

# **Making Home Affordable Data File User Guide**

*Version 10.0  
As of April 1, 2016*

## **Introduction**

In early 2009, President Obama announced the Making Home Affordable (MHA) Program to help families restructure or refinance their mortgages to avoid foreclosure. As part of this plan, the U.S. Department of the Treasury (Treasury) announced a national modification program for mortgages, the Home Affordable Modification Program<sup>SM</sup> (HAMP<sup>®</sup>). Under HAMP, participating servicers apply a uniform loan modification process to provide a borrower with sustainable monthly payments, which reduces the risk of default and possible foreclosure. Subsequently, Treasury introduced additional programs under the MHA Program including the Home Affordable Foreclosure Alternatives<sup>®</sup> Program (HAFA<sup>®</sup>), the Second Lien Modification Program<sup>SM</sup> (2MP<sup>SM</sup>), Treasury FHA-HAMP and RD-HAMP. Furthermore, in January 2012, Treasury announced enhancements to expand program eligibility to include an additional evaluation or “Tier.” The additional modification evaluation is referred to as HAMP “Tier 2,” while the existing HAMP modification is referred to as HAMP “Tier 1.” In July 2015 Treasury announced a “streamlined” loan modification process referred to as “Streamline HAMP.”

This user guide provides an overview of the lifecycle of the HAMP modification process, the HAFA process, the 2MP process and a presentation of data considerations when reviewing the Making Home Affordable Data File (Data File). Additional information about MHA policies and guidelines can be found at:

<http://www.treasury.gov/initiatives/financial-stability/Pages/default.aspx>  
and <http://www.HMPadmin.com>.

## **Purpose of this User Guide**

This MHA Data File User Guide, used in conjunction with the MHA Data File Data Dictionary, is a reference source that is intended to:

- help interested constituents use and interpret the data provided in the Data File; and
- describe data quality themes observed in the data.

Terms used but not defined in this User Guide shall be as defined in the Making Home Affordable Program Handbook for Servicers of Non-GSE Mortgages, available at:

<https://www.hmpadmin.com/portal/programs/guidance.jsp>.

## **Purpose of the MHA Data File**

As part of Treasury’s continued commitment to enhanced reporting and transparency, the Data File is made available to provide comprehensive data to researchers so that they may more fully understand the impact of the program. Treasury compiled the Data File from information provided

by mortgage servicers participating in the program, while adhering to strict privacy laws designed to protect homeowners' privacy rights. The Data File is updated monthly and is located online at: [http://www.treasury.gov/initiatives/financial-stability/reports/Pages/mha\\_publicfile.aspx](http://www.treasury.gov/initiatives/financial-stability/reports/Pages/mha_publicfile.aspx).

While this data is meant for responsible public use by interested parties, Treasury does not intend to provide validation of analysis to external parties.

This User Guide will be updated periodically as necessary. The most current available version is located online at the above URL.

## **MHA Data File Construct and Publication**

The Data File is available as a comma-separated value (".csv") file. The CSV format is generally convertible into and readable by almost all spreadsheets and database management systems.

The Data File consists of four data sets: the First Lien Loan Modification Data Set, the 2MP Data Set, the HAFA Data Set and the Net Present Value (NPV) Data Set (each, a Data Set):

- **First Lien Loan Modification Data Set.** Each record in this Data Set represents the most current information, as reported by participating servicers to Fannie Mae as the Program Administrator, on each modification of a first lien loan as it progresses through the stages of the modification process. This Data Set includes requests for modification that were not approved by servicers or not accepted by borrowers, trial modification setups, trial modification fallout, permanent modification setups, and permanent modification fallout. Also included in this data set are loans from other MHA programs such as those government loans modified under Treasury FHA-HAMP or Rural Housing Service Home Affordable Modification Program (RD-HAMP). Streamline HAMP data is currently not included in the MHA Data file.
- **Second Lien Loan Modification (2MP) Data Set.** Each record in this data set represents the most current information, as reported by participating servicers to the Program Administrator, on second lien loan modifications and both partial and full second lien extinguishments. Trial data for 2MP modifications is not included as trial period plans are not mandatory and only those loans that have become permanent are reported to the Program Administrator.
- **HAFA Data Set.** Each record in this data set represents the most current information, as reported by participating servicers to the Program Administrator, on a Short Sale or Deed-in-Lieu (DIL) as it progresses through the stages of the HAFA transaction. Included is data obtained at an agreement execution, property ownership transfer or termination of the agreement.
- **NPV Data Set.** Each record in this Data Set contains data inputs to, and results of, the NPV test performed by participating servicers at the point in time that the first lien loan was evaluated for the HAMP program. It is important to note that loans might not be evaluated for an NPV analysis if the loan fails to qualify for the program because of other

reasons, such as an ineligible date of origination. While each record in the NPV Data Set can be associated with a record in the First Lien Loan Modification Data Set, the converse is not the case. For those servicers that use Treasury's NPV portal, the last run on a related mortgage loan in the NPV portal is assumed to be the one used in the evaluation. The NPV test is not part of the eligibility criteria or evaluation process for 2MP, Treasury FHA-HAMP and RD-HAMP. Therefore, NPV data is not reported to the Program Administrator for these programs.

For the purposes of this disclosure, the First Lien Loan Modification Data Set, the 2MP Data Set, the HAFA Data Set and the NPV Data Set are further segregated into files sorted based on Property Region Codes (as defined below). An additional file will be created for each data set for those loans which do not have a value for Property Region Code. Also, a consolidated file will be created that encompasses all of the data from the eleven region files.

## **File Limitations**

### Privacy Considerations

The collection and use of the data contained in these files is subject to Federal privacy protection laws as well as restrictions in the MHA contracts with the servicers, which impact the overall content of the Data File. Treasury performed extensive analysis on compliance with these requirements, including the engagement of a third-party vendor to assist in the identification of potential risks to program participant privacy rights. Certain data attributes, such as social security number, borrower/co-borrower name and date of birth, have been excluded completely from this disclosure, while others, such as geographic location and exact number values, have been rounded or masked to protect individual participants.

### Geographical Limitations

The Data File masks property location to protect homeowner privacy. Based on volume and distribution of the modifications, the Data File limits geographic information to the related Metropolitan Statistical Area (MSA) or, in circumstances where the property does not reside in an MSA, or the property has not been geographically coded, the Data File provides the state code instead of MSA. Due to privacy considerations, it is not possible to provide loan-level information by zip code or Congressional district in this Data File.

