

# Multifamily Issuer Training

Reporting and Feedback System (RFS) Training Sessions

September 22, 2023









## MULTIFAMILY VIRTUAL ISSUER TRAINING

## **Presenters**

**Steve Audi** 

**Gail Smith** 

**Debbie Boles** 

**Melanie Buton** 



## **SESSION 2 RECAP**

## What were your key takeaways from Session 2? Do you have any unresolved questions?

(Use the whiteboard text annotation tool to respond)



## **SESSION 2 RECAP**

## **Topics Covered in Session 2:**

- **RFS Monthly Report of Pool and Loan Data** 
  - List the four types of RFS records
  - Explain how to edit records appropriately
  - Define which calculations are performed by RFS
  - Distinguish which fields an Issuer is responsible for reporting and editing

- **RFS Exception Feedback**
- Define common Exceptions messages and Summarization Alerts
- Describe how to navigate the Exception Summary screen to view Exception Feedback
- List steps to retrieve and download Exceptions Feedback file

- Overview of **Reporting Workflow**
- Describe two ways to report Pool and Loan level data
- List when and which records are required to be reported
- Describe how to report corrections
- Explain how to confirm a file was uploaded successfully



## **AGENDA**

Session 1: — Session 2: — Session 3: — Session 3: — Session 3: — Session 3: — Additional Reporting Requirements

2 Reference Documentation 6 RFS Exception Feedback 9 Cash and Reconciliations

RFS Reporting 7 Overview of Reporting Workflow

4 E-Notification



# Additional Reporting Requirements

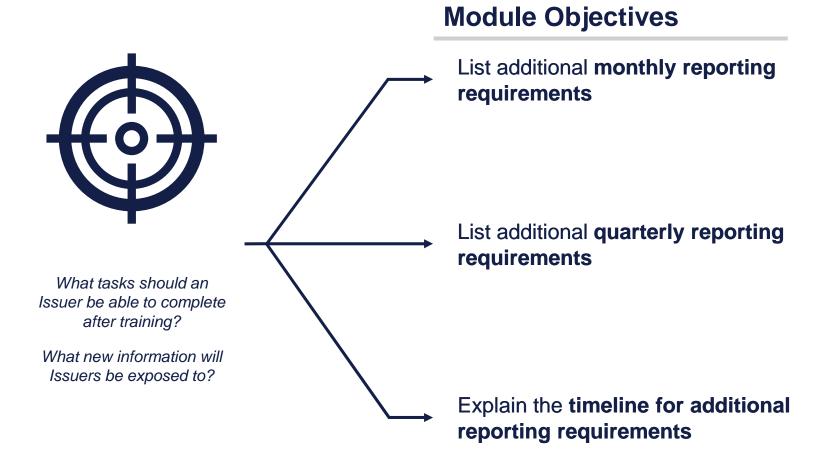








## **OBJECTIVES: ADDITIONAL REPORTING REQUIREMENTS**





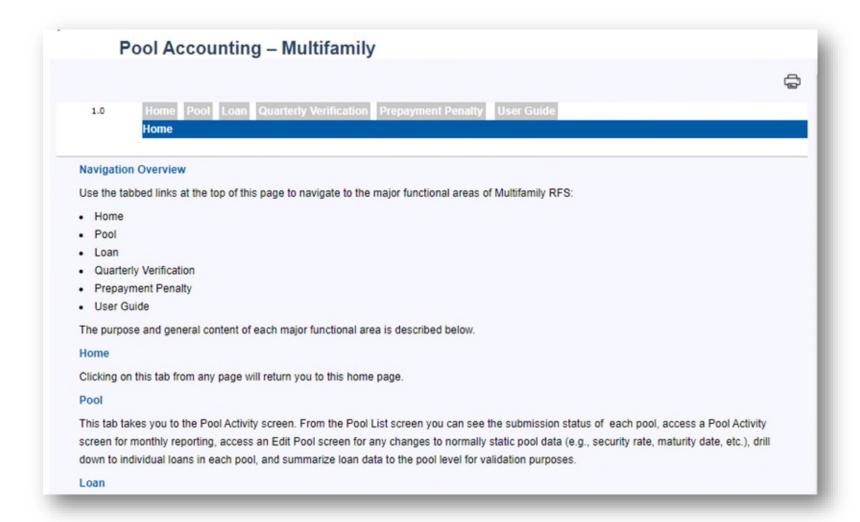
## ADDITIONAL REPORTING REQUIREMENTS

- Prepayment Penalty Reporting completion by 4th business day
- Monthly Reporting Certification opens 10<sup>th</sup> business day, completion by 14<sup>th</sup> business day
- Loan Matching and Suspense Monthly
- CAVS Quarterly
- WHFIT Quarterly
- Annual Financial Documents Yearly



## PREPAYMENT PENALTY REPORTING

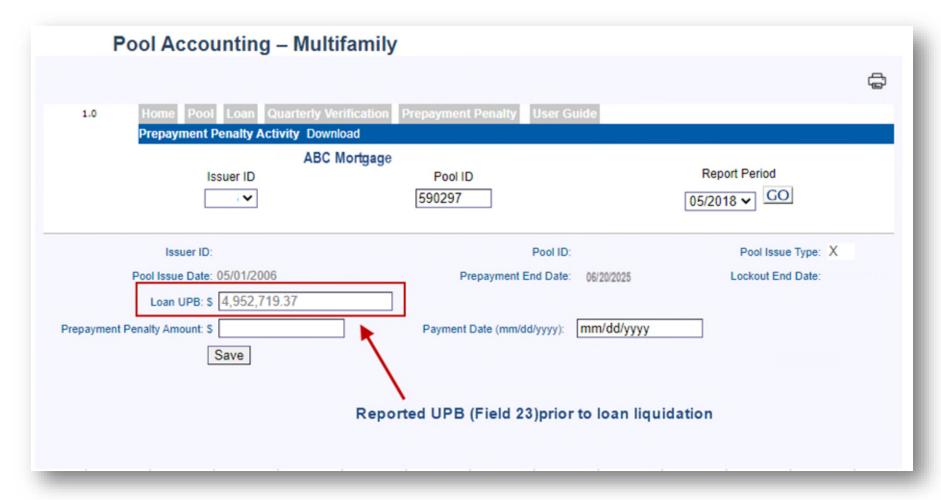
Completion due by 4<sup>th</sup> Business Day





