# Thursday Afternoon Agenda and PowerPoint Slides

### **April 13, 2017**

1:30	Scorecards	Greg Nelms, Kent Koehler
2:30	Break	
3:05	Lender Site Visits	Dreama Walker, Greg Nelms
3:35	Interest Rate Reduction Refinancing Loan	Jeff Wilson
	Worksheet – Policy Clarification	
3:50	Open Forum	John Bell III, Chiefs
4:50	Closing Remarks	Mark Connors

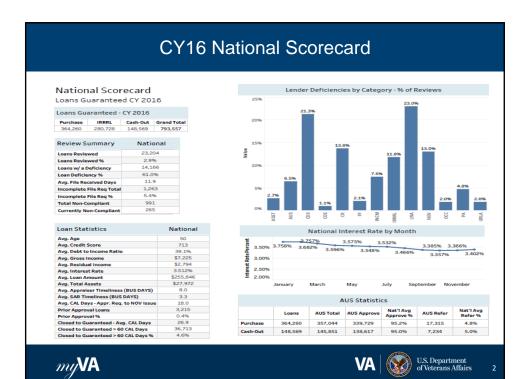


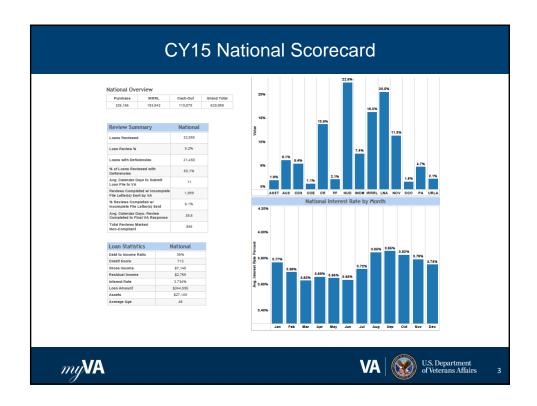
#### **The Lender Scorecard**

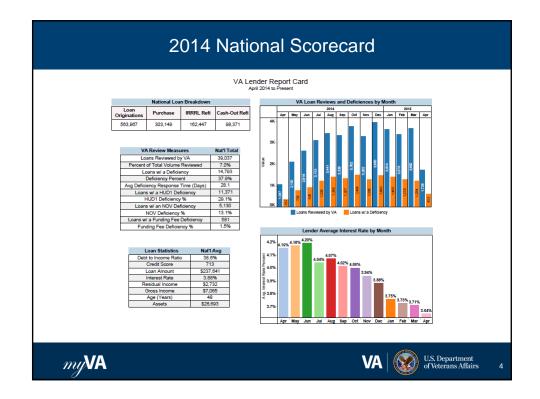
Kent Koehler, Loan Production Officer, St. Paul RLC Greg Nelms, Chief, Loan Policy, VA Central Office

