

## Disclosure Procedure – How to disclose a file to your borrower.

This guide outlines the procedures for setting up and submitting your initial disclosures and redisclosures to the compliance department, so they can be issued to your borrower(s). Please ensure that your file is completed prior to submitting your disclosure request. Any incomplete fields or missing information will be questioned by compliance and will lengthen your disclosure process. Disclosure requests must be submitted through 2 forms in Encompass, LE page 0 and LE page 4.

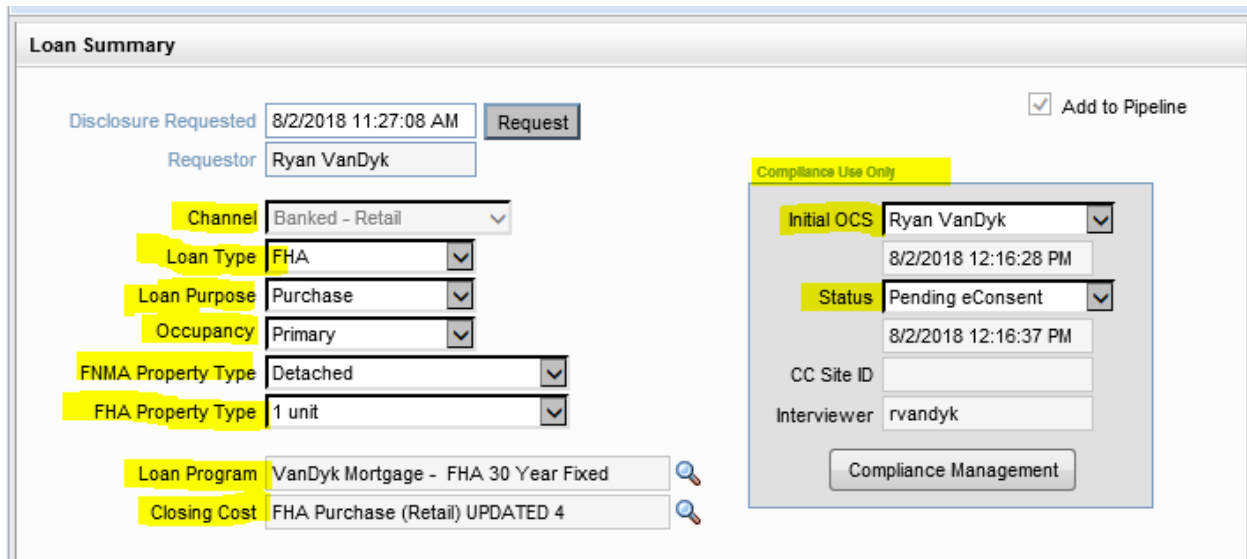
- LE page 0 → Initial Disclosure Requests.
- LE page 4 → Redisclosures Requests.

The use of these forms will automatically populate your disclosure request into the Origination Compliance Departments (The OC) pipeline and we will begin working on your file ASAP. The cutoff for same day disclosures is 2pm in the originator's time zone.

Review the screen shots of LE page 0 and 4 below for information on what fields are required to be completed to request your disclosures. All highlighted fields are required.

