



ALLY FINANCIAL INC.

GMAC Mortgage, LLC and Residential Capital, LLC

Management Information Systems

Prepared for the Board of Governors of the Federal Reserve System and the Federal Deposit Insurance Corporation

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Plan Overview for Management Information Systems

This Action Plan ("Plan") is established in response to the Consent Order dated April 13, 2011 (the "Order") among the Board of Governors of the Federal Reserve Bank (the "FRB"), the Federal Deposit Insurance Corporation (the "FDIC"), Ally Bank (the "Bank"), Ally Financial Inc. ("Ally Financial" or "AFI"), and certain of Ally Financial's direct or indirect subsidiaries including Residential Capital, LLC ("ResCap") and GMAC Mortgage, LLC ("GMACM") and together with ResCap, the "Mortgage Servicing Companies". Capitalized terms not defined in the Plan shall have the meaning assigned to them in the Order.

The purpose of this Plan is to set forth the actions taken and responsibilities necessary for the Mortgage Servicing Companies to comply fully with their obligations under Section 10 of the Order (see Appendix I). Section 10 of the Order requires:

Within 60 days of this Order, GMAC Mortgage shall submit to the Reserve Bank an acceptable plan and timeline for the review and remediation, as necessary, of the Mortgage Servicing Companies' management information systems ("MIS") for their residential mortgage loan servicing, loss mitigation, and foreclosure activities to ensure the timely delivery of complete and accurate information to permit effective decision-making. The plan shall, at a minimum, provide for:

- (a) *A description of the various MIS used or to be used by the Mortgage Servicing Companies;*
- (b) *a timetable for completion of the review;*
- (c) *a timetable for the remediation of any identified deficiencies; and*
- (d) *new systems or enhancements to the MIS to:*
 - (i) *monitor compliance with the Legal Requirements, supervisory guidance of the Board of Governors, and the requirements of this Order;*
 - (ii) *ensure the ongoing accuracy of records for all serviced mortgages, including, but not limited to, records necessary to establish ownership and the right to foreclose by the appropriate party for all serviced mortgages, outstanding balances, and fees assessed to the borrower;*
 - (iii) *ensure that the Loss Mitigation and foreclosure staffs have sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities; and*
 - (iv) *ensure that the single point of contact has sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities; and*
- (e) *Testing the integrity and accuracy of the new or enhanced MIS to ensure that reports generated by the system provide necessary information for adequate monitoring and quality controls.*

The Mortgage Servicing Companies have prepared this Plan as a response to Section 10 of the Order and the requirements therein.

Principles Guiding this Plan

The Mortgage Servicing Companies define MIS as a system or process that provides the information necessary to manage their operations effectively. MIS includes vendor-managed and in-house developed applications, databases and end-user tools that are sources of management information and reports utilized by the business to make effective decisions regarding strategic goals and objectives.

This MIS plan focuses on the MIS review and remediation action plans outlined to specifically address the items in Section 10 of the Order.

The foundation of the Plan is the identification and inventory of all MIS used by the Mortgage Servicing Companies to deliver information that permits effective decision-making. The MIS inventory enables the Mortgage Servicing Companies to take the following actions:

- Develop a comprehensive MIS review plan
- Develop a remediation plan
- Evaluate potential enhancements or new MIS

The inventory was built following interviews and information gathering sessions with the following business units who provided the information required to define and update the inventory of applications, databases, and end-user developed tools (also referred to as MIS) used or to be used throughout the organization. The business units identified below include all units contained in the servicing operations.

Business Units Interviewed:

- Customer Care and Collections
- Portfolio Management & Servicing Strategies: Servicing Analytics and Reporting
- Investor Operations
- Special Servicing
- Quality Assurance & Operational Control
- Bankruptcy
- Compliance / Legal
- Loss Mitigation - Liquidations
- Loss Mitigation Fulfilment
- REO
- Foreclosure
- EOTS (Servicing IT)
- Quality Control/Quality Assurance
- Training
- Internal Audit

A centralized IT function, Enterprise Operations Technology Solutions (“EOTS”), maintains and supports the primary residential mortgage loan servicing, data warehouse and record management systems, that are both internally and vendor supported. These systems are the primary source and system of record for management reporting, monitoring and document storage.

