

COVID-19 Frequently Asked Questions

Updated October 8, 2021

This document provides answers to frequently asked questions regarding U.S Bank Home Mortgage's residential mortgage policy updates as they relate to COVID-19. The FAQ document will be dynamic and will continually be edited and updated.

The FAQ provides guidance for temporary relief of policies due to COVID-19. Please continue to reference the U.S. Bank Seller Guide as the primary resource for all U.S. Bank policies.

In addition to this helpful FAQ, we have updated our Correspondent and HFA Overlay Matrices to now include a section devoted specifically to COVID-19 Related Overlays. The new COVID-19 Related Overlays section has been added to the end of the matrix.

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203(k) Rehab Program

Will U.S. bank allow any extension request for 203(k) escrows?	For loans underwritten by U.S. Bank, U.S. Bank will not allow any temporary flexibility allowed by FHA to continue administering the Rehabilitation Escrow Account, including the approval of extension requests and release of funds, which will allow the project to continue for mortgages where the Borrower is in forbearance due to the impacts of COVID-19
	the impacts of COVID-19. Refer to Seller Guide 2020-69

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Allonge / NOTE

Will you fund with copy of the NOTE?	No, U.S. Bank requires the original NOTE.
Will U.S. Bank accept electronic signatures on the NOTE?	U.S. Bank currently does not have eNote capability.

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Appraisal

Will U.S. Bank accept a PIW on 2 nd mortgage transactions, when the lender is selling the refinanced 1 st mortgage to U.S. Bank?	At this time, U.S. Bank still requires a full appraisal for all 2 nd lien transactions.
Are interior inspections required?	Conventional Agency
	When an interior inspection is not feasible because of COVID-19 concerns, either a desktop appraisal or an exterior-only inspection appraisal in lieu of the interior and exterior inspection appraisal (i.e., traditional appraisal) will be allowed. If a traditional appraisal is not obtained and there is insufficient information about the property for an appraiser to be able to complete an appraisal assignment with a desktop or exterior-only inspection appraisal, the loan will not be eligible for delivery to Fannie Mae or Freddie Mac. These flexibilities expired on May 31, 2021.
	<u>Portfolio</u>
	Currently there are no changes for interior inspections on Portfolio loans.
	<u>VA Only</u>
	When an interior inspection is not obtainable due to COVID-19 pandemic, either a desktop appraisal or an exterior-only inspection





appraisal in lieu of the interior and exterior inspection appraisal (i.e., traditional appraisal) will be allowed. We must document why this flexibility was utilized.

If a traditional appraisal is not obtained and there is insufficient information about the property for an appraiser to be able to complete an appraisal assignment with a desktop or exterior-only inspection appraisal, the loan will not be eligible for delivery to Ginnie Mae.

The flexibilities apply to Purchase transactions loan amounts limited to 1½ times the maximum Agency 2020 conforming loan limits for 1 unit limit for the county or county equivalent area. Purchase loan amounts greater than the conforming 1-unit county limit must have an interior exterior appraisal.

This flexibility expired with applications taken on or after April 1, 2021. Refer to Seller Guide Update 2021-017 for additional details.

FHA Only

When a full interior and exterior appraisal cannot be completed due to COVID 19 concerns by the appraiser or the occupant of the property, the appraiser may amend the scope of work to perform an Exterior-Only (viewing from the street) for Purchase Transactions1. The Exterior-Only Appraisal options must continue to be reported on the current FHA approved appraisal forms with amended certifications and scope of work disclosures. For loans underwritten by U.S. Bank, U.S. Bank has additional requirements in addition to the FHA requirements for the Desktop-Only appraisal.

This is flexibility expired on June 30, 2021. Appraisals must be completed on or before this date.

Rural Development

For purchase and non-streamlined refinance transactions, when an appraiser is unable to complete an interior inspection of an existing dwelling due to concerns associated with the COVID-19 pandemic, an "Exterior-Only Inspection Residential Appraisal Report", (FHLMC 2055/FNMA 2055) will be accepted. For loans underwritten by U.S. Bank, U.S. Bank has additional requirements in addition to the RD requirements for the Desktop-only appraisal.

Effective immediately, U.S. Bank is aligning our HFA VA and USDA appraisal requirements to allow exterior only appraisals when requested from the appraiser provided certain criteria is met.

This flexibility expired: June 30, 2021. Appraisals must be completed on or before this date.