## PREPAYMENT PENALTY REPORTING

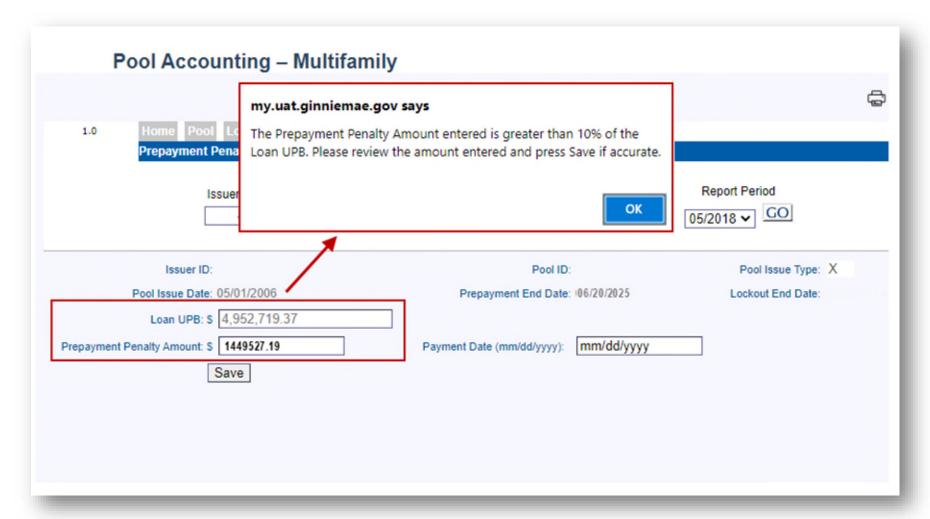
Completion due by 4<sup>th</sup> Business Day





## PREPAYMENT PENALTY REPORTING

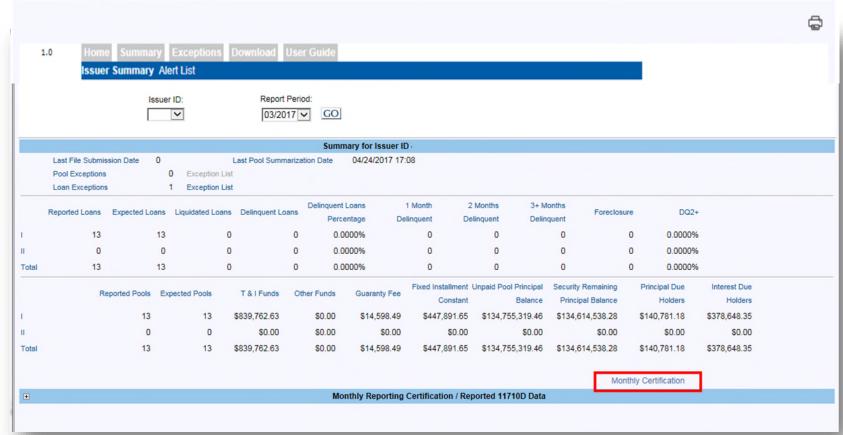
#### Completion due by 4th Business Day \_\_\_\_\_



## MONTHLY REPORTING CERTIFICATION

### Opens 10<sup>th</sup> Business Day Completion due by 14<sup>th</sup> Business Day

#### **Exception Feedback**



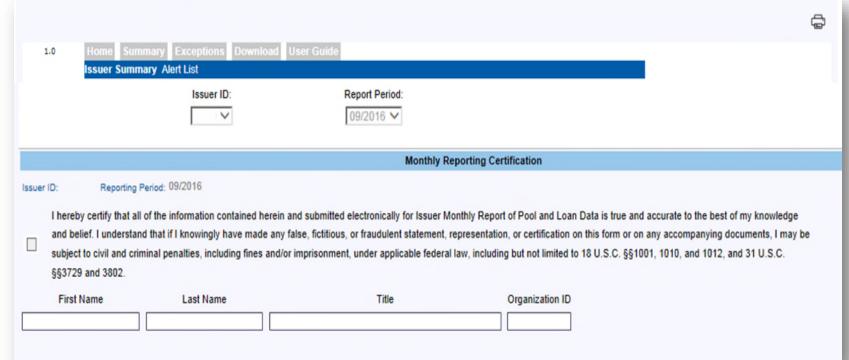


## MONTHLY REPORTING CERTIFICATION

#### Must have a SecurID Token:

- For Issuer user, user ID must be a signor on form HUD 11702 Resolution of Board of Directors (approved in MAMS).
- **For Subservicer**, user must be a signor on their Issuer's form HUD 11702 and must have form HUD-11707 Master Servicing Agreement (approved in MAMS).

## **Exception Feedback**





## LOAN MATCHING AND SUSPENSE

## Ginnie Mae Loan Matching

#### WHAT IS IT

RFS automated process; run "monthly"; electronically matches Issuer-reported loan data to the Agency "master" data

#### **EXAMPLES**

- FHA Multifamily Endorsement
- RD (USDA RHS) USDA RD Multifamily Endorsement Data

Agency files received each month, matched to issuer reported loan data in RFS



## LOAN MATCHING AND SUSPENSE

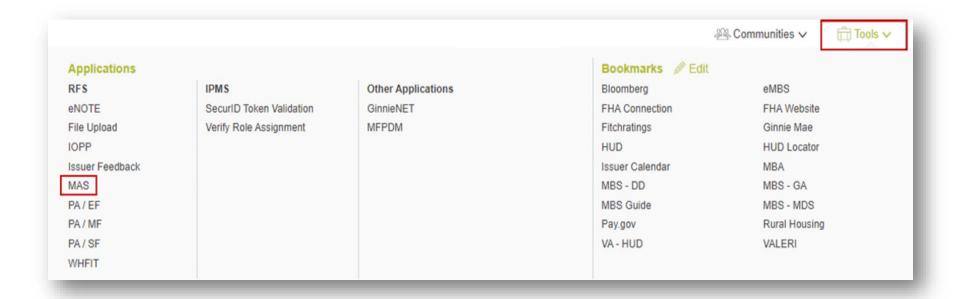
## **Ginnie Mae Loan Matching – "Match Criteria"**