### Property Region Codes

As previously referenced above, the First Lien Loan Modification Data Set, 2MP Data Set, HAFA Data Set and NPV Data Set are segregated into files based on geographical regions (Property Region Codes) as well as a combined region code file. Those codes are as follows:

<b>Property Region Code:</b>	<b>Localities Included:</b>
<b>Combined</b>	<b>All Geographic Regions</b>
East North Central	IL, IN, MI, OH, WI
East South Central	AL, KY, MS, TN
Middle Atlantic	NJ, NY, PA
Mountain	AZ, CO, ID, MT, NM, NV, UT, WY
New England	CT, MA, ME, NH, RI, VT
Pacific	AK, CA, HI, OR, WA
South Atlantic	DC, DE, FL, GA, MD, NC, SC, VA, WV
US National	GU, PR, VI
West North Central	IA, KS, MN, MO, ND, NE, SD
West South Central	AR, LA, OK, TX
No Geography	Includes those with no Property Region Code.

### Servicer Name Limitations

The mortgage servicer for each loan is not specified in the Data File. The terms of the contracts with MHA-participating servicers, known as the servicer participation agreements (posted online at the below URL), restrict disclosure of loan-level servicer information.

<http://www.treasury.gov/initiatives/financial-stability/TARP-Programs/housing/mha/Pages/contracts.aspx>

However, summary servicer performance information for the top servicers is provided in the MHA Program Performance Report, posted at: <http://www.treasury.gov/initiatives/financial-stability/reports/Pages/Making-Home-Affordable-Program-Performance-Report.aspx>

In addition, comprehensive MHA data (including information by servicer) is provided to program oversight entities and certain regulatory agencies responsible for overseeing fair lending laws.

### Government Monitoring Information

Applicants and homeowners in the MHA program are requested, but not required, to provide Government Monitoring Information (GMI) – that is, race and ethnicity information – as part of obtaining a modification under the MHA program. However, many homeowners choose not to provide GMI data.

### Data Quality and Completeness Considerations

Treasury relies on participating servicers to report accurate and timely information on MHA participants and activity. The information contained in these files is data as reported by servicers. There are various quality and completeness observations noted for the data contained in these files given the staged rollout of the MHA program requirements.

Treasury and its Program Administrator have, from the program’s inception, worked to identify data anomalies, with focus on the reporting of data elements used to calculate program financial

incentives. Beginning in the first quarter of 2010, strong data quality remediation efforts were implemented that focused on data related to incentive payments for permanent modifications. As part of this remediation effort, servicers were required to certify the data quality of the incentive-related data for permanent modifications reported to the Program Administrator. Treasury and its Program Administrator continue to work with servicers on data quality monitoring and remediation activities. As the data quality efforts are ongoing through the life of the program, issues may continue to be seen in the data. The most notable of those issues that may affect analysis of this data are described in “Key Data Quality Themes” in Appendix A.

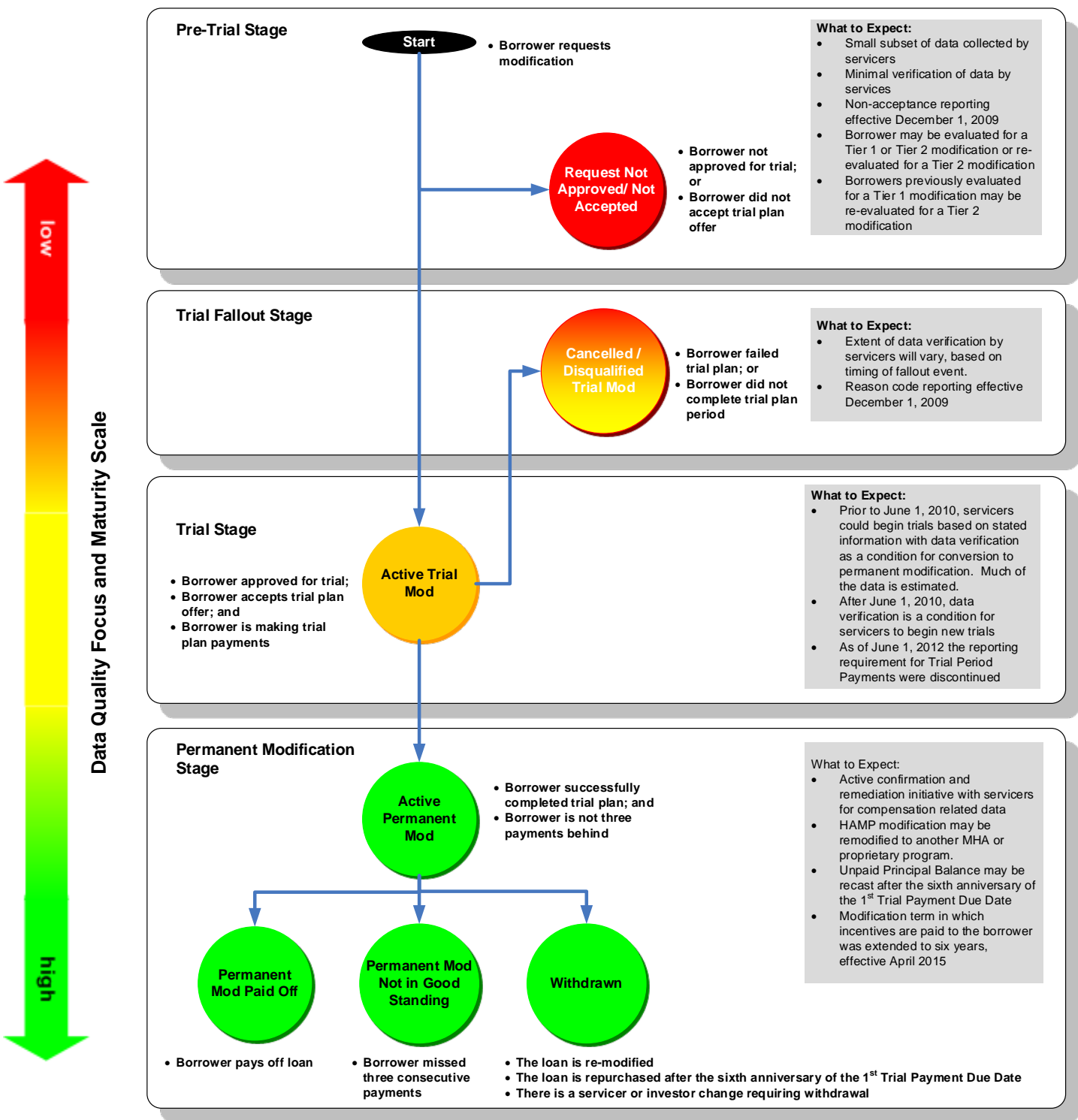
#### Collection and Reporting Date Limitations

Treasury guidelines require servicers to report GMI, NPV, trial not accepted/not approved (NANA) code and trial fallout data only for evaluations, trials and modifications after December 1, 2009. Consequently, a substantial portion of the entries in the MHA Data File do not contain this data, particularly for modifications completed before December 1, 2009.

The aggregation of loan-level data provided in the Data File may not match exactly with data provided by Treasury in its monthly MHA Program Performance Report or with other publicly available information due to the differences in reporting requirements.

