

Criteria for Servicer Evaluations

Contents

Summary	1
Role of Servicers.....	2
Servicer Evaluation Rating Levels	2
Evaluation Process	3
Areas of Evaluation.....	3
Related Criteria and Research.....	7

Summary

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Servicing is an essential part of structured finance transactions. Servicers perform functions like processing payments, mitigating delinquencies and maximizing recoveries, which can significantly affect the transactional performance and repayment of rated securities. To assist investors and market participants in assessing a servicer's ability and effectiveness, CSPI Ratings offers a servicer evaluation rating that provides an independent and standardized assessment of a servicer's ability to perform servicing and its management of operational risks.

CSPI Ratings' servicer evaluation ratings focus on the quality of the servicing operations rather than the creditworthiness of the servicer. Accordingly, CSPI Ratings' servicer evaluation ratings are distinct from CSPI Ratings' credit ratings and are subject to different ratings criteria and scales. CSPI Ratings' servicer evaluation ratings are mainly assigned to servicers involved in securitized transactions. However, CSPI Ratings may also evaluate servicers that are not active in securitized transactions.

This article describes CSPI Ratings' approach to assigning servicer evaluation ratings, which assess a servicer's capabilities through an examination of various performance areas, within the context of the portfolio and servicing types. CSPI Ratings' servicer evaluation ratings rank servicers in the categories of residential mortgage, commercial mortgage and asset-backed. Within each category, a servicer evaluation rating is specific to a particular servicing role, which is typically divided into three types:

- Primary Servicers: servicers responsible for day-to-day servicing and performance monitoring of loans once the loans have been closed.
- Special Servicers: servicers which service delinquent or nonperforming loans.
- Master Servicers: servicers responsible for overseeing trust assets and reporting.

CSPI Ratings evaluates both quantitative and qualitative risk factors when assigning servicer evaluation ratings. The key performance areas assessed by CSPI Ratings include:

- Company Structure and Management
- Staff and Training
- Loan Administration
- Nonperforming Loan Management
- Procedures and Controls
- Outsourcing Vendor Arrangements
- Technology and Disaster Recovery
- Financial Condition

Based on the results of the assessment, CSPI Ratings assigns the servicer's operation an evaluation rating of EXCEPTIONAL, GOOD, SATISFACTORY,

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WEAK and POOR, which indicates the strength of the servicer relative to other servicers performing the same servicing role in the same country or jurisdiction.

Role of Servicers

The servicer functions as an interface between obligors and investors. Its servicing quality has a direct impact on the cash flows of securitized collaterals and the performance of rated transactions. Servicers are responsible for, among other things, administrative functions like collecting and distributing funds, loan administration, asset and property administration, defaulted loan management, and information dissemination to market participants. CSPI Ratings' servicer evaluation ratings assess each aspect of the servicer based on its servicing type – primary servicer, master servicer, and special servicer. A summary of the key attributes associated with each of the servicing roles is provided below.

Primary Servicer

The primary servicer is responsible for all aspects of asset administration throughout the asset's lifetime. As the main contact for the obligor, the primary servicer processes payments, enforces reporting requirements, and provides customer services. The primary servicer also manages collections, mitigates losses and works out nonperforming loans. Primary servicing is generally performed by the originator, but the primary servicing function may be outsourced to third parties. Given the primary servicer is responsible for many servicing functions, CSPI Ratings' evaluation places emphasis on whether the primary servicer has the expertise, systems, procedures, and internal controls to effectively perform all the servicing functions.

Special Servicer

The special servicer is responsible for managing and resolving delinquent or nonperforming loans. The special servicer normally takes over the servicing of loans when certain performance triggers are triggered or the loans are nonperforming. Upon transfer of a loan to special servicing, the special servicer reviews the loan's status and establishes a resolution plan. Usually, there are various possible resolution strategies for a bad loan. The special servicer should devise and implement the resolution strategies that minimize losses to the trust while considering the interests of all bondholders. CSPI Ratings' servicer evaluations for the special servicer focus on the servicer's abilities in mitigating losses, maximizing recoveries, managing foreclosure and disposing nonperforming assets.

