

Default Reporting

Overview and Troubleshooting



About this Material

The following material is based upon current information in the MPF® Servicing Guides and recent announcements related to borrowers who have been impacted by COVID-19. These materials should not be used in place of the MPF Servicing Guides and the associated MPF announcements. The official versions of all MPF Guides and recent announcements are available through www.fhlbmpf.com and AllRegs®.

Please note that PFIs and Servicers are expected to abide by any/all federal or state laws or proclamations that may affect borrowers or loans affected by COVID-19.

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Delinquent Loan Reporting

Loans with the following characteristics must be reported monthly on the Delinquent Mortgage and Bankruptcy Status Report (Exhibit B):

- Loans that are 30 days or more delinquent as of the last day of the preceding month.
- Loans that are in Bankruptcy status regardless of the status of the loan (current/delinquent).
- Loans that have been placed into a forbearance plan due to a COVID-19 hardship.
 - ✓ Borrowers who were not delinquent prior to the forbearance plan are technically not delinquent (per credit reporting requirements*) but must be reported so the MPF Provider is aware of the loan status.

Servicers must report delinquency status information pursuant to MPF Traditional Servicing Guide 8.4

Delinquency Reporting

How Are Delinquent Loans Reported?

After May 1, 2020 *Exhibit B* must be uploaded into **eMAQCS® Plus** by the monthly due date:

- eMAQCS Plus is the new MPF Program default management system.
- All Exhibit B files must be uploaded into eMAQCS Plus and should not be sent to Wells Fargo.
 - \checkmark MPF Traditional product loans are due by the 5^{th} business day of each month.
 - ✓ MPF Xtra product loans are due by the 2nd business day of each month.
 - \checkmark MPF Government MBS loans are due by the 1^{st} business day of each month.





How Do I Access eMAQCS Plus?

- Requests for credentials may be submitted via the MPF Website, <u>www.fhlbmpf.com</u> (click on the *Resources* tab and select *eMAQCS Plus*).
- New users will receive an email that provides information about User IDs and the process for setting up a password.
- If you already have eMAQCS* credentials, a request must be submitted for additional access to eMAQCS Plus.
 - ✓ Once a credential request is processed, you may use your existing eMAQCS credentials to access eMAQCS Plus.

^{*}eMAQCS is used for quality control file reviews and is on a similar platform as eMAQCS Plus



Access to eMAQCS Plus

Credential requests and the login link are on the MPF Website







The required *Exhibit B* template (Excel format) with instructions is located in the *Glossary, Exhibits and Forms* section of the MPF Guide.

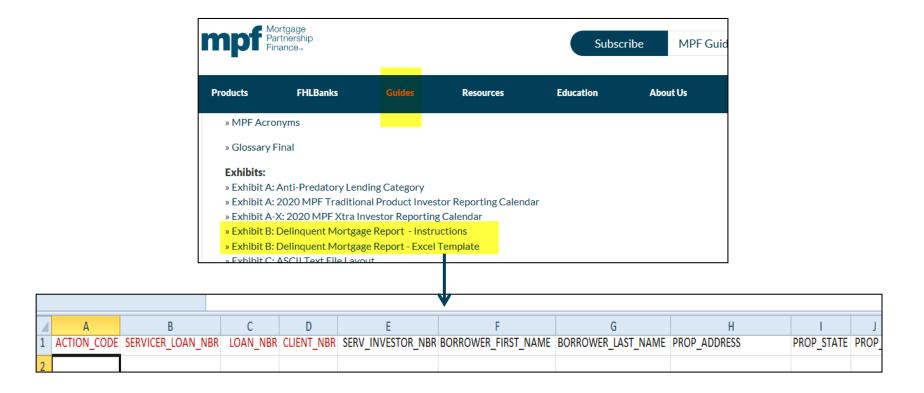




Exhibit B Basics

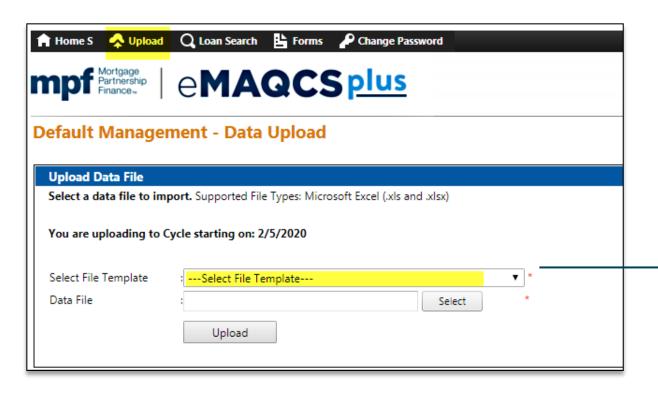
To ensure a successful upload, the *Exhibit B* template published in the MPF Guides should be utilized

• Required fields and those fields that are required when applicable must be completed according to the guidance provided in the **Exhibit B** instructions.

