

**All responses should refer to the official Lender Letters and Bulletins of the GSEs, along with any FAQs published. Only those items represent official guidance of the respective GSE and ALTA has obtained the answers to these questions and provided them to its members as a courtesy.**

Freddie Mac FAQs - <https://sf.freddiemac.com/faqs/covid-19-selling-faqs#title-closing-and-notarization>

Fannie Mae FAQs - <https://singlefamily.fanniemae.com/media/22326/display>

Fannie Mae RIN Job Aid - <https://singlefamily.fanniemae.com/media/22666/display>

1. RON: ASKED LIVE: Are Fannie and Freddie going to allow RON signed notes in the future? If so when, estimated timeframe, and what steps have to be taken to get there?
  - a. See Fannie Mae FAQ #63 and #64 and Freddie Mac, FAQ#2
  - b. For loans closed through the RON process, both wet signed and electronically signed Notes are permitted by the GSEs. Note that to deliver an electronically signed note, a lender must be approved to deliver eNotes.
  
2. RON: Is RON being used in New York and does the person signing have to be in New York?
  - a. New York is on the list of states where a notarization obtained by RON methods will be accepted. Lenders must ensure that the minimum standards and requirements are followed in obtaining the RON, including the notary public is licensed and physically located in the state where the notarial act occurred and, where required by law or regulation, is specifically licensed to perform a remote online notarization.
  
3. RON/RIN: ASKED LIVE: Are these minimum standards applicable ONLY to RON -- E-signed, Electronic Documents? Or also applicable to Wet-ink signed paper documents under an emergency order or RULONA 2018?
  - a. RON has minimum technology standards that are required in order for the loan to be GSE eligible.
  - b. For Fannie Mae, RIN has terms and conditions that must be met, and Fannie Mae has included best practices for the technology standards in order to ensure authentication, privacy, and integrity of the notarial ceremony.
    - i. See FM FAQ #60 and corresponding RIN Job Aid.
  - c. For Freddie Mac RIN requirements, see FAQ#6
  
4. RON: If the title company only has a requirement to keep the video record of the RON signing for 7 years but the lender requires access to the video record for the life of the loan (up to 30 years) doesn't the title company have to retain the record for 30 years?
  - a. For Fannie Mae, see FM FAQ #57
  - b. For Freddie Mac, see FAQ#5
  
5. RON: Once we provide a copy of the recording of the notarial ceremony isn't it the lender's responsibility to maintain their copy?
  - a. For Fannie Mae, See FM FAQ #57
  - b. For Freddie Mac, see FAQ#5
  
6. RON: It may be difficult for a title company to maintain the recording for the life of the loan. Also, some states have Executive Orders which require the notary to maintain a recording but require a shorter period of time. Is it okay for the title company/closing agent to provide a copy of the recording of the notarial act to the originating lender to maintain?

- a. For Fannie Mae, See FM FAQ #57
  - b. For Freddie Mac, see FAQ#5
7. RON: I thought the Remote online notaries had to keep records for 10 years regardless of who else keeps it.
  - a. See FM FAQ #57
  - b. For Freddie Mac, see Storage requirements in <https://guide.freddie.mac.com/app/guide/section/1401.16>
8. RON/GENERAL: What about the witness signing a deed; only the seller needs to sign, but Florida law requires witnesses on the deed?
  - a. GSE guidance and policies are only applicable to the lending documents.
9. RON: Regarding the storage of the recording of the notarial process: Do the vendors allow to download the recording so we may store on our protected servers or is there a fee we must pay to the vendors to keep the recordings?
  - a. Neither GSE directs this and only requires the lender to maintain, or cause to be maintained, the storage of the notarial process for the loans.
  - b. See FM FAQ #57 and Freddie Mac, FAQ #5
10. RON: If technology provider must retain record for 7 years under state law, but life of loan is far longer than that, then how can (or what happens) for Lender to have access for life of loan?
  - a. Neither GSE directs this and only requires a lender to maintain, or cause to be maintained, the storage of the notarial process for the loans.
  - b. See FM FAQ #57.
  - c. For Freddie Mac, see <https://guide.freddie.mac.com/app/guide/section/1401.16> and [FAQ#5](#)
11. RON: Jim mentioned that "RON" transactions are those that adhere to the specifics of Remote Online Notarization's, yet Brooke listed states where we could use RON. That list included Illinois, which only allows transactions adhering to the Governor's emergency order. Please advise. Thanks you.
  - a. For Fannie Mae, see FAQ #55
  - b. For Freddie Mac, see FAQ #3
12. RIN: ASKED LIVE: In a RIN notarization, if the borrower returns the signed document to the notary by postal mail or overnight delivery service, what date does the notary use for the notarial act?
  - a. It is up to a lender to review the state laws and comply with all laws, including the executive orders from governors, as part of their delivery of the loan. Note that the RIN policy is a temporary flexibility while RON is not.
13. RIN: If a state has RON and does not have an executive order to allow RIN, please confirm that using RIN is not an acceptable practice for Fannie and Freddie?
  - a. The GSEs have indicated they will accept RIN on a temporary basis in states where it is expressly permitted. It is up to a lender to review the state laws and comply with all laws as part of their delivery. Note that the RIN policy is a temporary flexibility while RON is not.

