



**Current HMDA Issues**  
Practical and Technical Issues

*Tuesday, March 6, 2018*



**Leonard Ryan**  
President



## Issues Still With A Lot of Questions As of March 5, 2018

- So You Have Now Submitted to CFPB
- THE NEW CFPB HMDA (2018 and Beyond)
- The December 21 CFPB Announcement
- ULI's & LEI's
- Correct Loan Amounts to Report for CFPB HMDA Data **"Relied On"**
- AUS Waterfall (Used to Evaluate)
- Other Issues QuestSoft is Seeing in the Field
- 2019 Changes With Mick at the Helm



## 2017 vs 2016 HMDA

The Difference...

### Only Submission of the Data

#### Old FRB Way

Use FFIEC software or HMDA Management System

Submit to [HMDA@FRB.gov](mailto:HMDA@FRB.gov)

#### Features

- Allowed for Validity Errors
- Sent back pages of Quality Errors for sign off
- September data release
- HMDA.DAT

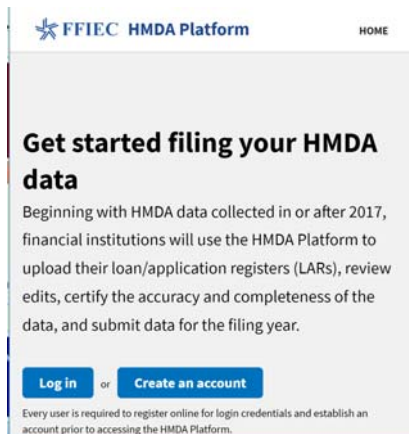
#### New CFPB 2017 Way

Use HMDA Management System or CFPB Data Conversion Tool

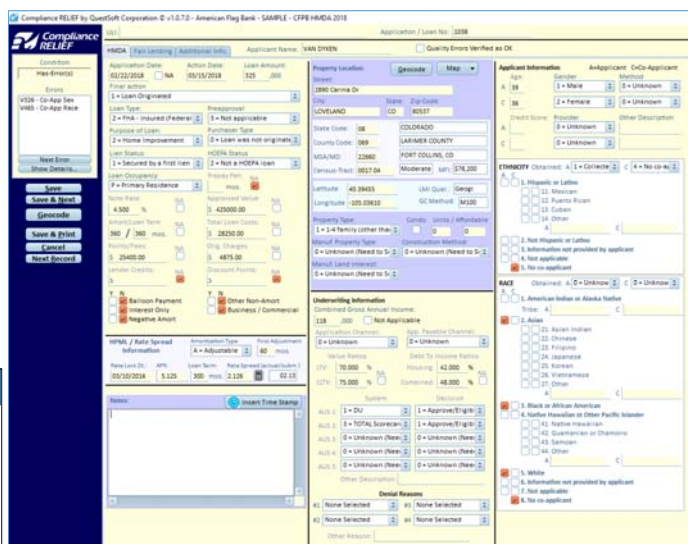
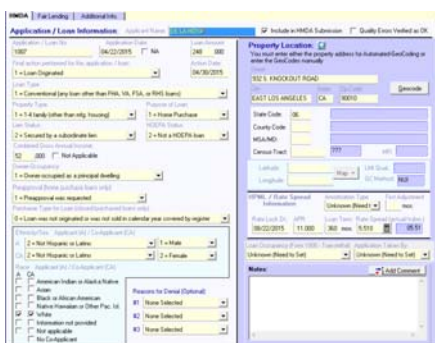
Upload to <https://ffiec.cfpb.gov/>

#### Features:

- Requires Username and Password
- New Submission overrides everything
- No Validity Errors Allowed... **Period!**
- April data release
- HMDA.txt



# The Magnitude of CFPB HMDA Changes



	FFIEC HMDA	CFPB HMDA	
Data Points	44	110	(150%)
Validity Errors	62	215	(247%)
Quality Edits	28	42	( 50%)
QS Checks	12	18	( 50%)
Total Errors/Edits	102	275	(169%)



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## Data Points at a Glance



### Current data points (including modified and unmodified data points)

- |   |   |   |   |  |
|---|---|---|---|--|
| <ul style="list-style-type: none"> <li>Legal Entity Identifier</li> <li>Universal Loan Identifier</li> <li>Application Date</li> <li>Loan Type</li> </ul> | <ul style="list-style-type: none"> <li>Loan Purpose</li> <li>Preapproval</li> <li>Construction Method</li> <li>Occupancy Type</li> <li>Loan Amount</li> </ul> | <ul style="list-style-type: none"> <li>Action Taken</li> <li>Action Taken Date</li> <li>State</li> <li>County</li> <li>Census Tract</li> <li>Ethnicity</li> </ul> | <ul style="list-style-type: none"> <li>Race</li> <li>Sex</li> <li>Income</li> <li>Type of Purchaser</li> <li>Rate Spread</li> </ul> | <ul style="list-style-type: none"> <li>HOEPA Status</li> <li>Lien Status</li> <li>Reason for Denial</li> </ul> |
|---|---|---|---|--|