Issuer Reported Loan Data (RFS Reporting) is matched to Agency Loan Data (Agency)

- Fields Matched:
  - Case Number\* (Field 5 RFS "L" Record)
  - OPB (Field 10 RFS "L" Record) for Project Loans
  - Mortgage Rate for CL loans;
- Issuers must resolve "Non-Matches"
- \* Agency Case Number within 15 Digit Case Number



## **ACCESSING MATCHING AND SUSPENSE**





## MATCHING AND SUSPENSE – A MODULE OF RFS

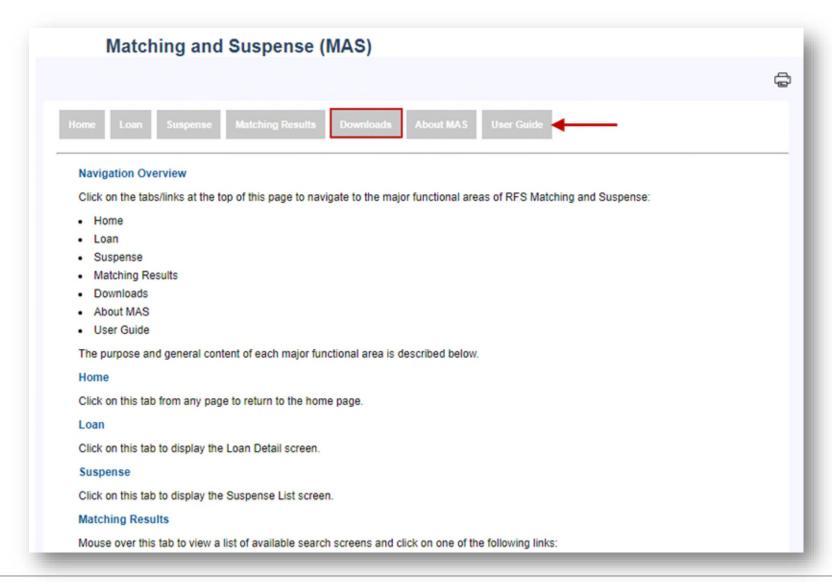
#### MAS errors are accessible on the "Downloads" tab

- There are 6 downloads on RFS
- 3 apply to Multifamily:

Schedule	Download file	e-Notification
6th BD	"Insurance" Match to 2 Agencies (Corrections can be made between the 1st and 10 <sup>th</sup> BD)	No
7th BD	Loan Various Suspense (for Data Changes)	Yes
10 <sup>th</sup> BD	Loan Matching Suspense (for Data Changes)	Yes



## NON-MATCHING LOAN DOWNLOADS





## RFS LOAN MATCHING SUSPENSE NOTIFICATION

#### View Issuer Notification

Issuer #:

9225

Date Created:

4/14/2017 1:13:19 PM

Reference #:

840685

Notice Type:

Loan Processing

Subject:

**RFS Suspense Download** 

Message:

Suspended records for the March reporting period are now available to view and download from the Ginnie Mae RFS Matching and Suspense (MAS) module. Instructions to view Suspense Items and download the Suspense List are found in Section 5.2 and Section 7.4 respectively of the MAS User Guide. Click on the MAS Suspense tab to view suspended records. Click on Suspense under the Download tab and follow the instructions to download the Suspense List. Review the items, mark the records with an A to accept or an R to reject in the appropriate column, and return it in spreadsheet format only to GinnieMaeSuspense@deloitte.com no later than 9:00 AM EST on the 2nd to last Business Day of April.

Read By:

Date Read:

Back

## MATCHING AND SUSPENSE – A MODULE OF RFS

## MAS exceptions are accessible on the "Downloads" tab

- There are 6 downloads on RFS
- 3 apply to Multifamily:

Schedule	Download File or Letter	E-Notification
After 6 <sup>th</sup> BD and 10 <sup>th</sup> BD	"Insurance" Match 2 Agencies (Corrections can be made between the 1st and 10th BD)	No
After 6 <sup>th</sup> BD 10 <sup>th</sup> BD	Match to Terminate FHA and RD (RHS)	Yes – N/A for MF
After 6 <sup>th</sup> BD 10 <sup>th</sup> BD	Loan Match Suspense (for Data Changes)	Yes
After 6 <sup>th</sup> BD 10 <sup>th</sup> BD	Aged Matching Monthly	Yes – N/A for MF
5 <sup>th</sup> BD	Aged Terminated Matching	Yes – N/A for MF
7 <sup>th</sup> BD	Various Suspense (for Data Changes)	Yes – N/A for MF
Before reporting period close (Around 25 <sup>th</sup> CD)	3 <sup>rd</sup> Match Available to download	No
As Applicable	Monitoring Letters	Yes – N/A for MF



## QUARTERLY VERIFICATION - REPORTING IN RFS

### **Custodial Account Verification "CAVS"**

MBS Guide Chapter 16-8 Custodial Institution Ratings.

RFS Menu Item, Select Quarterly Verification from the Pool Accounting – Multifamily module



Issuer must submit a verification between the 6<sup>th</sup> and the 15<sup>th</sup> business day of March, June, September and December stating funds custodian meets the requirements specified above



Must be reported to RFS by online data entry or file upload.



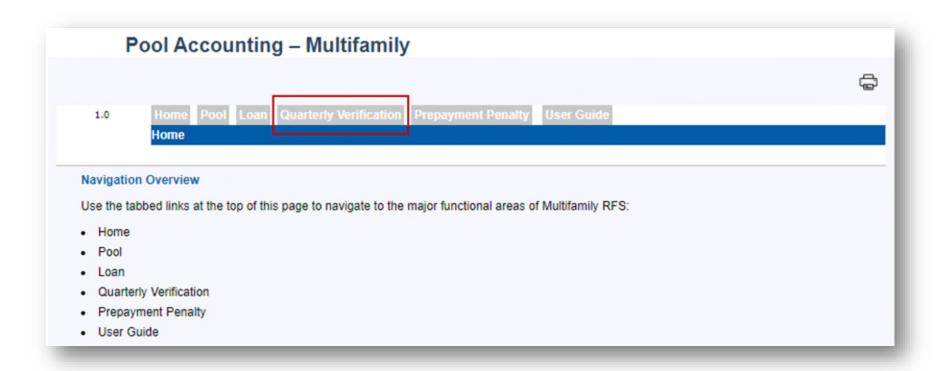
**Separate verification for each fund custodian** pursuant to Master Agreement for Servicer's Principal and Interest Custodial Account, form HUD 11709.



