

## MMC CARES Act Compliance Exam – Loan File Review Worksheet

### Instructions:

*The following procedures are designed to evaluate loan files for compliance with the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Regulation X and Regulation Z. This worksheet builds on the traditional “MMC Loan Servicing Exam Worksheet” to include procedures specific to the CARES Act. For example, these procedures ask examiners to verify that the company did not steer borrowers away from requesting a forbearance plan or offer shorter forbearance periods than allowed under the CARES Act.*

*It is recommended that examiners use this version of the servicing worksheet to review all loan files when conducting a review of CARES Act compliance. Special attention should be given to loan files in which borrowers requested assistance on or after March 2020 and loan files with a delinquent status as of March 2020.*

### CARES Act Information:

The [CARES Act](#) requires servicers of federally backed mortgages to grant forbearance to any requesting borrower who attests to a hardship related to the COVID-19 national emergency. The CARES Act specifies that servicers must grant an initial forbearance period of 180-days, followed by a second period of 180-days, if requested by the borrower. It has been widely accepted that the 180-day periods can be provided in shorter increments so long as the 180-day periods are available. Under the CARES Act, interest, late fees and penalties cannot be capitalized during the forbearance period.

The CARES Act also states that a servicer of a federally backed mortgage loan may not initiate any judicial or non-judicial foreclosure, move for a foreclosure judgment or order of sale, or execute a foreclosure-related eviction or foreclosure sale for not less than the 60-day period beginning on March 18, 2020. Furthermore, on June 17, 2020, the Federal Housing Finance Agency ([FHFA](#)) and Department of Housing and Urban Development ([HUD](#)) announced foreclosure and eviction moratoriums effectively freezing all foreclosures on loans federally backed by Fannie Mae, Freddie Mac and, FHA initially until August 31, 2020.

CSBS and the CFPB jointly issued [consumer guidance](#) and [industry guidance](#) to help borrowers and mortgage servicers navigate the processing of CARES Act forbearances. Additionally, the CFPB issued [Mortgage Servicing Rules FAQs related to the COVID-19 Emergency](#), which provides additional guidance on how the CARES Act forbearance requirements interact with loss mitigation and other requirements under Regulations X and Z.

The Multistate Mortgage Committee (MMC) has identified risks to consumers based on servicer implementation of the CARES Act. Examiners are to identify cases where servicers led borrowers away from beneficial options they are or were entitled to under the CARES Act. Examiners are to review the repayment options provided to each borrower once their forbearance period ended to ensure they were not steered towards a specific repayment option or provided fewer options than available. If consumer harm is identified, a review of the company’s policies and procedures will help identify the root causes of these issues.

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NMLS ID:

Onsite Exam Date:

Servicer:

Examiner:

## **(1) General Information: Promissory Note Review**

Borrower: \_\_\_\_\_ Co-Borrower: \_\_\_\_\_

Property Address: \_\_\_\_\_

Loan Number: \_\_\_\_\_ (this data should be pulled from the servicing system)



The information in this section should be compared to the servicing system data. Compliance should be indicated on the servicing compliance checklist page (Loan Boarding Section).

## **(2) Loan Origination Information: Promissory Note Review**

Interest Type: ARM  Fixed  Variable  Other  \_\_\_\_\_

Interest Rate: \_\_\_\_\_ ARM Ceiling \_\_\_\_\_ ARM Floor \_\_\_\_\_

Original Loan Date: \_\_\_\_\_ Boarding Date \_\_\_\_\_ Loan Amount: \_\_\_\_\_

Payment Structure: P&I \_\_\_\_\_ Tax/Insurance/MIP \_\_\_\_\_ Total \_\_\_\_\_



The information in this section should be compared to the servicing system data. Compliance should be indicated on the servicing compliance checklist page (Loan Boarding Section). If loan has been modified, servicer should still maintain Original Date of Loan & Original Amount of Loan.

## **(3) Loan Origination Information: Servicing System Review**

A) Type of Loan: FHA  VA  Fannie Mae  Freddie Mac  Portfolio  Other  \_\_\_\_\_

B) Lien Type: 1<sup>st</sup> Mortgage  2<sup>nd</sup> Mortgage  HELOC

C) Interest Application: Term/Amortizing  Daily Simple Interest (DSI)  Interest Only Term \_\_\_\_\_

## **(4) Current Loan Information: Servicing System Review**

Loan Status: Current  Delinquency Status: 30 Days  60 Days  90+ Days  Paid In Full

Loss Mitigation Request Date \_\_\_\_\_ Date of LM Request Acknowledgement \_\_\_\_\_

CARES Act Forbearance Granted? Yes  No  Not Applicable  (Only federally backed loans are eligible for CARES Act forbearance relief.)