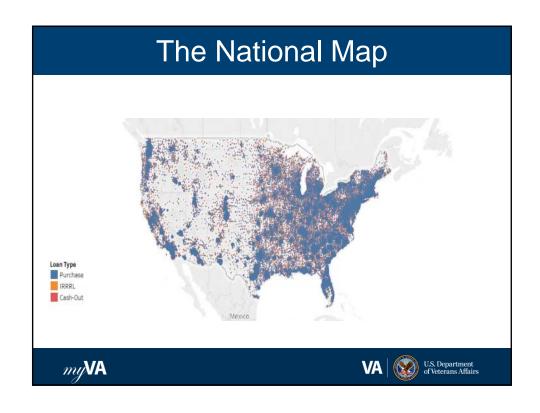
**Veterans Benefits Administration** 



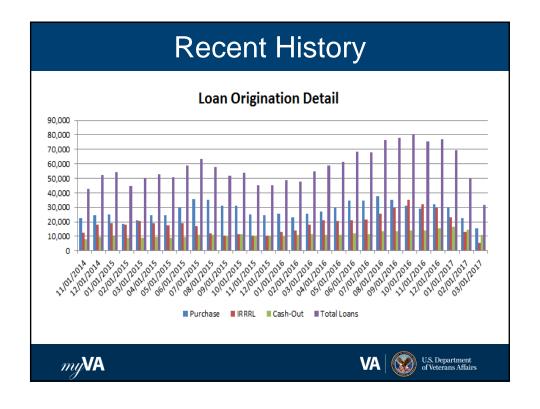


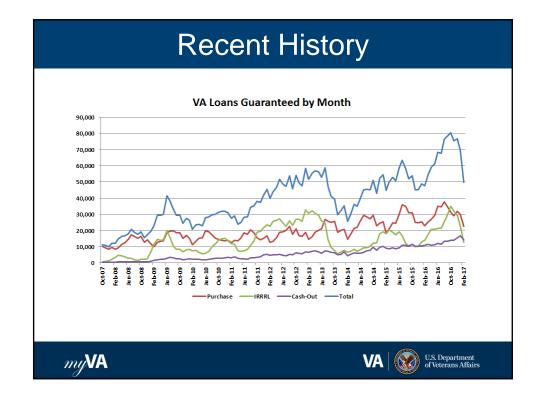


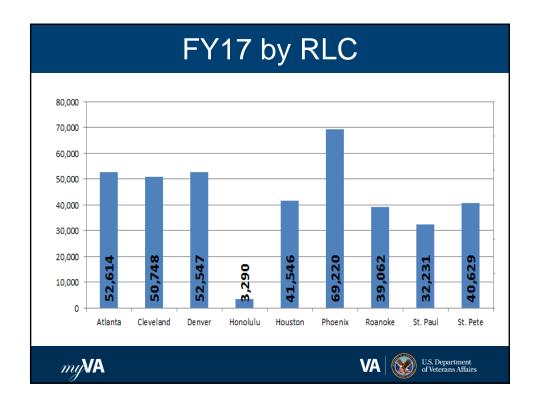


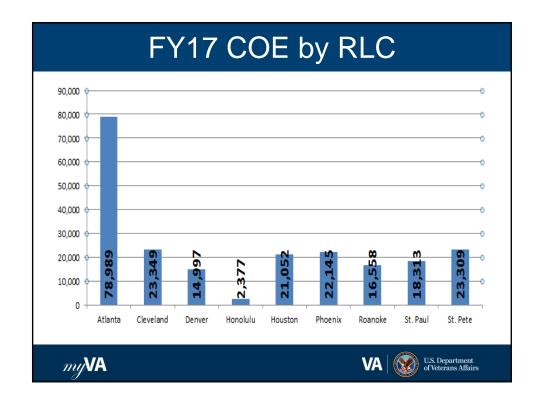














# Questions?

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### Loan Policy/Monitoring Unit

Greg Nelms Chief, Loan Production Dreama Walker Chief, Monitoring Unit

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### **Operational Audit**

- Pre-Audit Work by Auditors
- Quality Control (QC)
- SARS/Underwriters
- Declined Loans and Non-compliant files
- Marketing Materials
- Workload/Training/Branch Offices/etc.







# **Audit Timeline**

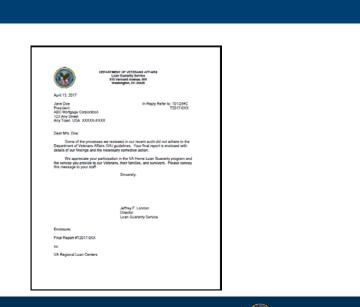
- Initial Contact 45-calendar days prior to site visit
- Auditors review pre-audit documentation
- Administrative Contact 7-calendar days prior to visit via email
- Requested Documentation Due within 3-calendar days of email
- Site Visit (Monday-Wednesday)
- Documents/Comments/Response Due 7-calendar days from exit briefing

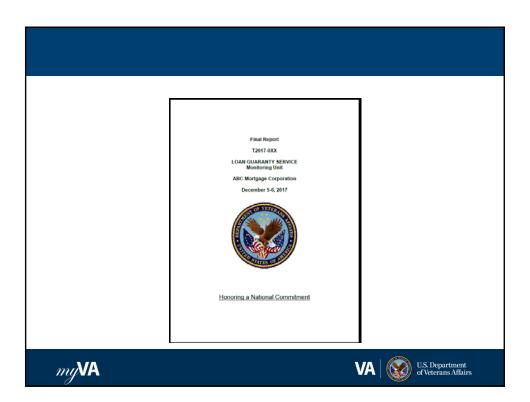


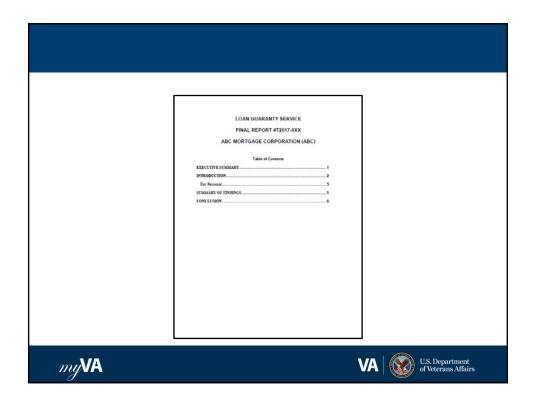
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#### EXECUTIVE SUMMARY