Will appraisal waivers be accepted?	U.S. Bank will continue to accept an Appraisal Waiver from Fannie Mae and Automated Collateral Evaluation (ACE) from Freddie Mac as an acceptable alternative to appraisals.
	HFA Only
	Appraisal waivers (PIW/ACE) are not acceptable on HFA loan transactions regardless of AUS findings.
Will a desktop appraisal be accepted?	Conventional Agency
	For purchase money transactions when an interior and exterior appraisal is not available, desktop appraisals are preferred rather than an exterior-only appraisal.
	The minimum scope of work for a desktop appraisal does not include an inspection of the subject property or comparable sales. The appraiser relies on public records, multiple listing service (MLS) information, and other third-party data sources to identify the property characteristics.
	These flexibilities expired: May 31, 2021.
	VA Only
	For purchase money transactions when an interior and exterior appraisal is not available, desktop appraisals are preferred rather than an exterior-only appraisal.
	This flexibility expired with applications taken on or after April 1, 2021. Refer to <u>Seller Guide Update 2021-017</u> for additional details.
	FHA Only
	FHA has monitored the Appraisal inspection scope of work usage from ML 2020-05 guidance and the Exterior-Only Appraisal option has demonstrated to be effective in support of initiatives to combat the spread of COVID-19 by limiting face-to-face contact across all eligible program transactions.
	With the effectiveness of the Exterior-Only option, the Desktop-Only Appraisal option provided in ML 2020-05, for certain purchase transactions without any Appraiser visual observation of the property, is no longer acceptable for appraisals performed on or after November 1, 2020.
	Refer to, Refer to Seller Guide Update 2021-007;
	HFA Appraisals for FHA Loans
	For HFA lenders, U.S. Bank will permit Exterior-only, as well as Interior/Exterior for FHA loans.
	Refer to Seller Guide Update 2021-007; Seller Guide Update 2020- 089, Seller Guide Updates 2020-52 and 2020-022: Multiple Topics





	including Temporary Flexibilities for additional FHA & Rural Development for details.
Will U.S. Bank accept an exterior only- 2055 report in	Conventional Agency
lieu of traditional appraisal during this health crisis?	An exterior-only inspection appraisal may be obtained in lieu of an interior and exterior inspection appraisal for the following transactions:
	Purchase money loans
	 Limited cash-out refinances where the loan being refinanced is a Fannie to Fannie or a Freddie to Freddie.
	Lenders will not receive value representation and warranty relief under Agency programs for loans with exterior-only appraisals.
	These flexibilities expired on May 31, 2021.
	HFA Only
	As per current policy, a Drive-by/Exterior Only appraisal is not eligible for HFA loans.
	Refer to <u>Seller Guide Update 2020-86</u> and <u>Seller Guide Update</u> <u>2020-021: Multiple Topics including Temporary Flexibilities</u> for additional details.
	Government Only
	FHA has monitored the Appraisal inspection scope of work usage from ML 2020-05 guidance and the Exterior-Only Appraisal option has demonstrated to be effective in support of initiatives to comba the spread of COVID-19 by limiting face-to-face contact across all eligible program transactions.
	This flexibility expired on June 30, 2021. Appraisals must be completed on or before this date.

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Borrower Attestation

Is a Borrower Attestation form required?	Effective with new locks taken on and after June 28, 2021 and loans in the pipeline U.S. Bank is removing the requirement for a COVID Borrower Attestation to be included in all files.
	Refer to <u>Seller Guide Update 2020-35 Multiple Topics</u> for details.





Closing

Will the Bank accept hybrid closings?	Yes, Lenders wishing to submit loans to U.S. Bank with eligible documentation with electronic signatures MUST first complete the Lender Approval Request. The following documents are ineligible for electronic signature. Ineligible Documentation Notes or Modifications Power of Attorney Documents creating Revocable Trusts Any document requiring Notarization (i.e. Security Instrument, Riders, etc.) IRS and Social Security Administration documents. As of March 27, 2020, U.S. Bank will accept an electronically signed 4506. Refer to the Funding Documentation Requirements in the Delivery and Funding section 900 of the Seller Guide.
Will U.S. Bank accept remote notarization, eNotary?	Under Review

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Early Payment Default

Will waivers be accepted due to COVID-19 on EPDs?	The existing U.S. Bank Correspondent and HFA EPD policy remains
	effective for loans in forbearance. Delinquent/missed payments may
	trigger EPD fees, despite a COVID-19 related forbearance.
	Refer to Seller Guide Update 2020-44, Mortgage Loans in Early Forbearance and Early Payoff and Early Payment Default, section 200 for details.