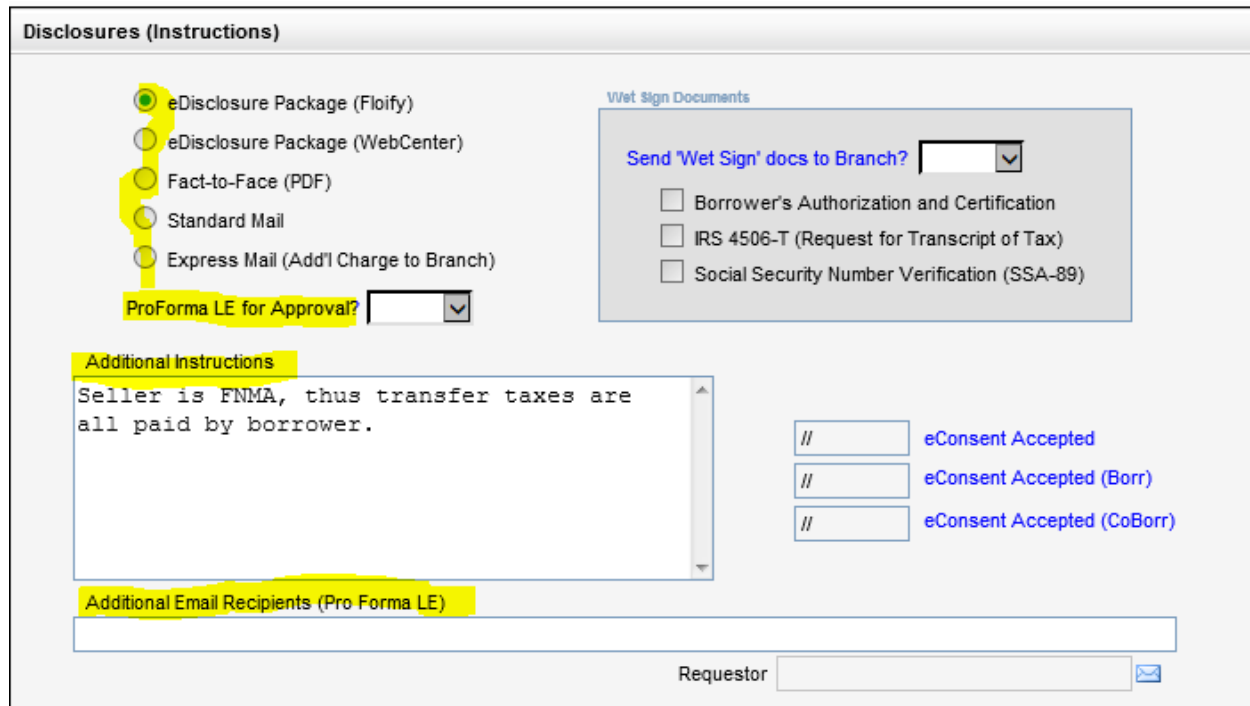
Initial Disclosure requests – Loan Estimate Page 0

Loan Summary:



- Request Button:
  - To submit your request for disclosure you must click the **“Request”** button at the very top of the form. Once a date and time has populated in the “Disclosure Requested” field your file in in the queue for disclosures.
  - Please note that the “Request” button will not become active (not grayed out) until all the required fields on LE page 0 have been completed.
- All information in the loan summary must match the loan program. If there are discrepancies (Closing Cost = FHA and Loan Program = Conv.) the file will be pushed back to the branch for clarification.
- Compliance Use Only:
  - These fields are used by compliance to track the disclosure specialist working on the file and the status of the disclosures. These fields can be added to your pipeline and can be used to easily track the status of their disclosures.
    - Initial OCS (Pipeline name – “OCS – Initial”) → who is assigned to your file.
    - Status (Pipeline name – “OCS – Status”) → Current status of your disclosures.

Disclosure (Instructions):



- Indicate how you would like your disclosures sent (Floify, WebCenter, PDF, etc.)
- Pro Forma LE for Approval:
  - Check yes, if you want a draft LE to approve prior to your disclosures being sent to the borrower.
- Additional instructions:
  - Add any additional instructions you deem necessary for the OC to know. Please use this for any special about the file that would deviate from a standard loan.
- Additional Email Recipients (Pro Forma LE)
  - If you indicated you want a Pro Forma LE, here is where you would list additional recipients to review and approve the Pro Forma.
- Send “Wet Sign” docs to Branch: (NOT REQUIRED)
  - You may request PDFs of the wet sign docs be sent to you via PDF.
  - Please note, most wet-sign docs can be issued electronically or can be pulled by the branch via the printer icon.
  - If using Floify, wet sign docs are available for the branch to send directly to the client electronically.

## Loan Details:

**Loan Details**

Itemization Fee Source?  SmartLE  Title Company Fee Sheet

Is Flood Insurance Required? TBD

Bond Loan? No

Subordinate Financing? No  Sub Fin \$

MCC Credit? No  MCC

1st Time Home Buyer? Yes

Co-Borrower? Yes

Co-Mortgagor? No

Escrow Account Required? Escrow (T&I)

Impounds Waived? Not Waived

Impound Types Taxes and Insurance (T)

Estimated Closing Date 08/31/2018

1st Payment Date 10/01/2018

- Itemization Fee Source:
  - Indicate if you would like Smart LE run or if you have uploaded a title company fee sheet you would like to use.
    - Smart LE → Automated system that will pull title fees from a data base of title companies surrounding the subject property.
    - Title Fee Sheet → A list of title fees provided by the branch. This MUST contain all title fees as well as full contact information from the physical office you are pulling fees from (Name, Address, Phone, Email and Website). This is required for the Settlement Service Provider List (SSPL) that must be sent to the borrowers on every loan.
  - Please do not change title fees without notifying The OC of the change. We manually fill out the SSPL and the fees must match the itemization. Thus, changes could result in non-compliance with CFBP guidelines.
- All other highlighted fees must be accurate and complete.