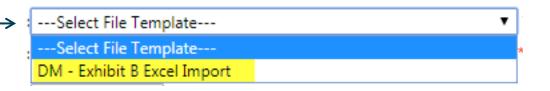
	, , , , ,		
	Standard File Layout		
COLUMN HEADER / FIELD NAME	DESCRIPTION AND DATA GUIDANCE	FIELD RULE	FORMAT COMMENT
ACTION_CODE	Provide Action Code that is reflective of loan's current status. Applicable Action Codes include: 0 (No Action) 12 (Relief Provision) 15 (Bankruptcy) 20 (Loss Mitigation) 30 (Refer to Foreclosure) 70 (REO) 71 (Third Party Sale) 72 (REO with Government Claim) Use numeric code.	Required, cannot be left blank	Numeric only. Description code not to be entered.
SERVICER_LOAN_NBR	A unique number assigned to a loan by the Servicer. This may be different than the LOAN_NBR field.	Required, cannot be left blank	Can include alpha and numeric characters
LOAN_NBR	Loan number assigned by MPF Program.	Required, cannot be left blank	Numeric Only



Exhibit B Upload in eMAQCS Plus



- Click on the **Upload** link on the eMAQCS Plus home page.
- 2. Select the **Exhibit B Excel Import** template.
- 3. Click Select to **Select** (browse) for your file.
- 4. Click Upload.



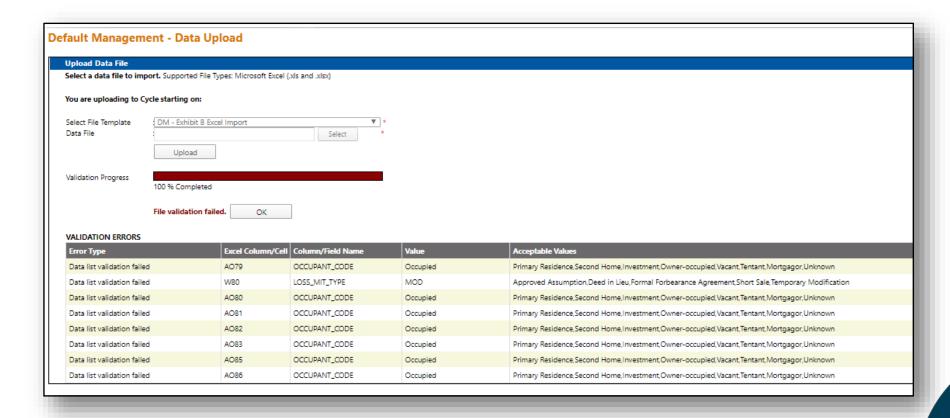


Common Exhibit B Errors



Unsuccessful Uploads

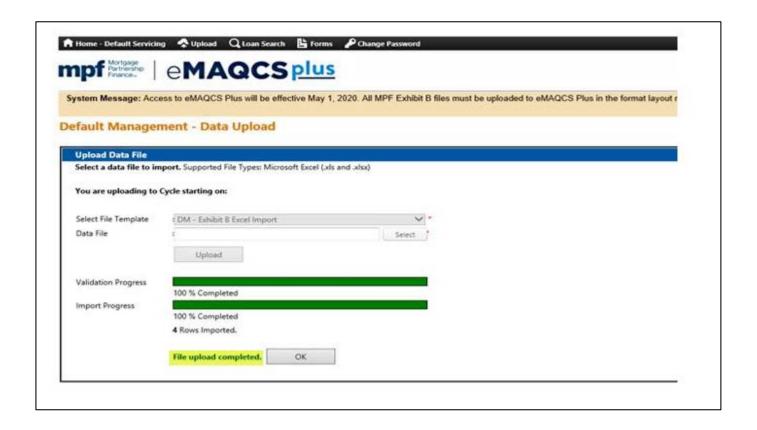
eMAQCS Plus will reject any *Exhibit B* file that does not meet the format requirements as provided in the applicable MPF Servicing Guide.





