



The Servicing Corner

Regulatory Tracking

Federal Guidance



COVID-19 Related HUD Extension and Waiver Expiration Dates

	Current Expiration	Reference
Foreclosure Moratorium	7/31/21	ML 21-15
Eviction Moratorium	7/31/21	ML 21-15
COVID 6-mo extension initial request	9/30/21	ML 21-15
Exterior only appraisals	EXPIRED	ML 21-06
\$5K Repayment Plan Cap Waiver	12/31/21	FHA Info 21-07
Verbal Occupancy Cert Waiver	12/31/21	FHA Info 21-07
Waives requirement for Eligible NBS to prove legal title or right to remain in the home	N/A	ML 21-11

Vacant or abandoned properties released from hold - foreclosures are proceeding

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State Level Guidance



- ✓ **Servicers are monitoring state-level guidance and regulations**
- ✓ **HUD moratorium currently supersedes all state guidance thus far, unless the State moratorium exceeds the HUD allowance (see OR)**
- ✓ **Servicers will comply with all state-issued guidance unless it is inapplicable to HECM or reverse mortgage loans**

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State Level Guidance



- ✓ **Anticipating Treasury Departments Homeowner Assistance Fund will provide relief for HECM borrowers in Property Charge Default Status**
- ✓ **NRMLA Working w/ National Consumer Law Center and other Consumer Advocates to Expand availability of HAF**
- ✓ **Need outreach to customers**
- ✓ **What states are “live” and need for positive traction**

Extensions

Thousands of Extension
Requests have been entered to
HERMIT

First Legal & Reasonable Diligence Timelines



Extended to 180 Days

- ML 2021-15 Extended First Legal and Reasonable Diligence timelines to 180 days from the date of expiration of the HUD moratorium, excluding vacant or abandoned properties

Note: Absent HUD direction, Servicers are applying extensions separately, not stacking expiration dates

Significant Borrower Outreach

- Millions of Statement Stuffers
- Thousands of state-specific notices (OR HB4204)
- Email campaigns
- Outbound phone campaigns
- Letters mailed re: extension expirations
- IVRs updated
- Website banners

Potential Industry Challenges

Appraisals / Closings

- ❖ Appraisal Completion Delays due to shortage of FHA appraisers
- ❖ Puerto Rico Closings delayed due to COVID and natural disasters

Legal

- ❖ County Recording delays
- ❖ Judicial State Court Backlogs
- ❖ Attorney Firm Management

Documentation

- ❖ Doc Review and Signing/Notarization
- ❖ Attorney File Prep / Submission
- ❖ Doc Prep: AOs

Other Servicing Questions?



Thank you!