## Exhibit A – The Life of a HAMP 1st Lien Modification

There are four major stages of a 1<sup>st</sup> Lien Modification as depicted below. Data availability and quality vary through the stages of the loan modification process.



### Pre-Trial Stage

For Tier 1 and Tier 2, a loan begins the Pre-Trial stage when a borrower requests a HAMP modification from his or her servicer. The servicer collects several types of data from the borrower to ensure the borrower and the loan meet basic HAMP eligibility criteria, then applies a series of waterfall steps as necessary to reduce the borrower's monthly mortgage payment to an acceptable percentage of the borrower's gross (pre-tax) income as defined in the Making Home Affordable Program Handbook.

A standardized NPV test is then used to analyze the cost/benefit of the loan modification to the investor. If a borrower is determined to be ineligible for HAMP or does not accept the Trial Period Plan (TPP), servicers are required to report the Trial NANA code to the Program Administrator and send the borrower a Non-Approval Notice. Changes in the borrower's circumstances and/or other considerations may elicit a re-evaluation of the borrower for the program, requiring continuous reporting updates to the loan information that reflect the latest evaluation data.

### Trial Fallout Stage

If a borrower fails to complete the TPP, the participating servicer is required to report the reason to the Program Administrator. It should be noted that the reasons for trial failures that occurred prior to December 1, 2009 were reported only at the discretion of the participating servicers. Those reason codes may not appear in the Data File. Appendix B lists the potential reasons why a borrower may not complete a TPP.

### Trial Period Plan Stage

Once a borrower is determined to be eligible, the servicer will offer a TPP. The homeowner must make the modified monthly mortgage payments on time and in full, during the trial period to demonstrate that the modified monthly payment will be sustainable.

### Permanent Modification Stage

Once a borrower successfully completes a TPP and a permanent modification is established, participating servicers are required to report permanent modification setup data to the Program Administrator. The loan setup file reflects the status of the loan after the final trial period payment is applied. The setup file also contains data for the current reporting period, which will include the prior month's unpaid principal balance.

Participating servicers begin reporting monthly payment activity in the month after the permanent modification is effective. Servicers must continue to report payment activity for all such loans on a monthly basis thereafter as long as the loan remains active under the Program. The modification terms of the loan can change after the sixth anniversary of the 1<sup>st</sup> Trial Payment Due Date as a result of a re-amortization or "recast" of a borrower's unpaid principal balance. The data reflects the original terms of the modification. The servicer or investor may withdraw a modification due to a re-modification, a repurchase after the sixth anniversary of the 1<sup>st</sup> Trial Payment Due Date, or a transfer to a new non-participating entity.

It should be noted that the current process for handling changes to investor data for 1st lien permanent modifications includes a cancellation of the active permanent modification, or a re-activation of the disqualified permanent modification, and a subsequent resubmission of the permanent modification with the revised investor information.

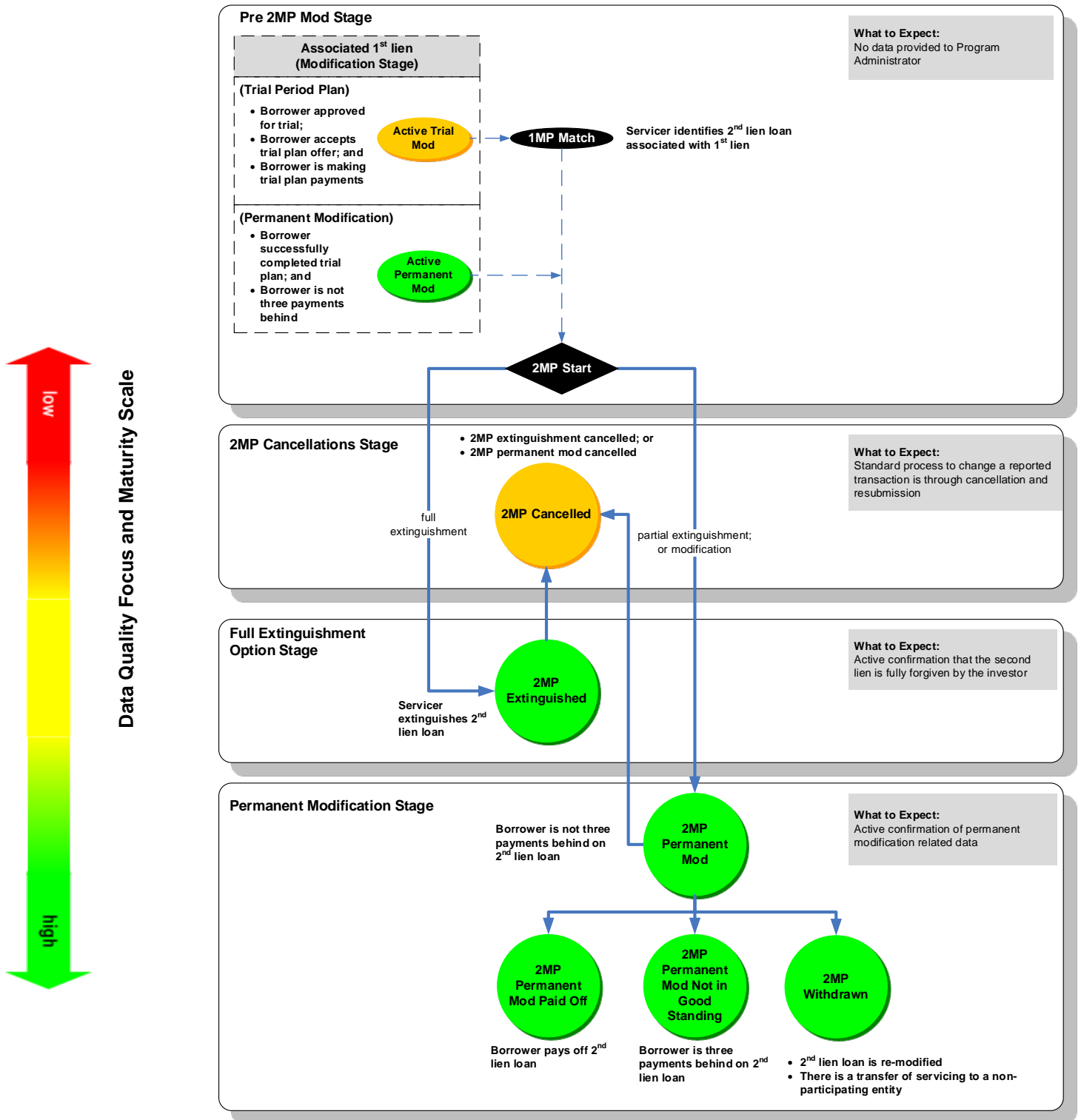


Additionally, the current process for handling corrections in scenarios where a modification record has been reported multiple times under different loan numbers or a Trial Period Plan was not actually initiated, requires servicers to report a status of Trial Cancelled with a Trial Fallout Reason of '18 – Submission Error Correction' for the modification record.