In addition to the centrally-managed EOTS applications, the Mortgage Servicing Companies identified and documented the applications, databases and end-user developed tools within the Business Units, that also support daily operations. These MIS include end-user developed databases and tools used by the business to track and analyze data, monitor and report results that are used in decision-making.

The Mortgage Servicing Companies also use a number of third-party vendors, which support a range of business functions. Each business unit has designated resources to interact with their vendors. Some of the outsourced service providers maintain systems outside of the Mortgage Servicing Companies. This includes vendors providing back office support.

The following functions depend on MIS for reporting and decision making: Board Oversight, Compliance Program, Single Point of Contact, Training, Mortgage Electronic Registration System, Third Party Management, Foreclosure Review and Servicing Management and Oversight. The Mortgage Servicing Companies have worked and will continue to work in conjunction with all teams responding to the Consent Order. As these programs and plans are completed and are approved, the Mortgage Servicing Companies will review new systems, enhancements or changes to the MIS. This review will refine the inventory and remediation timelines to appropriately address all MIS related matters proposed by the Board Oversight Plan (Order Section #2), Single Point of Contact Plan (Order section #5), Compliance Program (Order Section #8), Mortgage Electronic Registration System Plan (Order Section #9), and the outcomes of the Foreclosure Review (Order Section #3).

Consent Order Response

A. Consent Order Response to Section 10a

Consent Order Section 10a requires:

(a) A description of the various MIS used or to be used by the Mortgage Servicing Companies

The MIS inventory includes:

- MIS Name - Name of the application or system
- Description - Description of the purpose and use of the MIS
- Type - Defines MIS category e.g. application, database, tool, spreadsheet
- Area - Defines primary business group(s) using the MIS
- Supported by - Defines group or user(s) responsible for supporting the management / ongoing operations of the MIS (e.g. development, maintenance)

In creating the inventory, the Mortgage Servicing Companies performed the following procedures:

- Conducted interviews and information gathering sessions to inventory and catalogue the MIS used throughout the organization

- Inquired about the access to information and timeliness and accuracy of information needed to perform job functions
- Developed and documented our understanding of the MIS' purpose and use
- Reviewed results of prior year SAS 70, internal and external audits, regulatory reports and examinations for MIS deficiencies that could impact the timeliness, completeness and accuracy of information used in decision-making

The Mortgage Servicing Companies catalogued approximately 300 MIS, of which 34% are vendor-managed (includes business and centrally managed IT supported by the Enterprise Operations Technology Solutions (EOTS team), 43% business-managed, and 23% central IT-managed.

Of the approximately 300 MIS identified, the following five core MIS support residential mortgage loan servicing, loss mitigation and foreclosure activities, each of these are centrally supported by EOTS.

- [REDACTED] - The [REDACTED] loan servicing system ('[REDACTED] maintained and supported by [REDACTED] Lending Solutions, a third party information management systems and data processing service provider. [REDACTED] is the primary system of record for the Mortgage Servicing Companies' loan servicing operations. [REDACTED] is a comprehensive mortgage servicing system encompassing key loan stages from loan boarding through payoff and default management. [REDACTED] consists of both online/real-time and batch processing and interactive access and updating of all records, includes loan boarding, cash/payment processing, investor reporting, escrow administration, online collection, customer service, payoff, adjustable rate mortgage processing, and default management.
- [REDACTED] – [REDACTED] is a communication system utilized by the Mortgage Servicing Companies for all Foreclosure attorneys and includes electronic referrals, critical data from [REDACTED] and all necessary documents for referral. Process Management allows timeline management including customization of steps, referral holds and issues. The Foreclosure, Loss Mitigation and Bankruptcy business units are the users of the system. The [REDACTED] system is maintained and supported by EOTS.
- [REDACTED] –The Mortgage Servicing Companies utilize the [REDACTED] data warehouse and a [REDACTED] reporting tool to consolidate and report upon data primarily from [REDACTED] and [REDACTED]. The data from [REDACTED] is fed to the [REDACTED] data warehouse on a daily basis through an automated batch process. The data warehouse is also maintained and supported by the vendor, [REDACTED]
- [REDACTED] - [REDACTED] is a web-based tool used to access [REDACTED] reports, letters and forms. [REDACTED] is used by all Servicing business units. The application is supported by EOTS.

