



COVID-19 Servicer Reporting Requirements

Updated - May 15, 2020

As previously announced, National MI is aligned with the CARES Act and supports the recent forbearance programs announced by the FHFA and the GSEs. In order to provide uniformity in servicer identification and reporting of mortgage loans, specifically where the borrower has experienced a COVID-19 hardship, National MI has collaborated with the MISMO working group and other MI providers to develop standardized reporting for servicers related to defaults, forbearance, and loss mitigation workouts. As always, it is important to ensure complete and timely reporting to National MI, so we can appropriately allocate resources and support any servicer loss mitigation activities.

ADR (Automated Default Reporting)

When servicers provide monthly reporting to National MI for loans that are in default, they should use **RFD (Reason for Default) Code 12** – formerly “Energy/Environmental Costs” – to report **COVID-19 defaults**. Energy/Environmental Costs will now be combined with Over Obligated (Excessive Use of Credit) and will be reported using RFD Code 08. The name of RFD Code 12 has been updated to “National Emergency Declaration.” Loans in forbearance should be reported as “in Default” with the appropriate code when two consecutive payments remain unpaid. Monthly updates for an active NOD (Notice of Default) should continue until the borrower brings the loan current, either through their own funds or a loss mitigation workout (i.e. repayment plan, payment deferral, or loan modification).

- **MILAR 169 Reporting**

RFD Code 12 – previously representing Energy/Environmental Costs, this code will now be used for *National Emergency Declaration (including COVID-19 hardships)*. **Energy/Environment Costs will now be combined with Over Obligated (Excessive Use of Credit) and reported using RFD Code 08.**

- **MILAR 169 and MILAR 32**

For forbearance due to COVID-19 related hardship, use the following Workout Program Names (WPNs) to support the GSE’s new loss mitigation program.

- **Code 43 - National Emergency Forbearance Plan**
- **New Code 44 - Deferred Payment Program**

If a servicer is not able to implement the new codes, then Workout Program Names **Code 10 - Other Delinquent** and **Code 11 - Other Performing** can be used in place of Code 43 and Code 44.

Workouts

National MI has given delegated authority to the GSEs and Servicers for workouts. For loans owned by Fannie Mae or Freddie Mac, servicers should follow agency guidelines to complete loan modifications.

Further Details/Questions

For loans insured by National MI **on or after March 1, 2020**, please refer to the [new Servicing Guide](#) for further details.

For loans insured **prior to March 1, 2020**, please refer to the [previous Servicing Guide](#), which can also be found in the 2014 Master Policy Archive section, located on the [Master Policy Resources](#) page for more details.