

# 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 (NSC)	2. Program and DAS (e.g., multifamily development) Single Family Housing
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3. Waiver Requested by (person, entity, HUD employee)  
Matt Martin, Director, NSC

4. Waiver Item (directive number, date, page, paragraph, etc.)  
ML 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 February 28, 2021.

5. Did a check of SharePoint indicate Prior Approval of a factually similar waiver?  Yes (skip No. 6)  No (go to No. 6) If previously approved, give Counsel's name and date of approval.  
Sherece Tolbert, October 29, 2020

6. Counsel Determination. The Waiver Proposal **does not conflict**  **conflicts**  with statutory or regulatory provisions (cite rule or provision)

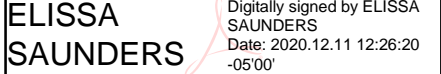
Counsel (signature)	 ELIZABETH DAVIS Digitally signed by ELIZABETH DAVIS Date: 2020.12.11 11:46:45 -05'00'	Date
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7. Employee Justification (attach additional pages if necessary)  
HECM borrowers continue to experience significant difficulties due to the COVID-19 National Emergency. Such difficulties include decreased income, as well as a reduced mobility, due to public health restrictions. Given these constraints, HECM borrowers are often unable to send timely repayment plan payments to their servicers. Under existing policy, when a borrower fails to make two consecutive payments on a HECM repayment plan, that plan fails. Servicers may only offer the borrower a new repayment plan where the borrower's total arrearage is less than \$5,000. Because borrowers have been unable to deliver timely payments to servicers due to COVID-19 related restrictions, this waiver ensures that mortgagees are able to provide borrowers with another repayment plan.  
This partial waiver will also allow borrowers to repay property tax arrearages of any amount, should the borrower be unable to make two consecutive payments during the COVID-19 National Emergency. This partial waiver builds on prior partial waivers, dated April 14, 2020, and October 30, 2020. This partial waiver has an effective date through February 28, 2020, as conditions warranting this partial waiver still impact HECM borrowers.

Field Office Concurrence

Name Elissa O. Saunders	Title Acting Director, Office of Single Family Asset Management	Date
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8.  Granted  Not Granted

Housing Director (signature)	 ELISSA SAUNDERS Digitally signed by ELISSA SAUNDERS Date: 2020.12.11 12:26:20 -05'00'	Date
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Comments  
Effective as of December 17, 2020.

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Distribution: (includes waivers granted and denied)  
Original to Field Office;  
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