### Data points identified in the Dodd-Frank Act

- |  |  |   |  |   |
|--|--|---|--|---|
| <ul style="list-style-type: none"> <li>Property Address</li> <li>Age</li> <li>Credit Score</li> <li>Loan Term</li> </ul> | <ul style="list-style-type: none"> <li>Total Loan Costs, or Total Points and Fees</li> <li>Property Value</li> </ul> | <ul style="list-style-type: none"> <li>Prepayment Penalty Term</li> <li>Introductory Rate Period</li> </ul> | <ul style="list-style-type: none"> <li>Non-Amortizing Features</li> <li>Application Channel</li> </ul> | <ul style="list-style-type: none"> <li>Mortgage Loan Originator NMLSR Identifier</li> </ul> |
|--|--|---|--|---|

### Data points added under the Bureau's discretionary authority

- |   |  |   |  |   |
|---|--|---|--|---|
| <ul style="list-style-type: none"> <li>Origination Charges</li> <li>Discount Points</li> <li>Lender Credits</li> <li>Interest Rate</li> </ul> | <ul style="list-style-type: none"> <li>Debt-to-Income Ratio</li> <li>Combined Loan-to-Value Ratio</li> </ul> | <ul style="list-style-type: none"> <li>Manufactured Home Secured Property Type</li> <li>Manufactured Home Land Property Interest</li> </ul> | <ul style="list-style-type: none"> <li>Total units</li> <li>Multifamily Affordable Units</li> <li>Automated Underwriting System</li> </ul> | <ul style="list-style-type: none"> <li>Reverse Mortgage</li> <li>Open-End Line of Credit</li> <li>Business or Commercial Purpose</li> </ul> |
|---|--|---|--|---|



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## Comment on The HMDA Memo of December 21, 2017

### CFPB Won't Nail You for Good Faith Efforts

The CFPB, FRB, FDIC, and OCC issued bulletins about HMDA. Key statements about HMDA data collected in 2018 and reported in 2019:

- No intent to require data resubmission unless data errors are material;
- No intent to assess penalties with respect to errors;
- Data collection will provide an opportunity to identify any implementation gaps and make improvements in their HMDA compliance management systems in future years;
- Examinations will be diagnostic to help identify compliance weaknesses, and credit will be given to good faith compliance efforts.



The CFPB stated it intended to engage in a rulemaking to reconsider aspects of transactional coverage, institutional coverage, and discretionary data points.



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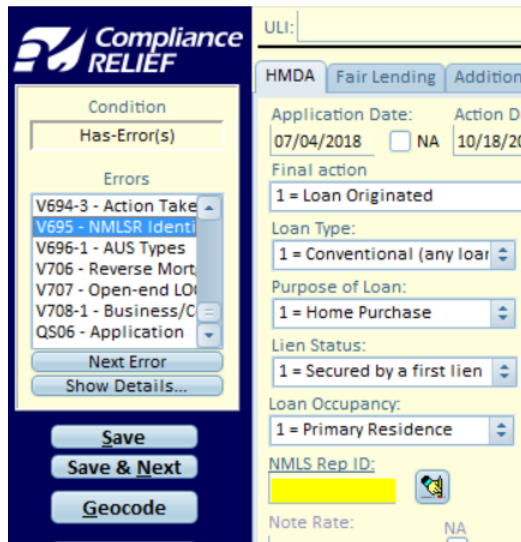
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## 2018 CFPB HMDA Validity Codes Don't Align with FFIEC HMDA

The CFPB came out with tests that have multiple conditions PER error code. We and some LOS vendors broke those out to make correction faster and more precise.

**(275 New Error Codes)**



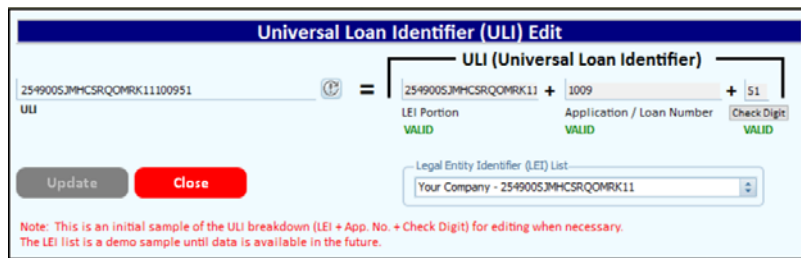
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## Universal Loan Identifier Issues

- **Duplicate ULI's Not Being Corrected**
  - This is a Quality Error (Q600)
  - YOU MUST REVIEW EACH ONE to ensure it is the same loan
- **Batch ULI's**
  - There are a substantial number of situations where generation of a batch ULI is being requested of QuestSoft.

