package is returned, in whole or in part. Upon receipt of the complete BSP, the package is now called a "borrower response package" (BRP) and initiates the underwriting process to evaluate the client's eligibility for a Loss Mitigation activity. If the BSP is not complete, SunTrust will launch a "required documents process" that works with the client to deliver the necessary documents for a complete BSP. The required documents process is a series of outbound communications via letters, [REDACTED] and phone calls by the SPC to inform the client of any additional information necessary.

Upon decision of the client's Loss Mitigation review, SunTrust is implementing a quality assurance review within the underwriting process. This review will be conducted on all Loss Mitigation decisions whether they are an approval or declination. The intent is to improve the accuracy of the underwriting process and also to ensure that a client's file is decided on a timely basis. If the quality assurance reviewer concurs with the decision, the decision is forwarded to the SPC for communication to the client. If the quality assurance reviewer does not concur with the decision, the loan is returned to the Negotiator

(see pages 44-45 for role definitions) for reevaluation.

### Foreclosure Certification Process

The SAI has established standards for a foreclosure certification process that must occur prior to SunTrust's referral of an account to an attorney to initiate foreclosure action and another that must occur prior to the foreclosure sale. The pre-referral certification must occur prior to the sale and will not be approved while any Loss Mitigation, BSP, BRP, or breach letters are still active. For the certification prior to foreclosure sale, SunTrust must provide written notice to the attorney that there are not any active Loss Mitigation activities and that the attorney must continue with the foreclosure proceedings.

SunTrust believes that these certification processes are effective controls to ensure a client is not foreclosed upon when an active Loss Mitigation activity is underway. We have assigned the certification responsibility to the SPC because they are the most knowledgeable resource about the client's condition and intentions. Additionally, the SPC role is designed to have the greatest visibility across default activities and thus would be able to stop a foreclosure should circumstances warrant.

### Consent Order Section 26 – Loss Mitigation “Approve” vs. “Acceptance”

The timelines established by MHA and SAI are generally aligned and it is SunTrust's intent to comply with the timelines within each program as required by the Order and investor requirements. During our evaluation of the requirements, SunTrust determined the possibility for a conflict existed between the Order and the SAI requirements.

The Order states in paragraph 6(g) that a client's loan “has been approved for modification on a trial or permanent basis, (i) no foreclosure or further legal action predicate to foreclosure occurs, unless the borrower is past due on two or more payments post-dating the trial or permanent modification”. The SAI has a requirement that a foreclosure referral may be initiated if the client does not accept a Loss Mitigation offer within fourteen (14) days of the offer.

SunTrust's concern is specific to the interpretation of “approve” under the Order and “accept” under the SAI. It is our interpretation that “approval” constitutes the communication of the underwriting decision to the client while our interpretation of “accept” is based upon the Agencies. The Agencies define the “accept” as the communication of the underwriting decision and the client's fulfillment of returning all



documents and the first payment under the modification – trial or permanent. SunTrust has received guidance from the Board that there is not a conflict on the basis that “post-dating the trial or permanent modification” means the loan was actually modified.”

[REDACTED]

[REDACTED] SunTrust will not initiate any foreclosure actions, including referral or foreclosure sales, until such time as the client is two payments or more past due and the 14-day client acceptance period has expired. This may result in longer foreclosure timelines but will ensure that SunTrust is compliant with the Order.

### 1.7 Gap Analysis of Consent Order Requirements for Single Point of Contact

SunTrust has completed a gap analysis of its existing capabilities (“Current State”) compared to the requirements of the Consent Order, our expected delivery “Future State” of the requirement, and the associated risks and contingency plans necessary to ensure delivery of the requirements in the Consent Order.

<b>Requirement</b>	(a) Measures to ensure that staff processing a borrower’s Loss Mitigation request routinely communicates and coordinates with staff processing the foreclosure on the borrower’s property
<b>Current State</b>	SunTrust has an established process for communication between the Loss Mitigation and Foreclosure departments. The existing process leverages the [REDACTED] platform, which will notify a department when a specific action or event occurs within another department. For example, if a loan is in the process of foreclosure and a loan modification is approved, [REDACTED] sends an “alert” from the Loss Mitigation department to the Foreclosure department that a loan modification is underway. (Alerts are “soft” notices to a specific party regarding an action taken on a loan and are for informational purposes only.) Similarly, if a loan is being reviewed for a Loss Mitigation and a foreclosure action is taken, [REDACTED] “alerts” the Loss Mitigation department of the foreclosure action.
<b>Future State</b>	[REDACTED] will be enhanced to create “hard” stops within the process when an account is



	<p>approved for a Loss Mitigation. [REDACTED] will then “alert” the Foreclosure department but will also prevent the foreclosure process from moving forward. This enhancement will include an automated notification to the attorney to suspend the foreclosure process and await further instructions.</p>
[REDACTED]	<ul style="list-style-type: none"> <li>• Enhanced [REDACTED] workflow processes and controls</li> <li>• Modified process flows and procedures for Loss Mitigation and Foreclosure</li> </ul>
[REDACTED]	<p>The delivery risk associated with meeting this requirement is considered [REDACTED]. The basic workflow infrastructure currently exists and operates as intended within [REDACTED] but will be enhanced with additional controls. [REDACTED]</p> <p>[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p> <p>[REDACTED] This risk is considered [REDACTED] until such time as the “hard” stops can be implemented.</p>
<b><u>Contingencies</u></b>	<p>To address the operational risks, SunTrust will proceed with implementing the foreclosure pre-referral and pre-foreclosure sale certification processes. These processes will ensure that a foreclosure proceeding will not occur when Loss Mitigation activities are underway. If the SPC role is not able to complete the certification, SunTrust will implement a review function separate from the existing foreclosure process to ensure this requirement is met.</p>

<b><u>Requirement</u></b>	<p>(b) appropriate deadlines for responses to borrower communications and requests for consideration of Loss Mitigation, including deadlines for decision making on Loss Mitigation Activities, with the metrics established not being less responsive than the timelines in HAMP</p>
<b><u>Current State</u></b>	<p>Although complying with HAMP specific timelines will be a new requirement for SunTrust, we do have the ability to set specific system triggers based upon defined timelines (time-based triggers). Currently, [REDACTED] has the ability to set timelines for specific actions and milestones and then report whether they were completed prior to the deadline. If the deadline is not met, [REDACTED] routes the loan to a specific work queue for past due actions and places it on a dashboard within the application. Once it is placed on the dashboard, the responsible party is alerted to review the account and take the necessary steps to complete the work. The delinquent items on the dashboard are also visible to specific managers to review the accounts and ensure the work is being managed on a timely basis.</p>
<b><u>Future State</u></b>	<p>SunTrust will enhance [REDACTED] to comply with HAMP specific timelines, and the SPC</p>

	<p>will be enabled with access to the [REDACTED] dashboard to monitor past due actions. We will review existing dashboards and determine whether any additional monitoring and tracking is required. To ensure that the Loss Mitigation work is completed on a timely basis, we are augmenting our procedures and training where required. See “Section 1.5 Making Home Affordable” above for more detail. Additionally, SunTrust will develop new operational reports to monitor compliance and exceptions to timelines. These reports will include loan level detail for accounts that are not compliant and will also report on trends over time.</p>
<p>[REDACTED]</p>	<ul style="list-style-type: none"> <li>• Addition of the SPC role within the [REDACTED] application</li> <li>• Revised workflow timeframes within the [REDACTED] application</li> <li>• Revised procedures and training for impacted Default departments (SPC, Loss Mitigation, Foreclosure)</li> </ul>
<p>[REDACTED]</p>	<p>The delivery risk associated with meeting this requirement is considered [REDACTED] [REDACTED] currently has time-based triggers that will need to be updated for the new HAMP timelines reducing the risk of missing timelines. The operational risk associated with meeting this requirement is considered [REDACTED] This is based upon the existing time-based triggers within [REDACTED] In addition, we have updated our training materials and desktop procedures to reflect the new timeline requirements.</p>
<p><b>Contingencies</b></p>	<p>As necessary, SunTrust will enhance operational reporting capabilities for teammates and managers to view loans that have exceeded specific timelines. The exceptions will be tracked over time to identify operational issues such as increased staffing needs or the need for additional teammate training. Also, we will establish operational testing to ensure compliance with the timelines.</p>

<p><b>Requirement</b></p>	<p>(c) establishment of an accessible and reliable single point of contact for the borrower so that the borrower has access to an employee of SunTrust Mortgage to obtain information throughout the Loss Mitigation and foreclosure processes</p>
<p><b>Current State</b></p>	<p>Today, each department in the Default cycle – Collections, Loss Mitigation, Bankruptcy, Foreclosure – is responsible for their communications with the client. Neither this role nor this capability exists within the existing Default organization.</p>
<p><b>Future State</b></p>	<p>SunTrust will establish a single point of contact for clients in Loss Mitigation and Foreclosure. The SPC role, titled a Home Preservation Client Representative (HPCR), is new to SunTrust and represents a significant change to the current operating model. A single point of contact for clients in Loss Mitigation and</p>

	<p>Foreclosure is a new capability and is expected to favorably impact client communications for all functional areas. See “Section 1.5 Approach – Vision” above for more details regarding the new role.</p>
<p>██████████ ██████████</p>	<ul style="list-style-type: none"> <li>• Creation of the SPC role, role definition, job description and compensation approach</li> <li>• New SunTrust staff to fulfill the new SPC role</li> <li>• Defined processes and procedures for the SPC role</li> <li>• New training curriculum and training material for the SPC position</li> <li>• Revised process flows for Loss Mitigation, Foreclosure, Collections and Bankruptcy to account for SPC position</li> <li>• Modified telephony requirements, including IVR, dialer and VRU changes</li> </ul>
<p>██████████</p>	<p>The delivery and operational risks associated with meeting this requirement are considered ██████████. The risks to meet this requirement are summarized as either organizational or technology. We are not considering these risks mutually exclusive. Organizational risks are considered ██████████ and are primarily focused upon the ability to hire and train the appropriate number of teammates to fulfill the new role. Technology risks are also considered ██████████ and are primarily focused upon the ability of the technology vendor to incorporate the business and technical requirements into the ██████████ platform to meet the deadline to deliver the SPC capabilities.</p>
<p><b><u>Contingencies</u></b></p>	<p>In order to address these collective risks, we have adjusted the deployment schedule by one month to provide additional time for a November 5, 2011 “go-live” date. This new delivery timeline is not dependent on the new GSE requirements due on October 1, 2011. The November 5<sup>th</sup> deployment date will provide additional time to hire and train the SPC role and will allow additional development and testing time for the delivery of the technology requirements associated with this requirement. Process risks for this requirement are considered ██████████ as we have completed a comprehensive assessment of the steps necessary to execute the SPC requirements. Organizational risk is being addressed by hiring a high percentage of existing SunTrust staff into the HPCR role, and supplementing them with external hires. Both resource pools will be required to have strong experience in collections, loss mitigation, foreclosure, call center, customer service, or sales. Coaches and experienced call center personnel will be walking the floor during implementation to ensure the HPCR is able to deliver the expected customer experience. To address the technology risks, in addition to the aforementioned extension of the delivery date,</p>

	<p>SunTrust has deliberately limited the scope of technical development for [REDACTED] to only those critical technology items necessary to ensure the success of the role. We are cataloging the additional enhancements, including the supplemental processing work necessary to ensure the complete compliance and control, for phased future implementations. It is our position that tightly managing the vendor to a limited number of new requirements will improve the ability for them to deliver against the existing program deadlines. SunTrust will establish a plan with [REDACTED] to deliver additional requirements that will enhance or automate processes.</p> <p>In the event that these steps and measures do not adequately address or mitigate risks associated with delivery of the technology to meet this requirement, we will establish a plan to recover or react to one of three scenarios: delayed delivery dates, code quality issues, and catastrophic or systemic [REDACTED] failures. These details are discussed below under “Section 1.7.1.</p>
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<b><u>Requirement</u></b>	(d) a requirement that written communications with the borrower identify by name the primary single point of contact along with one or more direct means of communication with the primary single point of contact, together with information about secondary points of contact in the event that the primary single point of contact is unavailable
<b><u>Current State</u></b>	This is a new capability that must be delivered as part of the SPC role.
<b><u>Future State</u></b>	SunTrust has identified 300+ Default related communications that will require the inclusion of the SPC contact information. A central group in Default will be established to manage the HPCR assignments and re-assignments, and will ensure that the SPC name and contact information will be included on the letters. A secondary point of contact will be available from the same team if the primary contact is not available.
[REDACTED]	<ul style="list-style-type: none"> <li>• 300+ client communications (i.e. letters) that require modification</li> <li>• Reassignment logic for identifying a secondary point of contact</li> <li>• Process flows for loan reassignment</li> </ul>
[REDACTED]	The delivery risk associated with meeting this requirement is considered [REDACTED]. All letters have been identified, and 40+% are sent through the [REDACTED] platform, which requires a minimal effort to change the letter templates within the system. Additionally, any letters sent manually to the client have been identified and are being updated to include the SPC contact information. The operational risk associated with



	meeting this requirement is considered [REDACTED]. The risk is the letters will not be updated to reflect the SPC on each communication the client receives.
<b><u>Contingencies</u></b>	Communications are being prioritized by importance and frequency. In the event that all letters are not be updated by the implementation date, the prioritized letters, primarily those involved in the introduction and early assignment of the HPCR, will be the first to be completed. In addition, to ensure the client is aware of the HPCR assignment, the HPCR will regularly communicate with the client through a series of telephone calls. The HPCR is also responsible to ensure that the HPCR “welcome” letter is sent to the client followed up with an introductory phone call that will include providing the HPCR contact information to the client.

<b><u>Requirement</u></b>	(e) measures to ensure that the single point of contact has access to current information and personnel (in-house or third-party) sufficient to timely, accurately, and adequately inform the borrower of the current status of the Loss Mitigation and foreclosure activities
<b><u>Current State</u></b>	SunTrust currently has in production the [REDACTED] platform to manage and track default work activities associated with loans in the GSE portfolios. A key capability of the technology, and a key driver for its selection as SunTrust's core default technology, is that it enables users to have visibility to a loan at any point in the default processing cycle – collections, Loss Mitigation, bankruptcy, and foreclosure. Currently [REDACTED] is used to manage and track work activities associated with non-GSE loans (government and privately owned). SunTrust is nearing completion on the conversion of the non-GSE loans onto the [REDACTED] platform (expected by December 10, 2011). When completed, all default related work activities will be managed on the [REDACTED] platform.
<b><u>Future State</u></b>	The future state is a more consistent and better defined end-state use of the [REDACTED] platform, including the creation of the SPC role within the application. For the SPC role, additional screens and triggers will be programmed into the [REDACTED] platform to ensure compliance with HAMP, GSE, and regulatory requirements. See “Section 1.4 Approach – SPC Enablement [REDACTED] above for additional details. In addition, SunTrust will utilize operational reports to ensure HAMP timelines requirements measure timely access to current information. The accuracy of the information will be addressed with enhanced processes, procedures, and controls. To measure the adequacy of our ability to provide information to the client, we will monitor client complaints for indications this requirement is not being met. Additionally, we will

	utilize the HPCR and HCPR team leads for feedback regarding the adequacy of information and timeliness of information to complete their assignments.
██████████ ██████████	<ul style="list-style-type: none"> <li>• Completion of pipeline conversion efforts for FHA, VA &amp; private investors</li> <li>• Creation of the SPC role within the ██████████ application</li> <li>• Enhanced ██████████ workflow processes and controls</li> <li>• New processes and procedures for the SPC role</li> <li>• Modified process flows and procedures for Loss Mitigation and Foreclosure</li> </ul>
██████████	The delivery and operational risks associated with meeting this requirement are considered ██████████ and are primarily a function of converting the FHA, VA, and private investor loans onto the ██████████ platform. These risks are similar to the organizational and technology risks described above for delivery of requirement C – the creation of a single point of contact.
<b>Contingencies</b>	A significant amount of the risk is being addressed by separating the conversion from the implementation of the SPC technology, and providing up to six weeks of additional testing and trials. SunTrust, with ██████████ have developed a specific release planning schedule that will deliver the application capability and conversion of the accounts by December 10 <sup>th</sup> . The risks to this schedule are ██████████ development and delivery capacity and are discussed in the “Contingencies” section under requirement C above and under Section 1.7.1 below.

<b>Requirement</b>	(f) procedures and controls to ensure that a final decision regarding a borrower’s Loss Mitigation request (whether on a trial or permanent basis) is made and communicated to the borrower in writing, including the reason(s) why the borrower did not qualify for the trial or permanent modification and, if applicable, the net present value calculations utilized by SunTrust Mortgage, and that involve the single point of contact within a reasonable time before any foreclosure sale occurs
<b>Current State</b>	SunTrust meets this requirement today by providing written and oral communication to the client of a Loss Mitigation decision. For Loss Mitigation approvals, clients are notified in writing and by telephone of the decision. Clients that are declined for a Loss Mitigation action are provided written communication of the decision.
<b>Future State</b>	SunTrust will enhance the written communications to include all information required under this requirement, including information on NPV calculations, and a phone call by the HPCR on all decisions. To ensure decisions are timely and accurate, SunTrust will establish a quality assurance (QA) review function for each Loss Mitigation



	decision.
<p>██████████</p> <p>██████████</p>	<ul style="list-style-type: none"> <li>• Enhanced written communications</li> <li>• New SPC/HPCR call scripting for client communication</li> <li>• Established “quality assurance” function for each loss mitigation decision</li> </ul>
██████████	The delivery and operational risks associated with meeting this requirement are considered ██████████. The letters have been identified, the process has been designed, and HPCR training will address how to handle difficult conversations, including offering clients non-retention, non-foreclosure alternatives such as short sales and deeds in lieu of foreclosure.
<b><u>Contingencies</u></b>	Accounts that do not pass the QA assessment will be re-underwritten to address the concerns of the QA review. A second QA review will also be completed. SunTrust will establish QA reports to monitor the accuracy and timelines of the decisioning process. In addition, prior to a foreclosure referral or a foreclosure sale, each loan will be independently reviewed by the HPCR for compliance with the customer contact requirements.