- [REDACTED] / [REDACTED] - [REDACTED] is a document repository for imaged documents. [REDACTED] houses loan documents and [REDACTED] is the tool used to view the documents. [REDACTED] and [REDACTED] are used by all Servicing business units. [REDACTED] is a vendor application that is supported internally by the Global Imaging Team. [REDACTED] is an internally developed tool and is also supported by the Global Imaging Team.

A complete list of identified MIS can be found in Appendix IV.

B & C. Consent Order Response to Section 10b and 10c

Consent Order Section 10b and 10c requires:

(b) A timetable for completion of the review;

(c) A timetable for the remediation of any identified deficiencies;

(b) A timetable for completion of the review;

The Mortgage Servicing Companies will complete the MIS review ("Review Plan") by the end of first quarter 2012. The Review Plan will include an evaluation of the approximately 300 systems and associated processes established to ensure timely delivery of complete and accurate information. The review will be prioritized to ensure the most significant MIS, those used in default related processing are reviewed first.

The Review Plan includes the following procedures:

- Gain an understanding of what level, granularity and frequency of information is required to manage the business risk at the various levels of the organization including Line Management, Senior Management, Board level as well as by Audit, Risk, Compliance and Control functions.
- Understand MIS gaps/needs identified in the other action plans being submitted in accordance with the Consent Order including the Board Oversight Plan (Order Section #2), Single Point of Contact Plan (Order section #5), Compliance Program (Order Section #8), Mortgage Electronic Registration System Plan (Order Section #9), and the outcomes of the Foreclosure Review (Order Section #3).
- Perform MIS study to identify gaps and deficiencies. This will include the following:
 - Conduct walkthroughs and working sessions with key stakeholders within the Business Unit and EOTS to understand the end-to-end process (data and system) flow and understand whether management performs QA/QC checks to ensure completeness and accuracy of data used in management reporting.
 - Identify and analyze the accuracy of reports used by management for decision-making.

- Review management's and system's quality control checks and/or trace data utilized within the report back to the source system(s) to determine whether appropriate data integrity checks are established and effective.
- Conduct interviews with key stakeholders within the Business Unit and IT to determine whether IT controls are established and being followed to ensure MIS meets business needs (e.g. security, change management, data validation, disaster recovery/contingency, etc)
- Perform MIS requirements analysis to assess whether systems continue to produce reports used in decision- making and whether system functionality can or should be migrated to the core loan servicing platform or EOTS. Consideration will be given to the following:
 - What are the business / regulatory requirements and are they being met?
 - What are Business Unit risks?
 - What is the level of technical sophistication required to support the system?
 - What is the volume of transactions?
 - How many users access the system?
 - How many locations are accessing the system?
 - What system security (physical and logical) risks exist?
 - What system infrastructure risks exist?
 - Develop plan with Business Units to categorize (i.e. remain in Business Unit, retire the system or move system to EOTS) MIS to ensure company's compliance, operational, and financial objectives are met. Short-term and long-term solutions will be identified along with priority and resource needs.

(c) Timetable for the remediation of any identified deficiencies;

Upon completion of the Review Plan, the Mortgage Servicing Companies plan to analyze all deficiencies identified, score and categorize each deficiency based on the complexity of MIS and associated risks/impact to the completeness and accuracy of the information utilized for decision-making. Based on the categorization, remediation action plans will be developed and implemented. The timeframes and prioritization are based on the risk associated with the deficiency and level of effort required to remediate the root cause. High-risk and short-term remediation efforts including consideration of mitigating controls, will be addressed immediately and longer-term actions will be implemented as noted in the matrix following.

