

# Request for Waiver of Housing Directive

U.S. Department of Housing and Urban Development  
Office of Housing  
Federal Housing Commissioner

OMB Approval No. 2502-0029  
(Expires 04/30/2020)

1. Field Office National Servicing Center	2. Program and DAS (e.g., multifamily development) Single Family Housing
3. Waiver Requested by (person, entity, HUD employee) Matt Martin, Director NSC	
4. Waiver Item (directive number, date, page, paragraph, etc.) Mortgagee Letter 2015-11, Option 1: HECM Loss Mitigation Repayment Plan, Section D. Unsuccessful Repayment Plan Performance, Bullets 1 (Partial Waiver) and 2. Relief Sought A temporary partial waiver of Mortgagee Letter 2015-11, that allows the Mortgagee to offer a Repayment Plan for unpaid property charges to HECM borrowers regardless of the total outstanding arrearage by waiving the phrase "if the outstanding arrearage is less than \$5,000" in bullet point 1 and waiving in its entirety bullet point 2 of Section D (Unsuccessful Repayment Plan Performance) under the section of the Mortgagee Letter entitled "Option 1: HECM Loss Mitigation Repayment Plan". This waiver will remain in effect through December 31, 2020.	
5. Did a check of SharePoint indicate Prior Approval of a factually similar waiver? <input checked="" type="checkbox"/> Yes (skip No. 6) <input type="checkbox"/> No (go to No. 6)	If previously approved, give Counsel's name and date of approval. Sherece Tolbert, April 2, 2020
6. Counsel Determination. The Waiver Proposal <b>does not conflict</b> <input checked="" type="checkbox"/> <b>conflicts</b> <input type="checkbox"/> with statutory or regulatory provisions (cite rule or provision)	

Counsel (signature) <b>Sherece Tolbert</b> Digitally signed by Sherece Tolbert Date: 2020.10.29 15:18:08 -04'00'	Date October 29, 2020
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7. Employee Justification (attach additional pages if necessary)

HECM borrowers continue to experience significant difficulties due to the COVID-19 National Emergency. This includes decreased income and reduced ability to move from their homes while protecting the public health. Given these constraints, HECM borrowers are unable to send repayment plan payments to their servicers timely in many cases. Under existing policy, when a borrower fails to make two consecutive payments on a HECM repayment plan the plan fails. Servicers can only offer the borrower a new repayment plan where the borrower's total arrearage is less than \$5,000. Because borrowers are unable deliver their payments to servicer timely due to COVID-19 related issues, this waiver would ensure that mortgagees can provide the borrower with another repayment plan.

This partial waiver will allow borrowers to repay property tax arrearages of any amount if the borrower is unable to make two consecutive payments during the COVID-19 National Emergency. This partial waiver builds on the previous partial waiver dated April 14, 2020, which expires on October 30, 2020. This partial waiver has an effective date through December 31, 2020 as the conditions warranting the partial waiver are still impacting HECM borrowers.

Effective as of the date signed by the Housing Director below.

Field Office Concurrence		
Name Elissa Saunders	Title Acting Director, Office of Single Family Asset Management	Date
8. <input checked="" type="checkbox"/> Granted <input type="checkbox"/> Not Granted	Housing Director (signature) <b>ELISSA SAUNDERS</b> Digitally signed by ELISSA SAUNDERS Date: 2020.10.30 08:42:43 -04'00'	Date October 30, 2020

Comments

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One copy to each of the following: Director, Organizational Policy, Planning and Analysis Division, Room 9116, HUD Headquarters, HRO  
Assistant General Counsel, Multifamily Mortgage Division, HUD Headquarters, Room 9230, CAHAA  
And one copy to either of the following: Office of the Deputy Assistant Secretary for Single Family Housing, Room 9282, HUD Headquarters, HU  
Office of the Deputy Assistant Secretary for Multifamily Housing, Room 6106, HUD Headquarters, HT