<b><u>Requirement</u></b>	(g) procedures and controls to ensure that when the borrower’s loan has been approved for modification on a trial or permanent basis, (i) no foreclosure or further legal action predicate to foreclosure occurs, unless the borrower is past due on two or more payments postdating the trial or permanent modification; and (ii) the single point of contact remains available to the borrower and continues to be referenced on all written communications with the borrower
<b><u>Current State</u></b>	This requirement is addressed in the same manner as Requirement (a) above. SunTrust has an established process for communication between the Loss Mitigation and Foreclosure departments. The existing process utilizes the ██████████ platform, which sends a notification to a department when a specific action or event occurs within another department. For example, if a loan is in the process of foreclosure and a loan modification is approved, ██████████ sends an “alert” to the foreclosure department that a loan modification is underway. (Alerts are “soft” notices to a specific party regarding an action taken on a loan and are for informational purposes only.) Similarly, if a loan is being reviewed for a Loss Mitigation and a foreclosure action is taken, ██████████ “alerts” the Loss Mitigation department of the foreclosure action.
<b><u>Future State</u></b>	██████████ will be enhanced to create “hard” stops within the process when an account is

	<p>approved for a Loss Mitigation. [REDACTED] will then “alert” the Foreclosure department but will also prevent the foreclosure process from moving forward. This enhancement will include an automated notification to the attorney to suspend the foreclosure process and await further instructions. In addition, the HPCR will also receive the alert to ensure the appropriate action was taken. SunTrust has also designed the SPC program such that an HPCR will remain assigned to the account through the trial modification period and 6 months after a final modification is completed.</p>
<p>[REDACTED]</p>	<ul style="list-style-type: none"> <li>• Enhanced [REDACTED] workflow processes and controls</li> <li>• New process flows for SPC/HPCR role</li> <li>• Modified process flows and procedures for Loss Mitigation and Foreclosure</li> </ul>
<p>[REDACTED]</p>	<p>The delivery risk associated with meeting this requirement is considered [REDACTED]. The basic workflow infrastructure currently exists and operates as intended within [REDACTED] but will be enhanced with additional controls. The operational risk is that a loan proceeds to Foreclosure during an active Loss Mitigation. This risk is considered [REDACTED] until such time as the “hard” stops can be implemented.</p>
<p><b><u>Contingencies</u></b></p>	<p>To address the operational risks, SunTrust will proceed with implementing the foreclosure pre-referral and pre-foreclosure sale certification processes. These processes will ensure that a foreclosure proceeding will not occur when Loss Mitigation activities are underway. If the HPCR role is not able to complete the certification, SunTrust will implement a review function separate from the existing foreclosure process to ensure this requirement is met.</p>

<p><b><u>Requirement</u></b></p>	<p>(h) policies and procedures to enable borrowers to make complaints regarding the Loss Mitigation process, denial of Loss Mitigation requests, the foreclosure process, or foreclosure activities that prevent a borrower from pursuing Loss Mitigation options, and a process for making borrowers aware of the complaint procedures</p>
<p><b><u>Current State</u></b></p>	<p>SunTrust currently discloses to clients its address for filing a complaint, scripts its Loss Mitigation representatives on how to handle customer complaints and escalations, and instructs its foreclosure attorneys to forward complaints. Complaints and escalations are handled by a centralized Client Resolution Team (CRT) separate from Loss Mitigation.</p>
<p><b><u>Future State</u></b></p>	<p>SunTrust will further enhance its written communication to clients notifying them of the ability to appeal Loss Mitigation decisions or file complaints regarding foreclosure activities. Clients will be provided a notice in the HPCR “welcome” letter and the</p>





	<p>Loss Mitigation decision letter of the ability to appeal or dispute a decision or outcome. Additionally, HPCRs will be trained to recognize complaints, and escalate appropriately to a supervisor, who in turn will ensure it is logged, and working with the customer resolution team, ensure it is resolved.</p>
<p>██████████ ██████████</p>	<ul style="list-style-type: none"> <li>• Enhanced written communications</li> <li>• New SPC/HPCR training regarding complaint review and escalation</li> <li>• SPC/HPCR client escalation call scripting</li> <li>• SPC/HPCR process flows for complaint management and escalation</li> </ul>
<p>██████████</p>	<p>The delivery and operational risks associated with meeting this requirement are considered ██████████. This requirement requires enhancing the content of letters to the client and additionally including these steps in the training material and procedures for the HPCR role.</p>
<p><b><u>Contingencies</u></b></p>	<p>Management will monitor the number of complaints and escalations, and will recruit additional resources from the Bank’s client escalation unit and the customer contact unit as appropriate.</p>

<p><b><u>Requirement</u></b></p>	<p>(i) procedures for the prompt review, escalation, and resolution of borrower complaints, including a process to communicate the results of the review to the borrower on a timely basis</p>
<p><b><u>Current State</u></b></p>	<p>In addition to establishing the CRT team in Default, SunTrust is currently expanding and enhancing the client complaint and escalation process managed through the SunTrust Online (STOLI) department. The CRT has established service levels that require a client complaint is acknowledged in one business day and resolved in thirty days. Until the complaint is resolved, a CRT representative will contact the client at least once within a seven day period to apprise them of the status of the complaint resolution. This process will continue until the issue is resolved.</p>
<p><b><u>Future State</u></b></p>	<p>SunTrust will incorporate the SPC process into the existing CRT team. The CRT will have final responsibility to resolve client complaints and disputes. The HPCR will be made aware of any complaints that are raised except where the HPCR is the subject of the complaint. In those instances, the CRT team will have the authority to reassign the client to a new HPCR. HPCRs will be trained to review an account for a complaint during the foreclosure review to ensure that any complaint has been resolved prior to a foreclosure referral or foreclosure sale decision. See “Section 1.5 Approach – Client Complaints and Escalation Process” above for further details.</p>

[REDACTED]	<ul style="list-style-type: none"> <li>• SPC/HPCR process flows for complaint management and escalation</li> <li>• New SPC/HPCR training regarding complaint review and escalation</li> </ul>
[REDACTED]	The delivery and operational risks associated with meeting this requirement are considered [REDACTED]. The CRT has been established and is operating as designed.
<b>Contingencies</b>	Management will monitor the number of complaints and escalations, and will recruit additional resources from the Bank’s client escalation unit and the customer contact unit as appropriate.

<b>Requirement</b>	(j) policies and procedures to consider loan modification or other Loss Mitigation Activities with respect to junior lien owned by SunTrust, the Bank, or SunTrust Mortgage where SunTrust Mortgage services the associated first lien mortgage and becomes aware that such first lien mortgage is delinquent or has been modified
<b>Current State</b>	SunTrust currently considers the second lien payment in restructuring a first but does not require that a SunTrust-owned junior lien must be modified at the time a first is being restructured.
<b>Future State</b>	SunTrust will establish policy and enhance process and procedures to require a SunTrust-owned junior lien to be reviewed for modification at the time a first lien is restructured. Modifications for junior lien loans will focus upon extending the term of the loan or reducing the interest rate on the loan to reduce the client’s monthly payment. Home equity lines of credit will be reviewed for interest rate reductions. The HPCR will be trained and provided procedures to ensure compliance with this requirement.
[REDACTED]	<ul style="list-style-type: none"> <li>• Enhanced junior lien loan modification processes and procedures</li> <li>• New SPC/HPCR processes for junior lien review, communication and modification</li> <li>• New SPC/HPCR training for junior lien review, communication and modification</li> <li>• Established policy to ensure junior lien review during first lien modification process</li> </ul>
[REDACTED]	The delivery and operational risks to comply with this requirement are considered [REDACTED] primarily due to the communication across the loss mitigation representatives that handle first and junior liens, and the differences in the underlying technologies. The risk in the junior lien review may be that a loan modification for the junior lien loan or line may not result in a material decrease in the client’s payment. This may be a result of a small principal balance or a low interest rate such as those currently associated with a home equity line of credit.
<b>Contingencies</b>	SunTrust can mitigate the risk or coordination between the two departments by



	creating or enhancing management reports to notify the junior lien Loss Mitigation team that a first mortgage is currently under review. Additionally, the QA review for Loss Mitigation will include a requirement to determine whether a SunTrust junior lien exists and whether it was included as part of the first lien modification decision.
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<b><u>Requirement</u></b>	(k) policies and procedures to ensure that timely information about Loss Mitigation options is sent to the borrower in the event of a delinquency or default, including plain language notices about the pendency of loan modification and foreclosure proceedings
<b><u>Current State</u></b>	SunTrust currently follows regulatory, state, and investor requirements for providing information to clients regarding Loss Mitigation options, which may include MHA, Hope Now, and other outreach programs. SunTrust has completed a review of the language in its communication to clients and has made considerable effort to ensure that the communication to the client is in “plain language”, while complying with legal or investor required language and disclosures.
<b><u>Future State</u></b>	SunTrust is adopting the GSE strategic alignment initiative (SAI) solicitation package for all mortgage loans it services. The SAI solicitation package is sent to a client when their loan is 31 days, and subsequently, 61 days past due. These solicitation packages provide the client with a list of options and resources available to them to receive a Loss Mitigation review. Additionally, SunTrust will follow the HAMP timelines as required under Requirement 6(b) of the Order. See “Section 1.7 Agency Service Alignment Initiative – Borrower Solicitation for Loss Mitigation” above for additional details.
[REDACTED]	<ul style="list-style-type: none"> <li>• Revised Default (Collections, Loss Mitigation, Foreclosure, Bankruptcy) processes and procedures to comply with SAI</li> <li>• New SPC/HPCR processes that align with SAI</li> <li>• Creation of SAI borrower solicitation package within the [REDACTED] application</li> </ul>
[REDACTED]	The delivery risk associated with meeting this requirement is considered [REDACTED]. The operational risk associated with meeting this requirement is considered [REDACTED]. The two primary risks are 1) the timing and delivery of communication, and 2) the ability to provide “plain language” communication to the client.
<b><u>Contingencies</u></b>	The risk associated with delivery of client communication is discussed under Requirement (b) above. By adhering to the GSE SAI requirements for the entire portfolio, a consistent process and expectation can be established and managed with



	<p>employees and clients. Additionally, management will develop reports to validate the appropriate triggers are met. The second risk of providing the client with “plain language” communications will be managed through the HPCR. The HPCR will be trained, versed, and informed on each communication to the client and will be available to discuss any questions or concerns the client may have. The HPCR will be scripted to ensure that at the conclusion of each call, the client is asked if they understood the specific requirements and to ask any clarifying questions.</p>
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<b><u>Requirement</u></b>	(l) policies and procedures to ensure that foreclosure and related documents provided to borrowers and third parties are appropriately maintained and tracked, and that borrowers generally will not be required to resubmit the same documented information that has already been provided, and that borrowers are notified promptly of the need for additional information
<b><u>Current State</u></b>	SunTrust currently images all inbound documentation provided by clients. This process utilizes the existing [REDACTED] imaging platform and is integrated with the [REDACTED] platform. SunTrust also notifies clients via the [REDACTED] regarding missing documents required for a Loss Mitigation review.
<b><u>Future State</u></b>	SunTrust will enhance its document image and capture process by leveraging the processes currently used for mortgage loan originations. These processes will provide additional expertise in this area, including expanded operational controls, enhanced reporting, and increased scale for the organization. In addition, SunTrust will enhance the client notification process by expanding the [REDACTED] to notify clients of documents received or those that remain outstanding. The HPCR will have visibility into the tracking of documents through [REDACTED] and will be responsible to follow up with clients in a timely manner to address documentation issues.
[REDACTED]	<ul style="list-style-type: none"> <li>Enhanced document image and capture processes</li> <li>Enhanced client communications through [REDACTED]</li> </ul>
[REDACTED]	The delivery and operational risks associated with meeting this requirement are considered [REDACTED]. The primary risk is reviewing the documents provided by clients and confirming they are correctly indexed and categorized.
<b><u>Contingencies</u></b>	SunTrust will monitor documents that do not meet existing indexing standards and identify where refinements or enhancements to the process are required. SunTrust will develop operational reports to monitor document receipt and tracking. Exceptions to timelines will be included in the operational reports. The HPCR will be responsible

[REDACTED] for monitoring exceptions and taking the appropriate action to resolve the exception.

**Risk Rating Key**

- **Low** – Likelihood of occurrence is <25% AND the resulting impact of risk realization is manageable with minimal impact to business operations.
- **Medium**– Likelihood of occurrence is 25-50% OR the resulting impact of risk realization will have a manageable but measurable impact to business operations.
- **High** – Likelihood of occurrence is >50% OR the resulting impact of risk realization will have a significant, measurable impact to business operations

Management’s assessment of the risks associated with individual components are primarily rated as [REDACTED], however, the collective risks of the Single Point of Contact program are considered [REDACTED]

**1.7.1 [REDACTED] Delivery Risks and Contingency Plans**

The largest risk to the implementation of the Single Point of Contact capability is the ability of the technology vendor ([REDACTED]) to complete the required [REDACTED] changes within the specified timeframes. Specific technology risks related to [REDACTED] have been identified and mitigated where possible through tighter scope controls, increased executive supervision and advance testing by line of business personnel. [REDACTED]

In the event the [REDACTED] application does not perform as expected, the following contingency plans have been identified, depending on the severity of the failure:

*Delayed Technology Delivery Dates*

In the event [REDACTED] fails to deliver the committed functionality within the established project timeframes, the following contingency plan will be executed:

1. The extent of the delay will be evaluated. Although the current timeline does not contain significant schedule contingency, some minor schedule contingency does exist.
2. If the anticipated delay is minimal (1-2 weeks), the delay will be absorbed within the available schedule contingency.
  - a. A revised delivery schedule will then be published and timelines will be adjusted accordingly, while maintaining the planned project end dates.
  - b. User training and staff rollout will be minimally impacted. A revised training plan and deployment schedule will be developed, published, and communicated to address the

impact.

3. If the anticipated delay is moderate (3-4 weeks), the team will explore the option of foregoing a phased deployment strategy and instead focus on a traditional “big bang” implementation approach.
  - a. A revised deployment schedule will be developed and communicated to all teams. We will forego our planned November implementation and combine it with our scheduled December implementation.
  - b. The deployment team will revamp the system rollout and implementation plans.
  - c. The training team will revise the training schedule to ensure the SPC training delivery remains close to the revised deployment date for increased effectiveness.
  - d. The human resources and staffing team will revise their hiring plan to adjust to a single deployment.
4. If the anticipated delay is significant (5+ weeks), the team will enact either the code quality or catastrophic contingency plans, described in detail below.

#### Code Quality Issues

In the event the [REDACTED] application is delivered with significant code quality issues, the following contingency plan will be executed:

1. An impact analysis on the affected business functionality will be conducted by SunTrust Default and Technology leadership, supported by Default LOB personnel.
2. If the affected business functionality can be isolated from the rest of the process:
  - a. The affected functionality will be removed from the planned SPC process flow.
  - b. Manual processes will be used in lieu of technology solutions.
  - c. The procedures for these manual processes will be documented.
  - d. Training on these manual procedures will be provided to impacted users.
3. If the impacted business functionality is widespread, cannot be isolated or results in inherent business risk, the team will explore the opportunity to delay the schedule as referenced above or proceed to the catastrophic contingency plan.
4. In parallel with the activities above, SunTrust will prioritize identified defects based upon business priority and severity, and will work with [REDACTED] (or other impacted technology vendors) to resolve the defects in accordance with this prioritization.

#### Catastrophic or Systemic [REDACTED] Failure

In the event of a catastrophic or systemic failure of the [REDACTED] application, the following contingency plan will be executed:

1. The newly deployed [REDACTED] code will be removed and the prior code installation will be

restored.

2. Existing personnel will revert to current state operational practices, including the use of [REDACTED] and [REDACTED] depending on investor classification.
3. SPC/HPCR resources will be instructed to perform their duties leveraging manual processes that overlay the current technology solution. The impacted areas are workflow and operational reporting, which will be supported by additional personnel gathered from other operational areas and supported with external resources as necessary.
4. These manual processes will be enacted to enable communications between the SPC/HPCR role and existing Foreclosure and Loss Mitigation personnel.
5. The new [REDACTED] code will be examined by SunTrust and the vendor to determine the underlying root cause of the failure.
6. The system defect(s) will be corrected and undergo rigorous testing prior to re-deployment.
7. A new implementation and deployment schedule will be developed.
8. The functionality will be re-deployed once SunTrust executive leadership is confident in the vendor's delivery schedule and code quality.

## 1.8 Accomplishments to Date

### 1.8.1 Incentive Plan Review

SunTrust senior management has conducted a review, see Appendix, of Default Operations incentives programs to ensure compliance with the Consent Order, which is focused on Loss Mitigation and foreclosure practices to ensure that our practices are compliant with legal and regulatory practices and do not result in outcomes that may harm the client, the investor, or the institution.

#### Foreclosure Incentives

SunTrust **does not** provide incentives for our employees engaged in foreclosure activities. It is our intention to ensure that foreclosure activities are conducted in accordance with legal and regulatory standards. Compensation for employees within the foreclosure department follows our company's compensation philosophy that rewards employees for their performance and contribution and that incentives, particularly those based upon volumes, are not an appropriate practice within this department. It will remain SunTrust's intent that incentives **are not** provided to our employees for activities related to foreclosure activities.

### Loss Mitigation Incentives

SunTrust provides incentive plans for its Mortgage Loss Mitigation team with the objectives to promote the reduction of loss for loans within the Servicing/Bank portfolios; drive participant performance to peak efficiencies and provide for superior performance; and attract, motivate, and retain highly productive employees. These plans are established and reviewed on an annual basis by the plan sponsor, who is responsible for Default Operations and is not a participant within this plan, with final approval by the line of business executive. Additionally, to ensure the appropriate oversight for incentive plans, additional reviews and approvals are obtained from a SunTrust Compensation Consultant, the Senior Finance Officer for Consumer Banking, and the Chief Retail Credit Officer.

As a result of creating the SPC role within Loss Mitigation, SunTrust has modified its Loss Mitigation incentive plan to include the SPC role. We believe that incenting the SPC through participation in the Loss Mitigation incentive plan will foster greater participation by all parties to complete Loss Mitigation activities to a high standard, within required timelines and will result in a better experience for the client during this process.

The revised incentive plan will not only include the SPC role as a participant. SunTrust is inserting a quality control requirement to ensure the high standards and accuracy of decisions are met. The revised plan is currently in draft format and is awaiting final approval by the approving officer identified above. (The revised plan in draft form is included in the Appendix.)