Mortgage Insurance:

**902. Mortgage Insurance**

**Mortgage Insurance Options** FHA

Loan Program VanDyk Mortgage - FHA 30 Year Fixed

MIP / USDA Guarantee / VA Funding	<input type="checkbox"/>	Factor (%)	<input style="width: 80%;" type="text" value="1.750000"/>	Amt Financed	<input style="width: 80%;" type="text" value="\$ 3,377.00"/>	Amt Paid (Cash)	<input style="width: 80%;" type="text" value="\$ 0.50"/>
MMI / PMI / USDA Annual (Factor 1)		Factor (%)	<input style="width: 80%;" type="text" value="0.850000"/>	Months	<input style="width: 80%;" type="text" value="360"/>	Payment (Monthly)	<input style="width: 80%;" type="text" value="\$ 135.79"/>
PMI (Factor 2)			<input style="width: 80%;" type="text"/>		<input style="width: 80%;" type="text"/>		
Cancel at			<input style="width: 80%;" type="text"/> %				

**Conventional (Only)**

Monthly MI? ▼  Charges added to monthly payment (PMI / MMI)

Single Payment MI? ▼  Charges collected upfront (Borrower-Paid MI)

Lender Paid MI? ▼  Lender Paid Mortgage Insurance (LPMI)

Reduced MI (Conventional Only)

**VA (Only)**

VA Status ▼

Entitlement Code

Funding Fee Status ▼

- Mortgage insurance options:
  - Select the appropriate mortgage insurance type for your loan.
  - Ensure both monthly and upfront factors are accurate for your loan.
  - Complete the additional fields for either Conventional or VA loans.
- See our “PMI - How To” Guide for more information on how to set up the PMI/MI for all common loan types.

eFolder Documents:

eFolder Documents	
//	Purchase Agreement <input type="checkbox"/> Branch Confirmation (Purchase Agreement)
//	Proof of Pricing (Not Locked) <input type="checkbox"/> Branch Confirmation (Pricing)
//	Title Company Fee Sheet (No SmartLE) <input type="checkbox"/> Branch Confirmation (Fee Sheet)

- Ensure the above documents are in the File Manager if they apply to your loan.
  - Purchase agreement:
    - Purchase only.
    - Seller paid fees will not be allowed on the itemization without a PA in the file.
  - Proof of Pricing:
    - Needed if the file is unlocked and a lender credit is being given or discount points are being charged.
  - Title Company Fee Sheet:
    - Needed if Smart LE is not being used.
    - Must contain contact information for the title company being quoted.

Title and Transfer Tax Charges:

	Buyer	Seller	S/O
1103. Owner's Title Insurance	<input type="text"/>	1,000.00	<input checked="" type="checkbox"/>
1104. Lender's Title Insurance	500.00	<input type="text"/>	<input type="checkbox"/>
1203. Transfer Taxes	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>
1204. City/County/Stamps	1,099.71	<input type="text"/>	<input type="checkbox"/>
1205. State Tax/Stamps	<input type="text"/>	1,420.00	<input checked="" type="checkbox"/>
Lender Credit?	No <input type="checkbox"/> (for any loan file fees)		
Lender Credit Amount \$	<input type="text"/>		
Additional Credits	Seller Credit	\$	3,000.00
	Tax Proration Credit	\$	1,200.00
		\$	<input type="text"/>

10% Tolerance Item  
 Zero Tolerance Item  
 S/O = Seller Obligated

Spanish App  
 I certify the fee information above is accurate.

- Fee lines 1103 – 1205:
  - Ensure these are accurate in terms of both dollar figure and who is paying them (buyer or seller).
  - If a fee is Seller Obligated (S/O) and not part of the seller credit please indicate this with the check box.
- Lender Credit?
  - If a Lender credit is being given please indicate as such and the amount.
- Additional Credits:
  - This copies over from the 1400 section of the itemization, please list all additional credits here.
- I certify the fee information above is accurate:
  - This is the last check box that must be clicked to activate the “Request” button at the top of the form.

## Re-Disclosure requests – Loan Estimate Page 4

To submit your request for redisclosure you will need to complete LE page 4. The Change of Circumstance (COC) is the main focus of LE page 4, as you must convey to The OC what is changing on the file so we can send out accurate disclosures.

**Reminder:** All COCs must be disclosed to the borrower within 3 business days to stay compliant with TRID timelines.

### Loan Details:

**Loan Estimate Page 4 (COC)**

Re-Disclosure Request Date: 8/2/2018 2:13:42 PM Request

Re-Requestor: Ryan VanDyk

Date Change Occurred: 08/02/2018

Add to Pipeline

**Changed Circumstance (Description & Instructions)**

Rate locked at 5.000% for 15 days.