14. RON: ASKED LIVE: Can RON vendors not listed on the eClosing Technology Service Provider List be used on Fannie/Freddie loans?
  - a. Lenders are charged with complying with GSE guides for eligible delivery. The list of providers is provided as examples and not exhaustive or prescriptive.
  - b. For Freddie Mac- If eNote is included in the RON closing process, the eClosing technology used must be approved by Freddie Mac.
  
15. RIN: ANSWERED DURING PRESENT: Can RIN be used in a state without an emergency order or legislation allowing it?
  - a. The GSEs have indicated they will accept RIN on a temporary basis in states where it is expressly permitted. It is up to a lender to review the states laws and comply with all laws as part of their delivery. Note that the RIN policy is a temporary flexibility while RON is not.
  
16. RON: Is there some guidelines the RON companies will have to follow concerning updates? I had to have my first RON company change their system because they were not set up for Virginia with the KBA and ID verification, only KBA. They were not aware of the updates that came out from Fannie and Freddie stating both were required.
  - a. The GSE guides are public, along with Lender Letter and Bulletins, and can be accessed by anyone who would like to review the guidelines, minimum requirements, and terms and conditions. Lenders are charged with delivering the loans in compliance with the guides.
  
17. RIN: ASKED LIVE: In reference to RIN: If the signed documents are delivered to the notary via overnight service, is there going to be an issue with the notary date being at least one day later than the loan document and borrower signature date?
  - a. See above question 13.
  
18. RON/RIN: ANSWERED DURING PRESENT: It appears that two of the speakers contradicted each other. Can we use RON for wet sign mortgages or not?
  - a. See Fannie Mae FAQ #58. and Freddie Mac, see FAQ #1 and FAQ #2
  - b. One of the benefits of a RON transaction is that the notarized documents are signed electronically, and the notarial seal is applied electronically. However, any of the remaining documents in the closing package, including the note, can be signed in paper as part of the RON process, also known as a Hybrid RON. Only eNotes may be electronically signed and lenders must be approved to deliver eNotes.
  
19. RON: Please clarify who should be storing the A/V recording of the notarial ceremony and where stored, in order to meet the Lender access issue. How is this impacted relative to assignment?
  - a. For Fannie Mae see FAQ #57
  - b. For Freddie Mac see FAQ #5
  
20. RON: An initial slide had shown a Retention period for RON recordings of 7 years, but the Seller of a loan must maintain or have access to the signing ceremony for the life of the loan. It is unclear to me on the application of the 7 years.
  - a. There are two different standards mentioned. The minimum requirement references the system requirements, which require the system used to maintain the recording for the statutory minimum as prescribed by law, or at least 7 years. The lender has a

separate requirement which requires the lender to maintain, or cause to be maintained, the recording for the life of the loan.

For Fannie Mae, see FM FAQ #57.

For Freddie Mac, see <https://guide.freddie.mac.com/app/guide/section/1401.16> and [FAQ#5](#)