#### **1.8.2 Communication Review**

As required by the Consent Order, a thorough review of all communications sent to the client regarding Loss Mitigation and foreclosure actions was conducted. Breach letters are sent based on state and investor guidelines. The majority of breach letters are required to be sent between 32<sup>nd</sup> and 34<sup>th</sup> days of delinquency and some states require breach letters to be sent as early as the 19<sup>th</sup> day of delinquency. Unlike breach and foreclosure letters, Loss Mitigation letters are not tied to a specific number of day's delinquent status. Loss Mitigation outreach letters are sent to the client on a monthly basis once the client's loan is delinquent. Other Loss Mitigation letters, i.e. solicitations, document requests, approvals and denials, are sent on an as needed basis. Since Loss Mitigation actions can occur until a foreclosure sale is held, communications do overlap in timing and may cause some confusion for the client. While SunTrust will still have to comply with state and investor regulations and send breach letters, demand, and foreclosure letters when required, we can improve the language on the communications so it is clear



to the client the options they have available prior to foreclosure.

As part of our Action Plan to implement Single Point of Contact, we will extend the communications review that was completed per the Consent Order, and define requirements to update each of the collection and Loss Mitigation and foreclosure communications that are sent to the client. These activities will include a timeline review to compare the current timelines at which the communications are sent with the timeline guidance provided from MHA. We will update the timing of the communications to closer align with the MHA guidance. We will also conduct a review of the language in all communications to ensure that messages to the client are consistent and clear. Any necessary changes to the communication language will be made as part of the implementation of SPC. Along with the updates made to the language in the communications, we will also add the name and contact information of the Single Point of Contact and the secondary point of contact. This will give the client a direct line into SunTrust Mortgage in the event there are any questions regarding the information contained in the letters.

### **1.8.3 Defined Single Point of Contact End State Vision**

See Section 1.4 Approach – Vision for discussion.

### **1.8.4 SPC Job Description**

The SPC job description has been developed, reviewed and approved by Default Management, Human Resources, and Consumer Banking Risk Management. (Final job descriptions are provided in the Appendix.) Internally, the SPC position will be titled as the “Home Preservation Client Representative”. This position will report to the senior manager for Loss Mitigation whose department is responsible for working with borrowers to evaluate loss mitigation options – both preservation and liquidation – with the client. The SPC must have a comprehensive knowledge of loss mitigation options and foreclosure timelines and activities.

The primary duties of the SPC role include, but are not limited to

- Communicating with the borrowers to complete the submission file for loss mitigation review
- Analyzing housing credit and income information

- Identifying and recommending loss mitigation options for borrowers
- Notifying borrowers of decision, current status and timelines throughout the process

The minimum requirements for the position are a high school diploma, two years experience in one of the following areas: a direct client contact center, collections, loan workouts, sales environment or other related financial services experience. Preferred requirements are a bachelor's degree and more than three years of experience in a default management function or call center environment.

#### **1.8.5 SPC Training Plan**

The SPC training program is currently being designed and will require new training classes to be developed. The training for SPC specific classes will initially be delivered via instructor-led classes. Eventually, web-based training and on-the-job training (OJTs) aids will be developed once the curriculum and subject matter for each class is completed.

The SPC curriculum will initially leverage existing Default Servicing courses (see Appendix for overview) to provide the SPC with an introduction to the Default Servicing functions – collections, loss mitigation, foreclosure, and bankruptcy. Additional introductory courses will include mortgage lending and regulatory requirements – including fair lending, fraud prevention and information security. Each of these courses is intended to provide the foundation for the SPC to develop the requisite knowledge and skills necessary to perform the role. All training materials, job aides, checklists, policies and procedures are stored online and are accessible by all SPC teammates. The documents and procedures will be continually reviewed for enhancements and updated as needed.

A fundamental requirement of the SPC role is to effectively interact with clients whether communication is written or oral. Each SPC will be provided with training to develop listening skills, writing skills, and the fundamentals of customer service. These classes will be provided in both classroom and role playing settings to give the SPC the opportunity to develop the skills and practice them prior to interacting with clients.



<b>Orientation</b>	SPC Kick-Off	Discovery	Learning Portal End User Training			
<b>Compliance</b>	AWARE - Introduction to Information Protection	2011 AML for Consumer Banking LOB	2011 SunTrust's Code of Business Conduct and Ethics	SunTrust Mortgage Fraud Awareness 2010	2011 Corporate Security- Integrity Awareness	2011 Fundamentals of Fair Lending
	Servicemembers Civil Relief Act (SCRA) - <i>New</i>	Regulation B - MOD Tracker - <i>New</i>	Fraud Awareness Best Practices			
<b>Mortgage Loan Process</b>	Introduction to Mortgage Lending 1	Introduction to Mortgage Lending 2	Introduction to Mortgage Lending 3	Introduction to Mortgage Lending 4		
<b>Default</b>	Default Administration Foundations - <i>Revised</i>	SunTrust Loss Prevention Strategies	Loss Control Overview <i>Revised</i>	Bankruptcy Overview <i>Revised</i>		
<b>Single Point of Contact</b>	SPC Roles and Responsibilities <i>New</i>	Client Communication: Solicitation and Response - <i>New</i>	Loss Mitigation Strategies and Evaluation <i>New</i>	Foreclosure Reviews <i>New</i>	Accepting Payments <i>New</i>	
	HPCR Escalation Process <i>New</i>	Fannie Mae One and Done Servicing - <i>New</i>	Community Outreach Overview - <i>New</i>			
<b>Systems</b>	[Redacted]					
<b>Core Manager Courses</b>	Default Supervisor OnBoarding <i>Revised</i>	Manager Academy	Foundations of Management: All Things Equal	Time Track for Approvers	Manager Self Service	Essentials for New Managers: Building a Foundation
	Learning Portal Manager Training					
<b>Key</b>	Instructor-Led	WBT	Job Aid			

*Blended Learning Approach Leveraging Existing Training Programs*

**Figure 1-3: Curriculum for the SPC**

The curriculum for the SPC, highlighted above, is meant to provide the SPC with the requisite skills and knowledge to perform the functions of the role. The training will focus upon orientation to SunTrust and the Default organization. The schedule will then shift to compliance training beginning with information security (AWARE) and other required regulatory and SunTrust training requirements. These two groups of courses will complete required SunTrust training for all teammates.

The next set of classes is intended to provide an overview of the mortgage loan process. Following these courses, the schedule will provide instruction to build a foundation in Loss Mitigation and default management – courses include loss control (foreclosure), loss prevention, and bankruptcy compliance.

Upon completion of these courses, training for the SPC begins. There are eleven planned courses to provide instruction for the SPC role and responsibilities, borrower communication, Loss Mitigation options and strategies, escalation and borrower complaints, and outreach. (See Figure 1-3 above for specific classes.)

The training schedule is expected to last two to three weeks and include approximately 100 hours of instruction (the exact duration will be dependent on the final approved curriculum). The first week will be focused on introductions to SunTrust (if new hires) and introductions to Default Servicing (all) referenced above. These classes will be delivered by instructor-led and web-based training classes. The second week of training will be focused on introductions to systems - [REDACTED], [REDACTED] and imaging systems. The training will include classroom and practice time in a testing region to familiarize and learn the SPC role. The final section of training will focus on role playing and responding to different client situations.

Regular training and communication will be required to provide the SPC with current information or opportunities to improve or refine skills to master the role. The training curriculum for the SPC role is being incorporated with the training improvements required under Section 12 (Training) of the Consent Order.

In addition to training, it will be important to monitor the SPC's work to ensure that they are meeting the requirements of the role. We are reviewing the approaches to monitor their performance for meeting critical timelines for specific actions, interacting with their client's in a professional and empathetic manner, and receiving continuous feedback on their performance. We intend to do this through monitoring their assigned work in [REDACTED] monitoring calls such as done within SunTrust call centers, and OJT coaching by the team leaders. Additionally, we will leverage current coaching and training processes currently in place to monitor early stage collections.

#### **1.8.6 Other Loss Mitigation Roles**

Currently, there are three primary roles within the Loss Mitigation function – negotiator, setup processor and phone team. Each one of these roles will be impacted by the creation of the SPC and will require these roles to be modified.



### Negotiator

The negotiator role today is responsible to evaluate the client's circumstances based upon the submitted loss mitigation file and will attempt to qualify the client for the best retention program available. If a retention program is available, the negotiator is then required to evaluate liquidation options available to the borrower. The negotiator then communicates the final decision to the client. With the new SPC role in place, the negotiator will continue to evaluate the client's circumstances but will communicate the result of the review to the SPC. The SPC will be responsible to communicate the decision to the client.

### Setup Processor

The setup processor is responsible to work with the client to gather the necessary documentation to underwrite the loss mitigation file. If a loan modification is approved, the setup processor provides the client with the documentation to be signed and returned in order to fulfill the approval of the modification. The setup processor will work in a back office role to support the SPC. When the processor determines that additional documentation is required from the client, they will work through the SPC to obtain the information.

### Phone Team

The phone team today is responsible for inbound phone call from clients, transfers from internal departments such as collections, and following up on requests for more documents. This team is still being evaluated as the impact of the SPC role is significant. It is anticipated that this team will continue to exist in a smaller capacity. They will likely provide a centralized point of contact for clients requesting information on loss mitigation questions in the event a SPC has not been assigned. An example of this will be clients current on their loans but are in imminent default that have not been assigned an SPC.

In addition to these existing roles and the SPC role, SunTrust will be creating a QC review role responsible for the accuracy of our loss mitigation underwriting by the negotiator.

### QA Review

The QA review role is new within the loss mitigation function and is being established to provide consistent and accurate decisioning of loss mitigation requests. This team will review each decision rendered by a negotiator and concur with the decision which is then released to the client. If there is a question regarding the negotiator's decision, the QA review will return it with comments to the original

negotiator for another review. If necessary, discrepancies will be escalated to management for a final decision.

#### 1.8.7 Foreclosure Processor Role

The foreclosure processor today is responsible for managing files through the foreclosure process. In limited instances this role interacts with clients to address questions regarding this process. The client contact responsibility will be transferred to the SPC and the foreclosure function will not have contact with the client. The foreclosure processor will retain responsibility to interact with the foreclosure attorney working on behalf of SunTrust or one of its investors.

#### 1.8.8 Other Default Roles - Collections

##### Collection Agent

Today, the collection agent is responsible for fulfilling collection activities such as handling inbound and outbound communications with clients, making arrangements to bring accounts current, and escalating requests for loan modification to Loss Mitigation. In addition, a specific team is dedicated to managing communications with clients regarding the status of foreclosures. This alleviates the need for the foreclosure processor role to interact with the client.

Under the new operating model to support SPC and SAI, the collector will be primarily responsible for establishing the QRPC with the client. The intent of the QRPC is to ascertain the client's intentions regarding the loan and the retention of the property. If the client wants to pursue a Loss Mitigation activity, the collector will attempt to pre-qualify the client for a Loss Mitigation activity using the [REDACTED]. Upon completion of the pre-qualification, the client will be assigned a SPC and the responsibility for the account is transferred from the Collections team. If the client does not accept the pre-qualification offer then we will not assign the SPC to the account at that time.

##### Collections Manager

The collections manager is responsible for managing the collection teams and is responsible for the oversight of dialer collection and client contact strategies. Additionally, the collections manager is responsible to respond to and oversee client emails while the loan responsibility remains with the collections team.

#### 1.8.9 Other Default Roles – Outreach

The outreach team is responsible for managing client community outreach efforts, which includes

participating in local home preservation activities with consumer advocacy groups. In addition, the outreach team is responsible for monitoring mediation efforts through state or legal programs. When a client's loan is under review for mediation, a new SPC will be assigned to manage the account during this process. A specialized SPC is required to understand the complexities of the mediation process. This mediation SPC will be responsible for coordinating and supporting the assigned mediator during the process.

#### 1.8.10 Other Default Roles – Customer Response Team

The Customer Response Team (CRT) is responsible for handling and resolving client complaints and concerns. This team's role is discussed earlier under the "Client Complaints and Escalations" section.

#### 1.8.11 Role Clarity and Role Interactions

SunTrust used a RASCI assignment matrix to clarify the responsibilities of people and technology within the process and document these interactions to complete a specific activity. In order to complete the RASCI, we reviewed each activity on the Level 3 process flows and identified the participant involved and determined the level of interaction specific to that activity. Each participant's interaction is categorized into one of the following:

- **Responsible:** Role that completes the activity / task
- **Accountable:** Role that has the final ownership / makes the final decision
- **Supporting:** Role that can provide support and / or resources
- **Consulted:** Role that needs to be consulted in order to make a decision
- **Informed:** Role that needs to be informed about the results

The benefit of using a RASCI assignment matrix is that it promotes a thorough evaluation of how the new SPC role will interact with clients and existing roles within Default. This thorough documentation of the role will be used to further define the role and be used as inputs to developing training and procedures.

The RASCI assignment matrix is provided in the Appendix.

#### 1.8.12 Completed High Level Workflow Design

Figure 1:4 High Level Work Flow for SPC is our proposed SPC operating model. The diagram outlines the approach and responsibility of the SPC when incorporated into the current operating model. The SPC role will be inserted within the organization so that the negotiator, QA review, processor, and foreclosure processor roles are back office support functions and do not communicate with the client.

## High Level Work Flow for SPC

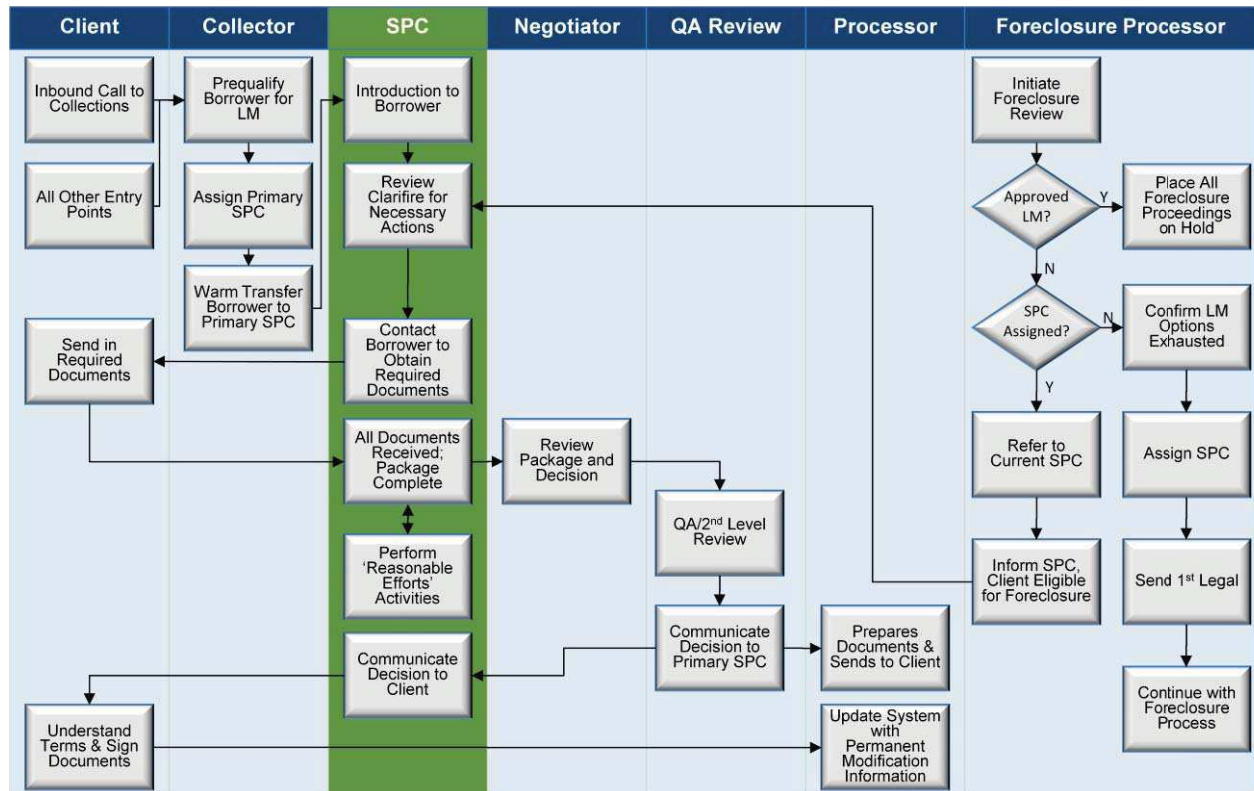


Figure 1-4: high Level Work Flow for SPC

### 1.8.13 Designed Mid Level Workflow for SPC Operating Model and Client Entry Points

See Appendix for details of the Mid Level (or Level 2) process flows.

SunTrust has completed the assessment and design of process flows to develop the SPC role. The designs include client entry points into the SunTrust organization, collections, loss mitigation and foreclosure functions. These designs incorporate Consent Order requirements and recently announced Agency requirements to deliver the SPC role and other enhanced default servicing capabilities.

The collections designs include outbound and inbound client contact standards. The process outlines when a client is determined to have a short-term situation and is able to make payment arrangements to bring the loan current. If this is not the case, then the client is introduced to loss mitigation options and is



pre-qualified for an available program. This event triggers the assignment of a SPC and collections will transfer responsibility of the loan to the SPC function.

The loss mitigation designs highlight that loss mitigation work will flow through the SPC as the focal point of client contact. The other workflows illustrate the new processes for file setup, client confirmation of received and decisioned loan file, fulfillment of an approved loan modification and liquidation activities.

The foreclosure designs illustrate the SPC role within the foreclosure process including timing of assignment (if role is not assigned from loss mitigation path), the review of the SPC prior to referral to an attorney to initiate foreclosure proceedings and also prior to any scheduled foreclosure sale to confirm there are not any active loss mitigation activities currently in process. It is important to note here that the SPC will have visibility into the foreclosure process at any time but inserting SPC reviews at these specific points within the process will serve as additional controls that no foreclosure actions occur when a borrower is working to preserve home ownership.

## **1.9 In-progress Activities**

### **1.9.1 Pipeline Conversion**

In order to comply with the Consent Order requirements, SunTrust must first complete the conversion of government and private loans (Pipeline) to the ██████████ platform. This conversion will be completed in October 2011. Once this conversion is completed, all mortgage loans serviced by SunTrust will be accessible through ██████████ allowing the SPC to access all of the client's information regarding Loss Mitigation and foreclosure.