**Separate verification for each fund custodian** pursuant to Master Agreement for Servicer's Escrow Custodial Account, form HUD 11720.

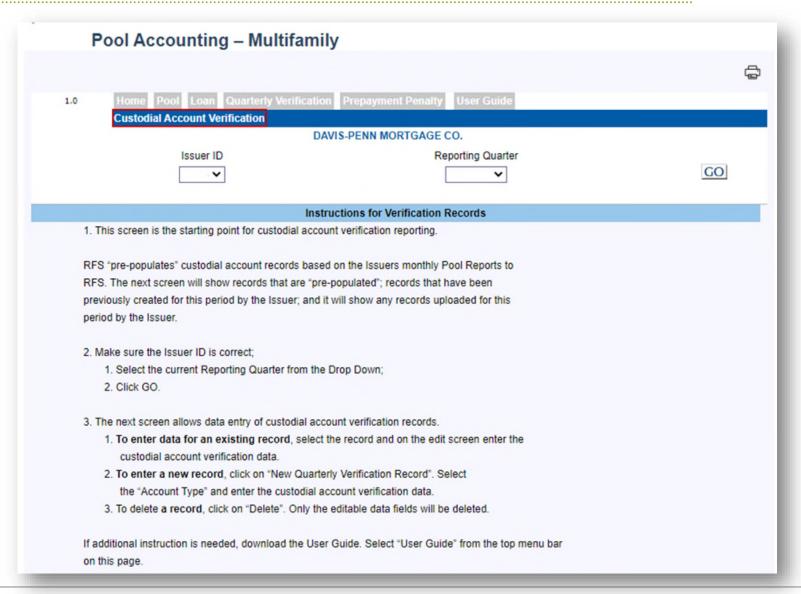


## **QUARTERLY VERIFICATION**





## **QUARTERLY VERIFICATION**





## WHFIT TAX REPORTING - A MODULE OF RFS

## Widely Held Fixed Investment Trust (WHFIT) Reporting

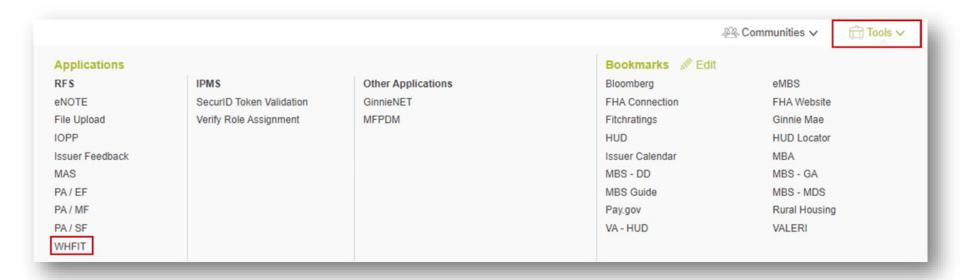
- Reported through MGM, RFS Menu item, Select "WHFIT" or file upload.
- Additional information in FAQs subcategory WHFIT
- WHFIT tax information is to be submitted by the 10<sup>th</sup> calendar day of the month corrections due by 15<sup>th</sup> calendar day

Report Months	Quarterly Reports
January, February, March	Due April 10th, corrections by the 15th
April, May, June	Due July 10th, corrections by the 15th
July, August, September	Due October 10th, corrections by the 15th
October, November, December	Due January 10th, corrections by the 15th

Appendix VI-18 Widely Held Fixed Investment Trust <a href="https://ginniemae.gov/issuers/program\_guidelines/MBSGuideAppendicesLib/Appendix\_VI-18.pdf">https://ginniemae.gov/issuers/program\_guidelines/MBSGuideAppendicesLib/Appendix\_VI-18.pdf</a>



## WHFIT TAX REPORTING - A MODULE OF RFS





## WHFIT TAX REPORTING

#### File Upload or Manual Entry

## Widely Held Fixed Investment Trust **Navigation Overview** Click on the tab/links at the top of this page to navigate to the major functional areas of RFS WHFIT. Home Issuer Reports About WHFIT User Guide. The purpose and general content of each major functional area are described below. Home Click on this tab from any page to return to the Home page. Issuer Click on this tab to display the Monthly Reporting screen. Reports Click on this tab to access the WHFIT reports and select the following reports to view: Summary Report Exception Report. **About WHFIT** Click on this tab to display the RFS software version for WHFIT. **User Guide** Click on this tab to download or display the RFS WHFIT User Guide.



## ISSUERS' ANNUAL FINANCIAL DOCUMENTS



Files must be uploaded through RFS File Upload.



Issuers must submit **annual financial statements** and related documents in accordance with **Chapter 3 of the MBS Guide**. Such documents must be reported in accordance with Appendix VI-20 of the MBS Guide.



Financial Documents are submitted via the MyGinnieMae (MGM). In accordance with Chapter 3. Documents are due within 90 days of the Issuer's fiscal year-end.