Master Servicer

The master servicer is responsible for overseeing the primary servicer, providing performance information to investors, delivering cash remittances to the trustee, interacting with the special servicer, and ensuring compliance with servicing agreements and regulatory requirements. In addition, the master servicer may be responsible for advancing scheduled payments to cover loan payment shortfalls. When evaluating the master servicer, CSPI Ratings places special emphasis on the processes and systems used by the master servicer to ensure efficient servicer oversight, accurate remittances and reporting, and effective determination of payment advances.

Servicer Evaluation Rating Levels

CSPI Ratings assigns the servicer evaluation ratings using a scale of five rating categories – EXCEPTIONAL, GOOD, SATISFACTORY, WEAK and POOR (see

Table 1).

CSPI Ratings also characterizes each servicer evaluation rating with an outlook, which represents an opinion on the potential revision of the rating for the intermediate-term servicing duration (approximately 6 to 24 months). There are four types of outlooks used by CSPI Ratings:

- Positive Outlook: rating may be raised
- Negative Outlook: rating may be lowered
- Stable Outlook: rating is not likely to change
- Evolving Outlook: rating may be raised or lowered

Table 1: Servicer Evaluation Rating Levels

Servicer Evaluation Rating	Description
EXCEPTIONAL	Servicers exhibit the highest servicing capacity, quality, and efficiency. These servicers may be characterized as companies that have a long-term stable servicing history, a proven track record of superior management, demonstrated expertise incorporating industry best practices, superior financial resources, advanced information technology, and excellent internal controls, policies and procedures.
GOOD	Servicers exhibit very high servicing capacity, quality and efficiency. These servicers may be characterized as companies that have a stable servicing history, a proven track record of strong management, demonstrated expertise incorporating sound industry practices, strong financial resources, well-established information technology, and strong internal controls, policies and procedures.
SATISFACTORY	Servicers exhibit proficient servicing capacity, quality, and efficiency. These servicers may be characterized as companies that have an acceptable servicing history, a proven track record of proficient management, demonstrated expertise in line with industry practices, adequate financial resources, sufficient information technology, and adequate internal controls, policies and procedures.
WEAK	Servicers exhibit a lack of servicing capacity, quality, and efficiency. These servicers may demonstrate some of the following characteristics: an unfavorable servicing history, weak management, limited experience, weak financial resources, deficient information technology, and limited internal controls, policies and procedures.
POOR	Servicers exhibit limited or no servicing capacity, quality, and efficiency. These servicers may demonstrate some of the following characteristics: poor servicing history, significant weaknesses in management, very limited or no experience, insufficient financial resources, significant deficiencies in information technology systems, and very limited or no internal controls, policies and procedures.

Evaluation Process

CSPI Ratings' servicer evaluation is mainly based on the analysis of information provided by the servicer and derived from on-site meetings with the servicer's management team. Before the on-site meetings, CSPI Ratings provides the servicer with a questionnaire that outlines the scope of the servicer evaluation and includes an information request for materials to be provided to us. Prior to the on-site meetings, CSPI Ratings conducts a preliminary review of the completed questionnaire and other material provided by the servicer.

Then, CSPI Ratings performs an on-site operational review of the servicer. During the on-site review, CSPI Ratings meets with the servicer's management and other professional staff to discuss the servicing capacities, processes, and controls. Typically, the on-site review includes a tour of facilities and review of system demonstrations. Through the on-site visits, CSPI Ratings seeks clarification on the servicer's responses to the questionnaire and obtains additional information on the servicer's operations.

