

Federal Home Loan Bank of Indianapolis

Subprime and Nontraditional Residential Mortgage Policy

Purpose and Intent

The Federal Home Loan Bank of Indianapolis (“FHLBI”) supports the expansion of fair and equitable home ownership opportunities. While the FHLBI does not originate mortgages, it does accept residential mortgage loans as collateral to support advances, and it purchases such whole loans and mortgage-backed securities (“MBS”) for its portfolio from time to time. The FHLBI recognizes that some of these portfolios could contain loans which would be considered subprime or nontraditional mortgages, depending on the definition of such loans.

The Bank recognizes that, in the process of serving its members and facilitating their mortgage lending activities, it must accept a small level of credit risk. It also recognizes, however, that subprime residential loans possess a higher risk profile than conforming loans. Because the market value of subprime loans may deteriorate more rapidly under economic stress than conforming loans, such loans are more vulnerable to losses. Nontraditional loans also possess a higher risk profile.

This policy was developed in response to Federal Housing Finance Agency’s Office of Supervision Advisory Bulletin 2007-AB-01 and establishes appropriate limits and mitigating controls for the Bank’s credit risk exposure to subprime and nontraditional residential mortgage loans in its member services products: Mortgage Purchase Program (“MPP”) and member collateral. This policy defines subprime and nontraditional residential mortgage loans as it applies to the FHLBI’s private label MBS portfolio, but all limitations, restrictions, and reporting requirements regarding the MBS portfolio are contained in the Risk Management Policy.

Board and Management Reporting

Member levels of estimated subprime or nontraditional mortgages pledged as collateral will be reported in aggregate to management and the Board on a semi-annual basis.

Definitions

The FHLBI recognizes that there is no industry accepted standard definition of a “subprime” or “nontraditional” mortgage; however, for purposes of this policy, the FHLBI will adopt the following definitions:

Subprime Mortgage

Subprime borrowers typically have weakened credit histories that include payment delinquencies and possibly more severe problems such as charge-offs, judgments, and bankruptcies. They may also display reduced repayment capacity as measured by credit scores, debt-to-income ratios, or other criteria that may encompass borrowers with incomplete credit histories. Subprime loans are loans to borrowers displaying one or more of these characteristics at the time of origination or purchase.

In an effort to avoid incorrectly identifying a prime loan as a subprime loan, a loan will be considered subprime under the following two conditions: First, absent additional mitigating or compensating factors, residential mortgage loans made to borrowers with FICO scores below 620. Second, absent additional mitigating or compensating factors, residential mortgage loans made to borrowers with FICO scores between 620 and 660 that include risk layering and adverse credit histories. Risk layering characteristics would include: debt-to-income ratios of 50% or greater, limited credit histories, and “reduced” or “stated” income documentation. Adverse credit histories include payment delinquencies, bankruptcies, charge offs or judgments.

Nontraditional Mortgage

Residential mortgage products that allow borrowers to defer payment of principal or interest, such as interest-only mortgages, payment-option mortgages, and negative amortization mortgages are considered nontraditional.

A mortgage or loan that is insured or guaranteed by the United States or any agency thereof, or otherwise is backed by the full faith and credit of the United States, and such insurance, guarantee or other backing is for the direct benefit of the holder of the mortgage or loan, will not be considered subprime or nontraditional.

Mortgage Purchase Program

The FHLBI’s MPP was approved by the Federal Housing Finance Agency (“FHFA”) to be an ‘A’ paper or prime mortgage loan program. The underwriting requirements of MPP have not diminished since inception of the program.

The FHLBI MPP was designed to manage credit risk for conventional loans largely through use of a Nationally Recognized Statistical Rating Organization (“NRSRO”) credit rating model. This model captures various risk characteristics to measure the expected credit risk in the portfolio of conventional loans purchased by FHLBI. The risk of loss to the FHLBI is minimized through a layered credit enhancement structure. Borrower equity, private mortgage insurance (“PMI”) (as applicable), the Lender Risk Account (“LRA”), and supplemental mortgage insurance (“SMI”) (as applicable) are in place prior to the FHLBI having exposure to credit loss risk.