**Instructions for electronic submission** of the documents through MGM are available in **Appendix VI-20** of the Ginnie Mae Mortgage-Backed Securities Guide.

https://ginniemae.gov/issuers/program\_guidelines/MBSGuideAppendicesLib/Appendix\_VI-20.pdf

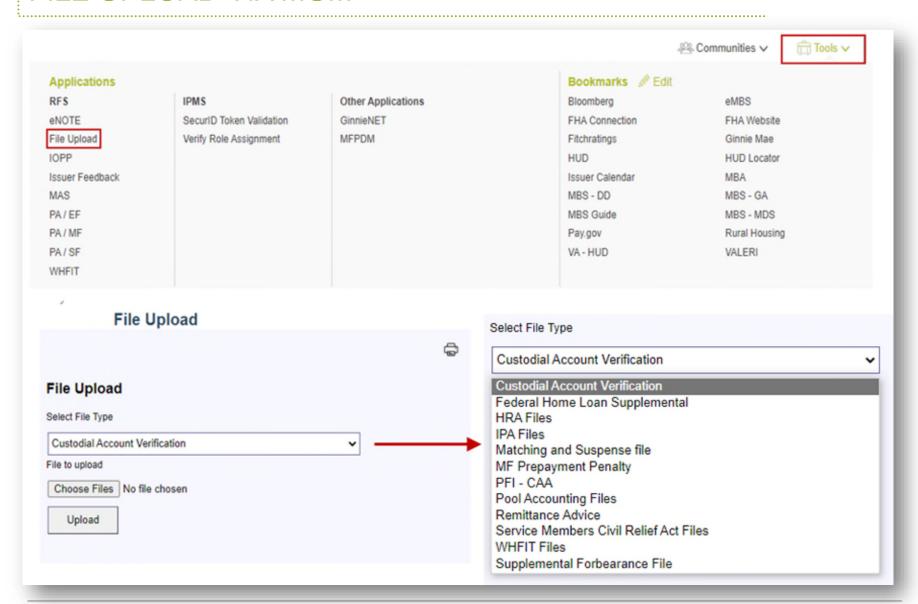


Documents must be in **PDF format**. Detailed instructions for File Naming are provided in Appendix VI-20.



**MGM FILE UPLOAD Function** is used to upload the documents. Select the "IPA Files" radio button on the File Upload Menu Page.

## FILE UPLOAD VIA MGM





## ACTIVITY

## **Polling Questions:**



- a) RFS Monthly Summary
- b) Pool Activity Screen
- c) WHFIT Screen
- d) Annual Financial Documents screen

#### 2. When are Annual Financial Documents due?

- a) Yearly
- b) Quarterly
- c) 6 months after fiscal year-end
- d) 90 days after fiscal year-end





Please return to complete the second half of today's session after a 5-minute break.



## Cash and Reconciliations









## **OBJECTIVES: CASH AND RECONCILIATIONS**

What tasks should an Issuer be able to complete after training?

What new information will Issuers be exposed to?



#### CASH

Describe how to report Cash on Hand in the appropriate bank account

Describe how to update Master Agreements

#### RECONCILIATION

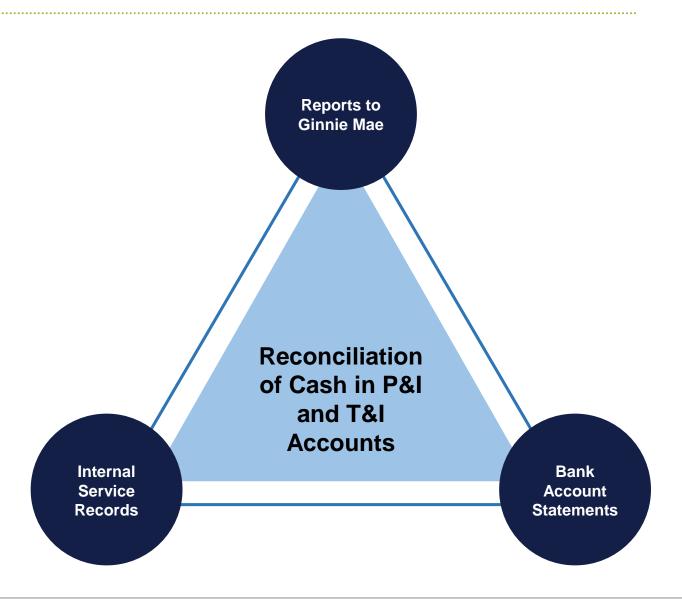
Explain how and when to submit **Custodial Account Verification** 

Explain the **reconciling requirements** (outside of RFS)

Explain **Pool to Security and Test of Cash process** 



## THE RECONCILING TRIANGLE





## GINNIE MAE MONTHLY REPORTING

#### **KEYS TO QUALITY REPORTING:**











## **CASH MANAGEMENT**

**Ginnie Mae's Access to Draft Funds** 

**Custodial Account Requirements** 

**P&I Shortfalls** 

**Test of Expected P&I** 

Reconciliation of Mortgage Collateral to Securities Outstanding

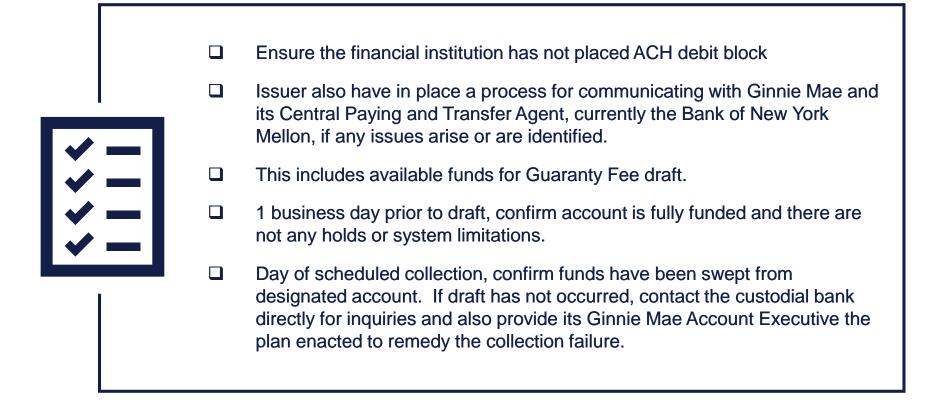
**Bank Reconciliation** 

**Miscellaneous** 



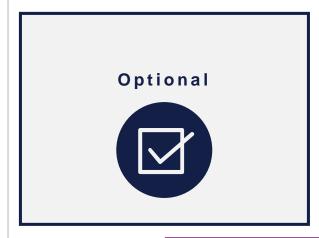
## GINNIE MAE ACCESS TO CUSTODIAL ACCOUNTS

Important that all Ginnie Mae Issuers ensure that they do not have restrictions in place that would impact Ginnie Mae's ability to draft funds from the central P&I custodial accounts on the 15th calendar day of each month.