CSPI Ratings reviews and analyzes the information gathered through the questionnaire and on-site visits. CSPI Ratings also considers information from other sources as appropriate. Based on the analysis of the collected information, a rating recommendation is presented to a servicer evaluation rating committee. Once the final servicer evaluation rating is assigned and the servicer decides to make it public, CSPI Ratings issues the servicer evaluation rating and outlook through a press release. After this, CSPI Ratings will publish a servicer evaluation rating report providing the rating analysis in greater detail.

CSPI Ratings conducts rating surveillance on an annual basis or more frequently in the event of material changes that may affect the servicer evaluation rating or outlook.

Areas of Evaluation

CSPI Ratings' servicer evaluation ratings assess the key areas critical to the servicer's ability, servicing quality and efficiency. We evaluate the company's structural effectiveness and management depth; the staff's expertise and professional experience; loan administration capabilities; the efficiency of nonperforming loan management; the scope and effectiveness of internal controls; the sufficiency of the servicer's financial condition; the adequacy and flexibility of outsourcing management; and the efficacy and security of the information technology environment. Each of these areas is discussed below along with some of the general expectations.

Company Structure and Management

Company structure and management experience are essential components of successful servicing. In our view, an effective management team combined with a well-designed organizational structure can significantly contribute to the servicing performance through efficient business planning and execution, and strategic responses to changes in market conditions.

CSPI Ratings assesses a servicer's management by reviewing the ability of its board and management as well as the management's experience in servicing assets. The management team's tenure in servicing companies indicates its expertise in conducting servicing activities. We generally expect a servicer's management team to have at least 10 years of relevant experience. CSPI Ratings also views favorably the management team that contributes to the development of industry best practices. CSPI Ratings takes into account the length of time that the senior management team has worked together, since we believe the core management team which has worked together for an extended period ensures consistency and continuity of strategy planning and execution.

CSPI Ratings evaluates whether a servicer's operational structure is appropriate for its servicing requirements, strategies, and risk profile. Typically, the highly rated servicer's operational structure should sufficiently support the servicer to perform servicing functions and mitigate potential risks. CSPI Ratings views favorably the organizational structure that promotes effective operations, ensures compliance with regulations and laws, and adapts to the servicer's portfolio and changing market environments.

Staffing and Training

CSPI Ratings assesses the servicer's ability to develop, motivate, and retain talent. We believe employee training is crucial in helping the servicer maintain a skilled workforce which is aware of loan servicing best practices. Well-rounded training programs not only expand the staff's knowledge and skills, but also motivate employees by dint of the fact that the company cares about their personal development. To motivate its staff, the servicer should provide appropriate compensation plans and opportunities for career advancement. In our view, well-trained and motivated staff generally contributes to higher productivity and facilitates better servicing.

CSPI Ratings reviews the scope and relevance of employee training programs. We expect the programs to be comprehensive, that include training on servicing practices, risk management, compliance, soft skills and technology. However, the level and method of training should depend on the servicer's size, knowledge base, and servicing requirements. Generally, servicers that have a dedicated manager responsible for a formalized training function are viewed favorably.

We believe the turnover rate is also an indicator of organizational stability and management's ability to motivate staff. CSPI Ratings reviews the staff turnover rate and compares it with the average rate for similar servicers. In our view, both excessively high and low turnover imply management issues.

Staffing plans are typically assessed by workload and volume, and the servicer's reaction to workload changes. CSPI Ratings views favourably servicers that are able to reasonably forecast workloads, proactively respond to peak loads, and successfully react to unforeseen servicing work.

Loan Administration

A servicer's main function is to process payments and prevent loans from defaulting. As part of its evaluation, CSPI Ratings reviews the servicer's procedures and practices for new loan boarding, loan and collateral document tracking, payment processing, property and asset administration, investor reporting, advances, and property insurance administration. We expect a highly rated servicer to have efficient frameworks and effective risk controls for all its loan administration functions.