### **1.9.2 The SPC Program**

#### Program Organization and Governance

In addition to the overarching Consent Order governance framework, an additional layer of formal project management and governance has been created to support the development and delivery of the SPC role. This program consists of weekly workstream meetings, cross-functional meetings, and regular steering committee meetings with executive leadership.

The steering committee is comprised of executive leadership from Consumer Banking including the Head of Consumer Banking, the Head of Mortgage, the Risk Officer, and Default Servicing Manager . Additional leadership is provided by the STI Corporate Risk Officer and other leaders from Enterprise Information Services (EIS) and Legal. Several of these executives also sit on the Consent Order steering committee providing consistency and coordination between both activities. The steering committee meets weekly.

One of the primary responsibilities of the steering committee is to ensure compliance with the requirements of the Order, the SAI and other regulatory and SunTrust initiated efforts. The steering committee oversees the program and is in place to ensure that risks and issues that arise are addressed and managed. The steering committee is monitoring the risks with delivery the SPC program, the SAI initiative, and the Pipeline conversion which must all be completed before the end of 2011. Risks to the success of the SPC programs and compliance with the Order may be impacted by the SAI initiative and the Pipeline conversion. The steering committee receives regular reporting and updates on the program's progress along with possible risks and issues. The risks and issues are then required to be addressed, contingency plans developed or steps to mitigate the risk are evaluated.

The steering committee is currently reviewing the structure of the Default Evolution program and evaluating the need to enhance resources, staff, and funding in order to ensure delivery of the Order's requirements. As these plans are identified, SunTrust will communicate and advise of any impacts or changes to this submission as required under the Order.

The program itself is led by a program owner responsible for the eight workstreams within the program and day-to-day management of the program. Assisting the program owner are the workstream sponsor and the workstream lead. The workstream sponsor provides direction and leadership to the efforts to fulfill the workstream deliverables. The workstream lead is responsible for managing activities within the workstream and escalating issues and questions to the sponsor. This team meets weekly.

#### Program Workstreams

Eight work streams have been created to fulfill the SPC role within Default Servicing. A brief description of each work stream is provided below.

- Process Definition – responsible to define high-level and detailed day-to-day process for the new

SPC role. Refines existing processes and serves as subject matter expert (SME) for other work streams. This team is critical to establish the blueprint for the technical and organizational designs to deliver the SPC role.

- HR/Staffing – responsible to develop job requirements and skills, define compensation and benefits strategy, approve organizational reporting structures, and staff for new roles as needed.
- Training – designs the training curriculum and schedule for the SPC role. Additionally, responsible for the development of training classes and materials.
- Conversion – responsible to develop the execution plan for the new SPC role. This team will recommend a strategy to convert new and existing loans into the new SPC process.
- Telephony – designs new inbound and outbound telephony strategies to meet new SPC role requirements. Recommendations will include leading practices for use of existing technology or opportunities to leverage other services.
- Letters – responsible to identify borrower communications and to work with legal, compliance, and marketing to refine language where necessary to reduce confusion and complexity.
- Technology – responsible for the delivery (design, testing, and release) of Default technology including ██████████. This work stream is also responsible to coordinate with Process Definition to modify process design in the event timelines cannot be met.
- Deployment – manages all aspects of site readiness including facilities, furniture, computers, and telephones. Manages “control room” for rollout of SPC role into new organization.

### 1.9.3 Single Point of Contact Capability and Complexity Scorecard

The following capability scorecard has been developed to provide an assessment of SunTrust’s capabilities to meet SPC requirements defined in the Consent Order. In addition, a Complexity assessment is provided for insight into our estimate of the level of effort to deliver the role. The scorecard will track progress across process, people and technology. Each Harvey ball represents 25% increments of current state capabilities to deliver the target state capabilities for each requirement. This matrix will be updated on a monthly basis.

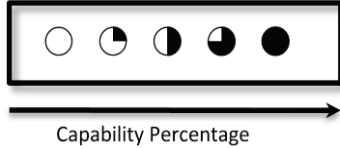
#### Capability Percentage Overview

The capability percentage in the People column is currently listed as “0%” or “N/A”. The assessment of “0%” is evaluated against the SPC role and not other existing roles. The objective will be to build the capability to 100% for this project thus fully meeting the requirements of the SPC role. The “N/A” assessment is meant to represent that our goal is to fulfill this capability with process automation. The SPC role will be trained and monitor these activities for each loan assigned to them to ensure compliance with the Order.












Complexity Percentage Overview








The complexity percentage is intended to provide insight into our initial thoughts for the level of effort required to deliver the capability. It is management's best initial estimate for the work ahead and is based upon our evaluation of existing and future capabilities and that need to be enhanced or developed. The final rating is a summary of the collective efforts across process, people and technology.



Consent Order Requirement	Capability	People	Process	Tech	Complexity
a) Measures to ensure that staff processing a borrower's Loss Mitigation request routinely communicates and coordinates with staff processing the foreclosure on the borrower's property;	<ul style="list-style-type: none"> <li>Will leverage [redacted]                             <ul style="list-style-type: none"> <li>Reuse existing Loss Mitigation (LM) &amp; Foreclosure (FC) triggers</li> <li>Need to implement hard stops</li> <li>[redacted] roles                                     <ul style="list-style-type: none"> <li>Create SPC role</li> <li>Redefine LM &amp; FC roles</li> </ul> </li> </ul> </li> </ul>				
b) appropriate deadlines for responses to borrower communications and requests for consideration of Loss Mitigation, including deadlines for decision making on Loss Mitigation Activities, with the metrics established not being less responsive than the timelines in HAMP;	<ul style="list-style-type: none"> <li>Will leverage [redacted] by implementing the HAMP guidelines and deadlines for responding to the borrower (see MHA Handbook v3.1)</li> </ul>	N/A			
c) establishment of an accessible and reliable single point of contact for the borrower so that the borrower has access	<ul style="list-style-type: none"> <li>Defined end-state workflow for the Single Point of Contact</li> <li>Will establish the Single Point of Contact role</li> </ul>				




Consent Order Requirement	Capability	People	Process	Tech	Complexity
<p>to an employee of SunTrust Mortgage to obtain information throughout the Loss Mitigation and foreclosure processes;</p>	<ul style="list-style-type: none"> <li>○ Persons currently in the Set-up and/or Phone Team will be trained for this position</li> <li>○ Will also need to hire new staff</li> <li>• █████ will enable the assignment of the SPC to the Borrower once they are pre-qualified for a Loss Mitigation program and/or they have qualified for Foreclosure</li> <li>• Telephony will be enhanced to allow the borrower to reach the SPC when needed</li> </ul>				
<p>d) a requirement that written communications with the borrower identify by name the primary single point of contact along with one or more direct means of communication with the primary single point of contact, together with information about secondary points of contact in the event that the primary single point of contact is unavailable;</p>	<ul style="list-style-type: none"> <li>• All current communications have been collected and reviewed</li> <li>• SPC contact information and secondary point of contact information needs to be added to all communications to the borrower</li> </ul>	N/A			
<p>e) measures to ensure that</p>	<ul style="list-style-type: none"> <li>• █████ enables users to view all</li> </ul>	N/A			

Consent Order Requirement	Capability	People	Process	Tech	Complexity
<p>the single point of contact has access to current information and personnel (in-house or third-party) sufficient to timely, accurately, and adequately inform the borrower of the current status of the Loss Mitigation and foreclosure activities;</p>	<p>Borrower information</p> <ul style="list-style-type: none"> <li>All loans will be viewable in [REDACTED] after Pipeline conversion</li> </ul>				
<p>f) procedures and controls to ensure that a final decision regarding a borrower's Loss Mitigation request (whether on a trial or permanent basis) is made and communicated to the borrower in writing, including the reason(s) why the borrower did not qualify for the trial or permanent modification and, if applicable, the net present value calculations utilized by SunTrust Mortgage, and that involve the single point of contact within a reasonable time before any foreclosure sale</p>	<ul style="list-style-type: none"> <li>HAMP decline letters currently list reason for decline</li> <li>Net Present Value (NPV) will need to be added to all declination letters</li> </ul>	<p>N/A</p>			

Consent Order Requirement	Capability	People	Process	Tech	Complexity
occurs;					
<p>g) procedures and controls to ensure that when the borrower’s loan has been approved for modification on a trial or permanent basis, (i) no foreclosure or further legal action predicate to foreclosure occurs, unless the borrower is past due on two or more payments postdating the trial or permanent modification; and (ii) the single point of contact remains available to the borrower and continues to be referenced on all written communications with the borrower;</p>	<ul style="list-style-type: none"> <li>• [REDACTED] allows users to see the status of loans that are in modification or foreclosure</li> <li>• Will need to enhance [REDACTED] to place hard stop on Foreclosure proceedings if borrower is in active Loss Mitigation</li> </ul>	N/A			
<p>h) policies and procedures to enable borrowers to make complaints regarding the Loss Mitigation process, denial of Loss Mitigation requests, the foreclosure process, or foreclosure activities that prevent a borrower from pursuing Loss Mitigation options,</p>	<ul style="list-style-type: none"> <li>• Integrate with existing Client Complaint process</li> </ul>				



Consent Order Requirement	Capability	People	Process	Tech	Complexity
and a process for making borrowers aware of the complaint procedures;					
i) procedures for the prompt review, escalation, and resolution of borrower complaints, including a process to communicate the results of the review to the borrower on a timely basis;	<ul style="list-style-type: none"> <li>Integrate with existing Client Complaint process</li> </ul>	○	◐	○	◐
j) policies and procedures to consider loan modification or other Loss Mitigation Activities with respect to junior lien owned by SunTrust, the Bank, or SunTrust Mortgage where SunTrust Mortgage services the associated first lien mortgage and becomes aware that such first lien mortgage is delinquent or has been modified;	<ul style="list-style-type: none"> <li>Currently Junior Liens are reviewed during 1st lien modifications</li> </ul>	N/A	◑	◐	◑
k) policies and procedures to ensure that timely information about Loss Mitigation options is sent	<ul style="list-style-type: none"> <li>Loss Mitigation communications are currently sent to eligible borrowers</li> <li>Review policy and procedures for</li> </ul>	N/A	◑	◐	◑

Consent Order Requirement	Capability	People	Process	Tech	Complexity
<p>to the borrower in the event of a delinquency or default, including plain language notices about the pendency of loan modification and foreclosure proceedings; and</p>	<p>compliance</p>				
<p>l) policies and procedures to ensure that foreclosure and related documents provided to borrowers and third parties are appropriately maintained and tracked, and that borrowers generally will not be required to resubmit the same documented information that has already been provided, and that borrowers are notified promptly of the need for additional information.</p>	<ul style="list-style-type: none"> <li>All documentation that is received is currently imaged and indexed and can be viewed via [REDACTED]</li> </ul>	<p>N/A</p>			

## 1.10 Description of Action Plan

The Single Point of Contact action plan is designed to ensure that communications between SunTrust Mortgage and its clients, both oral and written, related to Loss Mitigation and foreclosure activities are timely and effective, and are designed to avoid confusion to clients.

The plan ensures that:

- The role of Single Point of Contact is created and will be the primary person communicating with a client regarding any Loss Mitigation and foreclosure activities.
- Deadlines for responding to a client's request for Loss Mitigation as well as the decision on the Loss Mitigation are in line with the HAMP deadlines.
- Enhance management and operational reporting to ensure compliance with deadlines.
- All written communications to a client in Loss Mitigation or foreclosure will be updated with the name, phone number, email, and fax number of the Single Point of Contact, as well as information regarding a secondary point of contact.
- Enhancements will be made to telephony in order to provide direct routing to the SPC.
- Enhancements will be made to [REDACTED] in order to provide the SPC with access to a client's status and current account information.
- All declination decision letters to the client include reasons for decline as well as the NPV calculations utilized by SunTrust mortgage.
- Enhancement to [REDACTED] to capture the NPV calculation.
- Enhancements to [REDACTED] to prevent foreclosure proceedings when a client has an active Loss Mitigation.
- Integration with existing Customer Complaint process to allow clients to make complaints and for SunTrust to respond promptly and escalate if needed.
- Enhancement process and procedures for Loss Mitigation to ensure Junior Lien review process.
- All documentation is imaged, indexed and viewable through [REDACTED]



**1.10.1 Action Plan Milestone Deliverables**

The SPC program has been designed to deliver a comprehensive program based upon process, people and technology improvements. Of these three, technology is the most complex and requires the most planning and development to deliver the capabilities. SunTrust has developed the following milestone dates and will revise them as additional information is gathered. The milestones to deliver technology are as follows:

<u>Phase</u>	<u>Completion</u>
Requirements	September 2011
Build	November 2011
Test	November 2011
Deployment	December 2011

**1.10.2 Action Plan**

<b>Action Item</b>	<b>Assigned To</b>	<b>Evidence of Completion</b>	<b>Completion Date (Month)</b>
Conduct Loss Mitigation and Foreclosure incentive review to ensure practices do not discourage Loss Mitigation	██████████	Incentive review write up and signoff by ██████████ and ██████████	Complete
Communications review to determine if Loss Mitigation and Foreclosure communications overlap	██████████	Consolidated list of communications sent to client and coinciding timeline	Complete
<b>Single Point of Contact (SPC) Requirements</b>			<b>September 2011</b>
SPC end state vision definition	██████████	Level 1 & 2 Process Flow illustrating SunTrust and Client interaction within the Loss Mitigation and Foreclosure processes	Complete



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
SPC role definition		Single Point of Contact role has been approved by Human Resources	Complete
SPC organization definition		Organizational structure has been defined and staffing levels appropriated	Complete
Training requirements for SPC organization defined		Training requirements defined for SPC roles, [REDACTED] and other technology and signed off by work stream stakeholders	Complete
[REDACTED] enhancements requirements defined		[REDACTED] requirements defined and signed off by work stream stakeholders	Complete
[REDACTED] enhancement requirements defined		[REDACTED] requirements defined and signed off by work stream stakeholders	Complete
[REDACTED] Imaging enhancement requirements defined		[REDACTED] Imaging requirements defined and signed off by work stream stakeholders	Complete
Online letter writer enhancement requirements defined		Phase 1 online letter writing requirements defined and signed off by work stream stakeholders	Complete
Telephony enhancement requirements defined		Telephony requirements defined and signed off by work stream stakeholders	Complete
Facility and hardware requirements		Facility and hardware requirements	Complete



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
defined		and defined signed off by work stream stakeholders	
Define Loss Mitigation and Foreclosure communications enhancement requirements		Loss Mitigation and Foreclosure communications requirements defined and signed off by work stream stakeholders	Complete
Conduct SPC policy review and define requirements		Policy requirements defined and signed off by work stream stakeholders	Complete
Conduct SPC procedure review and define requirements		Procedure requirements defined and signed off by work stream stakeholders	Complete
Conduct client complaint procedure review and define requirements		Complaint procedure requirements defined and signed off by work stream stakeholders	Complete
Conduct reporting and metrics review and define requirements		Reporting and metrics requirements defined and signed off by work stream stakeholders	Complete
Define requirements for Junior Lien review		Junior Lien process requirements defined and signed off by work stream stakeholders	Complete
Define [REDACTED] change management plan		[REDACTED] change management plan defined and signed off by work stream stakeholders	Complete
<b>Single Point of Contact Build</b>			<b>November 2011</b>



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
Hire SPC staff	[REDACTED]	Open SPC roles have been posted and staffed accordingly	Complete
Train SPC organization	[REDACTED]	All SPC teams have been trained on updated processes	Complete
Develop [REDACTED] requirements	[REDACTED]	[REDACTED] requirements have been coded and are ready for SIT testing	Complete
Develop [REDACTED] requirements	[REDACTED]	[REDACTED] requirements have been coded and are ready for SIT testing	Complete
Develop [REDACTED] Imaging requirements	[REDACTED]	[REDACTED] requirements have been coded and are ready for SIT testing	Complete
Develop online letter writer requirements	[REDACTED]	Online letter writer requirements have been coded and are ready for SIT testing	Complete
Develop telephony requirements	[REDACTED]	Requirements have been coded and are ready for SIT testing	Complete
Obtain and install needed facilities and hardware	[REDACTED]	Facilities are ready for use and hardware has been installed	Complete
Update all Loss Mitigation and foreclosure client communications	[REDACTED]	All impacted Loss Mitigation and foreclosure communications have been updated with required language and have been approved by Legal & Compliance	Complete



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
Update policy impacted by SPC	[REDACTED]	All impacted Loss Mitigation and foreclosure policy has been updated and approved by work stream stakeholders	Complete
Update procedures impacted by SPC	[REDACTED]	All impacted Loss Mitigation and foreclosure procedures have been updated and approved by work stream stakeholders	Complete
Develop client complaint process enhancements	[REDACTED]	Complaint process has been updated and is ready for testing	Complete
Develop new reports to meet requirements	[REDACTED]	Reports have been updated and are ready for testing	Complete
Develop Junior Lien requirements	[REDACTED]	Junior Lien process has been updated and is ready for testing	Complete
Build change management organization for [REDACTED]	[REDACTED]	Change management plan is ready for implementation	Complete
<b>Test</b>	[REDACTED]		<b>December 2011</b>
Test [REDACTED] enhancements	[REDACTED]	[REDACTED] User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test [REDACTED] enhancements	[REDACTED]	[REDACTED] User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete





Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
Test [redacted] Imaging enhancements	[redacted]	[redacted] User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test online letter writing enhancements	[redacted]	Online letter writer User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test telephony enhancements	[redacted]	Telephony User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test hardware installation	[redacted]	Hardware is in proper working order	Complete
Test updated Loss Mitigation and Foreclosure communications	[redacted]	User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test client complaint process enhancements	[redacted]	User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test reporting enhancements	[redacted]	User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	Complete
Test Junior Lien process enhancements	[redacted]	User Acceptance testing (UAT) has been satisfactorily completed and is ready for deployment	December 2011



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
<b>Deployment</b>			<b>December 2011</b>
Deploy SPC organization	[REDACTED]	Organization is in full utilization	Complete
Rollout revised incentive plan		If necessary, employees incentives will be revised as a result of the SPC role	Complete
Deploy [REDACTED] enhancements		[REDACTED] enhancements have been rolled out and are working with minimal defects	Complete
Deploy [REDACTED] enhancements		[REDACTED] enhancements have been rolled out and are working with minimal defects	Complete
Deploy [REDACTED] Imaging enhancements		[REDACTED] enhancements have been rolled out and are working with minimal defects	Complete
Deploy online letter writing enhancements		Online letter writer enhancements have been rolled out and are working with minimal defects	Complete
Deploy telephony enhancements		Telephony enhancements have been rolled out and are working with minimal defects	Complete
Deploy hardware		Hardware has been installed and is in proper working condition	Complete
Rollout updated Loss Mitigation and Foreclosure client communications		Updated Loss Mitigation and Foreclosure communications have	Complete



Action Item	Assigned To	Evidence of Completion	Completion Date (Month)
		been rolled out and are working as designed	
Rollout updated SPC policies		Updated policies have been rolled out and are working as designed	Complete
Rollout updated SPC procedures		Updated procedures have been rolled out and are working as designed	Complete
Rollout updated client complaint procedure		Updated complaint process has been rolled out and is working as designed	December 2011
Rollout updated reporting and metrics		Updated reports and metrics have been rolled out and are working as designed	Complete
Rollout updated Junior Lien process		Updated Junior Lien process has been rolled out and is working as designed	December 2011
Implement SPC change management		██████ adoption is complete and Loss Mitigation and Foreclosure teams are utilizing ██████	Complete

### 1.11 Progress Tracking

A critical component of our Consent Order response is the ongoing tracking of action plan milestones. The tracking and monitoring of action plan milestones will be managed via an active project management process. The Consent Order PMO will continue to provide the oversight and structure to the process. An objective of the Consent Order PMO is to provide the Consent Order work stream owners with a common methodology and shared platform for tracking the action plans submitted to Federal Reserve Bank.