#### **COLLECTIONS CLEARING ACCOUNT**



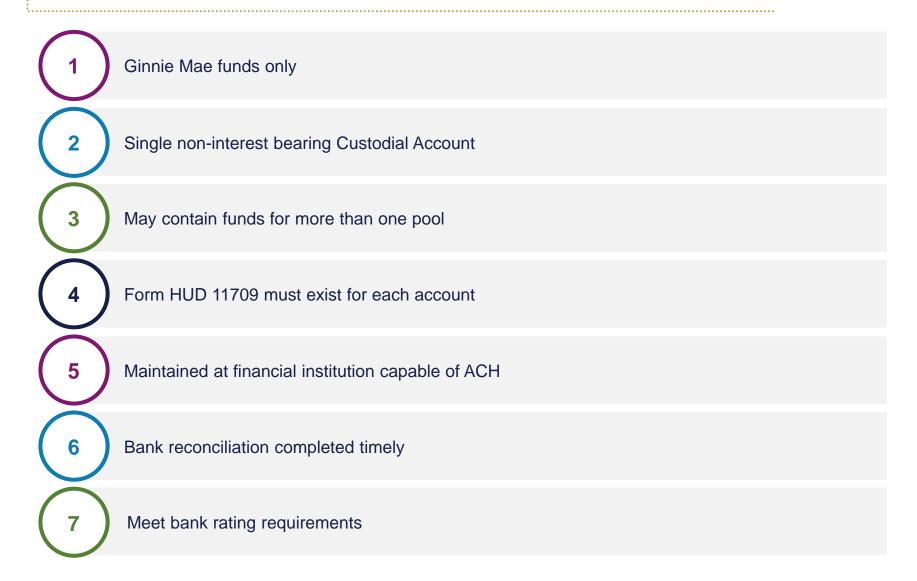






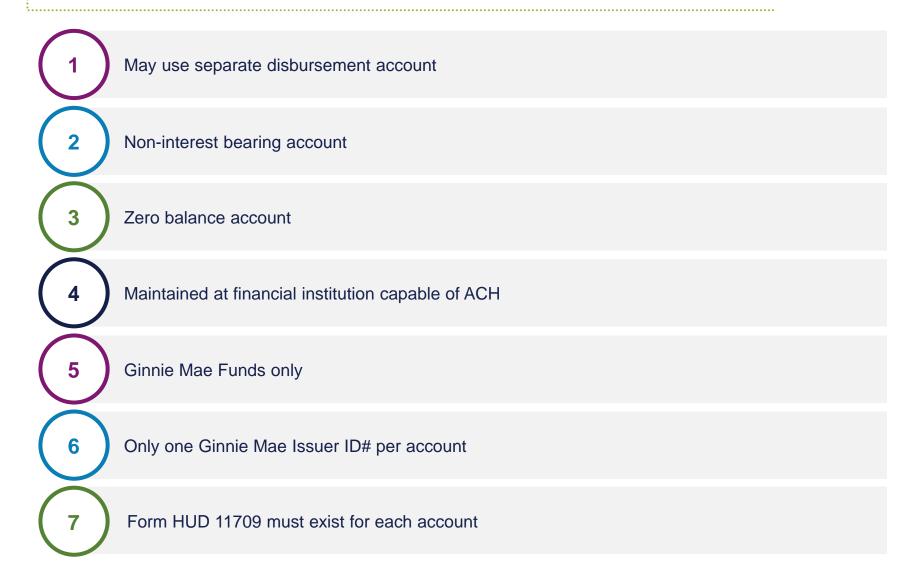


#### P&I CUSTODIAL BANK ACCOUNT REQUIREMENTS





#### P&I DISBURSEMENT ACCOUNT REQUIREMENTS





#### T&I CUSTODIAL BANK ACCOUNT REQUIREMENTS





#### CUSTODIAL BANK RATING REQUIREMENTS

#### **CAV – Custodial Account Verification**

An Issuer must maintain P&I custodial accounts at insured depository institutions (funds custodians) that meet the rating requirements adopted by Ginnie Mae.

- Aggregate principal and interest payments due from borrowers is equal to/greater than \$100,000 in any one month as measured by the fixed installment control.
- □ Project loan escrow accounts, whether required by FHA, RD or Ginnie Mae, for any project equal to or exceeding \$100,000 are also subject to these requirements.



#### CUSTODIAL BANK RATING REQUIREMENTS

#### **Agency Rating Requirement:**

**Agency Rating Requirement**: The institution must have a rating that meets at least one of the following criteria:

- ☐ Institutions with assets of \$30 billion or more either:
  - Short-term issuer rating by S&P of "A-3" (or better). If above not available, Long term issuer rating of "BBB-" (or better)
  - Short-term bank deposit rating by Moody's of "P-3" (or better). If not available, Long term bank deposit rating of "Baa3" (or better)
- ☐ Institutions with assets less than \$30 billion:
  - 125 (or better) by IDC, or
  - C+ (or better) by Kroll



#### **CUSTODIAL BANK RATING REQUIREMENTS**

If a depository institution satisfies:

- The Insured Accounts Requirement: the institution must have accounts that are insured by the FDIC or the NCUSIF
- The Regulator Rating Requirement: the institution must be rated as "well capitalized" by its federal or state regulator
- 3 Has a rating that meets or exceeds at least one of the Agency Rating Requirements specified

It will be acceptable as a funds custodian even if it is rated by another organization below the minimum level specified.

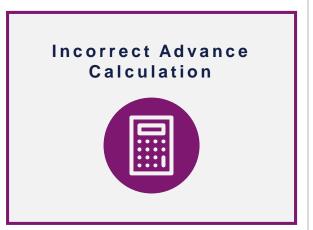
Due **between the 6th and the 15th business** day of March, June, September and December.

