Exhibit A: Structured Interview Questions

Servicing Rule Assessment
Outreach on servicing practices

Thank you for agreeing to discuss your servicing practices with us. The information you provide will help the Consumer Financial Protection Bureau ("CFPB") better understand the effects of its 2014 servicing rules.

Privacy Act Statement
5 U.S.C. 552(a)(e)(3)

The information you provide through your responses to the Consumer Financial Protection Bureau ("CFPB") will be used to evaluate understand the effects of its 2014 servicing rules. The CFPB will obtain basic contact information from study participants such as name, email address, and phone number.

Information collected will be treated in accordance with the System of Records Notice ("SORN"), CFPB.022, https://www.federalregister.gov/articles/2012/11/14/2012-27582/privacy-act-of-1974-as-amended. This information will not be disclosed as outlined in the Routine Uses for the SORN. Direct identifying information will only be used to facilitate the study and will be kept private except as required by law.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation in this exercise is voluntary, you are not required to participate or share any identifying information and you may withdraw participation at any time.

In accordance with the Paperwork Reduction Act of 1995, these questions have been approved by the Federal government's Office of Management and Budget under OMB control number 3170-0032. Without this approval CFPB could not ask these questions.

Your institution will not be identified in any reports we produce, and we will not disclose information in a manner allowing attribution to specific institutions or individuals except to the extent required by law. We expect to use information you provide to inform our analysis, and some of the information might appear without attribution in our reports. This information is not being collected for the purpose of assessing regulatory compliance.

Below is a list of questions that we would like to cover in our discussions with you. We may not cover every topic in the following list, but we plan to use the list as a guide for the discussion:

[Note: We do not expect all questions to be included in all interviews, based on expected time constraints and the relevance of questions to particular servicers. So we may send only a subset of this list to any particular servicer.]

1. Describe your servicing portfolio as of December 31, 2015 (or another recent date). Specifically, describe:
    a. Approximate total size of your servicing portfolio by number of loans and UPB.
    b. Your loan servicing acquisition model; i.e., approximately what share of loans you service are (i) self originated, (ii) purchases of recently originated loans, (iii) purchases of seasoned pools, (iv) purchases of distressed loans, (v) subservicing on behalf of other servicers, (vi) other?
    c. Approximately what proportion of the loans you serviced were owned/insured/guaranteed by:
        i. Fannie Mae or Freddie Mac,
        ii. FHA,
        iii. VA or USDA,
        iv. your own account, and
        v. other owners?
    d. Approximately what percent of loans you serviced were at least 90 days delinquent?
    e. Throughout 2016, approximately how many:
        i. foreclosures were initiated (i.e., the first notice or filing was made in a foreclosure proceeding)
        ii. foreclosures were completed
        iii. trial modifications were initiated
        iv. loans were permanently modified (including both HAMP and non-HAMP modifications)
        v. short term or longer term repayment plans or forbearance plans were established
        vi. short sales or deeds in lieu of foreclosure were completed
        vii. HARP refinances were completed.

2. Subservicing
    a. Do you use one or more subservicers? If so, do you use subservicers to service your entire portfolio or only a portion of your portfolio? If a portion, what categories of loans are serviced by subservicers?
    b. Do you act as a subservicer? If so, do you service in your name or in the name of your clients?

3. Please describe in general terms how your servicing portfolio has changed since December 31, 2013.

4. The following questions ask about your practices related to certain provisions of the Bureau’s servicing rules. For each, we ask about your current practices and how those practices have changed since the Bureau’s servicing rules went into effect in January 2014. If applicable, we are also interested in any significant changes you have made to those practices since the housing crisis began. Please also discuss whether and how your policies differ according to the owner or guarantor of the loan (e.g. GSE, FHA, private label, or portfolio).

a. Early intervention
   i. What steps do you currently take to contact borrowers after a loan becomes delinquent? What is the timing and frequency of those efforts?
   ii. Please describe any major changes to this process you have made since 2008, either:
      1. as a result of the servicing rule that went into effect in January 2014, or
      2. for other reasons.
   iii. Please describe:
      1. The percentage of delinquent borrowers you successfully contact through your early intervention efforts;
      2. How long after delinquency it takes on average to establish right party contact;
      3. The percentage of delinquent borrowers that begin a loss mitigation application;
      4. The percentage of delinquent borrowers that complete a loss mitigation application (a) before the 120th day of delinquency, and (b) at any time prior to completion of a foreclosure; and
      5. The percentage of delinquent borrowers that successfully resolve their delinquency.
   iv. How have changes to comply with the Bureau's early intervention requirements affected these outcomes?

b. Continuity of contact
   i. Briefly describe your policies and procedures for providing delinquent borrowers continuity of contact (CoC) under the Bureau's rules.
   ii. When did you first implement a CoC program?
   iii. Please describe any major changes to your CoC policies and procedures since 2008 either:
      1. as a result of the servicing rule that went into effect in January 2014; or
      2. for other reasons.
   iv. Describe the impact that changes to your CoC policies have had on borrower success with loss mitigation. Have these changes made borrowers: (a) more likely to begin and to complete loss mitigation applications, (b) able to complete loss mitigation applications more quickly, and/or (c) more satisfied with their experience? Do you have any data to support these results?

c. Loss mitigation applications
   i. How do you define receipt of an initial loss mitigation application?
   ii. How do you define a complete application? Has this changed as a result of the Bureau's mortgage servicing rules? If so, how?
   iii. What percentage of loss mitigation applications are complete when first submitted? Are there circumstances that make this more or less likely?