Date of LM Response \_\_\_\_\_ LM Approved  Denied  (See #10 for further details)

Pending Foreclosure  Date 45 day NOI to borrower \_\_\_\_\_ Date of FC Hearing \_\_\_\_\_

CARES Act Foreclosure Moratorium observed from March 18, 2020 to August 31, 2020? Yes  No  Not Applicable  (Only federally back loans are eligible for CARES Act foreclosure moratoriums. FHFA and

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HUD extended the hold on foreclosure for Fannie Mae, Freddie Mac, single family FHA loans and reverse mortgage HECM loans until August 31, 2020.)

Foreclosure Sale Date: \_\_\_\_\_ Active Bankruptcy  REO  Charge-Off

Principal Balance: \_\_\_\_\_ Due Date: \_\_\_\_\_

Current Investor: \_\_\_\_\_ Guarantor: \_\_\_\_\_ Coverage % (for MIP): \_\_\_\_\_

Is the servicer in compliance with regards to the following areas?    **Yes**                      **No**                      **N/A**

**(5) Servicing Transfer Related Disclosures – This section is only for loans boarded after Jan. 1<sup>st</sup>, 2009.**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| A. Servicing Transfer Notices:                                |                          |                          |                          |
| 1. Goodbye Letter (when sold or contracted to a sub-servicer) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Hello Letter   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Applicable State Costs and Fees Schedule                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Applicable State License and Complaint Information Notice  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(6) Loan Boarding: Data Integrity**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| A. Electronic Loan Data Matches Loan Documents |                          |                          |                          |
| B. Proper Electronic Transfer of Balances      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Escrow Accounts Accurately Established      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(7) Loan Servicing: Data Integrity**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| A. Timely and Accurate Interest Rate Adjustments <b>(ARM Loans Only)</b>   |                          |                          |                          |
| 1. Calculate each change date for accuracy on ARM worksheet & include with exam worksheet  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. IR/Payment Change Notification mailed to borrower?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Payment History Review  |                          |                          |                          |
| 1. Timely Posting of Payment   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Accurate Posting of Payment   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Late Charge Assessments   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Escrow Activity (Application & Disbursements)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Escrow Account Analysis   |                          |                          | <input type="checkbox"/> |
| 1. Most recent Yearly Total of T & I / 12 – verify monthly escrow amount adjusted accordingly within allowed cushion of 2 months T & I | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. If there was an surplus, was the refund given within 30 days of the “Date of Analysis”?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Was detail of escrow change sent within 30-45 days prior to the change? (Annual Escrow Account Statement)                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(8) Servicing Notices **REQUIRED** (for all years in scope period)**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| A. Annual Year End (1098) Statements                          |                          |                          |                          |
| B. Annual Privacy Notice (GLBA)                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b><u>When needed</u></b>                                     |                          |                          |                          |
| C. Statement of Fee explanation (LC’s, etc., see references ) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| 1. Were all fees incurred assessed within 45 days?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Was borrower notified of all assessed fees within 30 days of assessment?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Were all fees charged within the cost range that the Servicer last provided to the Commissioner? (See Fee Schedule) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Annual Disclosure – for conventional loans with PMI still in effect.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| E. Applicable State Notice of Un credited Funds (within 10 days)   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| F. Standard Delinquency Notices (see reference worksheet )   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Is the servicer in compliance with regards to the following areas?      Yes                      No                      N/A

**(9) Borrower Communications Properly Documented**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| A. Customer Service   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Borrower’s Qualified Written Inquiry   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Procedure in case of disputed accuracy   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Collections  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. Do the servicing/collection letters include (when needed the appropriate verbiage requiring disclosure regarding “attempting to collect a debt and that any information obtained may be used for that purpose.” ? (mini Miranda) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(10) Bankruptcy**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| A. Has automatic stay been violated? See #1 & 2 in references                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Has servicer attempted to collect any portions of the remaining balance that was discharged? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(11) Foreclosure Prevention (Loss Mitigation) (Additional Info to be added)**

**Did the borrower request loss mitigation assistance in March of 2020 or anytime thereafter during the COVID-19 national emergency? If, yes complete A through L of this section.**

**Did the borrower request loss mitigation assistance outside of the COVID-19 national emergency timeframe? If, yes complete A through C of this section.**

**If the borrower did not request loss mitigation assistance do not complete this section.**

**Before citing a violation please note the regulatory flexibility related to Reg. X and Reg. Z offered by the CFPB as of April 3, 2020 in the [Mortgage Servicing Rules FAQs related to the COVID-19 Emergency](#).**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| A. Good Faith – Loss Mitigation (see reference sheet)  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. Did servicer acknowledge (in writing) a borrower’s loss mitigation request no later than <b>10</b> business days after the request?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Did servicer respond to the request (above) no later than thirty ( <b>30</b> ) business days after the receipt of all information necessary from borrower to assess whether or not borrower qualifies for ANY loss mitigation programs offered by servicer? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Did servicer include in a final response denying a loss mitigation request the reason for the denial & contact information for a person @ servicer location with  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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authority to reconsider the denial?

