

Consent Order Response –  
Training (Section 12)

# Consent Order Response

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## Training

(Consent Order Section 12)

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# 1. Training

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## 1.1 Overview

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### *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 \$172.31<sup>1</sup> billion and total deposits of \$121.9<sup>1</sup> billion. SunTrust Mortgage, Inc. headquartered in Richmond, VA, ranks as the eighth<sup>2</sup> largest servicer in the mortgage industry with 1.5%<sup>2</sup> 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.

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<sup>1</sup> SunTrust Quarterly Earnings Statement, June 2011

<sup>2</sup> Inside Mortgage Finance, March 2011

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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 decision 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 Administration (FHA), Veterans Affairs (VA) 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 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 Consent 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 Consent 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 Consent Order response and their defined action plan to remediate any identified gaps.

## **1.2 Work Stream Overview**

SunTrust University (STU) provides training services and products to all areas and staff within SunTrust, including areas within mortgage such as residential mortgage servicing and Default Management. When creating learning solutions, STU analyzes the performance gap within the functional area to determine what training is needed and why. Next we perform the design, development, and implementation of the learning solutions. We evaluate the learning solutions through satisfaction surveys, completed by participants, as well as tests at the end of the training modules. STU also manages the maintenance of its training programs.

As the various training courses are created, the content is reviewed and verified by management within the Default line of business to which the training applies. For example, Default training will be reviewed and approved by the impacted Default line of business (e.g. Foreclosure, Bankruptcy). Compliance related training courses are further reviewed and approved by SunTrust's legal department. This review and approval process is followed for both instructor led and online courses prior to them being offered to teammates.

Training may be delivered as online courses, instructor-led classroom sessions, and on-the-job-training (OJT) manuals or participant guides. The online courses are available through SunTrust University's Learning Portal. These modules are available to all target audiences on-demand to provide easy access to needed training. Employees may take the online courses as refresher training and annual re-certifications. The instructor-led training provides employees with a classroom experience that includes open dialogue and interactive learning. The OJTs may include scenario-based training where learners solve realistic business situations. Each scenario choice has a consequence that provides feedback and allows the learners to practice what they learned. OJTs also have a variety of exercises and activities scattered throughout the manual or guide. These exercises provide feedback to the learner about the activity relative to its learning purpose. Learners repeat the activities until they get the correct answers before proceeding.

## **1.3 Background**

In September 2009, the Federal Safety and Soundness examination, that included Default Administration, was conducted. These findings identified the need for additional training to be created for Bankruptcy, Loss Control, Loss Mitigation, and Collections functions and procedures within Default Administration by October

29, 2010. In response to the Federal Safety and Soundness examination, STU partnered with Default Administration to create 49 On-The-Job-Training (OJT) manuals, 4 web-based training (WBT) courses, and 6 instructor-led training courses (ILT). The development of this training was completed on October 29, 2010. The ILT courses started being held in July 2010. The OJTs were made available beginning in March 2010 for managers within Default Administration to train new hires.

During March 2011, STU was conducting a quarterly review of the training content for the WBTs, ILTs, and OJTs as part of SunTrust's internal Default Governance Council. This Council consists of representatives from audit, compliance, legal, and Default leadership. With this quarterly review, it was determined that some of the processes and procedures within the OJTs were outdated and required revisions to stay current with the changing business needs and environment. The content for the ILTs and WBTs were deemed current. Work to revise content and procedures in the OJTs had started when the Consent Order was issued.

## 1.4 Consent Order

12. Within 60 days of this Order, the Bank and SunTrust Mortgage shall submit to the Federal Reserve Bank an acceptable written plan, and timeline for implementation, to improve the training of all appropriate officers and staff of SunTrust Mortgage regarding the Legal Requirements, supervisory guidance of the Board of Governors, and SunTrust Mortgage's internal policies and procedures regarding residential mortgage servicing, Loss Mitigation, and foreclosure, and the policies and procedures adopted regarding a single point of contact described in paragraph 6 of this Order. The plan shall also include:
  - (a) A requirement that training be conducted and documented no less frequently than annually; and
  - (b) procedures to timely inform appropriate officers and staff of any new or changes to the Legal Requirements and supervisory guidance of the Board of Governors related to residential mortgage loan servicing, Loss Mitigation, or foreclosure.