All Single Point of Contact milestones have been uploaded into a common repository. Each milestone is tracked using a unique milestone identifier. In addition to the unique identifier, each milestone contains a description of the milestone, the associated work stream, the assigned owner of the milestone, the status of the milestone, the planned completion date, and the work stream sponsor and project manager. The work stream owner is responsible for maintaining the status of each milestone (e.g. Open, Complete, Closed) on a regular basis. Upon completion of a milestone, the work stream owner is expected to upload documentation to provide evidence the milestone was successfully completed. SunTrust Audit will have full access to the repository for any validation work they perform throughout the process.

The Consent Order PMO will monitor the status of milestones entered into the repository to confirm work stream owners are updating milestones as expected. The status of upcoming and past due milestones will be reviewed as part of the Consent Order weekly work stream status meetings. Past due milestones will be escalated to the Consent Order Steering Committee for awareness and executive action as necessary.

## 1.12 Response to the Reserve Bank Guidance, November 7, 2011

Additional guidance regarding Single Point of Contact (SPOC) was received from the Federal Reserve Bank on November 7, 2011. After reviewing the requirements, SunTrust believes it fully complies with the additional SPOC guidance provided in the November 7, 2011 letter. Our response regarding compliance with these requirements is detailed in the sections below.

### 1.12.1 Criteria for Single Point of Contact Role

Guidance:

- *Must be an employee of the servicer (not a contractor).*
- *Must not concurrently serve in another capacity within a different function of the servicer (e.g., collections).*
- *Must be appropriately trained and qualified.*
- *Servicer must develop, implement and document a policy that identifies the required level of experience and the training requirements for the SPOC position.*
- *Training requirements must be sufficient to ensure that the SPOC can carry out his/her duties and must include training on the complaint process, including the process for complaint filing, review, response, escalation, and appeal (upon request of the borrower) in order to be able to inform borrowers of the process when warranted.*

- *Servicer must have a documented business model to determine the number of cases assigned to a SPOC along with a requirement to review the model on a periodic basis to ensure number of cases assigned is appropriate and resulting in the required level of service.*

The SunTrust SPOC role is called a Home Preservation Client Representative (HPCR) and has been established as an independent group within the Default Management Group. The HPCR Group Manager, [REDACTED], is a direct report of the Default Group Manager, [REDACTED], and is responsible for the development, delivery, and execution of the Single Point of Contact operating model.

SunTrust's strategy for staffing the HPCR role has been focused upon transferring internal teammates in similar default-related customer contact roles (e.g. Loss Mitigation phone team and late stage collections), other internal teammates from SunTrust branches and call centers and external candidates with either strong client service experience or prior default experience. SunTrust Human Resources (HR) has leveraged local staffing and job placement agencies in order to accelerate the hiring process to recruit, interview, hire, and train more than 100 HPCR teammates within a three month period. Of the 110 HPCRs hired for the Wave 1 and 2 recruiting classes, less than 20% of the teammates in the HPCR role have been on-boarded via the job placement agency channel. As of 12/31/11 all contractors will have been hired as SunTrust employees and NO contractors will fill any SPC roles. Effective with the Wave 2 HPCR training class which began in November 2011, 100% percent of all hires will be offered permanent positions and NO temporary/contract positions will be offered.

Teammates employed in an HPCR role are solely focused upon fulfilling the Single Point of Contact mission and requirements. It should be noted that existing teammates being moved from an existing position such as the Loss Mitigation phone team to a HPCR role will have a clearly defined transition date and will not serve in both roles concurrently.

Teammates in the HPCR role are receiving a comprehensive training program conducted over a two week time period that includes instructor-led classes, web-based training and on-the job training (OJT) aids. The curriculum for this program (Figure 1-3) includes an orientation to SunTrust, regulatory and legal compliance training and an introduction to the mortgage loan process. The curriculum also provides training on general default servicing activities including collections, loss mitigation, bankruptcy and foreclosure. The HPCR teammate also receives training in ten courses, of which eight are new and were developed specifically for the HPCR role. Successful completion of HPCR training requires the teammate to pass written tests for each skill set and demonstrate the ability to perform the role during role play interactions with their supervisors and managers. They must also demonstrate the ability to perform specific job activities within the [REDACTED] and [REDACTED] platforms including accessing the status of a



loan modification evaluation or the status of a foreclosure in process. HPCR supervisors and managers will also monitor HPCR-client communication and provide feedback and coaching where necessary to ensure the client is informed and knowledgeable during the Loss Mitigation and foreclosure processes.

SunTrust has identified both a primary set of responsibilities and the minimum set of required skills and experience to fulfill the HPCR role. Primary responsibilities of the HPCR include compiling a complete file to submit to underwriting, analyzing housing credit and income information, identifying and recommending options for borrowers, and notifying borrowers of decision, current status, options, and timelines throughout the process. Additionally, the HPCR will perform a variety of mortgage loan documentation and call duties on loans with elevated complexity, using comprehensive knowledge of loss mitigation policies and procedures for loan products. There are three job levels for the HPCR role. A teammate must have the minimum set of skills and experience to qualify for the entry-level role and must have more experience and demonstrate greater skills to reach the high level roles. SunTrust has documented these requirements within its Single Point of Contact guidelines and procedures.

SunTrust has established a training course for the HPCR entitled “Escalations” that was developed specifically for the HPCR role. SunTrust believes that the HPCR, as the primary point of client contact, has a responsibility to recognize situations that will need to be escalated or will require additional attention to prevent the need to escalate. The training during the course focuses on recognizing default triggers early such as declination of a loan modification request or pending foreclosure sales. The HPCR is introduced to the Executive Services Office, which provides professional correspondence support, and the Client Resolution Team (CRT), which is an independent group within SunTrust responsible for handling client complaints and grievances. The HPCR will be made aware of a complaint filed with the CRT unless the complaint is filed against the HPCR at which time the CRT team will evaluate the need to reassign the client to a new HPCR. The independence of the CRT review of the situation and the possible reassignment to a new HPCR is to ensure the best client experience possible.

SunTrust has developed a specific operating model that integrates business processes, roles and responsibilities to ensure a HPCR can fully execute their requirements for a Single Point of Contact. Each SPC is expected serve a specific number of clients with a high degree of availability and knowledge, which is highly dependent upon the number of accounts assigned to the SPC at any one time. The SPC will require time each month to review the client’s account and status, speak with the client during the Loss Mitigation process, and conduct foreclosure certification reviews. Based upon discussions with peers and Default management’s direct experience with relationship based collections,

we anticipate the SPC will be able to manage seventy-five (75) active accounts at any one time. This metric will be re-evaluated periodically. An active account is defined as one either in Loss Mitigation or in the process of foreclosure during the months when a certification is required. In particular, we believe this is appropriate for foreclosures because of the various state timelines and the duration of time between the referral and foreclosure sale date.

In order to ensure that the HPCR is meeting their goals, SunTrust is developing a HPCR performance scorecard that will be based upon a combination of criteria:

- **Quantity-based metrics** – will measure the number of accounts assigned to a HPCR that are involved in the Loss Mitigation and foreclosure processes. The HPCR will be evaluated based upon timelines established by the Consent Order, Making Homes Affordable, and the Servicer Alignment Initiative.
- **Quality-based metrics** – will review the quality of the HPCR's performance and will be based upon management's observations, HPCR quality assurance (QA) reviews, and client surveys. The client surveys will be requested of clients serviced by the HPCR.

Specific performance or service levels are being evaluated as this is a new role and a period of experience is required to determine the appropriate thresholds. These observations will provide guidance for the Default management team to establish the appropriate benchmark for number of accounts serviced by a HPCR. We anticipate the completion of the initial benchmarks in December 2011.

#### 1.12.2 Assignment for Single Point of Contact

Guidance:

- *SPOC must be assigned to:*
  - *any residential mortgage borrower in default as soon as there is a successful communication between the borrower and the servicer about possible relief to address the borrower's delinquency; and*
  - *any residential mortgage borrower that is not in default and requests consideration for relief to address the borrower's anticipated or actual delinquency; or*
  - *any residential mortgage borrower that the servicer determines pursuant to its written policies to be in imminent risk of default.*
- *Assignment may be made by telephone, in writing, in person, or by other means upon servicer outreach or the borrower's request for assistance, and information for contacting the SPOC may be provided during that contact, however, a follow-up "Introduction" letter confirming the SPOC's contact information (including name, toll free phone number, address and email and preferred way of receiving documentation) must be provided to the borrower within 5 business days of assignment.*

- *Servicer must clearly document in policies and procedures the entire communication process for the SPOC (clear start and end) including time frames for communications (e.g., Introduction letter) to begin and circumstances under which the SPOC's responsibilities will conclude.*
- *All written collections, loss mitigation or foreclosure-related communications with the borrower from the assignment of the SPOC forward (includes routine default letters) must include the SPOC's contact information.*
- *The secondary SPOC should be identified on post-"Introduction" letter communications with the borrower as someone the borrower can reach if the primary SPOC is unavailable. The secondary point of contact must not be a pool of resources. The secondary point of contact must be able to perform the same level of duties, having the same level of authority as the primary SPOC.*
- *For SPOC communications with the borrower, a servicer must follow its existing procedures for communicating to a borrower in a language other than English.*
- *The SPOC must remain the same from loss mitigation through foreclosure sale.*
- *Should the servicer find it necessary to change the SPOC or any of the SPOC's information, the change should be contained in a specific document addressed to the borrower, clearly labeled "Change in contact information for Single Point of Contact" sent within 5 business days via the method of communication chosen by the borrower (e.g. registered mail or email).*

As required under the Consent Order, SunTrust Mortgage is assigning a HPCR to each client that is being evaluated for a Loss Mitigation or foreclosure activity. SunTrust is already compliant with the requirements to assist a client that is not in default, commonly known as "imminent default", and requests assistance with a Loss Mitigation activity and will assign a HPCR to assist the client during this process. Additionally, SunTrust will assist and solicit clients that are determined to be at risk by written policy or analysis of the client's situation.

The HPCR assignment process can occur in one of four ways. The first way is during a collection call in which SunTrust offers the client assistance to bring the client's delinquent loan current. During this call, if the client accepts the offer, SunTrust will use [REDACTED] to request assignment of a HPCR to the client. The collector then advises the client that the HPCR will contact the client during the next business day. The second way to assign a HPCR to an account is when a client requests assistance and can occur by a direct request, third party request such as housing assistance programs, or through client outreach programs. The third assignment option is to assign a HPCR to a client's account when the account enters the foreclosure process. The fourth assignment is upon the return of a Borrower Solicitation package which includes the Uniform Borrower Assistance form. It is our intent to ensure the client is afforded every opportunity to receive assistance to avoid a foreclosure action.

As a result of the HPCR assignment occurring at different workflow points during the Loss Mitigation and foreclosure processes, SunTrust has initially assigned an HPCR to new accounts entering one of these four assignment points. The result is that certain accounts will not have an HPCR assignment until one



of the assignment points is reached. We do not believe that a client that is in the process of completing a loan modification trial payment plan, which is essentially completed, requires an assignment of an HPCR. SunTrust will conduct a clean-up process to assign an HPCR to all accounts that do not have an HPCR assignment and will complete this by March 31, 2012. This date coincides with the last scheduled large scale staffing effort to ensure adequate staffing for the active accounts in Loss Mitigation or foreclosure.

SunTrust has established written policies and procedures to ensure the HPCR understands and fulfills the Single Point of Contact operating model. The procedures document the required timelines established by regulatory and investor requirements. SunTrust utilizes functionality within [REDACTED] to establish a workflow process that is based upon these requirements and uses date and time triggers to flag accounts that are approaching established timelines. Default management reporting has been created that monitors compliance with these timelines and management is committed to ensuring compliance with these requirements.

SunTrust has reviewed all Default-related written communication provided to the client and has modified enhanced or created new communication letters that include the HPCR's name, phone number and extension, and mail address so that the client may contact the HPCR.

SunTrust has carefully considered the Consent Order requirement to provide the client with a secondary point of contact in the event the HPCR is not available. Each HPCR is a member of a team, or pod, of other HPCRs who can serve as a secondary point of contact if the HPCR is not available. Our welcome letter will advise the client that if their primary SPC is not available and they do not choose to leave a message, then they will be automatically routed to a teammate that has immediate access to their file and has the same level of authority for their loan. A secondary HPCR team member will be able to serve the client with the same level of service in the event the primary HPCR is not available. Both the primary HPCR and any other HPCR within the same pod will have access to the client's loan information, status of the account, and be able to assist the client.

Our pod-based approach means that the primary HPCR is supported by a small team of resources knowledgeable about the product/investor and state requirements of the borrower. Our pod-based approach consists of pods with a maximum of 10 resources, with most of the initial HPCR teams consisting of 7 HPCRs. Our pod structure provides automated rollover telephony to others on the same team, increasing the likelihood that the borrower will reach an actual person (vs. voice mail) in the event the primary HPCR is unavailable. Our pod model and assignment logic are designed to ensure the borrower will reach a qualified individual and not be routed into the general default organization.

We have enhanced our technology to improve the client experience through our integrated technology platform. The use of [REDACTED] for all HPCRs to see the same information about the borrower within the system and our automated rollover telephony ensures that the client will have the greatest access to an HPCR when necessary.

We considered a specific secondary point of contact approach during our design efforts but deemed it to be less effective than the pod-based approach. The small pod structure provides a more effective mechanism for redistributing loans to other HPCRs in the event the HPCR is not available or when an HPCR leaves the position. We believe the small pod approach for a secondary contact will result in a better borrower experience, and complies with the intent of the Order.

### 1.12.3 Single Point of Contact Responsibilities

Guidance:

- *Serves as the primary contact for the borrower (or the borrower's trusted advisor as designated in writing by the borrower).*
- *Servicer must ensure that the SPOC has access to homeowner records (including servicing, collections, loss mitigation and foreclosure) and other relevant personnel (including third party contractors and foreclosure attorneys), and can view the borrower's status at all times to carry out the SPOC's duties.*
- *SPOC must be included in preparation of the pre-foreclosure certification process with respect to loss mitigation actions the servicer took prior to referring to foreclosure.*
- *Prior to proceeding with a foreclosure action, the SPOC must confirm and document that to the best of the SPOC's knowledge, in compliance with existing policies and procedures, all available loss mitigation alternatives offered by the servicer have been exhausted and a non-foreclosure outcome could not be reached.*
- *The servicer's personnel responsible for initiating a foreclosure action must confirm the past due status of the account with the SPOC prior to resuming/restarting/initiating or taking any legal action predicate to foreclosure.*
- *SPOC must properly document all of the SPOC's communication with and actions taken with respect to the borrower for recordkeeping purposes.*
- *SPOC must have direct and immediate access to servicer personnel with authority to stop a foreclosure proceeding.*

SunTrust has established the HPCR as the primary contact for the client to fulfill the Single Point of Contact responsibility and ensures the HPCR has full transparency into the client's loan activities through the [REDACTED] platform. Additionally, we have developed written procedures for the HPCR on how to access the required information using [REDACTED] a single fully integrated workflow system.

SunTrust has established specific responsibilities for the HPCR role and one of the most important is to ensure that a client is not subject to a foreclosure action unless Loss Mitigation alternatives are exhausted. To ensure this requirement is fulfilled, we have designed a business process that requires the HPCR to review, confirm, and document that Loss Mitigation activities are exhausted and a foreclosure action is necessary. This review by the HPCR must be completed prior to referral to legal for foreclosure and also prior to a scheduled foreclosure sale date. The HPCR is not party to the foreclosure process and serves as an independent party in this process to ensure the client's best interest and outcomes. The HPCR certification is incorporated into the [REDACTED] platform and recorded in the system of record, [REDACTED]

#### 1.12.4 Conclusion of Single Point of Contact Responsibilities

Guidance:

- *The SPOC retains responsibility for assigned borrowers until he/she verifies that one of the following has occurred:*
  - *The borrower's loan is brought current.*
  - *The borrower's loan is paid in full.*
  - *The loss mitigation effort (permanent loan modification, deed in lieu, short sale, etc.) was successful, which, in the case of a permanent loan modification, means two months of full compliance with the terms of the permanent modification.*
- *The foreclosure sale took place and, according to applicable state or local laws, the redemption period has expired.*
- *If a borrower needs to re-enter the SPOC program after a successful exit, the servicer should attempt to re-assign the same SPOC to the borrower when reasonably possible.*

SunTrust has established successful exit criteria for when it is appropriate for a client-HPCR assignment to conclude:

- Six months after a loan is brought current by the client.
- Six months after a successful loan modification.
- Upon completion of post-foreclosure processing or reconciliation of the account with the investor.
- Once the post-foreclosure redemption period has expired.

