

Remote Ink-Signed Notarization (RIN)

Job Aid for COVID-19 Temporary Flexibilities






This job aid provides information on use of temporary flexibilities for closing processes when using RIN. Refer to the [COVID-19 Frequently Asked Questions](#), for more information.

Due to disruption related to COVID-19, many state governors and other state bodies have issued temporary executive orders or other temporary authorizations 1) allowing for the use of real-time audio video technology to satisfy the physical presence requirements under applicable law for notarial acts, or 2) removing the requirements for physical presence under applicable law for notarial acts (each a “remote ink-signed notarization” or “RIN”).

NOTE: *We do not expect these temporary governors’ executive orders and authorizations related to RIN to extend beyond the COVID-19 national emergency.*

The terms and conditions of these orders and authorizations vary but in general, they permit the use of audio-video technology (for example, Zoom, Skype, or FaceTime[®]) to help facilitate what would otherwise be a traditional, in-person paper-based closing.

For the purposes of illustration only, a typical RIN may be as follows:

1. the paper closing package is delivered to the borrower, 
2. the notary examines a government-issued photo identification using the audio-video technology, 
3. the notary uses the audio-visual technology to witness the borrower ink sign the document, 
4. the borrower returns the document to the notary (via postal mail, delivery service, or in person), and 
5. upon receipt of the package, the notary physically applies his/her notarial seal or stamp to the loan documents. 

A RIN can be distinguished from a “remote online notarization” or “RON” in which the notarial documents are being signed and tamper-sealed electronically, with the notarial seal being applied electronically. As a further point of clarification, RIN transactions were not covered by the RON provisions in Lender Letter [LL-2020-03, Impact of COVID-19 on Originations](#).

We believe that the following minimum standards represent prudent closing processes when facilitating notarization using RIN and encourage (but do not require) lenders to implement the following:

- Review of a government-issued photo ID that has a signature via two-way audio video technology and capture of such photo ID via a photocopy or other electronic image;
- System measures to 1) prevent interference with the authenticity, integrity and security of the portions of the notarial ceremony that are conducted via the audio-video technology, and 2) protect the electronic record and backup record from unauthorized use;
- The notary performing the RIN should keep a backup of the electronic record;
- Recording of the portion of the notarial ceremony conducted via the audio-video technology with storage for the minimum period required by applicable laws or if no period is specified in the applicable law, for seven years; and
- The lender should maintain (or cause to be maintained) the recording of the portions of the notarial ceremony conducted via the audio-video technology for the life of the loan.

In general, when looking at digital closing options, we encourage lenders to explore our eMortgage options. If the lender is not approved to deliver eMortgages, we encourage the lender to consider using RON for notarization, and if RON is not available, to then consider RIN in jurisdictions that recognize the availability of such notarization methods.