New Loan Boarding

Among the loan administration functions, new loan boarding involves establishing an accurate and complete loan record, and transferring the record onto the servicer's servicing system. CSPI Ratings assesses the servicer's practices and systems for ensuring the accuracy of data and documents. We expect that the servicer has effective controls on data input accuracy and efficient systems for completing the boarding process promptly. We view favorably automation of the boarding process since it generally improves loan-boarding efficiency and reduces errors.

Loan and Collateral Document Tracking

Accurate and complete loan documentation protects the lender's interests and lien position. CSPI Ratings reviews the servicer's document tracking by assessing the effectiveness of the servicer's procedures and systems for verifying the completeness of information and tracking missing documents.

Payment Processing

CSPI Ratings reviews the payment process to determine the efficiency of collecting and posting payments. We also examine the servicer's controls over fund movements and the timeliness of balance reconciliation. We view favorably servicers which receive payments electronically and automatically post them.

Property and Asset Administration

Property and asset administration are critical to the servicing of commercial mortgage loans and small balance commercial loans. When assessing a servicer's asset administration, we review the completeness and effectiveness of the servicer's procedures for monitoring portfolio performance. We examine administrative functions such as collecting and analyzing financial statements, conducting property inspections, tracking loan and transaction covenant compliance, maintaining a watchlist of potential problem loans, monitoring property insurance, and mitigating delinquencies.

Investor Reporting

As part of the assessment of servicer's investor reporting capacity, we review the servicer's performance in terms of the timeliness, accuracy, and completeness of reporting information as well as remitting funds. We expect the servicer to have effective policies and procedures to control potential errors related to information reports and fund remittances.

Advances

Servicers are sometimes required to advance funds for delinquent loan payments to ensure bondholders continue to receive scheduled payments. CSPI Ratings reviews the servicer's policies and procedures for advancing. We expect that the servicer follows clearly documented policies and approval procedures for determining advances on loan payment shortfalls. The policies and procedures should clearly state the conditions for authorizing advances and processes for their recoveries.

Property Insurance Administration

Property insurance administration is also very important for effective loan administration and operational risk management. When evaluating its property insurance administration, CSPI Ratings reviews the servicer's policies and procedures for monitoring property insurance coverage adequacy and policy renewal tracking. In the case that the servicer outsources the property insurance administration to a third party, we expect the servicer to be able to track information and activities using its own system.

Nonperforming Loan Management

The ultimate performance of the portfolio is directly impacted by the servicer's default management and loss mitigation strategies. While the special servicer is generally responsible for servicing nonperforming loans, the primary servicer may also perform an important role in the nonperforming loan management. The primary servicer usually manages the nonperforming loans before the loans are transferred to the special servicer under certain conditions. When evaluating the effectiveness of the servicer's nonperforming loan management, CSPI Ratings focuses on the servicer's relevant experience, skills and control procedures. We review how the resolution strategies are determined and implemented. We also assess the servicer's loss management outcomes based on loss severity and resolution timing.

For primary and master servicers, we place particular emphasis on the servicer's ability to identify potential problem loans and ascertain the borrower's ability and willingness to pay. We believe early detection and proactive loss management help prevent delinquency and reduce loss severity.

Special servicers are expected to have sufficient nonperforming loan servicing experience and skills. Since working out defaulted loans requires knowledge of local culture and legal systems, we view favorably servicers who have demonstrable experience and knowledge in the jurisdiction of the serviced portfolios.

There are many possible resolution strategies which may be adopted by the servicers. We are of the opinion that appropriate and effective strategies can reduce losses and contribute to successful loss mitigation. We expect that highly rated servicers are able to employ various workout strategies, such as loan modifications, repayment plans, discount payoffs, enforcement, foreclosure and bankruptcy.

CSPI Ratings assesses the servicer's asset resolution results, such as the recovery amount and timing. We examine the servicer's historical performance and recovery amount relative to the collateral value. By doing that, we attempt to identify the servicer's incremental contributions to the observed resolution results.

During the resolution process, servicers generally use third parties such as legal counsel, appraisers, and property managers. As part of its nonperforming loan management evaluation, CSPI Ratings examines the servicer's approval and management procedures for the appointment of the external parties.