#### 1.12.5 Program Oversight

Guidance:

- *Servicers must develop and implement a robust quality assurance process that includes all sections of the SPOC consent order provision. The process must outline the scope and frequency of review, reporting process, and escalation process when issues are identified.*
- *Review of the SPOC process must be included in the internal audit plan.*



SunTrust Default management is establishing two specific quality assurance (QA) processes to improve our evaluation of a client's Loss Mitigation alternatives. The first QA process is focused upon the HPCR role and the client's HPCR experience. This new process will incorporate measures to evaluate the performance of the HPCR. The HPCR QA process will include regular monthly evaluations of every HPCR, which will be incorporated into the HPCR's performance scorecard. The results of the HPCR QA reviews will be reported to the HPCR and up through the organization as necessary to ensure oversight by executive management and the Board of Directors.

The second QA process that is being established is for the Loss Mitigation decision process and will evaluate the performance of the Loss Mitigation negotiator's accuracy and quality of decision to approve or deny a loan modification request. It will be conducted on a monthly basis and will be incorporated into the negotiator's performance scorecard. Management reporting will be established to comply with oversight requirements.

Corporate Risk and Consumer Banking Risk functions for operational risk and compliance management will monitor and test the HPCR role and function to ensure compliance with Single Point of Contact requirements. SunTrust's Internal Audit department (SAS) will include the SPC process and organization in its annual audit plan.

## 2. Glossary

Acronym	Definition
AML	Anti-money Laundering
BRP	Borrower Response Package
BSA	Bank Secrecy Act
BSP	Borrower Solicitation Package
CEO	Chief Executive Officer
CRT	Client Resolution Team
DPD	Days past due
EIS	Enterprise Information Services
FHA	Federal Housing Authority
FHFA	Federal Housing Finance Authority
FC	Foreclosure
HAFA	Home Affordable Foreclosure Alternative
HAMP	Home Affordable Modification Program
HPCR	Home Preservation Client Representative
HR	Human Resources
LM	Loss Mitigation
ILT	Instructor-led training
MHA	Making Home Affordable
█	█
NPV	Net Present Value
NMLS	Nationwide Mortgage Licensing System
OJT	On-the-job training
█	Imaging System
RASCI	Responsible, Accountable, Supporting, Consulted, Informed
QA	Quality Assurance
QRPC	Quality Right Party Contact
REO	Real estate owned
SAI	Servicer Alignment Initiative
SAS	SunTrust's Audit Services
SCRA	Servicemembers Civil Relief Act
SAFE	Secure and Fair Enforcement for Mortgage Licensing Act of 2008



<b>SPC or SPOC</b>	Single Point of Contact
<b>VA</b>	Veterans Administration
<b>WBT</b>	Web-based training

### **3. Appendix**

#### **Summary of Appendices**

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SunTrust Single Point of Contact

SPC Job Summary

SUNTRUST JOB SUMMARY

LINE OF BUSINESS: MORTGAGE

Rev: 7/1/2011

Job Family: Mortgage Loss Mitigation – Home Preservation Client Representative

Summary: The Home Preservation Client Representative is responsible for providing a single point of contact to borrowers whose loans are delinquent or at high risk for delinquency. This representative assists borrowers over the phone to find solutions to maintain home ownership. If retention options are not possible, discuss other solutions including short sales and deeds in lieu.

This role is a part of the Loss Mitigations function. Loss mitigation works with defaulted borrowers, investors, and insurers in an effort to avoid the completion of foreclosure and to mitigate loss in accordance with federal, state, and local regulation, investor/insurer and SunTrust policies and procedures.

Job Code	Grade	Job Title	Slotting Guidelines
TBD Non-Exempt	40	Mortgage Loss Mitigation – HPC Rep 1	<p>Primary duties include, but are not limited to, compiling a complete file to submit to underwriting, analyzing housing credit and income information, identifying and recommending options for borrowers and notify borrowers of decision, current status, options, timelines, through the process.</p> <p>Performs a variety of mortgage loan documentation and call duties on moderately complex loans, using comprehensive knowledge of loss mitigation policies and procedures for loan products.</p> <p><b>Minimum Requirements:</b> High School Diploma. 2 years</p>





**SUNTRUST JOB SUMMARY**

**LINE OF BUSINESS: MORTGAGE**

**Rev: 7/1/2011**

			<p>experience in a direct customer contact service, collections, loan workout or sales environment or related financial services experience. Strong follow up and customer service skills as well as computer knowledge including proficiency in Word and Excel. Demonstrated ability to work in a high pressure environment.</p> <p><b>Preferred:</b> Bachelors Degree. 2 years experience in a loss mitigation/originations processing/loan administration or call center environment.</p>
TBD Non-Exempt	41	Mortgage Loss Mitigation – HPC Rep 2	<p>Primary duties include, but are not limited to, compiling a complete file to submit to underwriting, analyzing housing credit and income information, identifying and recommending options for borrowers and notify borrowers of decision, current status, options, timelines, through the process. Performs a variety of mortgage loan documentation and call duties on complex loans, using comprehensive knowledge of loss mitigation policies and procedures for loan products.</p> <p><b>Minimum Requirements:</b> High School Diploma. 3 years experience in a direct customer contact service, collections, loan workout or sales environment or related financial services experience. Strong follow up and customer service skills as well as computer knowledge including proficiency in Word and Excel. Demonstrated ability to work in a high pressure environment.</p> <p><b>Preferred:</b> Bachelors Degree. 3 years experience in a loss mitigation/originations processing/loan administration or call center environment.</p>
TBD	42	Mortgage Loss Mitigation – HPC	<p>Primary duties include, but are not limited to, compiling a complete file to submit to underwriting, analyzing housing</p>



**SUNTRUST JOB SUMMARY**

**LINE OF BUSINESS: MORTGAGE**

**Rev: 7/1/2011**

Non-Exempt		Rep 3	<p>credit and income information, identifying and recommending options for borrowers and notify borrowers of decision, current status, options, timelines, through the process. Performs a variety of mortgage loan documentation and call duties on loans with elevated complexity, using comprehensive knowledge of loss mitigation policies and procedures for loan products.</p> <p>Minimum Requirements: High School Diploma. 4 years experience in a direct customer contact service, collections, loan workout or sales environment or related financial services experience. Strong follow up and customer service skills as well as computer knowledge including proficiency in Word and Excel. Demonstrated ability to work in a high pressure environment.</p> <p>Preferred: Bachelors Degree. 3 years experience in a loss mitigation/originations processing/loan administration or call center environment.</p>
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**SunTrust Single Point of Contact  
Incentive Program Review for Consent Order**

**SunTrust Incentive Program Review for Consent Order**



Adobe Acrobat  
Document

**SunTrust 2011 Incentive Plan for Loss Mitigation**



Adobe Acrobat  
Document

**SunTrust 2011 Incentive Plan for Loss Mitigation - Addendum (draft) for SPC Role**



Adobe Acrobat  
Document

**SunTrust Single Point of Contact**

<b>Proposed Training Curriculum</b>			
<b>Core Curriculum</b>			
<b>Course Name</b>	<b>Type</b>	<b>Description</b>	<b>Length</b>
Default Administration Foundations [MTG272]	ILT (Instructor-Led)	The aim of the Default Foundations class is to ensure that new hires in the SunTrust Default department are aware of the high-level process flows and departments that impact accounts that go into default. This training will prepare new hires to perform their job quickly and efficiently. Successful completion of this course will expose participants to a variety of information, tools, and resources that can be leveraged to ensure appropriate understanding and the ability to assist customers who are in default.	3 hours
Introduction to Loss Mitigation [MTG273]	ILT	This course is designed to introduce new hires to the concepts and processes of the SunTrust Loss Mitigation department and all the affiliated departments. It provides an overview of the origins and development of loss mitigation, including current trends. The course focuses on the fundamentals of loss mitigation and explains loss mitigation workout options that move the loss mitigation process to a solution. A description of the various	3 days



		Government Sponsored Enterprises and other agency options that address the current housing market crisis in our country is discussed. The various workout options provided by SunTrust and their requirements are also included. The course also describes the high-level process of handling loss mitigation clients at SunTrust. Includes a 30-minute online assessment.	
Introduction to Collections [MTG282]	ILT	This course is designed to provide the basic skill sets to enable new collections employees to become successful. It introduces new hires to the basic knowledge and skills needed for all Collection Specialists, including the role of the Collection Specialists in preventing and managing delinquencies, the Seven Stage Collection Methodology, addressing the FDCPA regulations for collection practices, collection tools available, creating a positive experience for a client, and coping with stress. Includes a 30-minute online assessment.	1.5 days
Loss Control Overview [MTG276]	WBT	This course introduces the basic concepts of loss control and the general processes involved. It will provide learners with the functional knowledge needed to carry out their job-specific tasks.	1.5 hours
SunTrust Loss	WBT	This online course provides an	30 minutes



Prevention Strategies [MTG381]		overview of the SunTrust Loss Prevention Strategies, including Collection Strategies and Foreclosure Alternative Programs.	
Bankruptcy Overview [MTG275]	WBT	This course introduces the basic concepts of bankruptcy and the processes involved in filing and closing a bankruptcy case. It will provide learners with the functional knowledge needed to carry out their job-specific tasks.	1.5 hours
<b>Mortgage-Related Web-Based Training – Optional</b>			
<b>These 4 WBTs provide an overview of the Mortgage Loan Process.</b>			
Introduction to Mortgage Lending 1 [MTG191]	WBT	This online course discusses the steps involved in the Mortgage Lending cycle and the basic activity that occurs with each step.	1 hour
Introduction to Mortgage Lending 2 [MTG192]	WBT	This online course discusses the Loan Originator and Loan Processor roles, responsibilities, and what takes place during Loan Origination and Processing.	1 hour
Introduction to Mortgage Lending 3 [MTG193]	WBT	This online course discusses the Loan Underwriter and Loan Close roles, responsibilities, and what takes place during Loan Underwriting and Closing.	1 hour
Introduction to Mortgage Lending 4 [MTG194]	WBT	This online course discusses the Post Closing review, the Secondary Market, and Loan Administration including the secondary market activities, some Mortgage Marketing	1 hour



		objectives, and roles and responsibilities, as well as descriptions of what occurs during Loan Administration.	
<b>Telephone Systems Training</b>			
<b>Once the decision is made regarding the telephone system, if it is Avaya, we offer an employee training course and a manager training course on telephony operations.</b>			
Avaya Proactive Contact 4.1 – Agent Training [MTG208]	WBT	This course covers the agent training material describing the usage of Avaya Proactive Contact Solution 4.1.	1.5 hours
Avaya Proactive Contact 4.1 Manager Training Internet Monitor [MTG229]	WBT	This course covers the supervisor training material describing the usage of Avaya Proactive Contact Solution 4.1.	1.5 hours
<b>Required New Hire Compliance Courses</b>			
<b>These are the required compliance courses that will be pushed out to New Hires and existing employees annually, based on their job positions.</b>			
AWARE – Introduction to Information Protection [ISS101-11]	WBT	AWARE is designed to orient teammates to their responsibilities under the Information Security Policy and associated topics. It outlines specific steps that you must take to ensure compliance with the policy as well as regulations. Information is one of SunTrust's most important assets. As such, you are obligated to:  * Read, understand, and comply with the SunTrust Information	75 minutes



		<p>Security Policy</p> <ul style="list-style-type: none"> <li>* Protect and be a good steward of SunTrust company and client information, regardless of your role at the Bank</li> <li>* Promptly report information security incidents to your Information Security Officer (ISO)</li> </ul> <p>The Information Security Policy is designed to protect and preserve the security, confidentiality, integrity, and availability of information owned by or in the care of SunTrust. The policy is based on legal and regulatory requirements, such as the Gramm-Leach-Bliley Act (GLBA), and industry standards.</p> <p>If you have questions about the Information Security Policy, please contact your ISO. Visit the Enterprise Technology Risk Management (ETRM) intranet site for a listing of ISOs.</p>	
<p>2011 AML Training for the Consumer Banking LOB [CMP263-11]</p>	<p>WBT</p>	<p>This course focuses on anti-money laundering (AML) responsibilities specific to the Consumer Banking LOB (including the Retail, Card, and Marketing, Mortgage, and Consumer Lending groups). The course is an annual training requirement and includes an overview of the Bank Secrecy Act (BSA).</p>	<p>1 hour</p>
<p>2011 SunTrust's Code</p>	<p>WBT</p>	<p>This course supports the Code of</p>	<p>1 hour</p>





of Business Conduct & Ethics [CMP270-11]		Business Conduct and Ethics Certification Process and is aimed at verifying that all SunTrust teammates are aware of the SunTrust code and have read and understand its guidelines and provisions.	
Online Fraud Awareness & Response for Line of Business Teammates [TMG280]	WBT	This course provides an overview of fraud, how to respond when online fraud is identified or reported, and where to find fraud resources.	30 minutes
2011 Corporate Security-Integrity Awareness [CMP269-11]	WBT	This course provides a review of the responsibility of each SunTrust teammate to protect the confidential information and assets of the bank and its clients and to report suspected violations to management, Corporate Security and or Audit Services.	30 minutes
SAFE Act Training [MTG460]	WBT	This course provides basic Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act) overview of the laws, regulations and SunTrust policy requiring Mortgage Loan Originators to register with Nationwide Mortgage Licensing System (NMLS).	1 hour
2011 Fundamentals of Fair Lending [CMP246-11]	WBT	This course provides basic fair lending best practices and a high level overview of the laws, regulations and SunTrust policy prohibiting discrimination in the credit lending process.	75 minutes
Foundations of Management: All Things	WBT	This course provides a review of the federal laws that govern employment	3.5 hours



Equal [MTG101-10]		relationships and the consequences for non-compliance.	
<b>Optional Developmental Courses</b>			
<p><b>These courses are optional developmental courses that managers may want the employee to take after they have been in the position for 30+ days.</b></p>			
Developing Fundamental Critical Thinking Skills	WBT	Critical thinking skills are increasingly consequential as organizational planning and decision making become more distributed and reliant on written and verbal communication factors. This course coaches you through the acquisition of an array of critical skills that can help you improve your information processing agility. You also will learn how to maximize your inferential and evaluative competencies to achieve better planning and decision-making efficiencies.	3 hours
Handling Calls with Confidence and Professionalism	WBT	This course will provide the necessary tools to be able to handle calls with confidence and professionalism.	3.5 hours
Writing Effective Business Documents	WBT	This course will teach participants how to write effective memos, create business letters, write powerful reports and proposals, and apply the guidelines of editing and proofreading.	2 hours
Writing Concisely and Accurately	WBT	Participants will learn how to compose business documents that are clear, concise, and correct. They	1 hour



		will learn the importance of using the right tone while composing business documents.	
Listening Basics	WBT	Do you sometimes feel like you are not getting the whole message when someone talks to you? If you have problems receiving information that is verbally communicated, this is the course for you. This course will familiarize you with the communication and listening processes, and how listening functions within communication. You will discover the factors and variables that influence communication and listening and learn strategies to overcome weak listening skills. You will then apply these skills to business-based examples. Knowing the basic communication and listening processes will make you aware of where communication can be adversely affected.	2.5 hours
Enhancing Listening Skills	WBT	Have you ever been taken by surprise by an unexpected deadline? Have you ever left a meeting unsure about what was decided? Have you ever asked a supervisor for advice, only to later forget what your supervisor told you? You can avoid problems like these by using effective listening skills. Effective	3 hours




			<p>listening helps you to know what's going on in your organization, get cooperation from your co-workers, solve problems, and be successful in your work. However, most people don't listen very well. This course will help you to improve your ability to listen to others. You will learn the skills you need to understand what people say, read their unconscious nonverbal messages, and get others to want to listen to you. You also learn how to apply these skills in a variety of business situations such as interviews, business meetings and negotiations.</p>	
Standard Business Etiquette	Business	WBT	<p>The rules of proper business etiquette are changing. In many corporations, middle management and the concept of seniority are being replaced by a flat organizational structure and intense competition. Such an environment makes the need for appropriate behavior especially crucial, particularly if you're looking to advance your career. How do you maintain your private "space" when you sit in one of a dozen cubicles? How should you address your peers and superiors, and what's the proper attire for today's corporate culture? In this course, you'll learn how to conduct yourself in the everyday business environment with poise and</p>	3 hours




		confidence.	
Advancing Service Expertise	WBT	<p>A certain degree of pampering is key to achieving customer loyalty, and this course shows us how to make "five star attitude" an integral part of our service commitment. These lessons are designed to foster awareness and new skills that deepen our customer service expertise. Gain techniques for personalizing customer interaction. Enhance your approach to customer assistance by giving it form in a structured plan. Understand the critical differences in specialized service when you are dealing with customers over the phone. And since technology now has an increasingly important place in daily business, you'll integrate tips for service-friendly e-mail into your customer assistance practices. With interactive examples, simulated dialogues, and game-like exercises, this skill-building course takes your customer service proficiency up a notch toward excellence.</p>	3.5 hours
Customers, Confrontation, and Conflict	WBT	<p>This course will give you the perspective to effectively cope with customer conflict, and sound methods to deal with all types of potentially confrontational situations. You'll be able to identify elements of emotional response that interfere with good customer service. Staying</p>	5 hours



		<p>cool, calm and customer-connected is a critical learning objective for this course. Develop communication skills that defuse customer complaints. Learn and differentiate the best methods to handle difficult customers in person and over the phone. By the end of this highly interactive course, you'll have the strategies necessary to restore customer confidence and move beyond the thorny issue to an even stronger relationship.</p>	
<p>Overcoming Difficult Service Situations</p>	<p>WBT</p>		<p>4.5 hours</p>



			
The Fundamentals of Exceptional Customer Service	WBT	This course is designed to take your goals beyond merely satisfying the customer to creating customer loyalty. The training takes aim at outdated modes of thinking, and establishes the building blocks for a service mentality that increases customer commitment, not to mention profits. Learn how to develop service standards and track their effectiveness. Explore the value of building relationships with customers. Most importantly, by the end of the course, you'll be able to create your own customer-focused philosophy.	3.5 hours
Asserting Yourself Professionally	WBT	This course will cover how to become an assertive business professional, how to be a proactive listener, and recognize benefits of using constructive feedback strategies.	3 hours
Problem Solving: Generating Alternatives	WBT	When faced with any problem, it's tempting, especially in today's frenzied business atmosphere to either take the easiest route or rely on the old tried and true methods. But how many times have you taken a certain action and realized afterward that you had more options than you realized. Now more than	2 hours