Action beats: Four <u>Gent Action beats</u> TASC was not meeting the requirements found in the VA Lender's Handbook, Chapter 1, Topic 15e, Element of a QC plan . Adequate Scope. Acceptant Enter 

Dest Action Name

Acceptant Enter 

Dest Action Interest 

Acceptant Enter 

Dest Action Enter 

Dest 
Dest

20 - Quality Control (QC) Loans 10 - LAPP QC Loans 10 - Declined Loans 5 - VA-Specific Marketing Materials







#### INTRODUCTION

ABC is a supervised lender owned by Any Bank. The home office is located at 123 Any Street. Any Town, USA: ABC has 17 branch offices nationwide.

Through November of fiscal year 2017, ABC originated 1,000 VA kons with an average lean amount of \$200,000. Included in these numbers were 100 interest Rate Reductions Reference Loans (RRFALS, with an average loan amount of \$200,000. Variety Reduction Reference Loans (RRFALS, with a superposition more) ABCs a participation in the VA home Loan program and its work in extending the benefit to up Reductive Veterians.

#### What is the Purpose of the Audit?

During Designer 4–9, 2017, the Mill conducted an audit at the office of AIDC for the purpose of lesting the design and efficiences of controls personing to the VA from regulations, politics, and presenters that have derive miseral legislate the legislations, politics, and presenters that have derive miseral legislate the VA home lane benefit. The audit was conducted in accordance with generally-accepted government auditing stantains.

The information contained in this report was collected through a review of relevant documents, interviews, and visual inspections of ABC's loan origination and LAPP processes and procedures. The stoppe of the audit prisonalizes includes, but is not limited to, the following major areas:

- Inheld U. The following rispor areas:

  Origination QC Plans (28 loans reviewed):

  Independent everes function

  Oogoe (10% or standout sampling method):
  Evidence of QC audits and results

  Management individuals and results

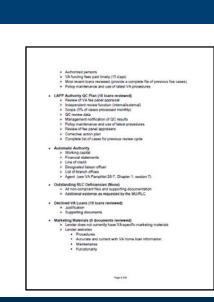
  Viviantification of ordination of QC results

  Viviantification of ordination of QC results

  Evidence of corrective action plans
  Communication of results to emplayers

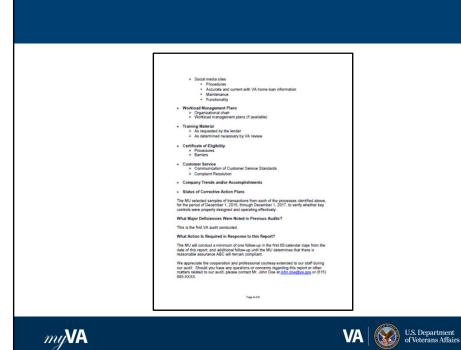


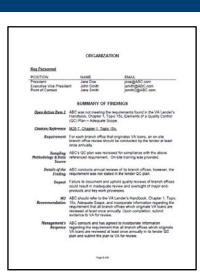






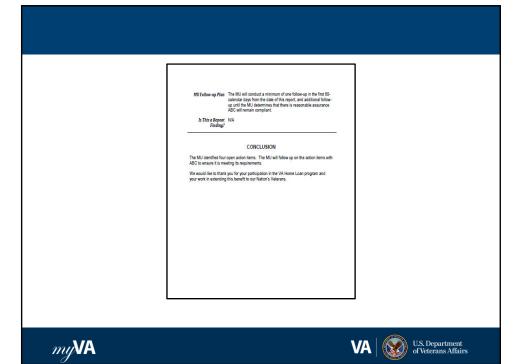






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#### Most Common Errors – QC Plans

Lender Handbook (26-7) Chapter 1: The Lender, Section 15 - Elements of a QC Plan. This policy requires certain provisions MUST be included in the lender's QC plan.