## Exhibit B– The Life of a 2MP Loan

The Second Lien Modification Program (2MP) provides a borrower with a modified first lien an option for modifying an eligible second lien loan.

There are four stages of a 2MP Modification as depicted below. Data availability and quality vary through the stages of the loan modification process.



## Pre 2MP Modification

When a borrower's first lien is modified, the 2MP servicer must offer to modify or extinguish the corresponding eligible second lien. The terms of the first lien modification will be used to determine the terms of the second lien 2MP modification.

## 2MP Cancellations

2MP servicers are required to report all 2MP cancellations using the appropriate reason code. It should be noted that cancellations are also used as a means to correct data previously reported to the Program Administrator. For loans requiring an update, a participating 2MP servicer must cancel the existing loan and resubmit the transaction using the correct data.

It should be noted that cancellations were previously also used as a means to transfer the servicing of 2MP modifications between servicers. However, as of August 2013, 2MP servicers can use existing system servicing transfer functionality to perform servicing transfers versus cancelling and resubmitting.

## Full Extinguishment Option

As an alternative to modifying an eligible second lien, a 2MP servicer may elect to extinguish the second lien. The extinguishment of the second lien may not become effective until the modification of the first lien becomes effective. Subsequent activity on the first lien modification will not impact a 2MP extinguishment that has been completed.

Full extinguishments must be reported in the month in which the full extinguishment is effective

## Permanent Modification

A 2MP permanent modification can become effective once the corresponding first lien permanent modification is effective and once the borrower has made all 2MP trial period payments, if required. 2MP servicers are required to follow the first lien modification steps to modify the second lien.

When applicable, a servicer may also offer a partial extinguishment of additional principal as part of the 2MP modification. This alternative can also be used instead of interest rate reduction.

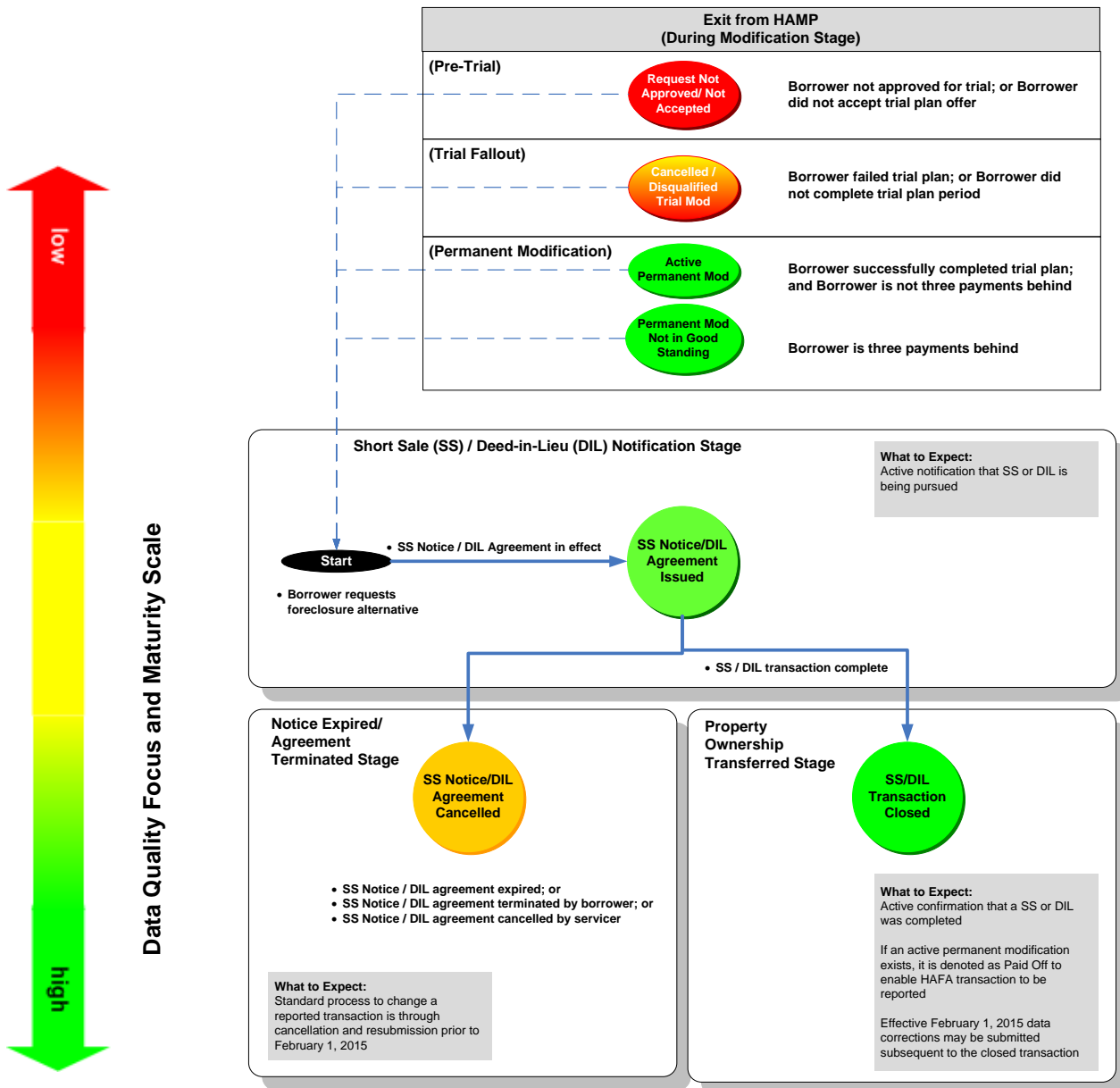
Servicers are required to report 2MP permanent modification transactions the month in which the 2MP modification is effective. Participating servicers are required to report monthly payment activity beginning in the first month after the 2MP permanent modification is effective. The servicer or investor may withdraw a modification due to a re-modification or a transfer of servicing to a non-participating entity.

Additionally, for instances where a 2MP modification was originally modified under a first lien HAMP Tier 1 modification that lost good standing, was re-modified or withdrawn, the 2MP modification is reinstated upon successful reporting of the re-modification, if applicable.

## Exhibit C – The Life of a HAFA

The HAFA Program provides eligible borrowers with the option of a short sale (SS) or a deed-in-lieu (DIL) of foreclosure as alternatives to foreclosure. Borrowers that meet the eligibility criteria for HAMP, but who are not offered a TPP, do not successfully complete a TPP, are in an active permanent modification or defaulted on a permanent HAMP modification may be evaluated for HAFA. HAMP eligible borrowers may also decline a HAMP modification and pursue a HAFA transaction. There are three major stages in the HAFA process as depicted below. Data availability and quality vary through the stages of the overall process.