			<p>ever, today's business world is complex and multifaceted. As a positive result of that complexity, however, you can enjoy the benefits of increased opportunities in problem solving. This course is designed to equip you with numerous and productive alternative generation strategies that will enable you to draw from a pool of expended options. By so doing, you'll better recognize and act on the best possible business choice. You'll explore ways to begin generating alternatives and get into the flow of enlarging your store of possible solutions, using both rational and creative approaches to problem solving.</p>	
Advanced Default Servicing	ILT		<p>This instructor-led course is designed to sharpen servicing skills for Default Administration representatives who have mastered essential processes and systems. The skills taught in this course include enhancing communication, handling difficult clients, the art of using questions to diagnose client needs, and negotiation skills. Representatives who complete this training will be able to properly apply solutions to more challenging Default Administration situations.</p>	2 days





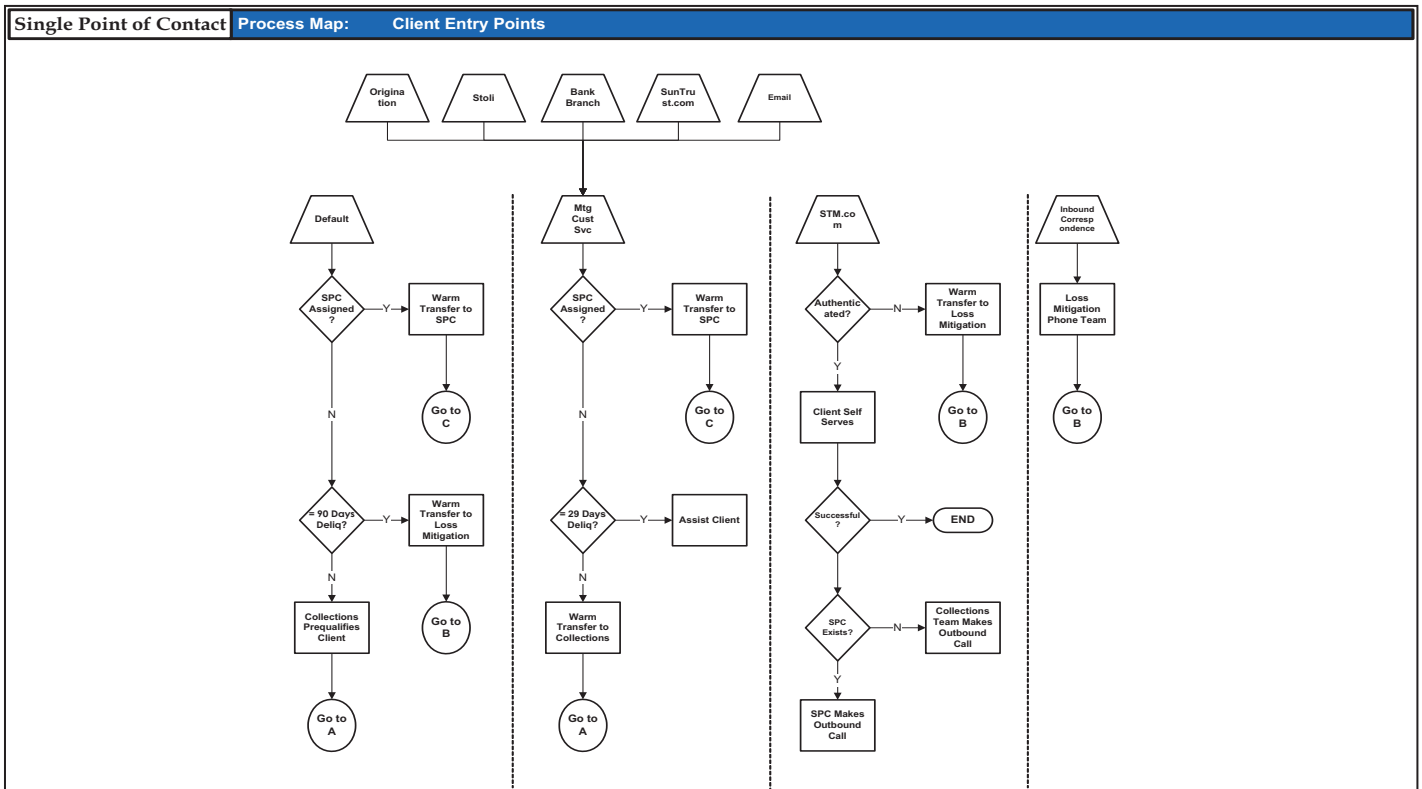
## SunTrust Single Point of Contact

### Integrated SPC Design

### Level 2 Process Flows

The following process map outlines client-initiated entry points into the SunTrust organization.

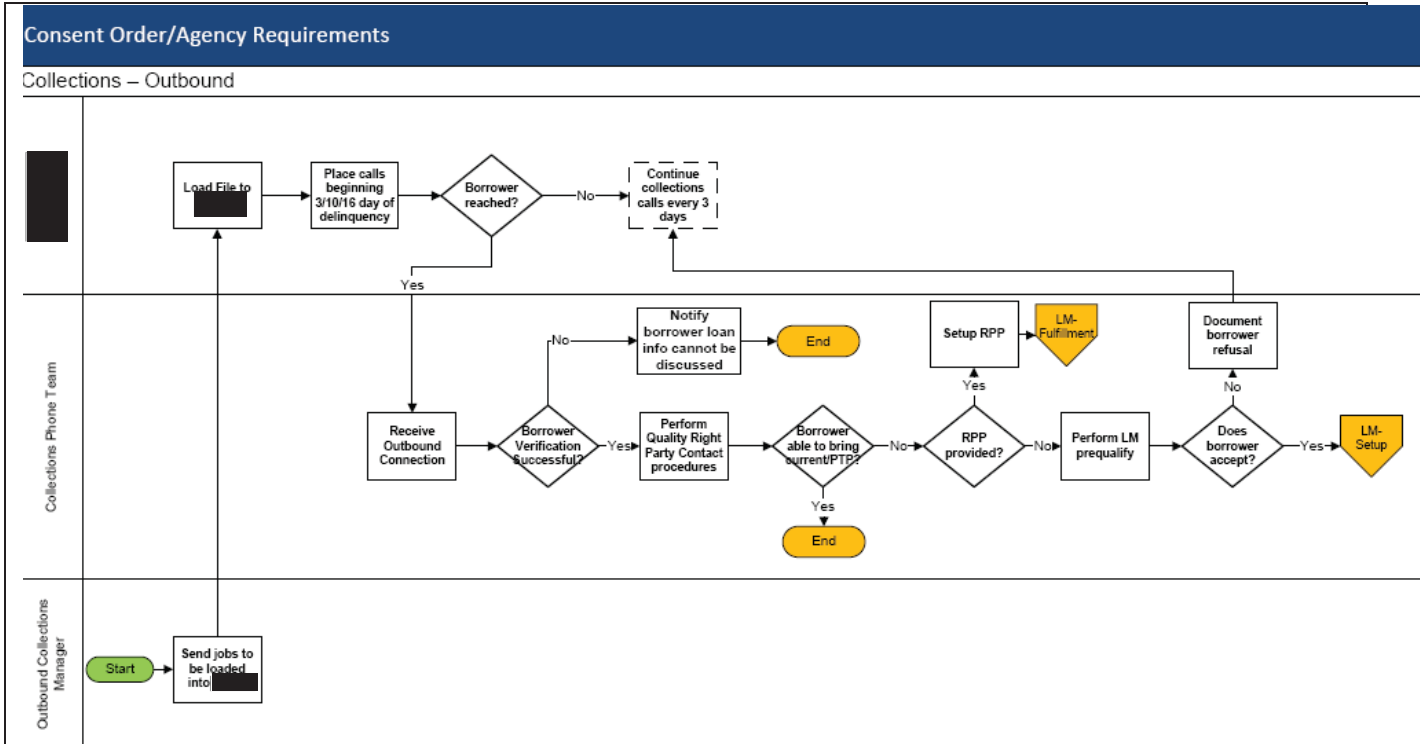
#### Client Entry Points



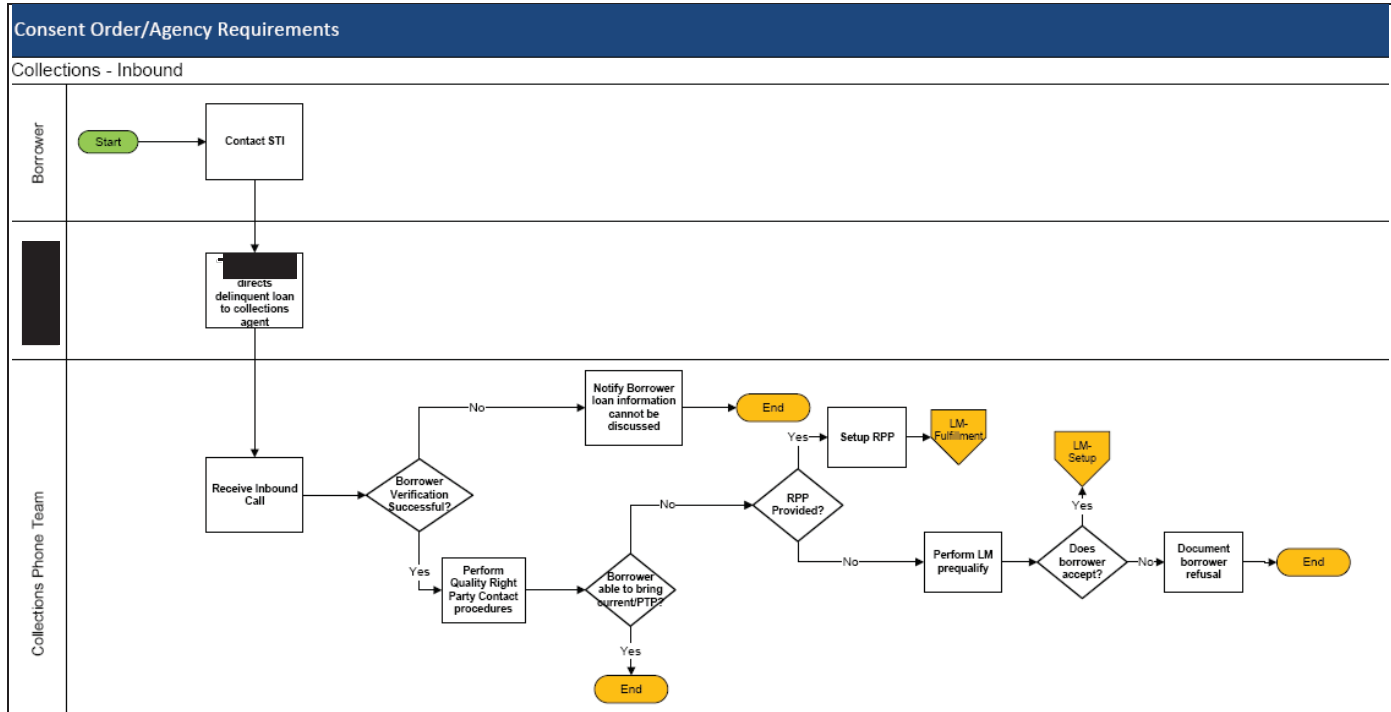
The following process flows have been designed to incorporate the Consent Order requirements for the SPC role and new Agency (FNMA/FHLMC) Servicer Alignment Initiative (SAI) requirements for default methodology including client contact, loss mitigation solicitation, and foreclosure processing.