#### **P&I COLLECTION SHORTFALLS**

#### **TEMPORARY SHORTFALLS:**







#### NON-RECOVERABLE CORPORATE ADVANCES



#### METHODS OF FUNDING P&I SHORTFALLS



# CORPORATE ADVANCES

**User Issuer Funds** 



# **EXCESS** FUNDS

Minimize Use of Issuer Funds



# POOL ADVANCE AGREEMENT

**Uses Bank Funds** 

Guide 5500.3 Appendix VI-1





CORPORATE ADVANCES

- □ Timing of Advances
  - Ginnie Mae I
- □ Recovery of Corporate Advances
- ☐ Documentation of Advances





CORPORATE ADVANCES

Ginnie Mae I

P&I Bank balance at negotiable date

#### Less:

- Additional principal payments not passed through until the following month
- Liquidations not passed through until the following month
- Prepaid installments
- Guaranty fee owed to Ginnie Mae
- = Adjusted bank balance
- Amount due security holders
- = Overage (Shortage)





**EXCESS FUNDS** 

- ☐ MBS Guide Chapter 15-5 Excess Funds
- Excess funds are defined as:
  - Unscheduled recoveries of principal on pooled mortgages received during the current month that are to be passed through with the following month's payment
  - Early receipt of scheduled payments

#### CORPORATE ADVANCES USING EXCESS FUNDS



Unapplied Funds and Service Fees



Pools Sharing Same Custodial Account



CORPORATE
ADVANCES
using
EXCESS
FUNDS

**Ginnie Mae I** 

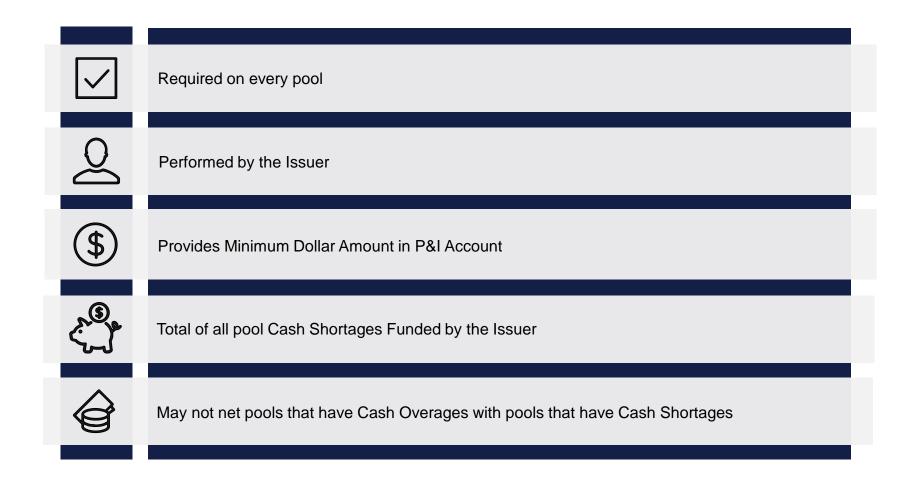
P&I Bank balance at negotiable date

#### Less:

- Guaranty fees owed to Ginnie Mae (ACH on 10<sup>th</sup> calendar day
- = Adjusted bank balance
- Amount due security holders
- = Overage (Shortage)



#### **TEST OF EXPECTED P&I**



### **TEST OF EXPECTED P&I**

TEST OF EXPECTED P&I CUSTODIAL ACCOUNT BALANCE AT CUTOFF		
POOL NUMBER: Reporting M	lonth:	
+ Prepaid Principal and Interest (Sum of L-Record Fields 16 and 17 for each prepaid loan in the pool)	\$	
+ Additional Principal Payments (Sum of L-Record Field 20 for each loan in the pool)	\$	
+ Additional Principal Adjustment (Sum of L-Record Field 21 curtailment adjustments for each current loan in the pool)	\$	
+ Liquidation Principal (Sum of L-Record Field 28 for each liquidated loan in the pool prior to its liquidation)	\$	
+ Delinquent Service Fee (Sum of L-Record Field 14 for each delinquent loan in the pool multiplied by the service fee rate divided by the mortgage interest rate)	\$	
+ Service Fee (P-Record Field 5: Enter only if taken after cutoff date)	\$	
+ Fixed Installment on Liquidation (Sum of L-Record Field 11 for each liquidated loan in the pool)	\$	
- Delinquent Principal and Interest (Sum of L-Record Fields 14 and 15 for each delinquent loan in the pool)	\$	
<ul> <li>Prepaid Service Fee         (Sum of L-Record Field 16 for each prepaid loan in the pool multiplied by the service fee rate divided by the mortgage interest rate)     </li> </ul>	\$	
- Service Fee from Liquidations (Sum of L-Record Field 26 for each liquidated loan in the pool multiplied by the service fee rate divided by the mortgage interest rate, based on last interest installment on Monthly Liquidation Worksheet)	\$	
= Subtotal (Expected P&I Balance)	\$	
- Reported P&I Balance (Field 12 of P-Record for pool)	\$	
= Difference: Over/Short	\$	



#### RECONCILIATION OF MORTGAGE COLLATERAL TO SECURITIES OUTSTANDING



Required on every pool



Performed by the Issuer



Pool of Loans is Collateral for Securities

- Over-collateralization adjusted pool principal balance is larger than the securities balance - recover principal
- Under-collateralization adjusted pool principal balance is less than the securities balance - remit principal



Tolerance for Over/Under Collateralized Pools

- \$1.00 per loan per pool
- Maximum of \$50.00 per pool



Recoveries for Over Collateralized pools

- May only recover principal amount greater than \$100.00 from unscheduled principal
- Contact your assigned Account Executive for guidance

# RECONCILIATION OF MORTGAGE COLLATERAL TO SECURITIES OUTSTANDING

	RECONCILIATION OF MORTGAGE COLLATERAL TO SECURITIES OUTSTANDING		
	POOL NUMBER:	REPORTING MONTH:	
+	Month end pool principal balance		
	(Sum of Fields 23 on L-Records in the pool (except liquidated loans)	\$	
+	Prepaid installment principal		
	(Sum of Fields 17 on all L-Records in the pool)	\$	
-	Delinquent installment principal		
	(Sum of Fields 15 on all L-Records in the pool)	\$	
-	CD Pools Only: Scheduled Principal		
	(Enter amount from Section 2.A. of Issuer's Monthly Reconciliation		
	of Pool and Loan Data Worksheet	\$	
+	CD Pools Only: Liquidation Principal Installment		
	(Enter principal portion of last installment reported on Issuer's Monthly Liquidation Reconciliation Worksheet)	ć	
	Monthly Equidation Reconcination Worksheet)	\$	
-	CD Pools Only: Additional Principal Adjustments or FIC change on GP	M	
	(Enter amount from Section 2.D. of Issuer's Monthly Reconciliation of Pool and Loan Data Worksheet)	\$	
	,	·	
=	Adjusted Pool Principal Balance	\$	
_	Securities Principal Balance		
	(Amount in Field 10 on the P-Record as entered by Issuer)	\$	
=	Difference: Over / Short	\$	
	•	-	



