



State of New Hampshire

Banking Department

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March 13, 2020

TO: New Hampshire Licensed Financial Service Institutions

FROM: Bank Commissioner Jerry Little

RE: Responding to Impacts of the Novel Coronavirus 2019 (COVID-19)

The New Hampshire Banking Department encourages all licensed financial service institutions to work constructively with New Hampshire consumers who may experience difficulties beyond their control due to economic disruptions caused by the Novel Coronavirus 2019 (COVID-19) (hereinafter "Coronavirus").

Similar to major natural disasters that suddenly interrupt the income streams of families in a geographic area, the Coronavirus may disrupt the income streams of New Hampshire consumers when individuals are quarantined for medical reasons. In addition, some employers may be unable to maintain operations temporarily due to Coronavirus-related supply chain interruptions. Like natural disasters, these scenarios are generally outside of anyone's control and their impacts are expected to ease in a reasonable amount of time.

Please consider the programs you might deploy to help consumers during a natural disaster and tailor those programs to fit with the circumstances surrounding the economic disruptions caused by the Coronavirus. Working with consumers, if done prudently and lawfully, can contribute to the health of the local community and will serve the long-term interests of the financial institution.

Consumers who are not quarantined or otherwise directly impacted by the Coronavirus may still be impacted by related economic disruption. For instance, homebuyers applying for a mortgage in New Hampshire could find their application delayed by third-party vendors in other areas of the country that are more significantly impacted by the Coronavirus.

It is vitally important that consumers contact their financial institutions as soon as possible to notify them if a Coronavirus-related quarantine or related disruption impedes their ability to make anticipated loan payments or otherwise fulfill financial obligations. Financial institutions are encouraged to be proactive and facilitate open lines of communication with their consumers. Early notification will enable financial institutions and consumers to discuss ways they can work through this event together.

Additionally, in response to inquiries received, the Department is issuing this guidance relating to the anticipated need to have mortgage loan originators work from home or other locations in light of the Coronavirus pandemic.

- A mortgage loan originator is not prohibited from working out of their home or another alternative work location under RSA 397-A:1, IV(b) provided they comply with the requirements in RSA 397-A:1, IV(b)(1) and (2). These requirements include that the location be within 100 miles of a supervisory office.
- It is possible that in an emergency situation such as a pandemic, an alternative work location will not be located within 100 miles of a supervisory office, or the supervisory office itself may be temporarily closed. Because of the Coronavirus pandemic, the Commissioner, under authority of RSA 397-A:1, IV(c), has determined that a temporary, alternative work location such as a personal residence or hotel, necessitated as a result of the Coronavirus pandemic, is not a location within the intent of RSA 397-A:1, IV.
- Accordingly, a temporary work location used during the Coronavirus pandemic, is not subject to the requirements of RSA 397-A:1, IV(b)(1) and (2). These temporary work locations are not therefore, required to be within 100-miles of a supervisory office.
- If a loan originator works from any alternative work location during the Coronavirus pandemic, his or her sponsoring licensee must ensure that protected personal information accessed or obtained by the loan originator remains secure using customary protocol and best practices.

Finally, we ask that you please notify the Department as soon as possible regarding business disruptions or other developments that have a significant impact on your institution resulting from the effects of the Coronavirus pandemic, to include any signs of erosion in consumer confidence. Your assistance in reporting these concerns will help us work with your institution to address any problems that arise as quickly as possible.

Thank you to the industry organizations who assisted in the distribution of this message. Please address any communications discussed above to the New Hampshire Bank Commissioner, at 53 Regional Drive, Suite 200, Concord, NH 03301 or via email to nhbd@banking.nh.gov