Prioritization of Remediation Plans and Associated Timeframes		Remediation Level of Effort		
		Minimum - requires enhancements to policy, procedures and/or controls and training.	Moderate - requires some minor MIS enhancements along with updates to policy, procedures and/or controls and training.	Significant - requires major MIS enhancements / new systems along with updates to policy, procedures and/or controls and training.
Categorization of	High Risk- Deficiencies that significantly impact completeness and accuracy of information used for decision-making.	6 months	9 months*	up to 24 months*
	Medium Risk- Deficiencies that will have some impact to completeness and accuracy of information used for decision-making.	9 months	9 months	up to 24 months
	Low Risk - Deficiencies that will have limited or no impact on the completeness and accuracy of information used for decision-making.	Remediate after 24 months**	Remediate after 24 months**	Remediate after 24 months**

*** Note: The first priority will be High-Risk deficiencies. This may include short-term remediation efforts such as implementing mitigating controls while longer-term solutions are being developed.**

****Formal plans to remediate low risk items will not be developed until after all high and medium risk deficiencies are addressed.**

Refer to **Appendix I and III** for work to be performed to complete the review and remediate deficiencies and **Appendix V** for review and remediation timelines.

D. Consent Order Response to Section 10d

Consent Order Section 10d requires:

- (c) *New systems or enhancements to the MIS to:*
- a. *Monitor compliance with the Legal Requirements, supervisory guidance of the Board of Governors, and the requirements of this Order*
 - b. *Ensure the ongoing accuracy of records for all serviced mortgages, including, but not limited to, records necessary to establish ownership and the right to foreclose by the appropriate party for all serviced mortgages, outstanding balances, and fees assessed to the borrower*
 - c. *Ensure that the Loss Mitigation and foreclosure staffs have sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities; and*
 - d. *Ensure that the single point of contact has sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities*
- i) *Monitor compliance with the Legal Requirements, supervisory guidance of the Board of Governors, and the requirements of this Order*

Monitoring of compliance is currently the primary responsibility of Mortgage Compliance and the Mortgage Servicing QA/QC function.

A plan to augment the current Mortgage Servicing QA/QC system, [REDACTED] is being developed. Initial discovery concluded [REDACTED] was not a viable option. As an alternative, third party software [REDACTED] is targeted to support the need for random statistical data sampling requirements. EOTS will work closely with the Mortgage Servicing QA/QC team to define the additional business requirements in the fourth quarter of 2011 and implement the necessary system to ensure effective monitoring of compliance with legal and regulatory requirements in 2012.

As processes are refined, EOTS will continue to work with the Mortgage Business Unit to enable compliance changes within the systems. For more detail, see the response to Section 7 of the Order.

- ii) *Ensure the ongoing accuracy of records for all serviced mortgages, including, but not limited to, records necessary to establish ownership and the right to foreclose by the appropriate party for all serviced mortgages, outstanding balances, and fees assessed to the borrower*

[REDACTED] and [REDACTED] are the core MIS used by Default Operations to ensure the ongoing accuracy of the records to establish ownership and the right to foreclosure, outstanding balances, and fees assessed to the borrower.

The Mortgage Servicing Companies are currently submitting a plan and procedures to address Mortgage Electronic Registration System (Order Section #9) and has engaged a consultant to conduct a Foreclosure Review (Order Section #3). Business requirements and process updates that will require enhancement to MIS as part of these activities will be incorporated into the Review Plan and remediation effort.

- iii) *Ensure that the Loss Mitigation and foreclosure staffs have sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities; and*

██████████ and ██████████ are the core MIS providing the Loss Mitigation and Default Operations staffs sufficient and timely access to information provided by the borrower regarding loss mitigation and foreclosure activities.

The Mortgage Servicing Companies are currently submitting a plan and procedures to address Board Oversight (Order Section #2), Single Point of Contact (Order Section #5), Mortgage Electronic Registration System (Order Section #9), and has engaged a consultant to conduct a Foreclosure Review (Order Section #3). Business requirements and process updates that will require enhancement to MIS as part of these activities will be incorporated into the Review Plan and remediation effort.