Successful Upload

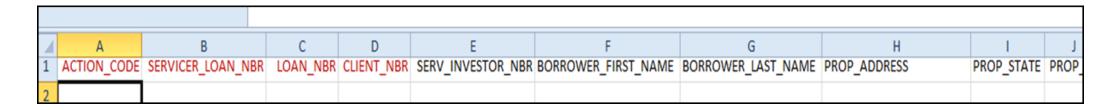
This is what you want to see...





The proper completion of *Exhibit B* is required to ensure a successful upload.

- Do not omit required data.
- Required fields appear in red.



- If any required fields are missing, the upload will fail.
- There are some fields on **Exhibit B** that are specified as **required if applicable**. See the instructions for information about all field requirements.



Do not enter invalid data into a column that requires a date

- All date fields should show an actual date, not N/A or NA, etc.
 - ✓ If there is no data or date to report and field is not required, leave it blank.
- The dates must be entered into the date column as follows: MM/DD/YYYY.
 - ✓ Omit leading zeros in MM/DD since this is an excel file.



Make Sure the MPF Loan Number is Correct.

- MPF Loan Number is a required field on Exhibit B.
- It is the LOAN_NBR field.
- This is the loan number assigned by the MPF Program and is not the Servicer loan number.
 - ✓ It may also be called an Investor Loan Number in your system.
- Omit leading zeros in LOAN_NBR field since this is an excel file.



What Number is Used?

SERVICER_LOAN_NBR	This is the number the Servicer has assigned to the loan	Required, cannot be left blank	Can include alpha and numeric characters
LOAN_NBR	This is the MPF Loan Number	Required, cannot be left blank	Numeric Only
CLIENT_NBR	This is the Participating Financial Institution (PFI) Number	Required, if applicable	Numeric Only. Use four(4) digit numeric assigned PFI.
SERV_INVESTOR_NBR	A unique number as assigned by an external Servicer to identify a group of loans in their system	Required, if applicable	Can include alpha and numeric characters

File identifying numbers that may have been provided by Wells Fargo should not be Used on *Exhibit B*. They are for other reporting purposes.



Reporting Due Dates

BORR_NEXT_PAY_DUE_DATE	As reported by the Servicer, this is the date that	Required,	MM/DD/YYYY
	the Borrower's next payment is due at the end	cannot be	
	of the Cutoff Date. Must always be a first of the	left blank	
	month date.		

- Loans that are 30 days or more delinquent as of the last day of the proceeding month, any loan in active bankruptcy or any loan that has been placed into a forbearance plan due to a COVID-19 hardship must be reported.
- The BORR_NEXT_PAY_DUE_DATE field on the *Exhibit B* is the date that the borrower's next payment is due at the end of the cutoff date.
- **Example**: If the next payment due date on a loan is 4/1/2020, the cutoff date to make that payment is 4/30/2020. If on 5/1/2020 the April payment is not made, the loan is considered 30 days late as of 5/1/2020.



Always refer to the *Field Descriptions* and Data Guidance provided in the Exhibit B Instructions found in the MPF Guides

Here's an example of the instructions for the **LOAN_TYPE** field:

LOAN_TYPE	The type of the loan. Must match one of the	Required,	Can include
	applicable loan types provided: FHA, VA, Conventional, Rural Housing Service, HUD 184,	cannot be left blank	alpha and numeric
	or Conventional with PMI.		characters

 Data reported must match one of the applicable loan types provided: FHA, VA, Conventional, Rural Housing Service, HUD 184, or Conventional with PMI.



Action, Reason and Status Codes



Reminder: Required Two-Digit Action Codes

Accurate Action Codes must be reported on Exhibit B

Servicers are also reminded that the **Action Code** is also a required field on their Monthly Accounting Reports that continue to be submitted to the Master Servicer (Wells Fargo).

00 = No Action 60 = Paid in Full

12 = Relief Provision 65 = Repurchase

15 = Bankruptcy 70 = REO

20 = Loss Mitigation 71 = 3rd Party Sale

30 = Refer to Foreclosure 72 = REO with Government Claim



Action Codes

Action Code Requirements for Covid-19 Forbearances

- Action Code 12 should be reported if there is an informal agreement with the borrower (i.e. a forbearance plan less than or equal to three months).
- If a Servicer chooses to have a borrower sign an agreement for a plan lasting three months or less, it is still considered an informal agreement.