Servicers participating in HAFA are required to report loan-level data at key milestones. Each of these milestones constitutes a separate data transmission.



#### Short Sale / Deed-in-Lieu Notification Stage

Servicers must report the loan-level notification data the month after a Short Sale Notice (SSN) or a DIL Agreement is issued. The notification must be submitted before a HAFA loan setup transaction can be processed.

#### Property Ownership Transferred Stage

A SS or DIL Loan Setup transaction is submitted to the Program Administrator the month after the property ownership is successfully transferred through a SS or DIL. An active HAFA Notification record with a matching HAMP Servicer Number and Servicer Loan Number must exist.

#### Notice Expired / Agreement Terminated Stage

A HAFA Cancellation transaction is submitted in the month after the SSN or the DIL Agreement expires or when the SSN or DIL Agreement is terminated by the servicer.

A cancellation submission must include the cancellation reason code. The list of Short Sale or DIL Cancellation Reason Codes that servicers must use is detailed in the MHA Data File Data Dictionary found in Appendix C.

It should be noted that the current process for handling a transfer of a HAFA transaction includes a loan cancellation by the transferor and a resubmission of the notification by the transferee. This could cause multiple instances of the same HAFA transaction appearing in the data file.

## Appendix A – Key Data Quality Themes and Observations

### Key Data Quality Themes and Observations

Throughout the course of the program, Treasury has undertaken several data initiatives to assess and improve the quality of data reported by the servicers to the Program Administrator. Participating servicers are required to maintain and report accurate records pertaining to MHA activity. To ensure that this is the case, the Program Administrator works with servicers to improve the quality of the existing reported data and additionally implements incremental program edits to prevent further data issues from occurring. As a result, MHA program data is continuously improving; however, data anomalies exist. These anomalies should be considered, as they could limit the usability of the data and/or affect data interpretation.

Some common themes among those anomalies are described below. Additionally, Appendix C includes details for the applicable attributes for each theme.

#### **Theme 1: Inconsistent Data Formats Reported**

**Definition:** As described in the Data Dictionary attached hereto as Appendix C, program guidelines specify all percentages are to be reported as integer. Due to the various external reporting systems and data entry methods, data are sometimes reported as decimals causing inconsistent formats across the data.

**Example:** A Mark to Market LTV of 152% is reported as ‘1.52’, (decimal) instead of ‘152’, (integer).

#### **Theme 2: Unreasonable Data Ranges**

**Definition:** As described in the Data Dictionary and program guidelines, data reported are not within a reasonable range when compared to values for other modification attributes or expected guidelines. Outliers exist for some of the data elements identified in Appendix C.

**Example:** Amortization Term before Modification is less than the Remaining Term before Modification.

#### **Theme 3: Misinterpretation of Data Requirements per Program Guidelines**

**Definition:** Data reported are not in compliance with the existing attribute definition or the expected timing of the data.

#### **Examples:**

- Association Dues/Fees before Modification is reported as an annual amount instead of a monthly amount during loan setup.
- Second lien modifications, which will have a step up after the five-year modification term, have been reported as fixed rate in the system of record.

#### **Theme 4: Default Values Are Reported When Data Is Not Available or Not Properly Set Up for Reporting.**

**Definition:** As a result of program changes and/or construction and limitations of external reporting systems, some data reporting may not be consistent with defined program parameters. As a result, in certain circumstances data may be reported with default values in order to allow activity to be entered into the system of record.

**Example:** Servicers may have implemented policy changes related to HAFAs borrower relocation assistance prior to the functionality being in place in the system of record. As a result, reported transaction dates may be adjusted to align to the effective date of the system revision.

#### **Theme 5: Data Inconsistencies When Compared Across Various Data Attributes or Data Sets**

**Definition:** There is a subset of data attributes across the data sets that, while similar in definition, may vary due to timing of reporting or purpose of collection. Any comparison of these cross data set attributes or use of cross data set attributes to perform recalculations of other attributes may produce unexpected results due to the difference in timing or purpose of the specific attributes.

##### **Examples:**

- Monthly Housing Expense before Modification = Principal and Interest Payment before Modification + Escrow Payment before Modification + Association Dues/Fees; or Principal and Interest before Modification from the NPV Data Set does not equal the Principal and Interest Payment before Modification from the First Lien Loan Modification Data Set.
- First Lien Step Schedule data reported does not align with expected policy variables. Examples such as the Interest Rate reported for the Final Step does not align with Maximum Interest Rate After Modification.

#### **Theme 6: Availability of Data**

**Definition:** With the evolution of the program, changes in reporting requirements often occur. Servicer implementation of new reporting requirements often lags adoption of policy changes. In addition, not all changes to program requirements require retroactive reporting. As a result, gaps may exist in modification data.

Refer to Appendix C for implementation specific conditionality.

**Example:** Trial Fallout Reason Code is blank for a cancelled trial modification with an effective date of October 1, 2010.

**Appendix B:  
MHA Reason Codes and Descriptions**

**HAMP Reason Codes**

MHA Reason Code		Description	HAMP Tier 1 Not Offered Reason Code	Trial Not Approved/ Not Accepted Reason Code	Trial Fallout Reason Code
1	Ineligible Mortgage	<p>Loan is not eligible for modification under the MHA program because it does not meet one or more of the following basic program eligibility criteria:</p> <ul style="list-style-type: none"> <li>• Mortgage loan must be a first lien mortgage loan originated on or before January 1, 2009.</li> <li>• Current unpaid principal balance (UPB) of the mortgage loan prior to capitalization must be no greater than \$729,750 for a one-unit property; \$934,200 for a two-unit property; \$1,129,250 for a three-unit property; or \$1,403,400 for a four-unit property.</li> <li>• Mortgage loan has been charged off and borrower released from liability for repayment.</li> </ul>	✓	✓	
2	Current DTI Less than 31%	Under HAMP Tier 1, borrower's current monthly housing expense, which includes the monthly principal and interest payment on their first lien mortgage loan plus property taxes, hazard insurance and homeowner's dues (if any) is less than or equal to 31% of their gross monthly income (i.e. monthly income before taxes and other deductions).	✓	✓	
3	Property Not Owner Occupied	Loan is not eligible for modification under HAMP Tier 1 because the property secured by the mortgage loan is not occupied by the borrower as their primary residence.	✓	✓	
4	Other Ineligible Property - Property Condemned, Property > 4 units	<p>Loan is not eligible for modification under the MHA program because:</p> <ul style="list-style-type: none"> <li>• The property secured by the mortgage loan is vacant (Tier 1 only),</li> <li>• The property is condemned or uninhabitable, or</li> <li>• The property has more than four dwelling units.</li> </ul>	✓	✓	