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Final Documents

Will consideration to delivery timelines for Final	Final Document Delivery Requirement Extended – As a result of the
Documents due to COVID-19 be updated?	closures of many businesses and county offices across the country, U.S. Bank will implement the following updates to our policy
	effective immediately:





Final Document Delivery – U.S. Bank will require all final documents be received no later than 180 days (vs 90-days) after the date of purchase date.

Final Document Billing Notifications – U.S. Bank will only send billing notifications for the month of March for any documents aged more than 180-days old (thus eliminating charges for the new final documents reflecting the 120-day category.)

Refer to <u>Seller Guide Update 2020-015: Multiple Topics</u> for additional details.

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Forbearance

Is U.S. Bank offering forbearance programs to support borrowers?

If a borrower is unable to make their mortgage payment, we are offering several customer assistance programs that may allow them to have their mortgage payments suspended for up to 180-days (6-months). Our forbearance program allows for a suspension of payments for up to 180 days. With our customer assistance programs, borrowers will not be charged any late fees and their account be reported as current to the Credit Reporting Agencies.

 If, after the initial 180 days suspension of payments their hardship has still not been resolved, we will continue to work with them. If they are unable to pay the suspended installments in full, options such as extending the forbearance program up to an additional 180-days, repayment plans, or a loan modification may be available if they meet requirements.

Will U.S. Bank purchase a loan currently in forbearance?

U.S. Bank will not purchase any loan that is currently in deferment or forbearance of their mortgage payment.

Refer to <u>Seller Guide Update 2020-092</u> and <u>Seller Guide Update 2020-86</u> for details.

Prior Forbearance Communications Include:

Seller Guide Update 2020-075

<u>Seller Guide Update 2020-067: Updated Eligibility for Sale of Loans in</u> a COVID-19 Forbearance for details.

Seller Guide Update 2020-50

Seller Guide Update 2020-44

Seller Guide Update 2020-039 Mortgage Loans in Early Forbearance.

For Government eligibility requirements refer to <u>Seller Guide Update</u> 2021-016, and Seller Guide Update 2020-48 for details.





How will U.S. Bank handle conventional loans that enter into forbearance after purchase?	Effective immediately, for conventional Agency purchase or rate and term refinance loans that enter into forbearance after the purchase by U.S. Bank, U.S. Bank will not assess the standard Agency LLPAs of 5% (for first-time homebuyers) or 7% (for all other loans).
	Refer to <u>Seller Guide Update 2020-092</u> and <u>Seller Guide Update 2020-86</u> for details.
	Prior Forbearance Communications Include:
	Seller Guide Update 2020-075
	Seller Guide Update 2020-067: Updated Eligibility for Sale of Loans in a COVID-19 Forbearance for details.
	Seller Guide Update 2020-50
	Seller Guide Update 2020-44
	Seller Guide Update 2020-039 Mortgage Loans in Early Forbearance.
What is U.S. Banks policy for portfolio loans, for a borrower that has any mortgage loans in deferment or forbearance?	Secondary Investors have published new guidelines on qualification and documentation regarding any borrower who has any existing mortgage loan currently in forbearance. The existing forbearance must be exited, and specific underwriting guidelines applied before a new mortgage loan can be approved.
	Refer to <u>Seller Guide Update 2020-092</u> and <u>Seller Guide Update 2020-86</u> for specific underwriting guideline details.
	Prior Forbearance Communications Include:
	Seller Guide Update 2020-075
	Seller Guide Update 2020-067: Updated Eligibility for Sale of Loans in a COVID-19 Forbearance for details.
	Seller Guide Update 2020-50
	Seller Guide Update 2020-44
	Seller Guide Update 2020-039 Mortgage Loans in Early Forbearance.

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Inspections

Carbon Monoxide and smoke inspections: The fire department has halted all inspections. Will you allow a purchase loan to close without that?	Lenders are responsible for complying with state and local municipality guidelines.
Are there updated requirement for Certificate of Occupancy?	Under Review





Power of Attorney

Are POA requirements changing?	Refer to Seller Guide Section 900; Delivery and Funding, Funding
	<u>Documentation for Power of Attorney requirements</u> . As a reminder,
	a POA is not allowed on cash-out refinance transactions.

