

Invoice Requirements for Itemized Fees and Charges and Updates to the State Fees & Charges Deviations List

1. Purpose. The purpose of this Circular is to clarify when lenders are to provide invoices and/or supporting documents to VA to support itemized fees and charges that are charged to or paid by a Veteran or assumer obtaining a VA-guaranteed loan.

2. Background. VA regulations¹ limit the fees and charges that may be charged to or paid by a Veteran, surviving spouse or assumer (hereafter Veteran) obtaining or assuming a VA-guaranteed loan. Fees and charges not expressly permitted by VA **may not** be charged to or paid by the Veteran obtaining a VA-guaranteed loan. VA published Circular 26-24-19 to provide clarity regarding VA's expectations of how lenders comply with VA's policies on allowable fees and charges.

Section 3.a and Section 3.b(2) of Circular 26-24-19 required lenders to submit invoices to VA in the event the loan is called for a Full File Loan Review (FFLR).

Lenders are expected to continue to comply with VA's policies and procedures regarding itemized fees and charges outlined in the Circular and Chapter 8 of VA Lenders Handbook, Pamphlet 26-7. However, lenders are no longer required to provide supporting invoices at the time files are submitted for FFLR, manual guaranty requests, or assumptions. Instead, lenders are to maintain supporting documentation in their loan file and provide it to VA upon request including in response to VA Monitoring Unit Audits.

3. Action. Therefore, Circular 26-24-19 is changed as follows:

Page 2, Section 3.a: delete "*Invoices must be maintained in the loan file and provided to VA in the event the loan is requested for audit or review*", and enter "*Invoices from the service provider must be maintained in the loan file and provided to VA upon request and in response to oversight activities conducted by VA's Monitoring Unit*".

Page 2, Section 3.b(2): delete "*Invoices must be maintained in the loan file and provided to VA in the event the loan is called for a Full File Loan Review (FFLR) or otherwise requested for audit or review*", and enter "*Invoices from the service provider must be maintained in the loan file and provided to VA upon request and in response to oversight activities conducted by VA's Monitoring Unit.*"

4. Effective Date. This Circular is effective for loans files submitted to VA on or after the date of this Circular.

¹ 38 C.F.R. § 36.4313(d)(1)

5. Questions. For questions or comments, please submit a request through VA's Service Portal, Loan Guaranty Support at [LGY Customer Support](#), or contact VA by phone at 1-877-827-3702, between the hours of 8:00 AM and 6:00 PM Eastern time.

6. Paperwork Reduction Act. The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. § 3501-3520) and assigned OMB control numbers 2900-0515. In accordance with the Paperwork Reduction Act, VA may not conduct or sponsor, and a person is not required to respond, to a collection of information unless the collection displays a currently valid OMB control number.

7. Rescission: This Circular is valid until rescinded.

By Direction of the Under Secretary for Benefits

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