MHA Reason Code		Description	HAMP Tier 1 Not Offered Reason Code	Trial Not Approved/ Not Accepted Reason Code	Trial Fallout Reason Code
5	Investor Guarantor Not Participating	Loan cannot be modified under the MHA program because the investor of the subject mortgage loan has not provided contractual authority to modify the loan; the private mortgage insurance company insuring the subject mortgage loan has not approved the modification; or the guarantor of the subject mortgage loan has not approved the modification.	✓	✓	
6	Court/Public Official Declined	Loan is not eligible for modification under the MHA program because proposed modified terms were not approved by a court or public official.	✓	✓	
7	Negative NPV	Loan is not eligible for modification under the MHA program because the result of the standardized Net Present Value (NPV) test is “negative” and the investor has not authorized different thresholds. The standardized NPV test compares the NPV result for a modification to the NPV result for no modification. If the NPV result for no modification is greater than NPV result for the modification scenario, the modification result is deemed “negative”.	✓	✓	
8	Offer Not Accepted by Borrower / Request Withdrawn	Borrower withdrew their modification request for consideration for either a Trial Period Plan or HAMP Tier 1 or Tier 2 modification or did not accept either a Trial Period Plan or a HAMP Tier 1 or Tier 2 modification offer. Failure of borrower to make the <b>first</b> trial period payment in a timely manner is considered non-acceptance of the Trial Period Plan.  Effective April 1, 2016, servicers should not use this code for borrowers who fail to sign the permanent modification agreement, but should use MHA Reason Code 32, Modification documents not returned by borrower.	✓	✓	✓
9	Default Not Imminent - Default Status Not Eligible	Loan is not eligible for modification under the MHA program because: <ul style="list-style-type: none"> <li>• For HAMP Tier 1 or owner-occupied HAMP Tier 2: The subject loan is not delinquent and default is not reasonably foreseeable.</li> <li>• For rental property considered under HAMP Tier 2: The borrower has not missed two or more mortgage payments.</li> </ul>	✓	✓	
10	Property and/or Borrower Exceeds Allowable number of HAMP Modifications	Loan is not eligible for modification under the MHA program because the subject loan, borrower or co-borrower has received the maximum number of modifications permitted under the Home Affordable Modification Program.	✓	✓	
11	Loan Paid off	Loan is not eligible for modification under the MHA program because the subject loan was completely paid off and there is no longer a debt obligation or the subject loan was reinstated.	✓	✓	✓

MHA Reason Code		Description	HAMP Tier 1 Not Offered Reason Code	Trial Not Approved/ Not Accepted Reason Code	Trial Fallout Reason Code
12	Excessive Forbearance	Loan is not eligible for modification under HAMP Tier 1 because the principal forbearance required to achieve a payment of no more than 31% of the borrower's monthly income resulted in a forbearance amount that exceeds program guidelines.	✓	✓	
13	Request Incomplete	Borrower requested a modification under the MHA program but did not provide the documentation in a timely manner necessary for servicers to evaluate the borrower for HAMP Tier 1 or Tier 2. Servicers are required to provide the borrower with a notice listing all documents needed to complete the evaluation and dates by which the information must be received. If the borrower fails to provide all required verification documentation by the date provided, the servicer is unable to offer a modification.  Effective April 1, 2016, servicers should not use this code for borrowers who fail to sign the permanent modification agreement, but should use MHA Reason Code 32, Modification documents not returned by borrower.	✓	✓	
14	Trial Plan Default	Borrower accepted a Trial Period Plan under the MHA program but failed to make all the trial period payments in accordance with the Trial Period Plan			✓
18	Submission Error Correction (incorrect transaction type)	A HAMP Trial or 2MP Modification was not initiated or a record already exists in the HAMP Reporting System with the most current data for this loan.	✓	✓	✓
19	Unemployment Forbearance Plan	Borrower accepted a Trial Period Plan under the MHA Program however prior to receiving a permanent modification has become unemployed and qualified for an unemployment forbearance program.	✓	✓	✓
20	Federally Declared Disaster	Borrower accepted a Trial Period Plan under the MHA program however prior to receiving a permanent modification has been affected by a Federally Declared Disaster that has qualified them for a forbearance period.	✓	✓	✓
21	Application Discrepancy	Borrower is in a Tier 1 or Tier 2 Trial Period Plan but there is a discrepancy in documentation that requires additional documentation, and borrower has not provided all the requested documentation to resolve the discrepancy. Trial Period Plan will be terminated if required documents are not received by the date set by the servicer.  Borrower is under consideration for a Tier 1 or Tier 2 Trial Period Plan, but there is a discrepancy in the provided documentation and additional documentation is needed to complete the review of the loan. The request for modification will be considered withdrawn if documentation is not received by the date set by the servicer.	✓	✓	✓

MHA Reason Code		Description	HAMP Tier 1 Not Offered Reason Code	Trial Not Approved/ Not Accepted Reason Code	Trial Fallout Reason Code
23	Waiver Cancellations	Servicer has been specifically granted permission to remove a loan from the HAMP Reporting System.			✓
24	Dodd Frank Certification Non-Compliance	Borrower did not meet the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act	✓	✓	✓
25	Ineligible Borrower	Borrower or a co-borrower own in excess of five single family properties exclusive of principal residence or the borrower of the loan or owner of the property is not a natural person, i.e., Corporation or LLC.	✓	✓	
26	Ineligible Rental Property	The property fails to satisfy the criteria of a rental property to receive a Home Affordable Modification because the property is a second home, is rented on a seasonal basis and not year-round, or the Rental Property Certification was not provided in the Request for Mortgage Assistance.		✓	
27	Insufficient Monthly Payment Reduction	Principal and interest payment of a potential modification cannot be reduced by the minimum standard defined for HAMP Tier 2 in the MHA Handbook.		✓	
28	Post-Modification DTI Outside Acceptable Range	Proposed modified monthly payment, which includes a modified monthly principal and interest payment on the first lien mortgage loan plus property taxes, hazard insurance premiums and homeowners dues (if any), is not within eligibility guidelines defined for HAMP Tier 2 in the MHA Handbook.		✓	
29	No Change in Circumstance	Borrower did not accept the offer of a Trial Period Plan or Home Affordable Modification; twelve months have not elapsed since borrower received a modification, and/or circumstances have not changed. Or borrower circumstances have not changed since previously being denied a Home Affordable Modification.	✓	✓	
30	Repurchase/Involuntary Transfer	<ul style="list-style-type: none"> <li>The loan lost good standing or was paid off prior to the effective date of the repurchase.</li> <li>The loan was transferred to a transferee that is not currently a SPA servicer and does not intend to become a AAA servicer.</li> </ul>			✓

MHA Reason Code		Description	HAMP Tier 1 Not Offered Reason Code	Trial Not Approved/ Not Accepted Reason Code	Trial Fallout Reason Code
31	Other Permanent HAMP Modification	HAMP Trial was cancelled due to the borrower being approved for another HAMP modification.			✓
32	Modification documents not returned by borrower.	Borrower did not provide the required permanent modification documents in a timely manner and has defaulted on the Trial Period Plan as a result.			✓

