

Criteria Essentials – U.S. RMBS Rating Criteria

Published October 1, 2025.

Operational Risk Analysis

SERVICER RATINGS

Fitch rates residential mortgage servicers on a 1 to 5 scale and (+/-) modifiers. Servicers are rated by function and product type.

- Servicer functions include Primary, Master and Special
- Product types include 1st Liens, 2nd Liens, HELOCs, Manufacture Housing

ORIGINATOR/AGGREGATOR REVIEWS

Risk-based reviews of significant Originators and Aggregators on a pass/fail basis focusing on the following areas:

- Company Overview including History, Regulation, Licensing, Funding, etc.
- Management & Staff including Staffing Model, Leadership Team and Training
- Technology
- Business Operations including Sourcing Assets, Underwriting, Acquisition Management, Risk Management, etc.

REP & WARRANTY FRAMEWORK

Representations, Warranty and Enforcement framework is reviewed focusing on:

- Loan-level Reps & Warranties
- Sunset, Proximate Cause, Materiality and Knowledge Qualifier Provisions
- Loan File Review Procedure
- Dispute Resolution Procedure
- Enforcement Mechanics
- R&W Provider

Credit Risk Analysis

SUSTAINABLE HOME PRICES

Overvaluation is measured by comparing home price growth to Fitch's sustainable home price assumption, commonly referred as the Sustainable Market Value Decline (sMVD)

- Covers 412 MSAs and CMSAs
- Variables include Unemployment, Household Growth, Income, Rents and 30-Year Mortgage Rate
- Updated quarterly with new data
- sMVDs increase by Rating Case

LOAN LOSS MODELING

Loan-level default probability (PD) is based on a logistic regression using default observations on 50 million loans originated from 1991 to 2011. Loss severity (LS) is estimated using a probability-weight outcome analysis. *(see next page for more details)*

CASH FLOW MODELING

Fitch analyzes principal and interest payments to the notes across various scenarios using Intex Solutions software:

- Front, Mid and Back default timing
- Flat and Benchmark prepayment timing
- Up, Flat and Down interest rates movements, if applicable

Transaction & Legal Analysis

DOCUMENT REVIEW

Fitch reviews the Pooling & Servicer Agreement or Indenture Trust Agreement to ensure the transaction structure is consistent with the analytical assumptions. Key areas of focus include:

- Payment Waterfall Priorities
- Performance Triggers
- Net WAC definition
- Rated Final Maturity
- CE Floors
- IO, PO and Exchangeable Certificates

LEGAL REVIEW

Fitch reviews legal opinions in line with its global SF criteria. Opinions may include:

- True Sale Opinion
- Non-Consolidation Opinion
- Security Interest Opinion
- Safe Harbor Opinion

DILIGENCE REVIEWS

TPR firms grade Credit, Property and Compliance from A to D. TPR Review and Servicer Review components may include:

- Data Integrity, Property Valuation and Credit Underwriting Reviews
- Qualified Mortgage (QM) Designation
- TRID and Lending Law Compliance
- Collateral and Servicer File Reviews
- Updated Tax & Title Searches



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Criteria:

APPLICABLE CRITERIA

[U.S. RMBS Rating Criteria \(October 2025\)](#)

[U.S. RMBS Rating Criteria Supplemental Data File \(October 2025\)](#)

[Global Structured Finance Rating Criteria \(December 2025\)](#)

[Structured Finance and Covered Bonds Counterparty Criteria \(November 2023\)](#)

[Structured Finance and Covered Bonds Counterparty Criteria: Derivative Addendum \(November 2023\)](#)

[Structured Finance and Covered Bonds Interest Rate Stresses Rating Criteria \(October 2025\)](#)

[Structured Finance and Covered Bonds Country Risk Rating Criteria \(June 2025\)](#)

[Criteria for Rating Loan Servicers \(December 2025\)](#)

[Criteria for Rating U.S. and Canadian Residential and Small Balance Commercial Mortgage Servicers \(December 2025\)](#)

[Insurance-Linked Securities Rating Criteria \(June 2023\)](#)

[RMBS Lenders' Mortgage Insurance Rating Criteria \(January 2025\)](#)

[Non-Performing Loans Securitizations Rating Criteria \(November 2024\)](#)

Criteria Essentials – U.S. RMBS Loan Loss

Default Probability (PD) Framework

ORIGINATION PD MODEL

Logistic regression-based model generates life-of-loan PDs as of origination date. Replaces sLTV with OCLTV as a variable in the Base Case. Fourteen variables are used in the updated PD regression.

- Credit Score (FICO)
- Economic Risk Factor (ERF)
- Original Combined Loan-to-Value Ratio (OCLTV)
- Debt-to-Income Ratio (DTI)
- Number of Borrowers
- Property Value Ratio (PVR)
- Amortization Term
- Origination Channel
- Borrower Type
- Loan Purpose
- Loan Documentation Type
- Occupancy Type
- Self-Employed Borrower Flag
- Property Type

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SEASONED LOAN PD MODEL

Life-of-loan PDs are adjusted to reflect Remaining Life PDs using four updated performance and market variables. The payment history look-back period is shortened to 1-year since going back 2- or 3- years did not significant additional explanatory power.

- Current Loan Status
- Weighted Average Delinquency Score (WADQ)
- Mark-to-Market CLTV (MTM CLTV) Differential
- Loan Age

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PD ADJUSTMENTS

Analytical adjustments for risk factors not captured by the Origination PD or Seasoned Loan PD Models. Adjustments include:

- Payment Shock Loans
- DSCR Loans
- Foreign National Borrowers
- Negative Borrower Equity
- Step-Rate Loans
- Alternative Loan Documentation Types
- Cross-Collateralized Loans
- Loan U/W Defects
- Buy Down Loans
- Liquid Reserves
- CDFI Loans
- Default Interest Rates
- FICO Drift
- Modified Amort Term

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POOL-LEVEL PD ADJUSTMENTS

- Loan Count Concentration adjustment for portfolios with a Weighted Average Number (WAN) less than 200.
- Geographic Concentration adjustment for portfolios more concentrated than Fitch's model development data set.

Probability-Weighted Loss Severity (LS) Framework

CURE RATE ASSUMPTIONS

Accounts for scenarios where a Borrower defaults and cures without a loss. Cure rate is a function of:

- Base or Rating Case LTV variable
- Borrower Type
- Lien Position

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LIQUIDATION LOSS

Assumed losses due to foreclosure through disposition of the home, including:

- Base or Rating Case Property Value
- Distressed Sale Adjustment (DSA)
- Liquidation Costs
- Mortgage Insurance
- Loan-level LS Floors

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MODIFICATION LOSS

Losses to the securitization trust due to Loan Modifications. Fitch assumes:

- Principal forgiveness for LTV over 100%
- 1-Year of forgiven Interest payments

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LS ADJUSTMENTS

- LS Adjustments for TPR Observations, Findings and Underwriting Defects
- Pool-level LS Floors

Rating Case Parameters

Case	sMVD Floor	ERF Floor	Cat. Risk Prob.	Mod. Loss Prob.	Liquid. Time (mos)	Min. LS Floor
AAA	35%	2.25	10%	30.0%	36	20.0%
AA	30%	2.05	15%	37.5%	33	15.0%
A	24%	1.85	20%	45.0%	30	10.0%
BBB	18%	1.50	25%	50.0%	27	7.5%
BB	12%	1.25	30%	55.0%	24	5.0%
B	sMVD	1.00	35%	60.0%	21	2.5%
Base	NA	NA	50%	65.0%	18	0.0%