## 1.5 Approach

SunTrust University is taking a phased approach to addressing the Consent Order requirements. We have divided the training response into four bodies of work: the Preliminary Phase, the Consent Response Phase, the Consent Support Phase, and the Culmination Phase.

Training will be deemed mandatory if it is job-critical to the teammate's job role, whether the teammate is a new hire or existing employee. Examples include courses that provide an overview of the teammate's line of business (LOB) or functional area, related compliance courses, job task or process training, and system training. Mandatory training will be automatically listed on the teammate's "Training To Do" list in the STU Learning Portal. Optional training may include any courses available through SunTrust University that a teammate may elect to complete or that the teammate's manager assigns for further development. Examples of such optional training include courses for self development or additional technical skills. Existing teammates will be provided with any new training specific to their job roles. This training will automatically be listed on their "Training To Do" list within the STU Learning Portal. Refresher training will be provided on an as-needed basis. Refresher training is provided to teammates who violate a policy, display performance issues, or have work quality problems.

### ***Preliminary Phase***

This phase is currently underway. The objective of this phase is to review and update the existing training materials that were created for the Loss Mitigation, Foreclosure, Bankruptcy, and Collections departments within Default as a result of the 2009 Federal Safety and Soundness examination. STU is identifying and removing the outdated content from the inventory of 49 OJT manuals created for these areas. The content

for the instructor-led classroom training is reviewed and updated on a quarterly basis. The content of online courses created for Default is reviewed annually. These online courses provide overviews of the functional areas within Default; this training content is aligned with current procedures and practices.

### **Consent Response Phase**

In this phase, STU will assess the training needs and develop training for all departments impacted by Section 12 of the Consent Order: Loss Mitigation, Foreclosure, Mortgage Loan Servicing, and Single Point of Contact. STU will follow the (Assessment, Design & Develop (produce), Implement (deliver), Evaluate) A.D.D.I.E. methodology when creating training (Assessment, Design & Develop, Implement, Evaluate). This begins with an Assessment to analyze the gaps between the current training and training that is needed in order to address the Consent Order. After reviewing the analysis results, the Design and Development of the various training solutions occurs. This includes producing the different training solutions, verifying the content with subject matter experts, creating the courses, materials, leader's guides, and supporting resources for the training. For the Implementation, STU creates a delivery strategy and plan to test and then launch the training. ILT courses are scheduled and listed in STU's Learning Portal. WBT courses are uploaded into the Learning Portal. The training will be Evaluated no less than annually to include any changes or updates to course content.

### **Consent Support Phase**

STU will support the training needs identified by the departments and functional areas responding to the Consent Order such as Mortgage Electronic Registration System (MERS), Third Party Management, and the Compliance Program. STU will apply the A.D.D.I.E. methodology when analyzing and creating training for these departments. Training solutions for these areas will include WBTs, ILT courses, job aids, and other learning resources. This training will be listed and available through STU's Learning Portal.

### **Culmination Phase**

This includes the remaining departments within Default (not specifically identified in Section 12) that will also need training updates in support of updated procedures. It also acknowledges that other training needs may surface later for the groups responding to the Consent Order. This also includes any remaining Mortgage Loan Servicing training needs.

Training specifically created for the Consent Order will be delivered no less than annually. The completion by employees will be tracked and documented through STU's Learning Portal, where managers and employees may view the list of courses they have completed as well as any outstanding mandatory training. STU will review the content of all training resulting from the Consent Order on an annual basis. During these intervals, this training will be evaluated and updated as needed to include changes or new information. Changes will be documented within the content. Communication procedures will be created and implemented to inform the appropriate officers and staff of new or changed information as outlined in Section 12 of the Order. This plan will include a process for enforcing the completion of required training associated with the Consent Order.

## **1.6 Accomplishments to Date**

The following actions related to the Training requirements of the Consent Order were completed between April 13, 2011 and July 8, 2011:

- SunTrust University has written a plan and timeline for performing the training work as described in Section 12 of the Consent Order.
- STU has reviewed the existing 49 OJT manuals for Default to identify outdated content, processes, and procedures. [REDACTED]

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- STU is working with the leadership of Default to identify the training required to respond to the Consent Order.
  - STU has identified the existing training programs that may be used for the Single Point of Contact.
  - We are conducting a series of training needs assessments to determine what new training content needs to be designed and delivered for Single Point of Contact and Foreclosure.
  - We are drafting a new-hire training curriculum for the Single Point of Contact role.
  - STU is designing the content for the MERS online course. This course will explain the how to be in compliance with MERS requirements (Section 10).