### FHA-HAMP and RD-HAMP Loan Modification Fallout Reason Codes

MHA Reason Code		Description
1	Ineligible Mortgage	<p>Loan is not eligible for modification under the MHA program because it does not meet one or more of the following basic program eligibility criteria:</p> <ul style="list-style-type: none"> <li>• Mortgage loan must be a first lien mortgage loan originated on or before January 1, 2009.</li> <li>• Current unpaid principal balance (UPB) of the mortgage loan prior to capitalization must be no greater than \$729,750 for a one-unit property; \$934,200 for a two-unit property; \$1,129,250 for a three-unit property; or \$1,403,400 for a four-unit property.</li> </ul> <p>Mortgage loan has been charged off and borrower released from liability for repayment.</p>
14	Trial Plan Default	Borrower accepted a Trial Period Plan under the MHA program but failed to make all the trial period payments in accordance with the Trial Period Plan
15	Data Correction	Servicer cancelled the modification in order to correct data.
16	Payor Request	The payor, which may be Treasury, Fannie Mae, or Freddie Mac, requested the modification be cancelled.
17	Compliance Request	MHA-Compliance requested the modification be cancelled.
18	Submission Error Correction (Incorrect Transaction Type)	A HAMP Trial or 2MP Modification was not initiated or a record already exists in the HAMP Reporting System with the most current data for this loan.

### 2MP Loan Modification Fallout Reason Codes

MHA Reason Code		Description
1	Ineligible Mortgage	<ul style="list-style-type: none"> <li>• Automatically assigned by the HAMP Reporting System whenever the corresponding first lien modification is cancelled, resulting in the cancellation of the 2MP modification.</li> <li>• Servicer has been granted permission from MHA to cancel the loan from the HAMP Reporting System.</li> </ul>
15	Data Correction	Servicer cancelled the modification in order to correct data.
16	Payor Request	The payor, which may be Treasury, Fannie Mae, or Freddie Mac, requested the modification be cancelled.
17	Compliance Request	MHA-Compliance requested the modification be cancelled.
18	Submission Error Correction (Incorrect Transaction Type)	A HAMP Trial or 2MP Modification was not initiated or a record already exists in the HAMP Reporting System with the most current data for this loan.

### Short Sale or Deed-in-Lieu Cancellation Reason Codes

MHA Reason Code		Description
1	Agreement Expiration	The amount of time allowed for execution of the SS or DIL agreement has ended.
2	Agreement Termination	The SS or DIL agreement was terminated because the terms of the SS or DIL agreement were not adhered to.
3	Notification Cancellation	Servicer cancelled the SS or DIL notification because it was submitted in error or a correction was needed.
4	Loan Setup Cancellation	Servicer cancelled the SS or DIL payment request because it was submitted in error or a correction was needed.
5	Servicing Transfer of HAMP Loan	Servicer cancelled the SS or DIL setup because the related HAMP Modification is in the process of being transferred to another servicer.
6	Payment of HAMP Loan	Property is not eligible for a SS or DIL under the MHA Program because the subject loan was completely paid off and there is no longer a debt obligation.
7	Other	Servicer cancelled the SS or DIL for a reason not of a type previously described.

## **Appendix C: MHA Data File Data Dictionary**

A data dictionary in a separate Excel workbook is provided for each data set (1<sup>st</sup> Lien Modification Data Set, 2<sup>nd</sup> Lien Modification Data Set, HAFA Data Set and NPV Data Set). Data elements in the dictionary are listed in order of the Order in File. Each data dictionary contains the following information:

- **Ref ID** - A unique reference identifier for the data element.
- **Order in File** - Indicates the order in which the data element appears in the file.
- **Name of Data Point** - The name of the data element as used in the file.
- **Business Name** - The business name of the data element.
- **Description** - The definition or business description of the data element.
- **Data Model Entity** - Identifies the entity in the MHA Program Data Model with which the data element is associated.
- **Calculation / Derivation** - Identifies any formula / calculation associated with the data element.
- **Source** - Indicates whether the data is reported by the servicer or generated by the system.
- **Data Type** - Identifies the format in which the data is provided and the character limit. For numeric data, the decimal precision is also specified.
- **Allowable Values** - Identified valid enumerations or data ranges, when applicable.
- **Conditionality** - Describes the condition under which data is available:
  - M = Mandatory. Data is always provided for each record in the file.
  - CR = Conditionally Required. Data is provided under the specified condition(s).
- **Data Quality Theme** - Identifies key data quality themes for the data element. Refer to the Government Data File User Guide Appendix A for more detailed descriptions of each data quality theme.
- **Data Quality Observations** - Identifies key data observations as the data element relates to the Data Quality Theme, mentioned above.

## Key Technical Specifications

The table below lists key technical specifications for the 1<sup>st</sup> Lien Modification Data Set, the 2<sup>nd</sup> Lien Modification Data Set, the Home Affordability Foreclosure Alternative Data Set, and the NPV Data Set of the MHA Data File (Data File).

	1 <sup>st</sup> Lien Modification Data Set	2 <sup>nd</sup> Lien Modification Data Set	Home Affordability Foreclosure Alternative (HAFA) Data Set	Net Present Value (NPV) Data Set
<b>File Name:</b>	HMP_Public_User_Mod_Data_\$RegionCd_YYYYMMDD.csv, where YYYYMMDD is the reporting date and \$RegionCd = Property Region Code. (\$RegionCd = 99, when Property Region Code is unknown).	HMP_Public_User_2MP_Mod_Data_\$RegionCd_YYYYMMDD.csv, where YYYYMMDD is the reporting date and \$RegionCd = Property Region Code. (\$RegionCd = 99, when Property Region Code is unknown).	HMP_Public_User_HAFA_Mod_Data_\$RegionCd_YYYYMMDD.csv, where YYYYMMDD is the reporting date and \$RegionCd = Property Region Code. (\$RegionCd = 99, when Property Region Code is unknown).	HMP_Public_User_NPV_Data_\$RegionCd_YYYYMMDD, where YYYYMMDD is the reporting date and \$RegionCd = Property Region Code. (\$RegionCd = 99, when Property Region Code is unknown).
<b>File Character Type:</b>	ASCII	ASCII	ASCII	ASCII
<b>Primary Key:</b>	Financial Asset ID	MHA Loan ID	MHA Loan ID	Financial Asset ID
<b>Scope of File</b>	<ul style="list-style-type: none"> <li>Program Inception through date of the file</li> </ul>			
<b>File Structure Type:</b>	<ul style="list-style-type: none"> <li>Comma-separated format (csv) with double-quotes around each field</li> <li>If a data field has multiple values, e.g. Borrower Race Type Code , then the group of multiple values will be bounded by [   ]. The values within the group are pipe delimited, i.e., separated by  </li> </ul>			
<b>File Header:</b>	<ul style="list-style-type: none"> <li>First record is data file header record</li> <li>Contains the data element names in a comma-separated format with double-quotes around each name and listed in the same order as the data</li> </ul>			
<b>File Footer:</b>	<ul style="list-style-type: none"> <li>N/A (no footer on file)</li> </ul>			

## Making Home Affordable (MHA) Program Data Model

Exhibit D on page 23 depicts the Data File Data Model. Each data entity in the data model is a logical grouping of related data elements in the Data File that represent a concept within the MHA program. The primary or central data entity is 1<sup>st</sup> Lien Loan. Relationships between the data entities may be mandatory or optional; data relationships where the cardinality is depicted as [0:m] or [1:m] indicate repeating groups.