4. Did the denial letter have in **“bold type”** & in print size as     
 large as the largest type on the letter: If you believe the loss mitigation request has been wrongly denied,  
 you may file a complaint with the MMC. **(STATUTES for 1 through 4 were effective June 1, 2010)**

5. Was the homeowner considered for other options?

6. Was the denial justified?

**B. Notices:**

1. Was a notice sent to borrower’s last known address sent at least 45 days before foreclosure  
 was initiated with the following information?

- a. An itemization of all past due amounts
- b. An itemization of any other charges to bring     
 the loan current
- c. A statement with possible options other than     
 foreclosure and options to discuss with certain entities
- d. Phone, address & other contact info for the     
 party authorized to attempt to work with borrower to avoid foreclosure
- e. Contact info for one or more HUD-approved     
 counseling agencies assisting borrowers to avoid foreclosure
- f. Contact info for the consumer complaint     
 section of the applicable state department

C. Review Final TIL to ensure amount financed is accurate     
 Comments \_\_\_\_\_

**CARES Act Forbearance**

D. Date of First Contact after March 1, 2020: \_\_\_\_\_

E. Method of First Contact after March 1, 2020: Form Submission  Telephone  Mail   
 E-Mail  Other  \_\_\_\_\_

F. Loan Status on Date of First Contact: Current  Delinquency Status: 30 Days  60 Days  
 90+ Days  120+

G. Did borrower request assistance or specifically request forbearance? Yes  No

1. If yes, date of request \_\_\_\_\_ (Note: Borrowers could request a CARES Act  
 Forbearance on or after March 27, 2020)

2. If yes, did borrower attest to having a COVID-19 related hardship? Yes  No

3. If no, did borrower describe a hardship that would otherwise have qualified for CARES Act  
 forbearance? Yes  No

Examples:

- Borrower asks about payment options because of unemployment or decreased wages.
- Borrower describes lost wages as a result of borrower or co-borrower contracting COVID-19.

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- H. If borrower requested forbearance before passage of the CARES Act, was standard forbearance granted? Yes  No
1. If yes, did servicer record information that reflects a COVID-19 related hardship? Yes  No
  2. If yes, did servicer contact borrower to alert borrower to CARES Act features, including the suspension of fees, penalties, and additional interest? Yes  No
  3. If no, did servicer waive fees, penalties, and/or capitalized interest? Yes  No
  4. If no, is there reason to believe the borrower would qualify for CARES Act forbearance? Yes  No
- I. Did the servicer ask for additional information related to the COVID-19 hardship? Yes  No
1. If yes,
    - a. Did servicer make clear additional information was not required for forbearance? Yes  No
    - b. Did servicer only process forbearance after non-essential questions were answered?  No
    - c. Was forbearance granted only after the additional information was provided? Yes  No
    - d. Did servicer require that additional information be provided in writing? Yes  No
    - e. Did servicer ask for information that is not included in Form 710<sup>1</sup>? Yes  No
- J. Was the forbearance granted for a period lasting fewer than 180-days? Yes  No
1. If yes, how many days was the initial forbearance period granted? \_\_\_\_\_
  2. If yes, what was the actual number of days of forbearance offered? \_\_\_\_\_
  3. If yes, was it made clear the borrower could request a 180-day period? Yes  No 
    - a. If no, review all applicable correspondence, call logs and complaint information (if available) to investigate whether borrowers were steered away from the 180-day forbearance period required by the CARES Act or otherwise sought to minimize the cost of a borrower with a COVID-19 related hardship. Servicers can provide forbearance periods of less than 180-days but must default to 180-days if borrowers do not agree to shorter terms. Moral suasion may not be used to steer borrowers away from 180-day forbearance periods or otherwise attempt to limit a borrower's rights under the CARES Act. While servicers are not afforded the ability to determine forbearance length based on the extent of a hardship, such information may be helpful in determining whether the servicer routinely provides forbearance periods that are unreasonably short compared to the CARES Act and hardships at hand. All loan files with forbearance periods shorter than 180 days should receive additional scrutiny from the examiner.
- K. Is there any indication that the borrower was placed into a forbearance plan without requesting forbearance? Yes  No

<sup>1</sup> <http://www.freddiemac.com/singlefamily/service/docs/form710.pdf>.