#### **Common Findings:**

- Section 15, c: Adequate Scope (Scope of audits or reviews be not less than 10% of all VA guaranteed mortgages, or if the volume exceeds 140 cases annually, a statistical sample of the total annual volume)
- Section 15, d: Management Notification (The QC plan must provide for written notification of deficiencies cited as a result of audits or reviews at least quarterly to the lender's senior management)







### **Quality Control - continued**

- Section 15, e: Corrective Action by Management (Employees be held accountable for performance failures or errors, and where patterns of deficiencies have been identified, corrective instructions be provided to all relevant employees, and file levels deficiencies must be cured)
- Section 15, f: Deficiencies Reported to VA (Require prompt reporting of any violation of law or regulation, false statements or program abuses by the lender, its employees or any other party to the transaction to the VA office of jurisdiction, and provide for furnishing audit or review findings to VA on demand) – Reported to RLC LGO/ALGO (Avoid reporting overlay deficiencies and report only VA guideline deficiencies)
- Section 15, I: Review of Loans (The QC plan must provide for the following on loans selected for review: Review of loans within 90 days of loan closing, <u>written</u> re-verification of borrower's employment, deposits, and all sources of funds, reordering of a new credit report from <u>another</u> credit source)





#### Most Common Errors - LAPP QC Plans

Lender Handbook (26-7) Chapter 1: The Lender, Section 15 -Elements of a QC Plan Section 15, C (For lenders participating in LAPP, reviews include the QC procedures)

QC plans MUST outline any LAPP QC procedures. Per Lender Handbook Chapter 13, section 1, every appraisal made for VA purposes **must** be reviewed by the lender's VA authorized staff appraisal reviewer (SAR) under the Lender Appraisal Processing Program (LAPP) in order to:

 Confirm that the photographs accurately reflect the appraiser's description of the subject and comparable properties







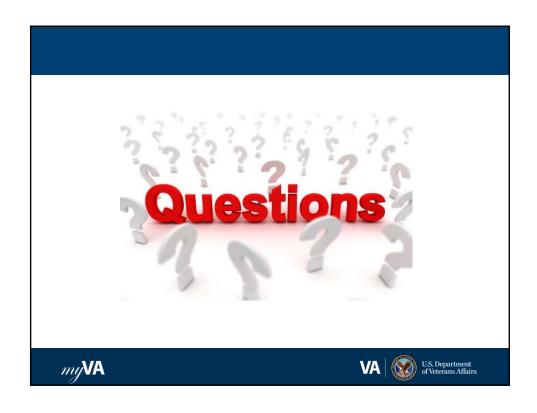
#### LAPP QC - continued

- Verify that the appraisal report is fully complete, clear and prepared according to industry-accepted appraisal techniques and VA instructions
- Determine that the appraiser's methodology is appropriate and that the appraiser's conclusions are consistent, sound, supportable, logical, and based upon data in the appraisal report
- Determine, through use of reasonably available information, that the appraiser's value recommendation and other conclusions are consistent with those in similar cases recently processed
- Identify all property-related conditions and requirements that must be satisfactorily resolved before the property can become the security for a VA guaranteed loan
- Issue a Notice of Value









## Thank You!!!

Thank you for helping us provide this important benefit to our Nation's Veterans!!!









### **VA Form 26-8923**

Jeff Wilson, Loan Guaranty Officer - Phoenix

**Veterans Benefits Administration** 



U.S. Department of Veterans Affairs

#### VA Circular 26-17-XX

### **Policy Clarification for VA Form 26-8923**

#### Line 1 specifics:

- This is limited to the precise calculation from the payoff statement including:
  - Principal balance
  - Accrued interest to the actual date of payoff
  - Recording charge or statement fee
  - Other charges related to the payoff
- Plus any energy efficient improvements

#### **Policy Clarification for VA Form 26-8923**

#### Line 2 specifics:

- This line is for a true principal reduction only.
- In cases where the borrower has the desire to reduce the loan and brings funds to close, use this block to reduce the total in Line 3.
- This line is not used to correct for any excess discount points that cannot be financed.

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#### VA Circular 26-17-XX

#### Policy Clarification for VA Form 26-8923

#### Line 5 specifics:

- This line is only for discount points that will be financed with the new IRRRL loan.
- No more than 2 discount points can be financed.
- In cases where the borrower has the desire to pay more than 2 discount points (within market norms) the excess is not included on this form.

