

BULLETIN

BROKER / WAREHOUSE LINES / NON-DELEGATED CORRESPONDENT



WWW.FLCBMTG.COM

Wednesday, November 05, 2025

Bulletin #2025-AC-023

NOTICE TO ALL CUSTOMERS

Important: Government Shutdown Temporary Policies

FLCBank is providing guidance to Customers regarding its requirements during the Government Shutdown; this guidance will automatically expire when the federal government resumes full operations.

Conventional Loans

A Verbal verification of employment (VVOE) dated within 10 days prior to loan closing is required for federally employed borrowers on Conventional loans. If the VVOE dated within 10 days prior to loan closing cannot be obtained due to the shutdown, the VVOE requirement may be waived if a written statement is in the file describing the following:

- the steps the lender took to obtain the verbal VOE, and
- that the requirement could not be met as a direct result of the shutdown.

The Loan Originator must Rep and Warrant to FLCBank that the borrower is employed at the time the loan is closing and loan purchased by FLCBank, unless employment has been validated by DU Validation Service or LPA's AIM, and the Loan Originator has no knowledge the borrower will not return to work after the shutdown ends.

Government Loans

- Federal employees remain ineligible for loan purchase on FHA loans unless confirmation of continued uninterrupted income during the Government Shutdown and a verbal verification of employment (VVOE) dated within 10 days prior to loan closing/loan purchase is provided.
- A verbal verification of employment (VVOE) dated within 10 days prior to loan closing/loan purchase for federally employed borrowers on VA loans (does not apply to active duty servicemembers, as the lender is responsible for obtaining the certification of continuous active duty as of date of note). Note: If the VVOE dated within 10 days prior to loan purchase cannot be obtained due to the shutdown, the VVOE requirement may be waived if a written statement is in the file describing the following:
 - the steps the lender took to obtain the verbal VOE, and
 - that the requirement could not be met as a direct result of the shutdown.

The Loan Originator must Rep and Warrant that the borrower is employed at the time the loan closing and loan purchased by FLCBank, and the Loan Originator has no knowledge the borrower will not return to work after the shutdown ends.

Conventional and Government Loans

As the Government shutdown continues, FLCBank is requiring additional reserves for federally employed borrowers who are closing on their mortgages. This is in addition to the requirements listed above.

The additional reserves required must be the greater of:

- Two months of documented reserves, or
- The amount of reserves required by the applicable loan product.

If you have any questions, please contact your [Account Executive or Client Relations Representative](#).

Please reference full product guidelines posted on the FLCBank website at www.flcbmtg.com. All products are subject to credit and property approval. Program terms and conditions are subject to change without notice. Not all products are available in all states for all dollar amounts. Other restrictions and limitations apply. FLCBank is a registered trademark of Florida Capital Bank, N.A. Member FDIC NMLS 790396 Equal Housing Lender. FLCBank 10151 Deerwood Park Blvd. Bldg. 100, Suite 200, Jacksonville, FL 32256 1.866.295.0014