Procedures and Controls

We believe well-documented policies and procedures provide the basis for consistent practices and effective quality control. Independent internal controls and audit processes can also help to monitor operational issues and mitigates risks. When assessing the servicer's operational risks, CSPI Ratings typically reviews the completeness of the servicer's policies and procedures, as well as the effectiveness and independence of its internal controls and audit processes.

We expect highly rated servicers to have detailed and well-documented policies and procedures for all major functional areas. We are of the opinion that well-designed policies and procedures ensure the quality, consistency and compliance of the servicing functions. Accordingly, we evaluate the quality of the policies and procedures as well as the compliance with legal and regulatory requirements. We also assess the process of drafting, reviewing, and updating policies and procedures.

We examine the findings raised in external and internal audit reports and management action plans. We believe independent and effective control functions ensure potential risks can be identified and resolved in a timely fashion. In addition, we review the procedures related to quality assurance, internal control and auditing. We believe more effective controls are likely to be implemented when the control functions are independent of each other.

Technology and Disaster Recovery

Technology is critical for the servicer to efficiently and accurately perform servicing duties. It assists the servicer in automating servicing functions, streamline working processes and disseminate portfolio information. CSPI Ratings reviews the systems and tools adopted by the servicer to assess the appropriateness and completeness of the technology being used. CSPI Ratings' technology review typically encompasses system functionality, information security, and the servicer's disaster recovery and business continuity plans.

CSPI Ratings generally asks the servicer to provide demonstration of its major systems and platforms during on-site meetings. When assessing the systems, we focus on system functionality and the degree of system integration. CSPI Ratings determines if the servicer is using appropriate technology in the context of the servicer's portfolio size and long-term strategy. Other than the main system, the servicer may need to use ancillary systems and databases to satisfy its servicing requirements. CSPI Ratings assesses the extent to which various individual systems are integrated to communicate information and improve efficiency. In addition, CSPI Ratings reviews the information security protocols and practices to ensure security of confidential information and data.

CSPI Ratings' technology evaluation also includes a review of the servicer's disaster recovery and business continuity plans. We expect the servicer to maintain viable and comprehensive disaster recovery and business continuity plans which are tested regularly. Highly rated servicers should have well-documented recovery procedures as well as backup systems and work locations to ensure continuity of the servicing functions in the event of natural disasters or other emergencies.

Outsourcing Vendor Arrangements

Use of outsourcing vendors provides the servicer with expertise and scale flexibility. When the servicer outsources its servicing processes, CSPI Ratings evaluates the vendor selection processes, the outsourcing agreements, the servicer's oversight and controls, and the servicer's contingency plans for replacing problematic vendors. We expect that the servicer has documented procedures for vendor selection and management. The outsourcing agreements should have well-defined incentives, penalties, and performance criteria to enable effective oversight of the vendors. In addition, the servicer is expected

to have knowledge of the outsourced processes and full control over the information. If there are potential issues on the outsourcing relationship, we expect the servicer to be able to replace the vendors or perform the functions inhouse.

Financial Condition

Although CSPI Ratings' servicer evaluation is not focused on the servicer's creditworthiness, its financial profile has a direct impact on the servicer's ability to retain management staff, respond to market challenges and finance investments to sustain or improve its servicing ability. CSPI Ratings assesses the servicer's financial profile to determine its stability and liquidity.

If the servicer is rated by CSPI Ratings, the rating would be used for the evaluation of its financial profile and converted to a financial condition score. If the servicer is not rated, CSPI Ratings would perform an internal assessment of the servicer's financial condition based on the servicer's annual reports, audited financial statements and other relevant information. A servicer evaluation rating would not be assigned to a servicer whose risk of insolvency over the next 12 to 18 months is very high.

Related Criteria and Research

- Rating Symbols and Definitions, 7 May 2018
- General Principles of Credit Ratings, 21 November 2017

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