- iv) *Ensure that the single point of contact has sufficient and timely access to information provided by the borrower regarding Loss Mitigation and foreclosure activities*

The Mortgage Servicing Companies are currently submitting a plan and procedures to address Single Point of Contact (Order Section #5). Business requirements and process updates that will require enhancements to MIS are included within the scope of the SPOC plan.

E. Consent Order Response to Section 10e

Consent Order Section 10e requires:

- (e) *Testing the integrity and accuracy of the new or enhanced MIS to ensure that reports generated by the system provide necessary information for adequate monitoring and quality controls.*

As new systems or enhancements are identified, test plans will be developed which follow the Ally Program and Project Management Standard, ██████████. The test plans will be designed to validate the integrity and accuracy of the new or enhanced MIS and ensure that reports generated by the system provide the necessary information.

MIS that are spreadsheets or models must adhere to the End User Database and Spreadsheet Controls information security guidelines. These guidelines include specific requirements to ensure the integrity and protection of data. Spreadsheets that meet the definition of a model as defined in the guideline will be subject to additional testing, validation and controls.

Current Status: All projects centrally-supported by EOTS must follow the corporate Project Methodology, [REDACTED] which includes established corporate standards and a defined change management process. New systems or enhancements to existing systems are tracked within the Mortgage Servicing Companies' [REDACTED] tool. The [REDACTED] tool is used by the Mortgage Servicing Companies to assist in tracking projects throughout the project management life-cycle. This tool provides automated controls (i.e. Workflow for project approvals, defines and segregates review and approval roles, categorization of level of effort and business need to assist in prioritization) to manage each phase of the project and prevent unauthorized changes to a system or tool being developed and implemented. Several layers of review and approval are required during the various stages of the project's life-cycle and these stages are managed by the [REDACTED] application.

The Project Methodology is tested annually as part of the annual external audit as well as test procedures associated with the SAS 70 over the Mortgage Servicing Companies' operations.

Action Plan: To add an additional layer of quality control, the Mortgage Servicing Companies will consider implementing a self assessment process or independent audit to periodically test a sample of enhancements or implementations and report up to the Business Strategy Committee ("BSC") and Senior Management the results and recommendations for continued refinement or improvement to the system testing process and procedures.

Review steps and detailed action plans with tasks, responsible parties, timelines and deliverables to address each identified area for improvement are included in Appendices I and III, respectively.

Summary / Conclusion

The Mortgage Servicing Companies have prepared a comprehensive description and inventory of MIS. The MIS Review plan has been developed and the Mortgage Servicing Companies will remediate deficiencies and gaps during the review. The timeline to remediate gaps will be appropriately focused on high-risk areas. We believe we have addressed the requirements of the Order.

Appendix I - Steps for the Review Plan

Below is a summary of the steps that support Management Information Systems review and remediation plan.

1. Inventory MIS used throughout the organization
This step has been completed.
2. Draft MIS Review work plan, Timeline, and Submit for Approval.
This step has been completed.
3. Execute the MIS Review work plan - System-Level Study
This step will be fully completed on or before 12/16/2011.
4. Execute the MIS Review work plan - MIS Requirements Analysis and Categorization
This step will be fully completed on or before 2/23/2012.
5. Analyze Results of MIS Review and Summarize MIS Control Deficiencies
This step will be fully completed on or before 3/23/2012.
6. Draft and Implement Remediation and Short-Term Action Plans for High Risk/Moderate and Significant Effort gaps.
This step will be fully completed on or before 7/13/2012.
7. Draft and Implement Remediation Action Plans for Medium Risk gaps.
This step will be fully completed on or before 1/11/2013.
8. Draft and Implement Remediation Action Plans for High and Medium Risk/Significant Effort gaps.
This step will be fully completed on or before 12/13/2013.
9. Identify New System or Enhancements and develop project plan
Completion dependent on completion of #1-6 above and enhancements or changes to the MIS proposed by the Board Oversight Plan (Order Section #2), Single Point of Contact Plan (Order Section #5), Compliance Program (Order Section #8), Mortgage Electronic Registration System Plan (Order Section #9), and the outcomes of the Foreclosure Review (Order Section #3).
10. Develop Business Requirements and Testing Scenarios
Completion dependent on completion of #1-6 above and enhancements or changes to the MIS proposed by the Order Section #2), Single Point of Contact Plan (Order Section #5), Compliance Program (Order Section #8), Mortgage Electronic Registration System Plan (Order Section #9), and the outcomes of the Foreclosure Review (Order Section #3).