Nontraditional and subprime conventional loans (as defined above) are not purchased by the FHLBI MPP. The MPP permits the purchase of FHA loans with low FICO scores only to the extent that such loans are insured by the FHA. Conventional loans acquired by MPP with FICO scores of 620 to 660 are not considered subprime due to other factors specific to the MPP. These factors include: a maximum LTV of 95%, AUS (Automated Underwriting System) standard approval (no expanded criteria permitted), and a fixed rate / fixed term product. The minimum AUS approval for MPP is 'Approve / Eligible' (DU) and 'Accept / Eligible' (LP). AUS approvals below that level, such as 'Refer' or 'Caution' do not qualify for purchase under the MPP.

Participation in MPP requires sellers to implement (or maintain) their own quality assurance ("QA") program to verify their compliance with investor underwriting and documentation requirements. FHLBI performs a periodic review of the seller's QA program to confirm the seller's compliance

Member Collateral

Mortgage Whole Loans

Management will diligently strive to identify the amount of subprime and/or nontraditional residential mortgage loans pledged as collateral by each member. Procedures for identifying and monitoring pledged subprime and nontraditional mortgage loans will be maintained in the Collateral Procedures Manual.

Members pledging residential mortgage loans that have subprime or nontraditional mortgage loan concentrations exceeding baseline levels established in the FHLBI's overcollateralization methodology will have overcollateralization requirements increased to reflect the higher credit and liquidity risk associated with the concentration amounts. Exceptions must be approved by the FHLBI Member Credit Committee and reported to the Credit Risk Committee. FHLBI total estimated exposure to subprime or nontraditional collateral cannot exceed 20% of residential loan collateral pledged by all members without Board approval.

MBS as collateral for advances:

The types of mortgage loans securing MBS and CMOs have broadened and, with greater frequency, include subprime loans and nontraditional mortgage products such as payment-option ARMS, reverse mortgages, and interest-only mortgages. Securities backed by subprime loans and nontraditional mortgage products can carry additional credit risk and reputational risk.

In order to reduce the likelihood of exposing itself to additional credit and reputation risk, the FHLBI will, through a sample, perform a quarterly review of collateral securing advances backed by non-agency or private MBS and CMOs.

In addition, members pledging private-label MBS or CMOs issued or acquired after July 10, 2007 will be required to obtain an enforceable representation and warranty from the issuer that the underlying residential mortgages included in the loan pools comply with interagency guidance (issued in 2006 and 2007 by federal banking agencies) or must be determined by the FHLBI that the underlying loans conform to interagency guidance. Furthermore, the member must certify receipt of and/or provide a copy of such representation and warranty to the FHLBI. Procedures for monitoring these types of pledged securities will be maintained in the Collateral Procedures Manual.

Requirements / Limitations

Members pledging residential loan portfolios with subprime or nontraditional mortgage loans concentration amounts exceeding 40% are subject to the following requirements:

1. Must execute standard Advances Pledge and Security Agreement ("APSA"), which places a lien on essentially all of the member's assets. Not eligible for specific lien-only agreement.
2. Must submit to comprehensive UCC-1 filing on all of the member's loans, receivables, and other financial assets, which legally perfects our interest in this collateral.,
3. Must operate under specific listings or physical possession collateral arrangement unless otherwise approved by the Member Credit Committee and reported to the Credit Risk Committee.
4. Subject to full, on-site risk reviews of residential mortgage collateral on an annual basis.
5. The member will be placed on the Credit Watch List and will be fully analyzed by our underwriting department for financial condition and trends on a quarterly basis. The member's examination reports will be reviewed and summarized as the reports are made available by the member's primary federal regulator.

Member Compliance

Periodic confirmation will be required from members subject to federal or state regulatory oversight that the member is complying with nontraditional residential mortgage and subprime mortgage lending guidance for loans originated or acquired after July 10, 2007.

Effective Date

This policy became effective on October 1, 2007.

This policy was first approved by the Federal Home Loan Bank of Indianapolis Board of Directors on June 14, 2007, effective June 30, 2007, and was amended on September 17, 2007, amended on July 25, 2008, Board annually reviewed on July 30, 2009, and amended on July 30, 2010.