

SEL-2022-065: Clarification: Form 4506-C Request for Transcript of Tax Returns

November 18, 2022

☑ Correspondent Lending

☑ Housing Finance Agency (HFA)

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Summary



The following items have recently been updated in the U.S. Bank Correspondent Seller and HFA Division Lending Guides, specific to Loan Delivery, Underwriting and Credit Policy.

U.S. Bank Correspondent Seller and HFA Division Lending Guides: Unless notated within each section as Correspondent only policy or based on product availability such as Portfolio products available only in Correspondent, these updates are applicable to both our Correspondent and HFA lenders. The respective sections of the U.S. Bank Correspondent Seller and HFA Division Lending Guides are included in each section. This communication serves to announce changes and updates including an effective date. Always review the U.S. Bank Correspondent Seller and HFA Division Lending Guides for the most current policy. Guidelines are updated with the information in this communication and should be referred to instead of the communication for guidance.

Underwriting, Delivery, and Product Grids For overall ease of use, we have enhanced our communications to now include underwriting and delivery method checkboxes to each section when applicable. You'll also find a new grid that outlines the applicable products.

Effective Date In

Keeping you informed

Immediately unless otherwise noted within each section below.

U.S. Bank continues to closely monitor the ever-changing landscape of our business as a result of the impacts of the coronavirus (COVID-19).

For information about our ongoing work to support our lending partners and customers, we invite you to visit our Correspondent/HFA COVID-19 Resource Page within AllRegs for regular updates and the most current information.

We know you have many questions, and we are diligently working to address each of them. We have developed a list of <u>COVID-19 Frequently Asked Questions</u> and will continue to update this document on a regular basis to keep you informed of process and policy updates.

For additional information about our ongoing work to support customers, we invite you to visit <u>U.S. Bank's COVID-19 support site</u> for regular updates and the most current information.



Clarification: Form 4506-C Request for Transcript of Tax Returns Update

Underwriting/Delivery	
X	Corr. Delegated
X	Corr. Non-Delegated
X	Corr. EZD
\boxtimes	Corr. Mandatory
\boxtimes	HFA Delegated
\boxtimes	HFA Non-Delegated
Products	
\boxtimes	Conv. (Freddie)
\boxtimes	Conv. (Fannie)
\boxtimes	Conv. (Portfolio)
X	FHA
\boxtimes	VA
Χ	Rural Development

In **SEL-2022-064**, published on November 14, 2022, we announced updates to form 4506-C Request for Transcript of Tax Returns. As a point of clarificatin, please refer to the clarified date of this announcement (as shown in red) regarding the most recent form date. Additionally, U.S. Bank is researching the IRS guidelines for completion of Lines 5a and 5D and will provide an update soon.

Previously in **SEL-2022-063**, we announced that on May 6, 2022, the Internal Revenue Service ("IRS") released a draft of a revised Form 4506-C. The <u>IRS published a bulletin on November 1st announcing</u> that a new Form 4506-C is published and currently available online.

In addition to the revised form, the IRS also announced they are extending the deadline for transitioning to the new Form 4506-C. Both versions of the Form 4506-C will be accepted through February 28, 2023. Effective March 1, 2023, the newly published Form 4506-C will be the only form IVES Participants can use.

U.S. Bank Acceptance: U.S. Bank will begin accepting the updated Form 4506-C completed by the borrower in addition to continuing to accept the 4506-C form as outlined below:

Effective Dates:

- U.S. Bank will require usage of updated Form 4506-C for all closed loan packages delivered on and after December 1, 2022.
 - If a loan is selected for a post-funding QC audit and the Form 4506-C in the loan file is not on the most recent form dated 10-2022, the lender will need to provide an updated executed 4506-C form or the Tax transcripts.
- U.S. Bank is currently accepting the current and new forms.

Lenders are encouraged to review the information shared by the IRS for complete details of all changes, as well as your respective document providers. The following items are highlights of changes to the new Form 4506-C:

- The form includes many changes to make the form better suited for optical character recognition ("OCR") modernization efforts which will enhance the automated process of the form. The new form will no longer permit any editing of the form.
- Must be a clean typed copy of the 4506-C form.
 - Handwriting is unacceptable, except for the Signature and/or Sign Date and/or Title.
 - \circ $\;$ The form cannot be a combo of handwritten and typed.
 - We expect this requirement to affect only 1% of our current 4506-C submissions.
- Lines 1a. and 2a. provide the current name of the tax filer and joint spouse, if applicable, instead of the tax filer name(s) from last tax return.
- New lines 1c. and 2c. have been added to provide the names of tax filers on the last tax return, if different from current name(s) in 1a and 2a.
- Line 5a. now includes a new section for the IVES participant ID number, in addition to the IVES participant name, address, and SOR mailbox ID.
 - This is a required field where you will enter CoreLogic's information, Participant ID, SOR Mailbox, and address. Any form missing this information will be rejected. <u>Effective on all submissions of the new 4506-C form (5-2022), lenders</u> must update the line 5a information to read as follows:
 - <u>CoreLogic Credco, 40 Pacifica #900, Irvine, CA 92618. 877.877.6188,</u> Participant #302617 Mailbox ID: CLGX4506T
- New line 5c. provides space to add an optional unique identifier which can be entered with "up to 10 numeric characters to create a unique identifier showing in the mailbox file information."
- New line 5d. includes the client's name, address, and telephone number. The form and instructions state that this section cannot be left blank or marked as not applicable (NA). The instructions for Line 5d. notes that the client company is the party that receives the requested tax transcripts from the IVES participant. If the IVES participant is also the client company, the IVES participant information will be the same on lines 5a. and 5d.



- Line 7 now has additional spaces added. Line 7a. allows for up to three tax form numbers to be added and line 7b. provides boxes to indicate to which taxpayer(s) the request for wage and income transcripts applies. If no boxes are marked, transcripts will automatically be provided for all listed taxpayers.
- The signature section adds a new box for each signer to check when the form is being electronically signed. Forms signed electronically without the box marked will be rejected. Only authorized IVES participants are allowed to submit requests with electronic signatures.

Guide Update: Multiple sections of the Correspondent Seller and HFA Lending Guide will be updated to reflect the acceptability of the 4506-C requirements.

Questions



Correspondent: Please contact your Account Executive or the Client Support Area at 800.200.5881, option 1.

HFA: Please contact the Housing Finance Agency Hotline at 800.562.5165, option 1 for the HFA Customer Care Team.

