May 31, 2019  
No. 37

Ginnie Mae would like to remind Issuers that they are required to report the First Time Homebuyer field consistently across GinnieNET (Record M04 Field 7) and RFS (Various Record Field 21). The First Time Homebuyer status of a loan is reported to Ginnie Mae at the time of pool issuance, via GinnieNET. This can subsequently be corrected through RFS if the issuer later determines that the status reported to GinnieNET was incorrect.

Ginnie Mae is clarifying the instructions for reporting or correcting FHA Single First Time Homebuyer status reported to GinnieNET or RFS. For FHA Single Family loans, the status reported to Ginnie Mae is expected to be the same status as reported to FHA Connection and/or as documented on the HUD Addendum Form 92900A (addendum to the Uniform Application for Residential Mortgage Form 1003).

Proper Custodial Account Titling

Ginnie Mae would like to remind all Issuers of the need to ensure that their Principal and Interest Custodial Accounts and Escrow Custodial Accounts are titled properly for all accounts containing funds related to Ginnie Mae pooled loans. Ginnie Mae continues to identify improperly titled Custodial Accounts as a common finding during its Issuer Compliance Reviews.

When establishing new custodial accounts, please remember to include the Issuer’s full legal name within the title of each account, along with the required language per HUD form. Also, the full account name from form HUD 11709 or form HUD 11720, respectively, must match the account name and title on the bank signature card and corresponding custodial account bank statements.

For the Principal and Interest Custodial Account(s), form HUD 11709 must be executed within the Ginnie Mae Enterprise Portal (GMEP). Additional instruction is located in Appendix III-2 of the Ginnie Mae MBS Guide. For Escrow Custodial Account(s), form HUD 11720 must be executed within GMEP. Additional instruction for this form is located within Appendix III-3 of the Ginnie Mae MBS Guide.

Compliance Contractor Review Name Change Notification

Ginnie Mae conducts Compliance Reviews of all active Issuers and Document Custodians, providing assurance that the loan collateral underlying Ginnie Mae securities conforms to program requirements, and to ensure the proper loan servicing of Ginnie Mae pooled loans. The PricewaterhouseCoopers Public Sector LLP and/or a Grant Thornton team are currently Ginnie Mae’s contractors that conduct Compliance Reviews.

The purpose of this document is to convey program news and notes only. All terms and conditions of the MBS programs are in the applicable Guaranty Agreement and the Guide. Where there is any inconsistency between this document and the applicable Guaranty Agreement or the Guide, the provisions of the applicable Guaranty Agreement or the Guide will govern.
Ginnie Mae would like to notify Issuers that PricewaterhouseCoopers Public Sector LLP has officially re-branded as Guidehouse LLP.

Therefore, you may have or will receive Compliance Review-related correspondence from Guidehouse LLP and/or Grant Thornton. There is no change in the teams performing the review or the process for conducting the review.

**EINs for Ginnie Mae I and Ginnie Mae II Custom Pools**

The Internal Revenue Service (IRS) issued a statement on May 13, 2019, prohibiting entities from using their own Employer Identification Number (EIN) to obtain the EINs required for Ginnie Mae I and Ginnie Mae II Custom pools (Pool Type “X” and “C” only).

According to the IRS, only individuals with tax identification numbers who have been registered with the IRS as the “responsible party” may request an EIN and individuals named as responsible party must have either a Social Security number (SSN) or an individual taxpayer identification number (ITIN).

In order to avoid potential delays in issuing MBS, Issuers are encouraged to review the IRS requirements at [https://www.irs.gov/newsroom/irs-revises-ein-application-process-seeks-to-enhance-security](https://www.irs.gov/newsroom/irs-revises-ein-application-process-seeks-to-enhance-security) and the associated links and instructions.