HARDSHIP WORKSHEET

Post-Forbearance Escrow Reconciliation Worksheet

18

RECONCILE HARDSHIP PERIOD

Track taxes and insurance paid during a forbearance period and reconcile those disbursements with later escrow shortage or deficiency treatment.

WHEN TO USE	FEDERAL / PRIMARY REFERENCE
Track taxes and insurance paid during a forbearance period and reconcile those disbursements with later escrow shortage or deficiency treatment.	12 CFR § 1024.17 · 12 CFR § 1024.34

Federal baseline to check

- ☐ Tax and insurance disbursements can continue during a hardship period even when the borrower is not making the normal monthly payment.
- ☐ If the borrower is more than 30 days overdue when the servicer performs the escrow analysis, Regulation X provides an annual-statement exemption; foreclosure and bankruptcy can also trigger the exemption.
- ☐ If an annual statement was omitted under that exemption and the loan later becomes current, the servicer must provide account history since the last annual statement within 90 days of the date the account became current.

BORROWER AND LOAN

Borrower name ______________________________	**Property address** ______________________________
Loan/account number ______________________________	**Servicer name** ______________________________

Forbearance timeline

Forbearance start: __________ End: __________ Date account became current (if applicable): __________

Notes: ____

Escrow deposits during period

Borrower escrow deposits during review period: $__________

Notes: ____

Taxes/insurance paid during period

Taxes paid: $__________ Insurance paid: $__________ Other escrow disbursement: $__________

Notes: ____

Post-forbearance analysis

Post-hardship analysis date: __________ New recurring escrow: $__________/mo

Notes: ____

Balance to explain

Shortage / deficiency: $________ Repayment treatment: ____________________

Notes: ____

Attachment checklist

☐ Forbearance agreement/notices

☐ Escrow history during hardship period

☐ Tax and insurance bills

☐ Post-forbearance analysis

☐ Copy of this completed template retained for your records

☐ Mailing / delivery confirmation retained if sent formally

Use notes

☐ Separate missed borrower escrow deposits from actual tax/insurance advances; both can affect the post-forbearance balance but they are different ledger events.

☐ Record the date the account became current after hardship, because that date matters for the 90-day account-history requirement when the annual-statement exemption applied.

☐ Do not assume the forbearance agreement itself waived escrow shortages or deficiencies unless it expressly says so.

☐ Keep a complete copy of the completed template and supporting records; send copies rather than irreplaceable originals when copies are sufficient.

PRIMARY SOURCES TO CHECK

12 CFR § 1024.17 • 12 CFR § 1024.34

Official links: https://www.consumerfinance.gov/rules-policy/regulations/1024/17/ | https://www.consumerfinance.gov/rules-policy/regulations/1024/34/