## 1.7 In-progress Activities

The following training activities are in progress:

- STU is reviewing the OJT manuals for Loss Mitigation in order to satisfy the preexisting requirements from the 2010 Federal Audit.
- We are revising the OJTs for Loss Mitigation and Foreclosure to reference the most current procedures for these areas within Default.

## 1.8 Description of Action Plan

SunTrust University has developed an action plan and implementation timeline to improve training for all SunTrust Mortgage officers and staff in regards to SunTrust Mortgage’s internal policies and procedures for Residential Mortgage Loan Servicing, Loss Mitigation, Foreclosure, and Single Point of Contact. The plan also addresses training activities that support other areas identified within the Consent Order including MERS, Third Party Management, and the Compliance Program.

The training action plan is dependent upon procedures and policies being determined for Residential Mortgage Loan Servicing, Loss Mitigation, Foreclosure, Single Point of Contact, MERS, Third Party Management, and the Compliance Program. There is the dependency for Single Point of Contact and Third Party Management to determine their workflows, processes, procedures and policies so that training may be created to support them.

### Preliminary Phase

- Provide Loss Mitigation and Foreclosure with updated training curricula that include coaching guides, training materials, job aids, resource references, and course quizzes/final exam. If participants do not pass the final test, they repeat the course until they successfully pass the exam,
- Provide training that points to the most current procedures in the Retail Lending Guide, published policies in the SunTrust Online Support System (SOS), and regulatory information located in AllRegs.com.
- Deliver this content as refresher training to existing SunTrust teammates in Loss Mitigation and Foreclosure. This training will be provided to new hires on an ongoing basis.
- Track the completion of this training in STU’s Learning Portal, as it is completed by current employees and new hires in Loss Mitigation and Foreclosure.

### Consent Response Phase

- Produce a training plan to address the points in Section 12 of the Consent Order. This plan includes a learning needs analysis and identification of the learning objectives for the training to be designed for Residential Mortgage Loan Servicing, Loss Mitigation, Foreclosure, and Single Point of Contact.
- STU will develop and deliver training using blended methods (classroom, online courses, job aids) that reach all identified teammates. Training will be delivered at minimal on an annual basis. This training will be reviewed and updated annually.
- We will implement these training programs based on a schedule and plan approved by Default and Loan Servicing Leadership.
- Review training performance based upon evaluation data with the line of business leaders.
- Create procedures to timely inform employees of any new or changes to the Legal Requirements and supervisory guidance of the Board of Governors related to residential mortgage loan servicing, Loss Mitigation, or Foreclosure.
- As the training is deployed STU will track the completion of these courses through its Learning Portal.

### **Consent Support Phase**

- Produce the training courses for MERS, Third Party Management, and the Compliance Program to support their response to the Consent Order.
- Review training needs for the other departments and functional areas responding to the Consent Order.
- Identify the appropriate type of training required for each by following the A.D.D.I.E. methodology (Assessment, Design & Develop [produce], Implement [deliver], Evaluate).
- As training is rolled out for any of these areas, STU will track the completion of these courses through its Learning Portal.

### **Culmination Phase**

- Produce a training needs analysis across the remaining Default Management departments.
- Identify learning objectives for the training to be designed for each of these departments.
- Design, develop, and deliver blended training methods that reach all identified teammates.
- Implement these training programs based on a schedule and plan approved by Default Leadership.
- Review training performance based upon evaluation data with the line of business leaders.
- As training is rolled out for any of these areas, STU will track the completion of these courses through its Learning Portal reports. These training completion reports will be produced on a monthly basis and provided to STU's Mortgage Learning Consultant to be kept on file. These reports will be available upon request. Training reports will be provided to Default Management so they may monitor course completions.