### Data Entity Descriptions:

- **1<sup>st</sup> Lien Modification** – Represents a 1<sup>st</sup> lien modification that was evaluated under HAMP, Treasury FHA-HAMP or RD-HAMP.
- **1<sup>st</sup> Lien Modification Status** - Indicates the status of the 1st lien modification under HAMP, Treasury FHA-HAMP or RD-HAMP. Includes the status of the last transaction submission reported by the servicer (Submission Status) as well as the current 1st lien modification status (Loan Modification Mode Code and Loan Status Code). Loan Modification Mode Code and Loan Status Code must be inspected together to understand the current status of the 1<sup>st</sup> lien

modification. The last transaction submission reported by the servicer (Submission Status) may not be the same as the current status of the 1<sup>st</sup> lien modification (Loan Modification Mode Code and Loan Status Code). Servicers report Permanent Cancellation Codes only on government loans modified under Treasury FHA-HAMP and RD-HAMP.

- **Subject Property Information** – Represents the residential property securing the mortgage loan.
- **1<sup>st</sup> Lien Trial Modification Information** – Information on the trial modification period under HAMP, Treasury FHA-HAMP and RD-HAMP. If the trial period is underway or was successfully completed, information on the date of the first trial payment received from the borrower will be available. If the trial was cancelled by the servicer, trial payment data will not be available. If the trial was not approved or was not accepted, reason codes will be available. However, if the trial was cancelled by the servicer, reason codes may not be available. Trial payment data may be available if reported by the servicers; however, the trial payment data reported by the servicer may not reflect the complete number of trial payments made by the borrower.
- **Borrower Information** - General information on the primary borrower. Does not include identifying information, such as name or social security number.
- **Borrower Race Data** - Information disclosed by the borrower.
- **Co-Borrower Information** - General information on the co-borrower. Does not include identifying information, such as name or social security number.
- **Co-Borrower Race Data** – Information disclosed by the co-borrower.
- **1<sup>st</sup> Lien Loan Characteristics Before Modification** – Describes key characteristics of the loan before modification under HAMP, Treasury FHA-HAMP or RD-HAMP.
- **1<sup>st</sup> Lien Loan Characteristics After Modification** – Describes key characteristics of the loan after modification under HAMP, Treasury FHA-HAMP or RD-HAMP.
- **Step Rate Schedule Data** – the rate schedule of the step rate product after modification of the 1<sup>st</sup> lien or 2<sup>nd</sup> lien loan.
- **1<sup>st</sup> Lien Permanent Modification Payment Information** – Represents the most recent monthly payment information reported by the servicer during the permanent modification. Does not represent the full payment history of the permanent modification.
- **Investor** – Represents the owner of the 1<sup>st</sup> lien modification, 2<sup>nd</sup> lien loan or short sale or deed-in-lieu.
- **MHA Program** – Indicates the MHA program or campaign for which the 1st lien loan, 2<sup>nd</sup> lien loan, or short sale or deed-in-lieu was evaluated was evaluated.
- **2<sup>nd</sup> Lien Modification** – Represents a 2nd lien loan that was modified or extinguished under 2MP.
- **2<sup>nd</sup> Lien Modification Status** – Indicates the status of the 2<sup>nd</sup> lien modification under 2MP. Includes the status of the last transaction submission reported by the servicer (Submission Status) as well as the current 2<sup>nd</sup> lien modification status (Loan Modification Mode and Loan Status Code). Loan Modification Mode Code and Loan Status Code must be inspected together to



understand the current status of the 2<sup>nd</sup> lien modification. The last transaction submission reported by the servicer (Submission Status) may not be the same as the current status of the 2<sup>nd</sup> lien loan modification (Loan Modification Mode and Loan Status Code).

- **2<sup>nd</sup> Lien Trial Modification Information** – Represents a 2<sup>nd</sup> lien loan that was modified or extinguished 2MP.
- **2<sup>nd</sup> Lien Loan Characteristics Before Modification** – Describes key characteristics of the 2<sup>nd</sup> lien loan before modification or extinguishment under 2MP.
- **2<sup>nd</sup> Lien Loan Characteristics After Modification** – key characteristics of the loan after modification under 2MP.
- **2<sup>nd</sup> Lien Permanent Modification Payment Information** – Describes key characteristics of the loan after modification under 2MP.
- **Short Sale / Deed In Lieu Information** – Information on the short sale or deed-in-lieu provided to the borrower as an alternative to foreclosure on an eligible 1<sup>st</sup> lien modification under HAMP.
- **Short Sale / Deed In Lieu Status** – Indicates the status of the short sale or deed-in-lieu. Includes the status of the last transaction submission reported by the servicer (Submission Status) as well as the current Short Sale/Deed In Lieu status (Loan Modification Mode Code and Loan Status Code). Loan Modification Mode Code and Loan Status Code must be inspected together to understand the current status of the Short Sale/Deed In Lieu. The last transaction submission reported by the servicer (Submission Status) may not be the same as the current status of the Short Sale/Deed In Lieu (Loan Modification Mode Code and Loan Status Code).
- **NPV Evaluation Information** – Describes key inputs to and results from the Net Present Value (NPV) test that may have been performed on the 1<sup>st</sup> lien loan as part of the eligibility process at the point in time when the loan was first evaluated for HAMP. Government loans evaluated under Treasury FHA-HAMP and RD-HAMP are not subject to the NPV test. Due to the point-in-time nature of the data in the NPV data set, the data in the NPV data set may not be consistent with more current data values reported in the 1<sup>st</sup> Lien Loan Modification Data Set.
- **Alternative (PRA) NPV Evaluation Information** - Describes key inputs to and results from the Alternative (PRA) scenario of the Net Present Value (NPV) test that may have been performed on the 1<sup>st</sup> lien loan as part of the eligibility process at the point in time when the loan was first evaluated for HAMP. Government loans evaluated under Treasury FHA-HAMP and RD-HAMP are not subject to the NPV test. Due to the point-in-time nature of the data in the NPV data set, the data in the NPV data set may not be consistent with more current data values reported in the 1<sup>st</sup> Lien Loan Modification Data Set.

## Exhibit D - MHA Program –Data File Data Model