iv. Describe your processes to help borrowers complete their applications after they have been submitted.
v. What challenges have you experienced in providing accurate acknowledgment notices within five days of receiving an application?
vi. What effect do you believe the acknowledgment notice has had on (a) the share of borrowers that complete an application and (b) how long it takes them to complete an application? How do you measure this?
vii. On average, how many days past due are borrowers when they (a) submit and (b) complete a loss mitigation application? Has this timing changed since the servicing rule went into effect in January 2014?
viii. Do you notice an increase in borrowers submitting or completing applications before the 120th day of delinquency? What impact, if any, does completing an application before the 120th day of delinquency have on a borrower's ability to qualify for and successfully perform under a loan modification? How do you measure this?

d. Loss mitigation – Evaluating applications – timing of evaluation
   i. How long does it generally take to evaluate a loss mitigation application once the borrower has provided all required information?
   ii. Has the decision time changed since the servicing rule went into effect in January 2014, and if so, how?

e. Loss mitigation – Evaluating applications for all options available to the borrower
   i. Prior to the effective date of the rule, did you evaluate borrowers for all loss mitigation options simultaneously or sequentially?
   ii. Describe any process changes you made to comply with the requirement to evaluate for all options at the same time.
   iii. What impact do you think the requirement to obtain a complete application and then evaluate for all loss mitigation options at the same time has on borrowers' ability to resolve the delinquency? How would you measure that outcome?

f. Loss mitigation – Appeals when borrowers are denied for loss mitigation options
   i. Describe your procedures when a borrower seeks to appeal a denial of a loss mitigation option, including information about which personnel handle the appeals, how you review documentation related to an appeal, and any automated processes for reviewing/responding to appeals.
   ii. Do you offer appeal rights only to borrowers who submit a complete loss mitigation application 90 or more days before a scheduled foreclosure sale or to all borrowers who are offered loss mitigation?
   iii. Please describe any major changes you have made since 2008 to your appeals process, either:
      1. as a result of the servicing rule that went into effect in January 2014; or
      2. for other reasons.

iv. What percentage of borrowers who are denied loss mitigation options would be eligible for appeal rights?
v. How often do borrowers appeal denial decisions, and how often are they successful?

g. Loss mitigation – Initiating foreclosure
i. At what point during a delinquency do you typically make the first notice or filing in a foreclosure action?
1. Is this affected by whether you have had contact with the borrower regarding their delinquency or loss mitigation options?
ii. Has this changed as a result of the servicing rule that went into effect in January 2014?
iii. Do you have a different policy if the property is vacant?
iv. Do any of your communications with the borrower alert them to the benefit of submitting a complete application before the 120th day of delinquency? In your experience does this knowledge impact borrower behavior?
v. What impact does the timing of initiation of foreclosure have on a borrower's ability to qualify for loss mitigation options? Are foreclosure related costs and fees a factor?

h. Loss mitigation – Completing foreclosures
i. How frequently are complete loss mitigation applications submitted after the first notice or filing has been made in a foreclosure action?
ii. How frequently are complete loss mitigation applications submitted 37 days or less before a schedule foreclosure sale? How frequently are loss mitigation applications completed shortly before this time?
iii. The Bureau's rules prohibit certain actions to complete a foreclosure proceeding if the borrower has submitted a complete application. How has this requirement affected your procedures?
iv. How has this requirement affected the likelihood that borrowers avoid foreclosure by obtaining a loss mitigation option?

i. Loss mitigation – Operational capacity
i. During the recent housing crisis there was a significant increase in mortgage delinquencies. Please describe any operational changes made in response to the increased volume of delinquent loans. How did these changes affect your ability to evaluate delinquent borrowers for loss mitigation options?
ii. In the event of future economic downturn that increases the volume of delinquent loans, do you believe you would be more or less prepared to increase your capacity for delinquent loan servicing? How have the Bureau's mortgage servicing rules affected this?

j. Error resolution and requests for information

i. Describe your practices for investigating and responding when borrowers assert an error or request information, either by phone or in writing.
ii. What changes have you made to your error resolution/information request practices as a result of the servicing rule that went into effect in January 2014?
iii. Approximately how many information requests and notifications of error do you receive in a month, in writing and by phone?
iv. Has the volume of error notifications and information requests changed since the servicing rule went into effect?

k. Force-placed insurance
   i. Please describe any major changes you have made since 2008 to your policies regarding force-placed insurance, either:
      1. as a result of the servicing rule that went into effect in January 2014; or
      2. for other reasons.
   ii. For what percentage of serviced loans do you have to notify borrowers that insurance is lapsed or insufficient? Of these, what percentage of the loans are delinquent at the time of the lapse?
   iii. Of borrowers who receive a force-placed insurance notice, what percentage of the time:
      1. does the borrower provide evidence of insurance;
      2. do you obtain force-placed insurance on the borrower's behalf; and
      3. do you advance funds to the borrower's escrow account to maintain the hazard insurance policy?
   iv. Have these percentages changed since the 2014 servicing rule became effective?
   v. Describe any impacts of notification policies on borrower compliance with or satisfaction of insurance requirements.
   vi. Do you have a business affiliate that provides FPI coverage? If so, does the business affiliate provide FPI coverage for your whole portfolio?
   vii. How much did you impose in charges for force-placed insurance in 2015? Has this changed as a result of the servicing rule that went into effect in January 2014 and if so, how, taking into account any changes in loan volume that you service?
   viii. How do you analyze whether charges for force-placed insurance are bona fide and reasonable?

If you would like to provide any additional information in response to these questions you may submit it to Erik Durbin, Senior Economist, CFPB Office of Research at erik.durbin@cfpb.gov. Please do not provide any personally identifiable information other than basic contact information to include name, email address, phone number, and address.