### **Communication Plan**

- The current communication process for new training or course updates comes from either the Default LOB or Legal, depending on the content or course.
  - As business processes, workflows, or practices change, the LOB contacts their designated STU representative to discuss training changes, new programs, or course revisions.
  - Legal contacts their designated STU representative to discuss new programs, training changes or course revisions.
- To update the communication plan, STU will determine the various ways that SunTrust receives information about any new details or changes to the legal requirements and supervisory guidance of the Board of Governors related to Residential Mortgage Loan Servicing, Loss Mitigation, or Foreclosure.
  - Identify who in SunTrust monitors these changes and updates.
  - Identify who should interpret this information, how it applies to Residential Mortgage Loan Servicing, Loss Mitigation, or Foreclosure, and how the related audiences needing to receive this information will be determined.
  - Partner with SunTrust's Mortgage Communications group to determine the best future communication practices and process flows.
- Determine the correct distribution points and contact people for these communications.

- Identify the internal communication resources and options that may be used to disperse this information.
- Create processes and procedures to timely inform the appropriate officers and staff of this new or changing information
- Identify who in SunTrust University receives this information and how it is to be dispersed within STU.
- Create a process for updating compliance information in STU's training content.

### 1.8.1 Action Plan

Below is the action plan for the four phases of training:

#### Preliminary Phase

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	OJTs for Loss Mitigation are reviewed to identify outdated content	OJT manuals, participant guides, and job aids have outdated content removed from them	Complete
	OJTs for Foreclosure are reviewed to identify outdated content	OJT manuals, participant guides, and job aids have outdated content removed from them	Complete
	OJTs for Bankruptcy are reviewed to identify outdated content	OJT manuals, participant guides, and job aids have outdated content removed from them	Complete
	OJTs for Collections are reviewed to identify outdated content	OJT manuals, participant guides, and job aids have outdated content removed from them	Complete

#### Consent Response Phase

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	Conduct training needs assessment for <b>Loss Mitigation</b>	Training needs assessment report	Complete
	Create procedures to inform employees of any new information and changes to the Legal Requirements and supervisory guidance of the Board of Governors related to residential mortgage loan servicing, Loss Mitigation, or Foreclosure.	Communication plan	Complete
	Design, develop and produce training (instructor-led classes and/or online courses) that	<b>Instructor-Led Classes:</b> the creation of the facilitator's guide, participant materials, job aids	March 2012

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	address the Consent Order issues for <b>Loss Mitigation</b>	<b>Online Courses:</b> the content has been uploaded into STU's system for technical testing	
	Implement/deliver the training to <b>Loss Mitigation</b>	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU's Learning Portal <b>Online Courses:</b> the courses are accessible through STU's Learning Portal	March 2012
	Evaluate the training content and completion for <b>Loss Mitigation</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	March 2012
	Conduct training needs assessment for <b>Foreclosure</b>	Training needs assessment report	Complete
	Design, develop and produce training (instructor-led classes and/or online courses) that address the Consent Order issues for <b>Foreclosure</b>	<b>Instructor-Led Classes:</b> the creation of the facilitator's guide, participant materials, job aids <b>Online Courses:</b> the content has been uploaded into STU's system for technical testing	February 2012
	Implement/deliver the training to <b>Foreclosure</b>	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU's Learning Portal <b>Online Courses:</b> the courses are accessible through STU's Learning Portal	March 2012
	Evaluate the training content and completion for <b>Foreclosure</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	March 2012
	Conduct training needs assessment for <b>Mortgage Loan Servicing</b>	Training needs assessment report	Complete
	Design, develop and produce training (instructor-led classes and/or online courses) that address the Consent Order issues for <b>Mortgage</b>	<b>Instructor-Led Classes:</b> the creation of the facilitator's guide, participant materials, job aids <b>Online Courses:</b> the content has been uploaded	February 2012

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	<b>Loan Servicing</b>	into STU's system for technical testing	
	Implement/deliver the training for <b>Mortgage Loan Servicing</b>	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU's Learning Portal <b>Online Courses:</b> the courses are accessible through STU's Learning Portal	March 2012
	Evaluate the training content and completion for <b>Mortgage Loan Servicing</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	March 2012
	Conduct training needs assessment for <b>Single Point of Contact</b>	Training needs assessment report	Complete **
	Design, develop and produce training (instructor-led classes and/or online courses) that address the Consent Order issues for <b>Single Point of Contact</b>	<b>Instructor-Led Classes:</b> the creation of the facilitator's guide, participant materials, job aids <b>Online Courses:</b> the content has been uploaded into STU's system for technical testing	December 2011 **
	Implement/deliver the training to <b>Single Point of Contact</b>	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU's Learning Portal <b>Online Courses:</b> the courses are accessible through STU's Learning Portal	December 2011 **
	Evaluate the training content and completion for <b>Single Point of Contact</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	December 2011 **