DESCRIPTION AND DATA GUIDANCE

Provide Action Code that is reflective of loan's current status. Applicable Action Codes include:

- 0 (No Action)
- 12 (Relief Provision)
- 15 (Bankruptcy)
- · 20 (Loss Mitigation)
- 30 (Refer to Foreclosure)
- 70 (REO)
- 71 (Third Party Sale)
- · 72 (REO with Government Claim)

Use numeric code



Action Codes

Action Code Reporting for Covid-19 Forbearances

- <u>Action Code 20</u> should be reported if there is a **formal agreement** signed by the borrower and the forbearance plan is greater than three months.
- The following information should also be provided if Action Code 20:
 - ✓ Loss Mitigation Type (LOSS_MIT_TYPE) should reflect FFA (Formal Forbearance Agreement)
 - ✓ The date the Servicer approved the plan must be provided (LOSS_MIT_APPR_DATE).
 - ✓ An estimated date of completion (or actual completion date) must be provided (LOSS_MIT_EST_COMP_DATE or LOSS_MIT_ACT_COMP_DATE).
 - ✓ In the Comments Section indicate the terms of the forbearance (i.e. full payment, P&I only, etc.).
- These same Action Codes should be included on the monthly accounting reports that continue to be submitted to Wells Fargo.



Status Code and Reason Code

Exhibit B Reporting for Covid-19 Forbearances

- Delinquency Status Code should be 9 (Forbearance)
- Delinquency Reason Code should be 022 (Energy-Environment Costs)*
- Loans previously using Delinquency Reason Code 022 should now use 007 (Excessive Obligations).



^{*} This is not a accurate reason description but is being used as a temporary code.

Workout Hierarchy & Processing Workouts



Workout Hierarchy

Is the Hardship Resolved?	Evaluation Findings	The Servicer Should Consider
YES	The borrower can afford to fully reinstate	Reinstatement
YES	The borrower cannot afford to fully reinstate	Repayment Plan
YES	The borrower cannot afford a repayment plan	COVID-19 Payment Deferral Plan
NO	The hardship is not resolved but does not appear to be permanent	Extending the initial forbearance plan for up to no more than 12 months (Note the 12 month maximum must include the length of any initial forbearance plan)



Workout Hierarchy

Is the Hardship Resolved?	Evaluation Findings	The Servicer Should Consider in This Order
	The borrower is experiencing a hardship that	Temporary Loan Payment Modification
NO	has resulted in a permanent or long-term decrease in income or increase in expenses	Short Sale
		Deed-in-Lieu of Foreclosure

NOTE: If a borrower requests to be evaluated for a liquidation workout option, the Servicer must first evaluate the borrower for a liquidation workout option.



Reporting Due Dates

Reminder for loan level accounting reports sent to Wells Fargo

- When reporting loans that are in a forbearance plan, do not roll the next due date to the end of the forbearance period.
- The next payment due date should reflect the actual next payment that was due at the time they entered into the forbearance.
- Example: If the borrower suspended their payments for April, May and June, the next payment due date should continue to reflect April 1.



Repayment Plan Reporting

How to report post-forbearance payments for borrowers beginning a repayment plan

Basic Scenario

- Your borrower had a 90-day forbearance plan which allowed them to suspend their payment of \$1200 per month from May-July.
- To repay the \$3600, they set up a repayment plan over 12 months. An additional \$300 per month will be added to their payment.
- On August 1st they resume their regular payments plus the additional amount owed under the repayment plan which equals a temporary payment of \$1500 per month.



Reporting Post-Forbearance Scenario

Payment Due	Post as Due	Repayment Balance
August	May	\$300
September	June	\$600
October	July	\$900
November	August/September	\$1200 remit as an additional payment
December	October	\$300
January	November	\$600
February	Dec	\$900
March	January/February	\$1200 remit as an additional payment
April	March	\$300
May	April	\$600
June	May	\$900
July	June/July	\$1200 remit as an additional payment
August	August (back on track)	Repayment plan is finished



Final Reminders

 PFIs and Servicers are expected to abide by any/all federal or state laws or proclamations that may affect Borrowers or loans affected by COVID-19.

 Any Servicer who has finalized a post-initial 90 day forbearance plan workout option that does not meet the requirements published by the MPF Provider should contact their MPF Bank immediately.



MPF Program Information

MPF Service Center

Phone - 877-463-6673

Email - MPF-Help@FHLBC.com

Hours - 8:30 AM to 4:30 PM CST