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Pricing / Rate Lock

What is U.S. Bank's position on lock extensions during COVID-19?	For loans locked on or before March 27 th that, due to COVID-19, require an extension that is outside of U.S. Bank policy, please utilize one of these options for assistance: • Submit a request through the UniteUS Communication Panel (Client Support Category), or • Call our Client Support Team 800.200.5881, option 1. Please include the purpose and detail of the delay and the number of extension days needed.	
How will U.S. Bank handle repricing or applying penalties to loans when stipulations cannot be met?	Refer to Pricing/ Registration/Fees, section 600 of the Seller Guide.	
How do I contact the Mandatory Commitment Desk?	Beginning Wednesday, March 18, 2020, please send all inquiries for the Mandatory Commitment Desk including call-In bids, pair-off requests, or other time sensitive bid related items to the following email address as outlined: • Mandatory Commitment Desk Email: SubmitToUS@USBank.com Note: Please indicate **Urgent Request** in the subject line of your email.	

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Recording

Is Electronic Recording Allowed?	Yes, U.S. Bank will accept Electronic Recordings where allowed.
Will U.S. Bank allow the use of Gap Insurance due to	Yes, as long as U.S. Bank is in 1 st lien position and the title company
closure of recording offices?	accepts gap insurance.





Rental Income

Does U.S. Bank require any reduction in rental income?

Conventional Agency

U.S. Bank has removed the overlay for Agency loans previously communicated.

Portfolio

Short term rental income (Airbnb, VRBO, e.g.) will not be considered stable despite any evidence from a history on tax returns.

Rental income for qualifying purposes will only be considered stable with a fully executed lease agreement with a duration of at least 12 months at time of execution. If the lease has expired and has gone month to month, proof the rental is still rented (lease extension, proof of rent received, etc.) will be required. Refer to Seller Guide section 714.2.2.3 Non-Employment Related Borrower Income.

FHA Only

FHA published a temporary COVID-19 guidance stating that Borrowers utilizing rental income for qualification must now have the net rental income reduced by 25% for each property generating rental income.

This flexibility expired: September 30, 2021.

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Self-employed Borrowers

Are there special requirements for a selfemployed borrower on Agency and Portfolio loans, including any specific requirements for business assets?

Conventional Agency

U.S. Bank requires specific documentation for self-employed borrowers.

The loan file must include a written analysis of the self-employed income amount and justification of the determination that the income used to qualify the borrower is stable.

Additionally, U.S. Bank has specific documentation requirements for borrowers who own more than one business.

Refer to Seller Guide Update 2021-44: Multiple Topics for details.

Portfolio Only

Effective for locks before April 30, 2021 refer to Seller Guide Update 2020-95: Multiple Topics

Effective for locks on or after April 30, 2021 refer to the applicable underwriting guidelines.





If a self-employed borrower took advantage of the SBA Payroll Protection Loan, will it have an impact on their application for a mortgage?	The underwriter must consider the business's financial strength by analyzing the borrower's earnings and determine the stability of the net income used by the borrower to repay their mortgage.					
	Self-Employed Income and Debt Analysis: When analyzing the financial strength, the underwriter would need to account for business obligations which may have a negative impact to the net earnings of the business. When underwriting has knowledge that a business received an SBA Payroll Protection Loan (SBA-PPP), this needs to be accounted for during the analysis of the business's earnings. This obligation could have a negative impact to the net income of the business. Underwriting will account for this obligation during the analysis of the business's earnings by:					ich may have writing has (SBA-PPP), earnings.
	payme 2. Reduce accoun 3. If docu forgive	nt was account the business ted for in the mentation is n, returned come calculation ability to regable, effective	nted for. s net earning P&L. provided tha or paid in full, son and notec evaluating ar pay. Underwr e and likely t	iting is respo o continue. A	tion is not cle P was forgive eed to be add file. ied upon in d nsible for just	early n, partially dressed in etermining tifying that
What are U.S. Bank's requirements for Verification of Business?	The underwriter must verify two items for a self-employed borrower: 1. Existence of Business through the use of Secretary of State or Business Licensees 2. Business is currently open, operating and generating revenue Refer to Seller Guide 2020-84 for details.					
When does U.S. Bank have to verify the borrower's business is open and operating?	When a borrower is using self-employment income to qualify, the U.S. Bank must verify the borrower's business is operating and generating income prior to the note date as follows:					
		Agency	Portfolio	FHA	VA ¹	RD ¹
	Requirement Expires	Until Rescinded	Rescinded	Rescinded	Until Rescinded	Until Rescinded
	# of Days	20 Business	10 Business	10 Calendar	10 Calendar	10 Calendar
	¹ For loans unde	erwritten by l	J.S. Bank			





Refer to Seller Guide 2020-84 for details.