## Collections Design

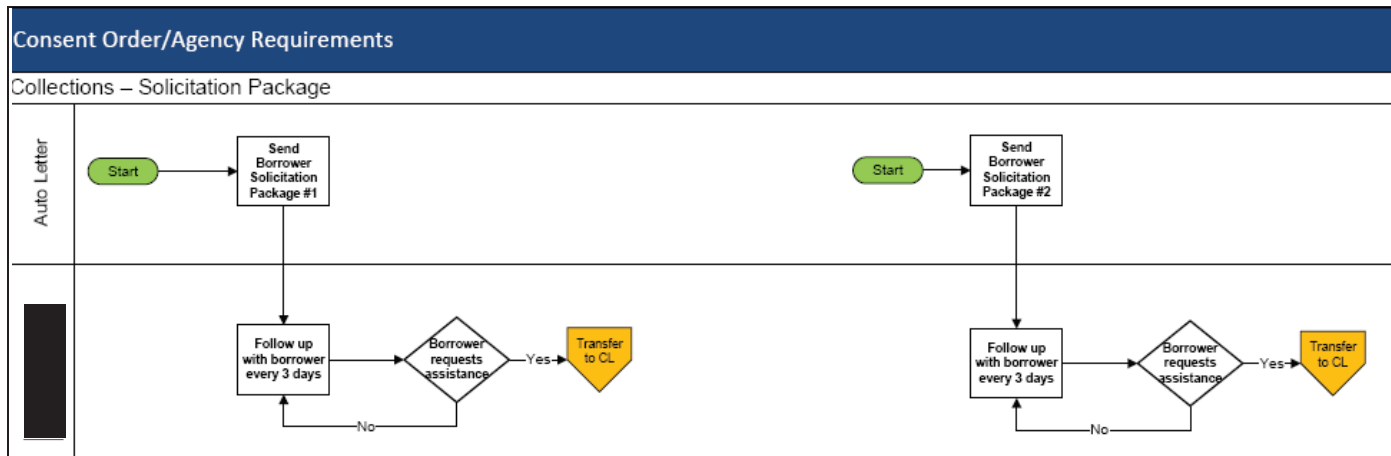
### Outbound Contact



**Inbound Contact – All Loans**

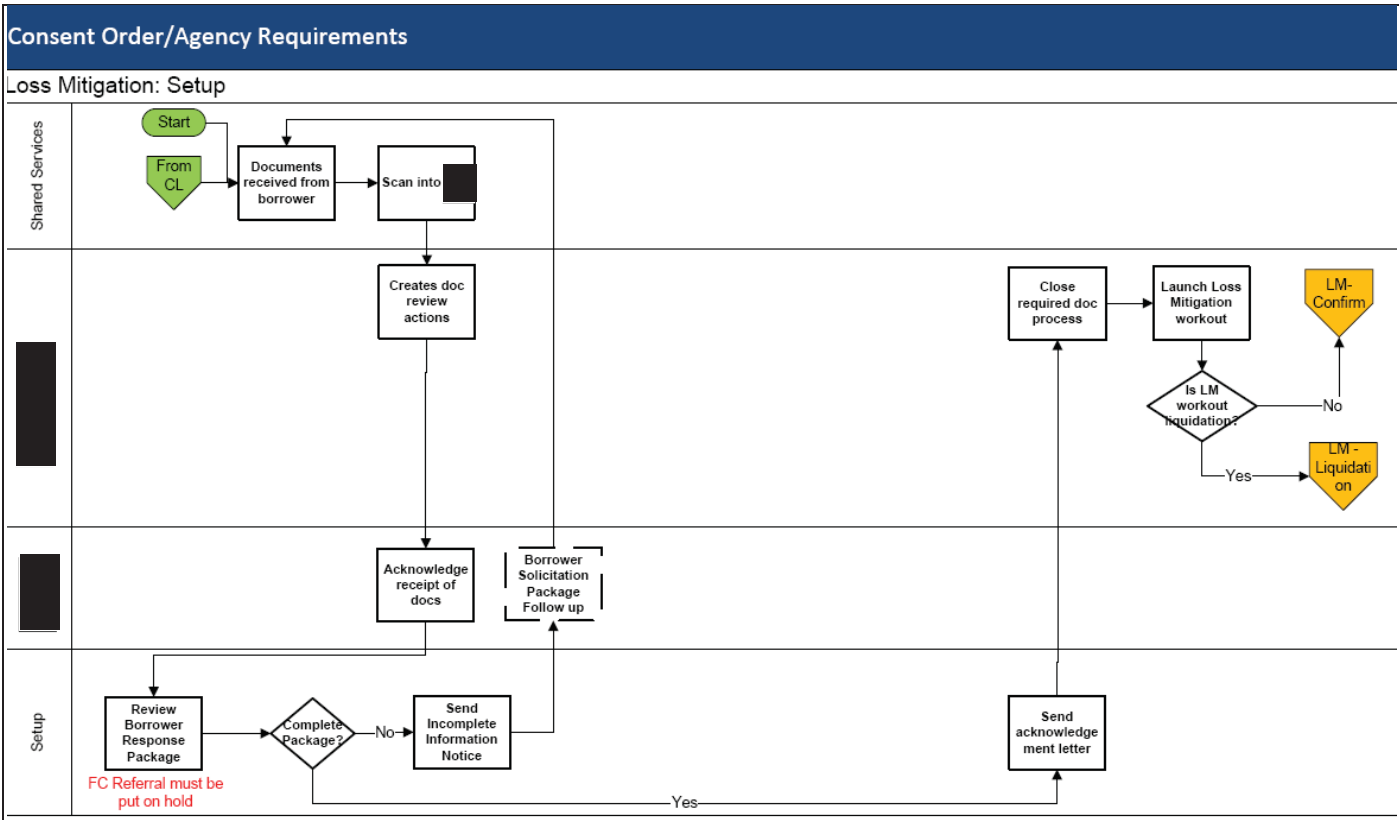


**Client Solicitation Packages**

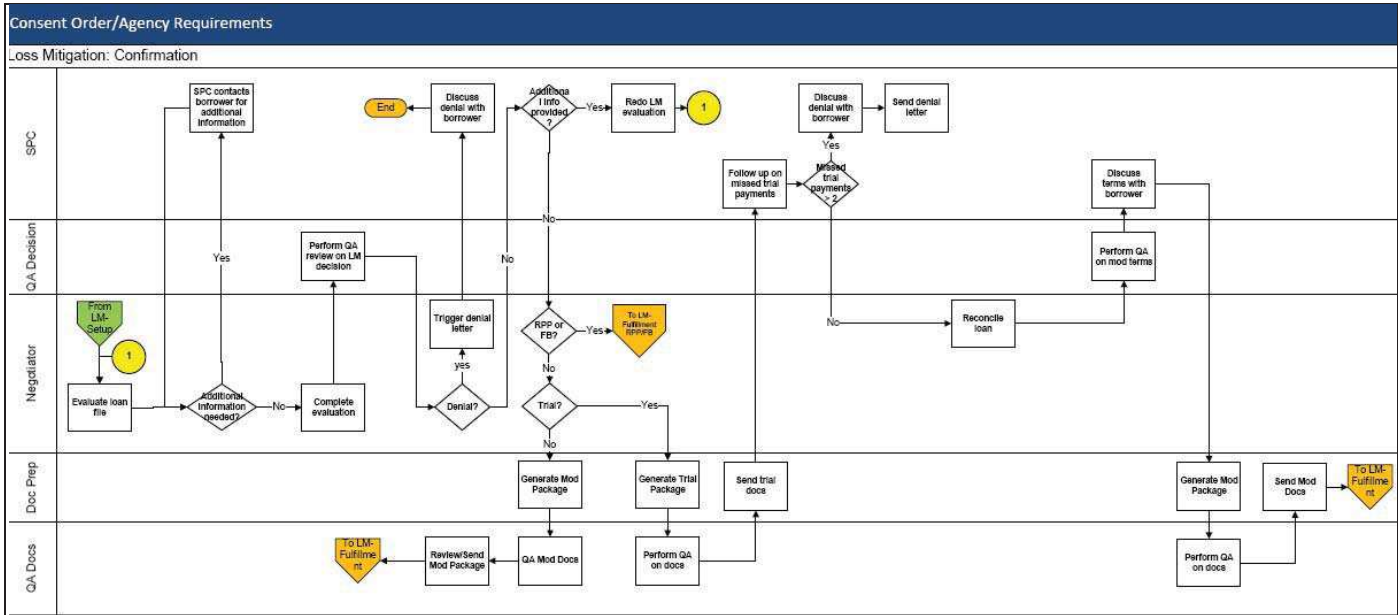


**Loss Mitigation Design**

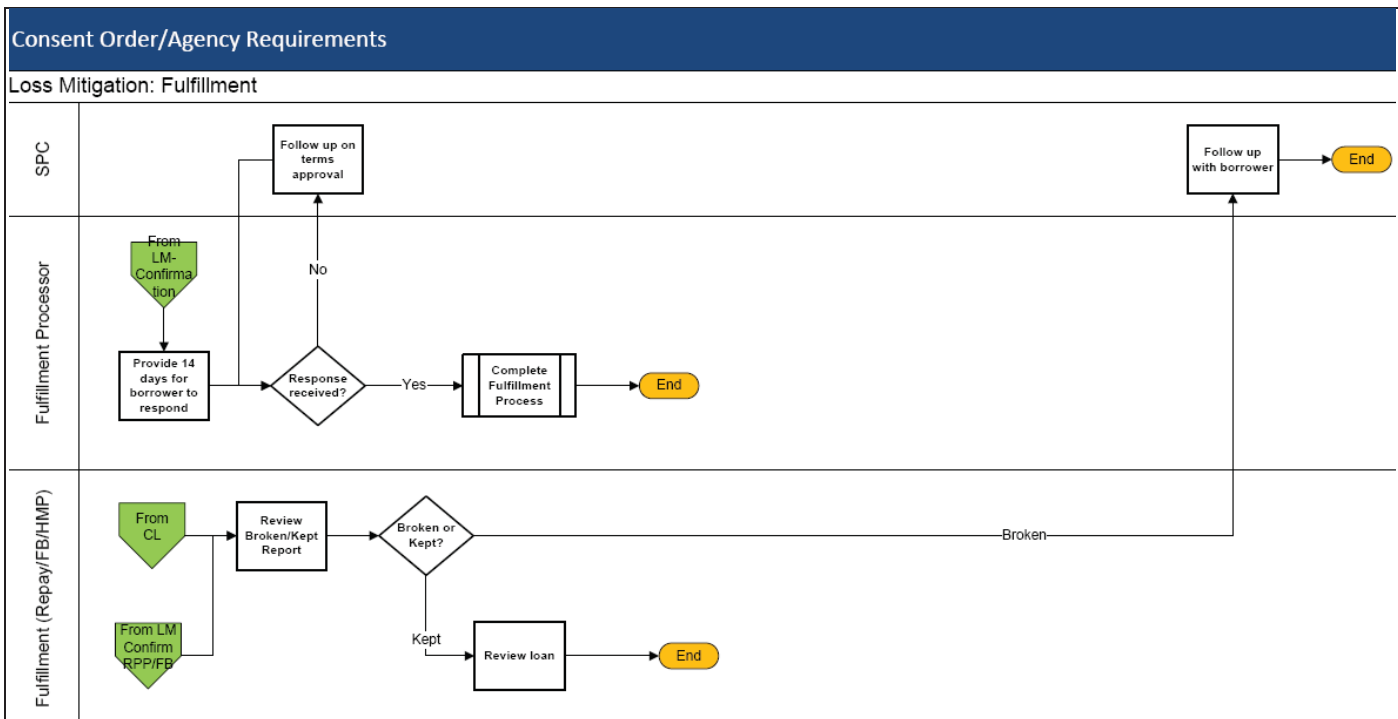
**Loss Mitigation File Setup**



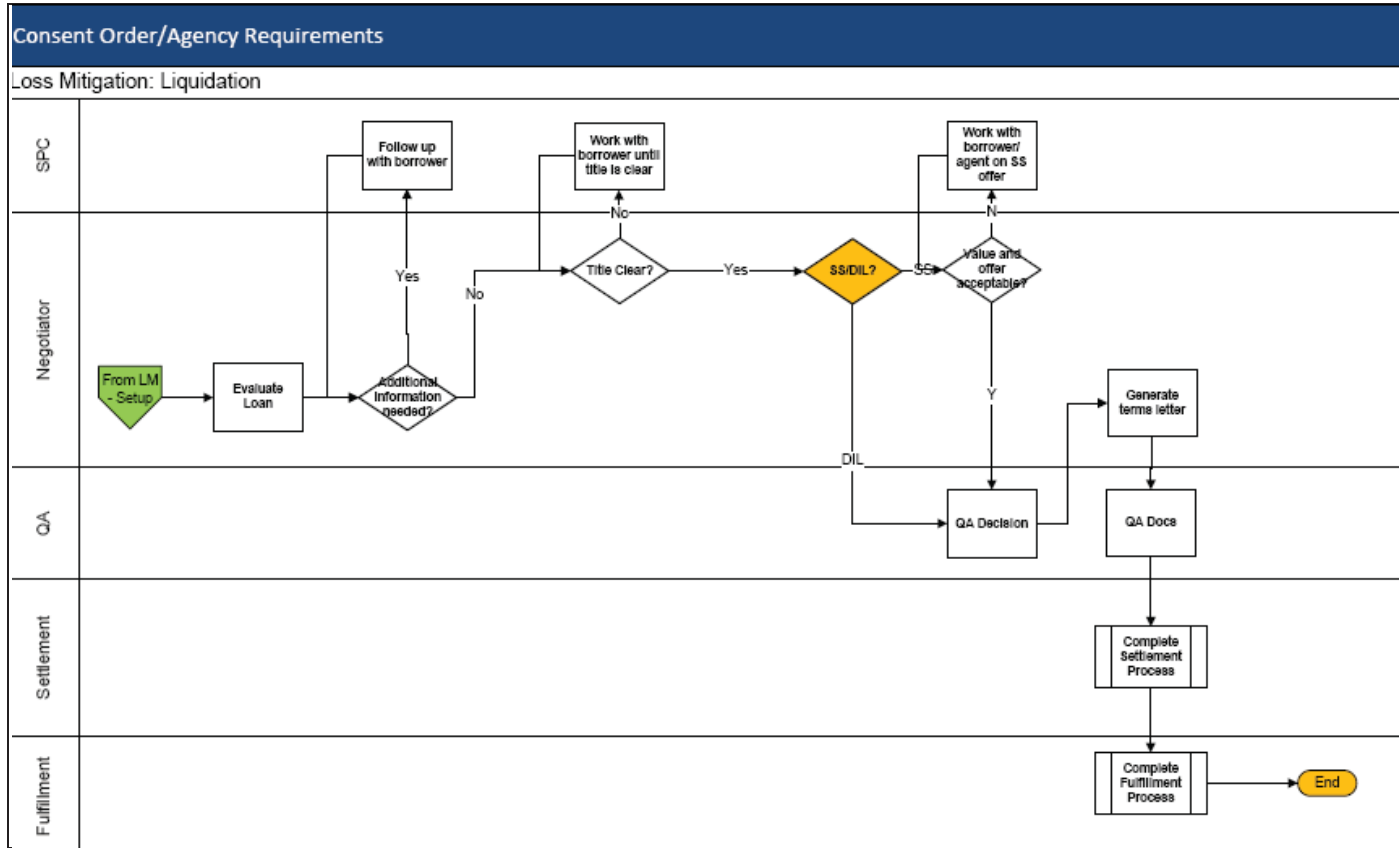
### Client Confirmation



### Loan Modification Fulfillment

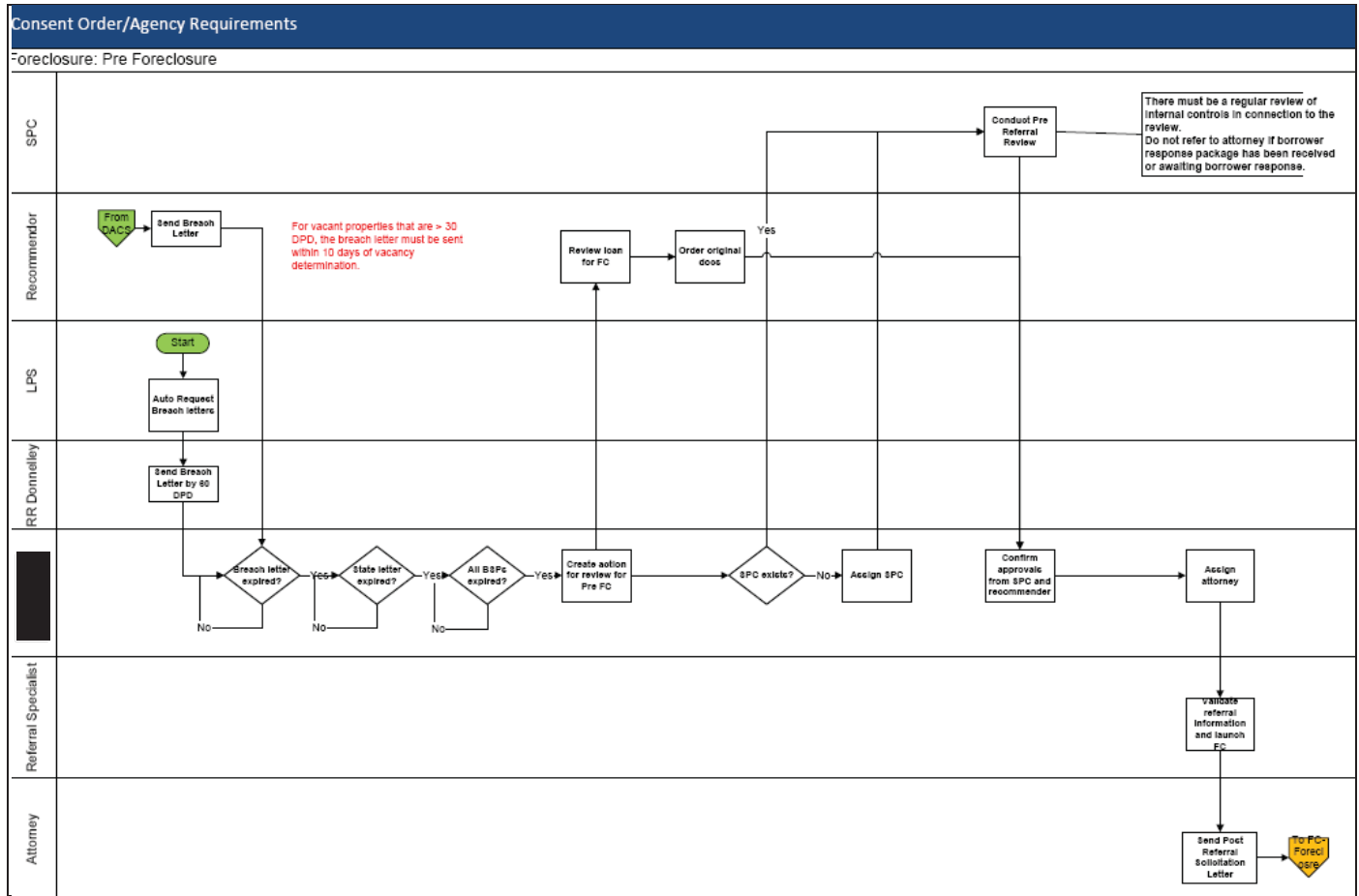


### Liquidation (Short sale/Deed-in-lieu) Processing



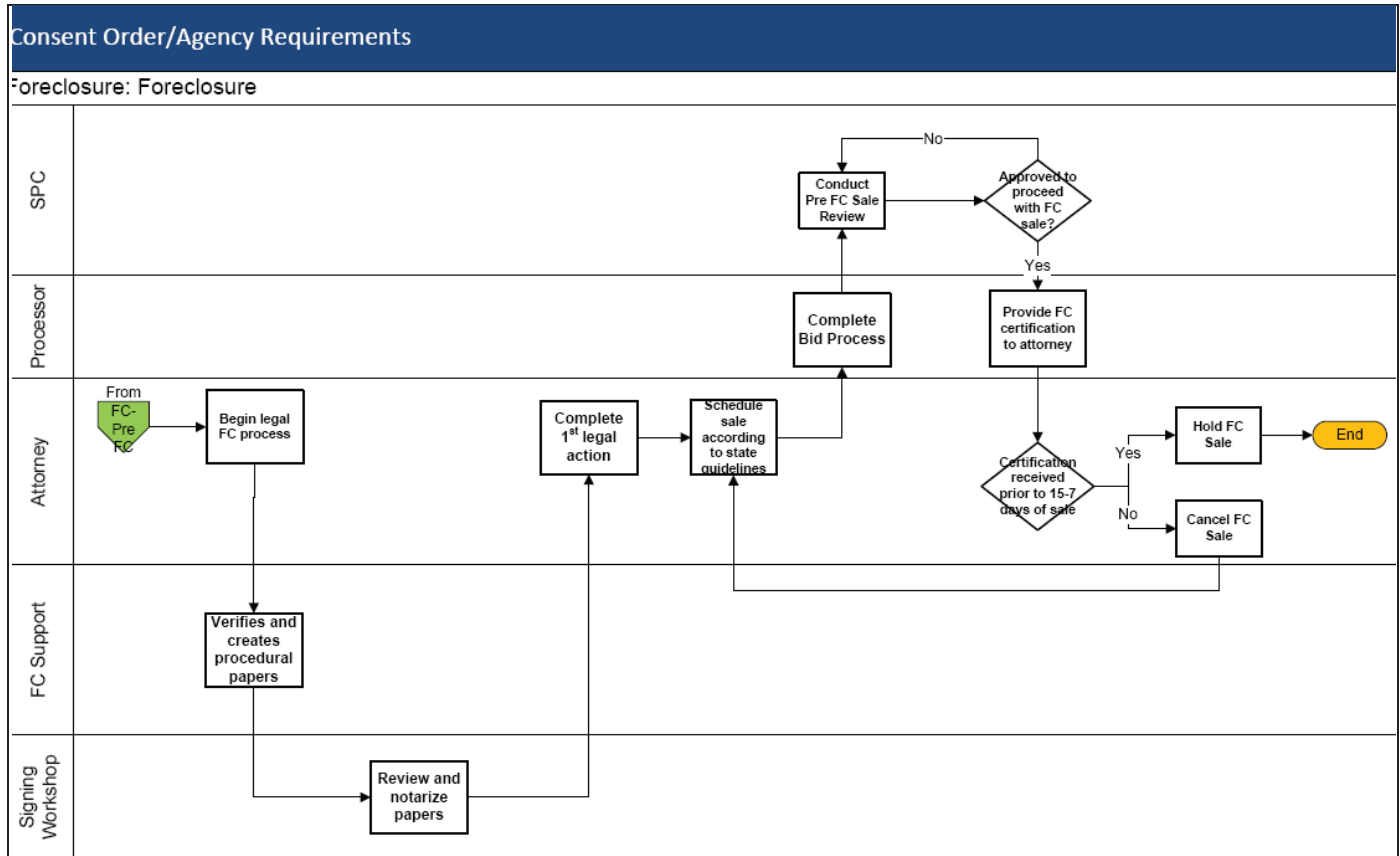
**Foreclosure Design**

**Pre-Foreclosure Process**





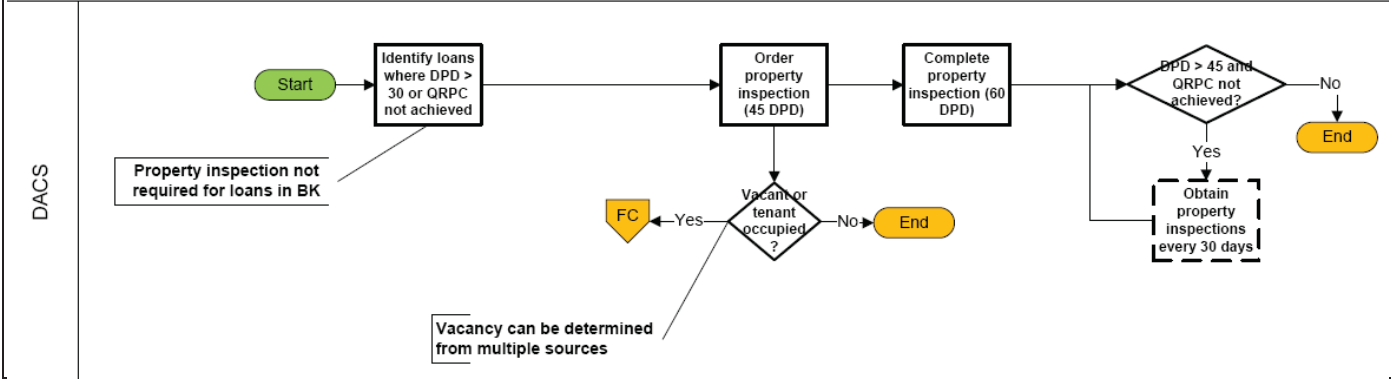
### Foreclosure Process



Property Preservation

Consent Order/Agency Requirements

Property Preservation



**SunTrust Single Point of Contact  
Integrated SPC Design  
Level 3 RASCI Assignment Matrices**

The following RASCI matrices represent the interaction between the various roles, systems, and vendors that are involved in fulfilling the Order and SAI requirements for Single Point of Contact.

**SunTrust Bank Single Point of Contact RASCI matrix**



Adobe Acrobat  
Document