## P&I Reconciliation









### GINNIE MAE P&I ACCOUNT RECONCILIATION

Sample Format		
Bank statement balance at cutoffdate of	S	
D eposits in transit (total):	+	
Outstanding checks (total):		
Adjustments (Explanation required):		
SUBTOTAL (Adjusted bank balance):	=	
LESS Reported P&I and Other Funds (Sum of Fields 12 and 13 on the Pool Record as entered by Issuer)		
Unreconciled difference (explain):	=	
Explanation for "Adjustments" noted above:		
Deposits in transit over thirty (30) days (date an	id amount):	
Checks outstandingover thirty (30) days (date a	and amount):	
parer: Date:		
viewer Date:		



#### GINNIE MAE P&I ACCOUNT RECONCILIATION

☐ Bank account reconciliations must be completed within **30 days** of the Issuer's monthly reporting cut-off date for all accounts.



- Detail must be available that list the P&I cash book balance for each pool/loan package that uses the custodial bank account as of issuer's monthly cutoff.
  - Balance at the end of the previous reporting month, plus the daily deposits related to the pool, minus disbursements for the pool, which equal the ending balance. This is known as Cash Flow Method.
  - This balance is reported on the Pool Record, Field 12 P&I Fund Balance.
- All adjusting items on a reconciliation must be completely resolved during one of the next two reporting cycles.

## **T&I** Reconciliation









### GINNIE MAE T&I ACCOUNT RECONCILIATION

Bank statement balance at cutoff date of	\$		
Deposits in transit (total):	+		
Outstanding checks (total):			
Adjustments (Explanation required):			
SUBTOTAL (Adjusted bank balance):	=		
LESS Reported T&I Funds (Field 11 on the Pool Record as entered by Issuer			
Unreconciled difference (explain):	=		
Explanation for "Adjustments" noted above:			
Deposits in transit over thirty (30) days (date and amount):			
Checks outstanding over thirty (30) days (date and amount):			
Preparer: Date:			
Reviewer: Date:			

**Sample Format** 



#### GINNIE MAE T&I ACCOUNT RECONCILIATION

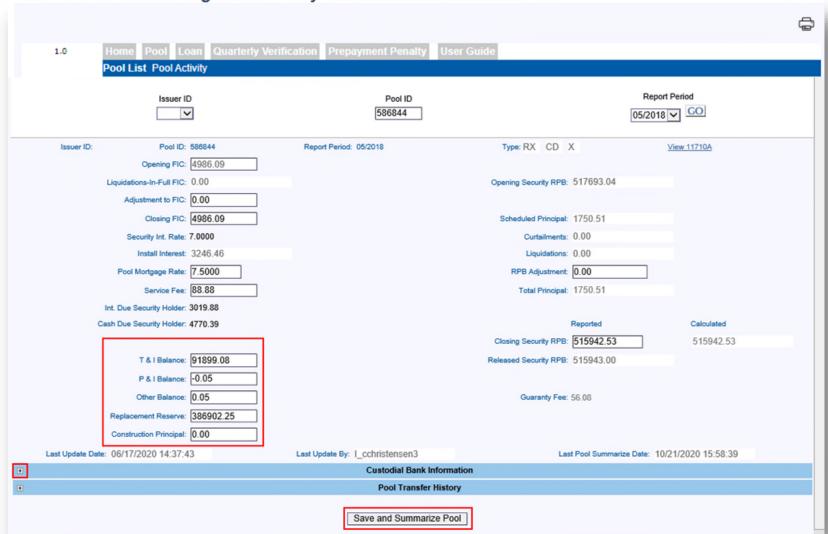
■ Bank account reconciliations must be completed within **30 days** of the Issuer's monthly reporting cut-off date for all accounts.



- ☐ Funds that are required to be deposited in an escrow custodial account must be deposited within two (2) business days of the pool settlement date.
  - The escrow balance for ALL loans in the pool is reported on the Pool Record, Field 11 T&I Escrow Balance.
- All adjusting items on a reconciliation must be completely resolved during one of the next two reporting cycles.

#### **POOL ACTIVITY SCREEN**

Pool Accounting - Multifamily





## **POOL ACTIVITY SCREEN**

⊟	Custodial Bank Information	
Principal Account#:  Escrow Account#:  Replace Reserve Account#:  Construction Loan Account#:	Principal Bank ABA#:  Escrow Bank ABA#:  Replace Reserve Bank ABA#:  Construction Loan Bank ABA#:	
Pool Transfer History		
Save and Summarize Pool		



#### **ACTIVITY**

#### **Polling Questions:**



- b) 30 days from cutoff
- c) 60 days from month-end



- a) Every month
- b) When the bank has \$100,000 in deposits
- c) When the FIC equals \$100,000 or more



- a) I do not know
- b) Notifies issuers of collateral to security discrepancies
- c) Notifies issuers to fund the bank account



#### **BEST PRACTICES**

100% of Pool and Loan data reported by 2nd Business Day

All E and C level alerts related to the Pool and Loan record must be cleared no later than 7:00 pm (EST) on the 4<sup>th</sup> Business Day

Consistency of data reported in RFS

Case number reported on Loan File should match case number reported at Origination

Issuers are fully responsible for meeting reporting timelines and accuracy of data reported by a sub-servicer

Adhering to established Cut-off date

Ensure the correct liquidation removal reason code is reported

Analyze and correct RFS edit exceptions per Severity Level requirements

Review E-Notification daily



## **QUESTIONS & ANSWERS**