Appendix II - Board Level Deliverables and Due Dates

This plan does not have Board deliverables and does not require Board approval

Appendix III - First Level Plan Details

P. Ref. #	Deliverable	CO Section	Task	Owner	Projected Start Date	Projected End Date
1	Inventory of MIS used throughout the organization					
1.1	Conduct interviews with key stakeholder to identify MIS	10a	<ul style="list-style-type: none"> Interviews were conducted with key stakeholders within the business units, EOTS and control functions to identify all the systems, databases, and end-user developed tools. 	EOTS / BU / Consultants	4/13/11	Completed
1.2	Document the purpose and use of MIS	10a	<ul style="list-style-type: none"> During interview, understanding of the end-to-end process (data) flow and documented the purpose and use of the MIS along with an understanding of the reporting process being generated from these systems. 	EOTS / BU / Consultants	4/13/11	Completed
1.3	Gather and review Policies, Procedures and controls documentation	10a	<ul style="list-style-type: none"> Obtained and reviewed IT Governance Policies and Procedures and Unit desktop procedures, where available. 	EOTS / Consultants	4/13/11	Completed
1.4	Review results of prior year reports	10a	<ul style="list-style-type: none"> Reviewed results of prior year reports for MIS deficiencies that could impact the timeliness, completeness and accuracy of information used in decision making. Identified any MIS themes or areas of risk that will require remediation. The following items were considered: <ul style="list-style-type: none"> Regulatory reports or examination; and Internal and external audit reports, including SAS 70 reports. 	EOTS/ Consultants	4/13/11	Completed
1.5	Determine system controls required to comply with P&P	10a	<ul style="list-style-type: none"> Collaborated with IT and Business Unit to identified change management, system development, security administration, security - segregation of duties, training, disaster recovery, business continuity controls to be established and followed. 	EOTS / BU / Consultants	4/13/11	Completed
1.6	Complete MIS Inventory (validate MIS with BU and IT owners)	10a	<ul style="list-style-type: none"> Validate MIS Inventory with key stakeholder in the IT and business. Refer to Appendix IV. 	EOTS / BU / Consultants	4/13/11	Completed

Proj. Ref. #	Deliverable	CO Section	Task	Owner	Projected Start Date	Projected End Date
2	MIS Review Work Plan					
2.1	Draft MIS Review work plan and Submit for Approval	#10 b	<ul style="list-style-type: none"> • Prepared MIS Review Plan based on information gathered during the inventory and MIS analysis process • Develop projected timeline for review • Submit plan for approval 	EOTS	4/13/11	Completed
3	MIS Review Report					
3.1	Execute work plan - MIS Review	10b	<ul style="list-style-type: none"> • Identify project team lead and team members, • Obtain funding to engage independent consultant • Engage independent consultants • Conduct interviews with the business units to identify MIS control gaps • Perform MIS study to identify gaps and deficiencies. This will include the following: <ul style="list-style-type: none"> ○ Conduct Interviews with key stakeholders within the BU and IT to determine whether IT controls are established and being followed ○ Identify and analyze the accuracy of reports used by management for decision making. ▪ Review management's and system's quality control checks and/or trace data utilized within the report back to the source system(s) to determine whether appropriate data integrity checks are established and effective. ▪ Deliver MIS Study Report/Heat Map to display gaps and deficiencies 	EOTS	8/17/11	2/23/12