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- L. If the borrower set up automatic payments through an ACH authorization prior to entering forbearance, did the servicer pause automatic withdrawals from the borrower’s account during the forbearance period? Yes  No
1. If no, did the servicer address the error? Yes  No

Is the servicer in compliance with regards to the following areas?      Yes                      No                      N/A

**(12) REO (Real Estate Owned)**

Unless the servicer (or investor) plans to sue for any deficiency balance that may result, we will not be reviewing REO accounts.

**(13) Fair & Reasonable Fees**

- A. Were assessed charges fair & reasonable on:
- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 1. Active & discharged BKT accounts?      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Pending & recent foreclosure accounts? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(14) Payoff Requests**

- A. Payoff request requirements:
- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| 1. Issued within 10 days of request  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Payoff shows date prepared and amount of payoff for that day  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Includes breakdown of each charge or fee by type  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Includes per diem & any other related info needed to calculate payoff                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Includes location to where payment must be made and any limitation as to the authorized method of payment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Was a sole payoff request (within a six-month period) provided <b>without charge</b> ?                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(15) Paid-in-Full Transactions**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| A. Final Payment timely posted   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. Prepayment penalty assessed   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Documents released with the county in a timely manner. (within 30 days) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Escrow refund mailed in timely manner                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| G. Release of lien letter in file  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(16) Force Placed Insurance - This section is only if insurance was force placed 1/1/09 or later.**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| A. Notice sent to borrower advising of action taken  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B. No evidence in file that other coverage is in force   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| C. Forced place coverage does not exceed the last known coverage amount or does not exceed the value of the insurable improvements                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| D. Refund or credit for unearned premium if sufficient coverage is obtained (partial) or proof of no lapse of coverage is provided within 12 months. (Full Refund) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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- E. Has the property been determined to be in a flood zone
1. Date of determination \_\_\_\_\_
2. Was the borrower notified flood insurance was required
3. Date of Notification \_\_\_\_\_
4. Was flood insurance force placed
5. Effective date of force placed flood policy \_\_\_\_\_  
 (Cannot be less than 45 days of the notification to the borrower flood insurance must be purchased)

**(17) Records to be Maintained** - Cite if any needed documentation is not found in the file per applicable state requirements. A licensed mortgage servicer shall create and retain a file for each mortgage loan which it services, which shall contain, as applicable:

- (2) a copy of the original note and Deed of Trust;
- (3) a copy of any disclosures or notifications provided to the borrower required by State or Federal law;
- (4) a copy of all written requests for information received from the borrower and the servicer's response to such requests as required by State or Federal law;
- (5) a record of all payments received from the borrower which contains all information required to be provided to a borrower upon request
- (6) a copy of any bankruptcy plan approved in a proceeding filed by the borrower or a co-owner of the property subject to the mortgage;
- (7) a communications log, if maintained by the servicer, which documents all verbal communication with the borrower or the borrower's representative;
- (8) a record of all efforts by the servicer to comply with the duties required under G.S. 53-244.110(7) including all information utilized in the servicer's determination regarding loss mitigation proposals offered to the borrower;
- (9) a copy of all notices sent to the borrower related to any foreclosure proceeding filed against the encumbered property; and
- (10) records regarding the final disposition of the loan including a copy of any collateral release document, records of servicing transfers, charge-off information, or REO disposition.

**Item (3) - DISCLOSURES OR NOTIFICATIONS** THAT WERE SENT TO BORROWER (per the letter log or communication / notes log) BUT the MMC DID NOT FIND EVIDENCE OF (copies) IN THE BORROWER'S SERVICING FILES ARE TO BE LISTED IN THIS VIOLATION.

If there is no indication that the required disclosure or notification was sent to the borrower the violation would be listed for the particular statute that requires it, not here. The following are examples of required disclosures and notifications but we are not yet certain that this is a complete list.

**Required by Federal Law:**

**"Hello" or "Goodbye" letter** - 12 C.F.R. § 1024.33 (RESPA)

**ARM Interest Rate / Payment Change Disclosure** - 12 C.F.R. § 1026.9

**Annual Privacy Notice** - 15 U.S.C. § 6803(a) GLB Act

**1098 Mortgage Interest Statement** – Internal Revenue Code

**Annual Escrow Statement** - 24 C.F.R. 1024.17 (RESPA)

**Annual Disclosure** - 12 U.S.C. § 4903(a)(3) (HOPA) - Regarding borrower's cancellation rights of private mortgage insurance (for conventional loans with PMI still in effect)

**Required by State Law**

**Applicable State and Fees Schedule**

**Applicable State License and Complaint Information Notice**

**Applicable State Notice of Intent (NOI)**

**Applicable State Statement of Fee Explanation**





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**(20) Comments:**

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