0.25% (\$490.94) of bona Fide Discount points added for interest rate chosen.

Loan amount increased from \$180,000.00 to \$193,000.00 due to decrease in down payment from borrower.

PMI changed from Upfront (\$3,500.00) to monthly (\$40/month).

**Compliance Use Only**

Re-Disclosure OCS: Ryan VanDyk 8/2/2018 2:13:57 PM

Status: Pending eConsent 8/2/2018 2:14:01 PM

Reset

Lock Date: 07/30/2018

Escrow Account Required?: Escrow (T&I)

Hedge Value:

Max. Lender Credit: \$ 7,118.67

Additional Email Recipients (Pro Forma LE)

Requestor:

- Re-Disclosures Request Date:
  - This functions exactly like the “Request” Button on LE page 0, once clicked (date & time populated) your file has been added to the OC queue for disclosure.
  - Will only activate once all required fields are filled in.
- Date Change Occurred:
  - Input the date in which the COC occurred. This is the starting point for the 3-business day time frame to disclose any increase in fees.
- Changed Circumstance (Description and Instructions):
  - List out what is changing with your file and please be specific. We need to disclose specific information about the COC to the borrower, thus if figures are changing please list them.



- Compliance Use Only:
  - These fields are used by compliance to track the disclosure specialist working on the file and the status of the disclosures. These fields can be added to your pipeline and can be used to easily track the status of their disclosures.
    - Re-Disclosure OCS (Pipeline name – “OCS – Re-Disclosure”) → who is assigned to your file.
    - Status (Pipeline name – “OCS – Re-Disclosure Status”) → Current status of your disclosures.
- Max Lender Credit:
  - If your loan is locked and you are giving a lender credit the amount above par will be listed here. Manager approval will be required to issue a lender credit above this figure.

Disclosure Method:

**Disclosure (Instructions)**

- eDisclosure Package (Floify)
- eDisclosure Package (WebCenter)
- Fact-to-Face (PDF)
- Standard Mail
- Express Mail (Add'l Charge to Branch)

//	eConsent Accepted
//	eConsent Accepted (Borr)
//	eConsent Accepted (CoBorr)

- Carries over from LE page 0.
- Ensure still accurate from initials.

### Change of Circumstance Reasons:

**Changed Circumstance Reasons**

LE Page 1

**INTEREST RATE RELATED**

Interest Rate (Locked)

Interest Rate (Locked - Change in Rate)

Interest Rate (Locked - Discount Points Added)

Interest Rate (Locked - Extension)

**LOAN PARAMETER RELATED**

Loan (Change in Loan Type)

Loan (Change in Loan Term Length)

Loan (Change in Mortgage Insurance) - Conventional PMI

Loan (Change in Mortgage Insurance) - FHA MMI

Loan (Change in Purchase Price)

Loan (Increase in Loan Amount)

**SUBJECT PROPERTY RELATED**

Appraisal (2nd Appraisal Required)

Appraisal (Re-Inspection Fee Added)

Property (Condo Certification Fee Added)

Property (Flood Insurance Added)

**FEE RELATED**

Fees (Correcting APR Increase)

Fees (Correcting Finance Charge)

Fees (Other)

Fees (Zero Tolerance Fee Increase)

**BORROWER RELATED**

Borrower (Addition or Removal of Borrower)

Borrower (Credit Score Increase / Decrease)

Borrower (Revisions Requested by the Consumer)

**MISCELLANEOUS**

Other

- At least one of the COC reasons must be checked to activate the Request button.
- Please ensure you are selecting all COCs that apply to your file.

Mortgage Insurance:

**902. Mortgage Insurance**

	Initial LE	Current	Seller
902. Mtg Ins. Premium	<input type="text"/>	3,377.50	<input type="text"/>

	1. MI Pmt	MI Factor	Months	Cancel at
1003. Mortgage Ins.	135.79	0.850000	360	<input type="text"/> %
Initial LE	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

	2. MI Pmt	MI Factor	Months
Initial LE	<input type="text"/>	<input type="text"/>	<input type="text"/>

Monthly MI?    Charges added to monthly payment (PMI / MMI)

Single Payment MI?    Charges collected upfront (Borrower-Paid MI)

Lender Paid MI?    Lender Paid Mortgage Insurance (LPMI)

MI Options    Reduced?

I certify the fee information provided is accurate.

- MI/PMI info carries over from Initials, ensure accurate if any changes have occurred.
- I certify the fee information provided is accurate must be checked to activate the "Request" Button.

If you have any questions, please email The OC at [Compliance@vandykmortgage.com](mailto:Compliance@vandykmortgage.com)

Thank you!