Proj. Ref. #	Deliverable	CO Section	Task	Owner	Projected Start Date	Projected End Date
4	MIS Requirements Analysis and Categorization Report					
4.1	<p>Execute work plan - MIS Requirements Analysis and Categorization Report</p> <p>The primary objectives: reduce complexity, increase transparency, improve data quality, increase business agility, and accelerate management reporting.</p>	#10 b, c	<ul style="list-style-type: none"> • Outline scope and approach of system level assessment • Utilize inventory to complete system-level assessment and deliver MIS Requirements Analysis report. Leverage gap analysis. • Develop decision criteria for MIS ownership (e.g. IT, business, decommission) • Perform detailed MIS Requirements Analysis. This includes but is not limited to the following: <ul style="list-style-type: none"> ○ Gathering business requirements ○ Determining technical requirements ○ Source data - interfaces/inputs/outputs ○ Identification of all interdependencies ○ Determination of ownership and transition plan, if applicable ○ Establish compliance monitoring • Working sessions will be conducted to identify & finalize long-term remediation action plans. The current definition of remediation action plan may require changes to MIS systems, procedures, quality controls, reporting, etc • Deliver MIS Requirements Analysis and Categorization Report 	EOTS / BU / Consultants	9/12/11	3/9/12
5	Summarize Listing of MIS Control Deficiencies					
5.1	Analyze Results of MIS Review and Summarize MIS Control Deficiencies	#10 b, c	<ul style="list-style-type: none"> • Evaluate deficiencies identified from the Gap and Deficiencies analysis. • Conduct open working sessions with relevant stakeholders within the business and IT to review list of potential deficiencies • Conduct workshops with the key stakeholders in business and IT and determine impact of deficiencies 	EOTS	12/19/2011	3/23/2012

Proj. Ref. #	Deliverable	CO Section	Task	Owner	Projected Start Date	Projected End Date
6	Develop Remediation Plan for High Risk Gaps and Implement Short-Term Action Plans					
6.1	Draft & Implement High Risk Remediation and Short-Term Action Plans	#10 c	<ul style="list-style-type: none"> • Develop High Risk Remediation Action Plan with Business. • Develop Short-Term Action Plans for all High-Moderate and High-Significant deficiencies. • Implement and Monitor corrective action 	EOTS / BU	1/9/2012	7/13/2012
7	Develop Remediation Action Plans for Medium Risk/Moderate Level of Effort gaps.					
7.1	Draft & Implement Remediation Action Plans	#10 c	<ul style="list-style-type: none"> • Based on results from MIS Requirements Analysis, the Mortgage Servicing Companies will execute remediation/implementation plans to include: <ul style="list-style-type: none"> ○ Leverage gap analysis to communicate existing policies and procedures ○ Develop plans to transfer BU systems to IT or enhance controls and reporting over BU owned systems ○ Development of sustainable IT solutions to be maintained in BU and IT 	EOTS / BU	4/9/2012	1/11/2013
8	Develop Remediation Action Plans for gaps requiring significant level of effort.					
8.1	Draft & Implement Remediation Action Plans	#10 c	<ul style="list-style-type: none"> • Based on results from MIS Requirements Analysis, the Mortgage Servicing Companies will execute remediation/implementation plans to include: <ul style="list-style-type: none"> ○ Leverage gap analysis to communicate existing policies and procedures ○ Develop plans to transfer BU systems to IT or enhance controls and reporting over BU owned systems ○ Development of sustainable IT solutions to be maintained in IT and BU 	EOTS / BU	6/11/2012	12/13/2013
9	Identify New System or Enhancements and develop project plan	#10 d	Dependent on completion of the review and MIS requirements analysis and enhancements or changes to the MIS proposed by the other work streams.	EOTS / BU	Depend on 10c	N/A - New System or enhancements may be identified from 10c and will be completed as part of the remediation timeline

Proj. Ref. #	Deliverable	CO Section	Task	Owner	Projected Start Date	Projected End Date
10	Develop Business Requirements and Testing Scenarios	#10 e	Dependent on completion of the review and MIS requirements analysis and enhancements or changes to the MIS proposed by the other work streams.	EOTS / BU	Depend on 10c	N/A - requirements and testing will be completed as part of the remediation timeline which will follow project and change management methodology