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#### Policy Clarification for VA Form 26-8923

#### Line 8 specifics:

- Other allowable closing costs on this line must be calculated from line J of the LE minus the following:
  - Greater of Line 5 or total discount points listed in section A from the TRID LE
  - Other closing costs not allowed (over 1%)
  - Line 6 (origination fee)
  - Line 7 (funding fee)
- Total of line 8 must be calculated correctly from the TRID LE.







#### VA Circular 26-17-XX

#### Policy Clarification for VA Form 26-8923

#### Line 11 specifics:

- Line 11 will be the lesser of:
  - TRID LE discount points from section A
  - The same percentage from Line 5
- Line 11 must be calculated correctly or a refund may be required after closing on VA review.



### **Policy Clarification for VA Form 26-8923**

- The remainder of the form is self evident and no different than in the past.
- If you have a corrected LE that results in a changed circumstance to line J, then you must recalculate the 26-8923 at that time.
- The 26-8923 must match the LE as this is what will establish the maximum allowable loan.



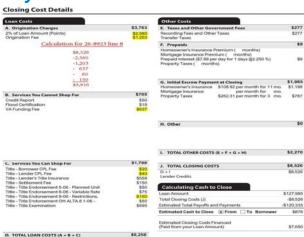


U.S. Department of Veterans Affairs

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#### VA Circular 26-17-XX

### **Policy Clarification for VA Form 26-8923**









#### Policy Clarification for VA Form 26-8923

#### INTEREST RATE REDUCTION REFINANCING LOAN WORKSHEET

RESPONDENT BURDEN. This information is needed to help you determine the appropriate amount of the VA-guaranteed loss you intend to process. Tile 38, Universelves, allows use to sak for this information. We estimate that you will need an average of 10 minutes to review the instructions. End the information, and the form VA cannot conduct or opened as collection of information mines a valsd ONE courted matter is objectly of You are not reprised to respect to a collection information in the same times a valsd ONE informed the properties of You and Control of Your Young You was not you will not

NOTE - Subm	it this form when requesting guaranty on an Interest Rate Reduction Refinancing Loan.	14-14-6-0		
	SECTION I - INITIAL COMPUTATION	100000000000000000000000000000000000000		
LINE NO.	ITEM		AMOUNT	
1.	EXISTING VA LOAN BALANCE (PLUS COST OF ENERGY EFFICIENT IMPROVEMENTS	s) s	120,350.89	
2.	SUBTRACT ANY CASH PAYMENT FROM VETERAN	-		
3.	TOTAL	\$	120,350.89	
	SECTION II - PRELIMINARY LOAN AMOUNT			
4.	ENTER TOTAL FROM LINE 3	s	120,350.89	
5.	ADD 2.00 % DISCOUNT BASED ON LINE 4	+	2,407.02	
6.	ADD 1.00 % ORIGINATION FEE BASED ON LINE 4	+	1,203.51	
T.	ADD 0.50 % FUNDING FEE BASED ON LINE 4	+	601.75	
8.	ADD OTHER ALLOWABLE CLOSING COSTS AND PREPAIDS	+	3,916.00	
9.	TOTAL	s	128,479.17	







#### VA Circular 26-17-XX

#### Policy Clarification for VA Form 26-8923

	SECTION III - FINAL COMPUTATION			
10.	ENTER TOTAL FROM LINE 9	\$ 128,479.17		
11.	ADD 2.00 % DISCOUNT BASED ON LINE 10	+ 2,569.58		
12.	SUBTOTAL	= 131,048.75		
13.	SUBTRACT AMOUNT SHOWN ON LINE 5	- 2,407.02		
14.	SUBTOTAL	= 128,641.74		
15.	SUBTRACT AMOUNT SHOWN ON LINE 7	- 601.75		
16.	SUBTOTAL	= 128,039.98		
17.	ADD 0.50 % FUNDING FEE BASED ON LINE 16	+ 640.20		
18.	TOTAL - MAXIMUM LOAN AMOUNT	\$ 128,680.18		

NOTE: \* MAXIMUM LOAN AMOUNT MAY BE ROUNDED OFF, BUT MUST ALWAYS BE ROUNDED DOWN TO AVOID CASH TO THE VETERAN. ROUND-OFF AMOUNTS OF LESS THAN \$50 DO NOT REQUIRE RECOMPUTATION. SIGNATURE AND TITLE OF OFFICER OF LENDER

VA FORM 26-8923

EXISTING STOCKS OF VA FORM 26-8923, SEP 2006, WILL BE USED.







# Questions?

**Veterans Benefits Administration** 