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Tax Returns / Tax Transcripts

How are we handling tax returns/transcripts?	Due to the COVID-19 national emergency, all IRS Tax Transcript			
	Processing Centers are now closed and they have not announced a			
	firm re-open date. The IRS will not issue tax return transcripts.			
	During this time, U.S. Bank will temporarily cease the requirement for obtaining tax transcripts effective immediately.			
	for obtaining tax transcripts effective immediately.			
	 There is no change to the current requirement that the form 4506 be executed by the borrower(s) and contained in the file so that income can be verified with the IRS at a later date. 			
	For 4506 esign requirmeents, please refer to Delivery and Funding section 900 of the Seller Guide.			
	 When the borrower is self-employed and tax transcripts are required per Underwriting Guidelines (per Underwriting Documentation), the underwriter must use one the following alternative methods to confirm the borrower(s) income. 			
	 Copy of cancelled check(s) matching amount due the IRS 			
	 Copy of deposit matching exact amount of any return using bank statement, deposit receipt, or direct bank verification indicating the transaction 			
	 Electronic filing receipt from IRS indicating the Submission Identification Number (SID), and AGI that matches the return. 			
	This requirement expired: April 30, 2021.			
	Refer to <u>Seller Guide Update 2021-22</u> for details.			
Will U.S. Bank allow an electronically signed 4506	Yes, U.S. Bank is able to process the e-signed 4506 form. U.S. Bank			
Form?	will purchase loans where documents are signed using an electronic			
	signature provided the documents are delivered and signed in			
	compliance with UETA, ESIGN, State law, all U.S. Bank policies and			
	procedures, or agency guidelines as outlined in our guide.			
	Refer to Delivery and Funding section 900 of the Seller Guide for details.			





VA Loans

	I - 1
What is U.S. Bank's time frame to comply with NOV	For loans underwritten by U.S. Bank, any additional items that need
conditions?	to be met on the NOV to comply with VA requirements must be met
	and completed in 60 days from the date of the NOV issuance.
	Refer to <u>Seller Guide 2020-022</u> for details.
	This requirement expired with applications taken on or after April 1,
	2021. Refer to <u>Seller Guide Update 2021-017</u> for additional details.
How will U.S. Bank handle Termite Inspections?	For loans underwritten by U.S. Bank, Termite Inspection report for properties located in an area on the Termite Infestation Probability Map of "very heavy" or moderate to heavy" will still be required.
	This requirement expired with applications taken on or after April 1, 2021. Refer to Seller Guide Update 2021-017 for additional details.
Will U.S. Bank allow any appraisal flexibilities for a VA Cash Out Type II loan?	For loans underwritten by U.S. Bank, a traditional appraisal is the only permissible appraisal for this loan type.
	This requirement expired with applications taken on or after April 1, 2021. Refer to Seller Guide Update 2021-017 for additional details.

Verification of Employment

How will U.S. Bank handle employees on furlough?	The COVID-19 pandemic has resulted in an increase in furloughed
Employer closed, still employed but out of work.	employees. A furlough is a suspension from active employment that
	does not typically guarantee restoration of an employee's position when the furlough period ends regardless of whether there is a projected "return to work" date. Therefore, until furloughed employees actually return to work and are able to provide evidence of a stable and reliable flow of employment-related income, they are ineligible for Conventional Agency, Portfolio loans as well as Government loans (FHA, VA, USDA). Refer to Seller Guide Update 2020-43 for details.
With employers closing, what will U.S. Bank accept in	Effective with new locks taken on and after June 28, 2021 and for
	, and the second
lieu of a Verbal Verification of Employment (VVOE)?	loans in the pipeline U.S. Bank is returning to pre-COVID requirements as follows:
	For salary and wage earners underwritten by U.S. Bank, employment must be reverified within 10 business days (10 calendar days for FHA) of the Note date using the standard Verbal Verification of Employment (VVOE).
	Refer to Seller Guide Update 2020-35 Multiple Topics for details.

