

## Criteria Essentials – U.S. RMBS Rating Criteria

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Operational Risk Analysis	Credit Risk Analysis	Transaction & Legal Analysis
<p><b>SERVICER RATINGS</b> Fitch rates residential mortgage servicers on a 1 to 5 scale and (+/-) modifiers. Servicers are rated by function and product type.</p> <ul style="list-style-type: none"> <li>• Servicer functions include Primary, Master and Special</li> <li>• Product types include 1st Liens, 2nd Liens, HELOCs, Manufacture Housing</li> </ul> <p><b>ORIGINATOR/AGGREGATOR REVIEWS</b> Risk-based reviews of significant Originators and Aggregators on a pass/fail basis focusing on the following areas:</p> <ul style="list-style-type: none"> <li>• Company Overview including History, Regulation, Licensing, Funding, etc.</li> <li>• Management &amp; Staff including Staffing Model, Leadership Team and Training</li> <li>• Technology</li> <li>• Business Operations including Sourcing Assets, Underwriting, Acquisition Management, Risk Management, etc.</li> </ul> <p><b>REP &amp; WARRANTY FRAMEWORK</b> Representations, Warranty and Enforcement framework is reviewed focusing on:</p> <ul style="list-style-type: none"> <li>• Loan-level Reps &amp; Warranties</li> <li>• Sunset, Proximate Cause, Materiality and Knowledge Qualifier Provisions</li> <li>• Loan File Review Procedure</li> <li>• Dispute Resolution Procedure</li> <li>• Enforcement Mechanics</li> <li>• R&amp;W Provider</li> </ul>	<p><b>SUSTAINABLE HOME PRICES</b> Overvaluation is measured by comparing home price growth to Fitch's sustainable home price assumption, commonly referred as the Sustainable Market Value Decline (sMVD)</p> <ul style="list-style-type: none"> <li>• Covers 412 MSAs and CMSAs</li> <li>• Variables include Unemployment, Household Growth, Income, Rents and 30-Year Mortgage Rate</li> <li>• Updated quarterly with new data</li> <li>• sMVDs increase by Rating Case</li> </ul> <p><b>LOAN LOSS MODELING</b> 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. <i>(see next page for more details)</i></p> <p><b>CASH FLOW MODELING</b> Fitch analyzes principal and interest payments to the notes across various scenarios using Intex Solutions software:</p> <ul style="list-style-type: none"> <li>• Front, Mid and Back default timing</li> <li>• Flat and Benchmark prepayment timing</li> <li>• Up, Flat and Down interest rates movements, if applicable</li> </ul>	<p><b>DOCUMENT REVIEW</b> Fitch reviews the Pooling &amp; Servicer Agreement or Indenture Trust Agreement to ensure the transaction structure is consistent with the analytical assumptions. Key areas of focus include:</p> <ul style="list-style-type: none"> <li>• Payment Waterfall Priorities</li> <li>• Performance Triggers</li> <li>• Net WAC definition</li> <li>• Rated Final Maturity</li> <li>• CE Floors</li> <li>• IO, PO and Exchangeable Certificates</li> </ul> <p><b>LEGAL REVIEW</b> Fitch reviews legal opinions in line with its global SF criteria. Opinions may include:</p> <ul style="list-style-type: none"> <li>• True Sale Opinion</li> <li>• Non-Consolidation Opinion</li> <li>• Security Interest Opinion</li> <li>• Safe Harbor Opinion</li> </ul> <p><b>DILIGENCE REVIEWS</b> TPR firms grade Credit, Property and Compliance from A to D. TPR Review and Servicer Review components may include:</p> <ul style="list-style-type: none"> <li>• Data Integrity, Property Valuation and Credit Underwriting Reviews</li> <li>• Qualified Mortgage (QM) Designation</li> <li>• TRID and Lending Law Compliance</li> <li>• Collateral and Servicer File Reviews</li> <li>• Updated Tax &amp; Title Searches</li> </ul>



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### 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

#### 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

#### 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.

#### PD ADJUSTMENTS

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

- Payment Shock Loans
- Cross-Collateralized Loans
- DSCR Loans
- Foreign National Borrowers
- Buy Down Loans
- Liquid Reserves
- CDFI Loans
- Default Interest Rates
- FICO Drift
- Modified Amort Term

### 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

#### 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

#### 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

#### 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%