\*\* This is dependent upon the creation of workflows, processes, procedures and policies for this area

**Consent Support Phase**

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	Identify the training content for online courses to support <b>MERS</b>	Outline of training content	Complete
	Design, develop and produce online course that supports <b>MERS</b>	Upload the content into STU's system for technical testing	Complete

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	Implement/deliver the training to <b>MERS</b>	Courses are accessible through STU's Learning Portal	Complete
	Evaluate the training content and completion for <b>MERS</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses	December 2011 **
	Conduct training needs assessment for <b>Third Party Management</b>	Training needs assessment report	Complete **
	Design, develop and produce training (instructor-led classes and/or online courses) that address the Consent Order issues for <b>Third Party Management</b>	<b>Instructor-Led Classes:</b> the creation of the facilitator's guide, participant materials, job aids <b>Online Courses:</b> the content has been uploaded into STU's system for technical testing	Complete **
	Implement/deliver the training to <b>Third Party Management</b>	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU's Learning Portal <b>Online Courses:</b> the courses are accessible through STU's Learning Portal	December 2011 **
	Evaluate the training content and completion for <b>Third Party Management</b>	Completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	December 2011 **
	Identify the training needed to support the <b>Compliance Program</b>	Outline of training content	Complete
	Design, develop and produce training that support the <b>Compliance Program</b>	Upload the content into STU's system for technical testing	Complete
	Implement/deliver the training resources for the <b>Compliance Program</b>	Content is accessible through STU's Learning Portal	Complete
	Evaluate the training content and completion for the <b>Compliance Program</b>	If the Compliance Program training involves any courses, have completion reports from STU's Learning Portal of both instructor-led and online courses. Update training content to include changes.	December 2011

\*\* This is dependent upon the creation of workflows, processes, procedures and policies for this area

**Culmination Phase**

Assigned To	Action Item/Milestone	Evidence of Satisfaction	Completion Date
	Conduct training needs assessment for remaining areas in Default such as Collections, Bankruptcy, REO, Support Services, and DORS	Training needs assessment report	Complete **
	Design, develop and produce training (instructor-led classes and/or online courses) for remaining areas in Default such as Collections, Bankruptcy, REO, Support Services, and DORS	<b>Instructor-Led Classes:</b> the creation of the facilitator’s guide, participant materials, job aids <b>Online Courses:</b> the content has been uploaded into STU’s system for technical testing	January 2012 **
	Implement/deliver the training to remaining areas in Default such as Collections, Bankruptcy, REO, Support Services, and DORS	<b>Instructor-Led Classes:</b> publish the training schedule for these classes in STU’s Learning Portal <b>Online Courses:</b> the courses are accessible through STU’s Learning Portal	February 2012 **
	Evaluate the training content and completion for remaining areas in Default such as Collections, Bankruptcy, REO, Support Services, and DORS	Completion reports from STU’s Learning Portal of both instructor-led and online courses. Update training content to include changes.	March 2012 **

\*\* This is dependent upon the creation of workflows, processes, procedures and policies for this area

**1.9 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 Training 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.

## 2. Glossary

Acronym	Definition
A.D.D.I.E	Training methodology: Assessment, Design & Develop (produce), Implement (deliver), Evaluate
████	████████████████████
CEO	Chief Executive Officer
DORS	Default Operations Reporting and Strategy
FHA	Federal Housing Administration
ILT	Instructor-led Training
MERS	Mortgage Electronic Registration System
Learning Portal	System that manages STU's course catalog, course registrations and completions, along with other training data
LOB	Line of Business
OJT	On-the-Job-Training
PMO	Program Management Office
REO	Real Estate Owned
SOS	SunTrust Online Support System
SPC	Single Point of Contact
STU	SunTrust University
VA	Veteran's Affairs
WBT	Web-based Training