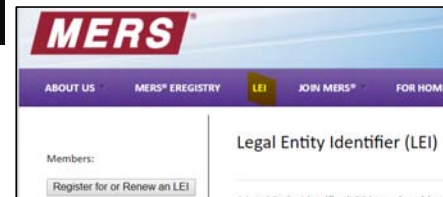
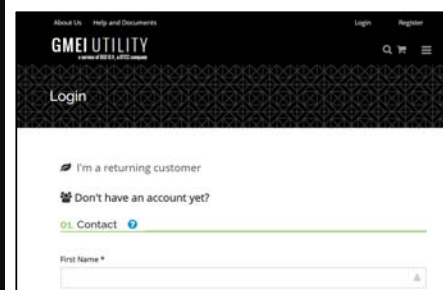


## Legal Entity Identifier (LEI)

- **What is the LEI?**
  - The LEI is a unique, 20-digit alphanumeric identifier associated with a single legal entity and is intended to serve as a uniform international standard for identifying participants in financial transactions.
    - Already in use by many countries.
    - Mandated in the U.S. for money funds and derivatives reporting.

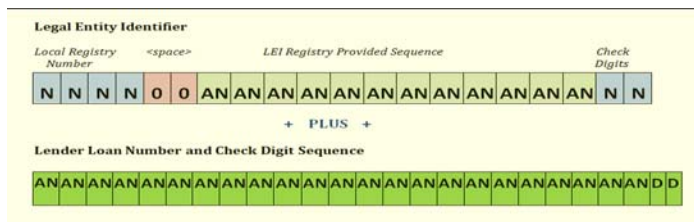
- **Where do you get one today?**

<https://www.gmeiutility.org/>  
<http://mersinc.org/lei>



## Legal Entity Identifier & Universal Loan Identifier (ULI)

- **Legal Entity Identifier (LEI)**
  - 20 Character Field to be standard for all lending institutions.
- **Your Loan Number**
  - Up to 23 characters PLUS a 2 digit check digit.
- **ULI Required for All HMDA Transactions 2018 +**
  - Action Code 1 Always Assigns.
  - Action Code 6 (Purchased) Assigns for loans from non-HMDA filers?



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## Universal Loan Identifier (ULI) Exception

To be completed by the Lender: Lender Loan No./Universal Loan Identifier  Agency Case No.

### Uniform Residential Loan Application

Verify and complete the information on this application. If you are applying for this loan with others, each additional Borrower must provide information as directed by your Lender.

**Section 1: Borrower Information.** This section asks about your personal information and your income from

- **Exception – Purchases** – For a purchased covered loan that any financial institution has previously assigned or reported with a ULI, the financial institution that purchases the covered loan must use the ULI that was assigned or previously reported for the covered loan. § 1003.4(a)(1)(i)(D).
- **Caveat – Applications** – For an application that was previously reported with a ULI and that results in an origination during the same calendar year that is reported in a subsequent reporting period pursuant to § 1003.5(a)(1)(ii), the financial institution may report the same ULI for the origination that was previously reported for the application. § 1003.4(a)(1)(i)(E).



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# New Demographic Information Addendum



**Demographic Information Addendum.** This section asks about your ethnicity, sex, and race.

**Demographic Information of Borrower**

The purpose of collecting this information is to help ensure that all applicants are treated fairly and that the housing needs of communities and neighborhoods are being fulfilled. For residential mortgage lending, federal law requires that we ask applicants for their demographic information (ethnicity, sex, and race) in order to monitor our compliance with equal credit opportunity, fair housing, and home mortgage disclosure laws. You are not required to provide this information, but are encouraged to do so. **The law provides that we may not discriminate** on the basis of this information, or on whether you choose to provide it. However, if you choose not to provide the information and you have made this application in person, federal regulations require us to note your ethnicity, sex, and race on the basis of visual observation or surname. The law also provides that we may not discriminate on the basis of age or marital status information you provide in this application.

**Instructions:** You may select one or more "Hispanic or Latino" origins and one or more designations for "Race." If you do not wish to provide some or all of this information, select the applicable check box.

<p><b>Ethnicity</b></p> <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Mexican <input type="checkbox"/> Puerto Rican <input type="checkbox"/> Cuban <input type="checkbox"/> Other Hispanic or Latino – Enter origin: _____ <i>Examples: Argentinian, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, etc.</i> <input type="checkbox"/> Not Hispanic or Latino <input type="checkbox"/> I do not wish to provide this information	<p><b>Race</b></p> <input type="checkbox"/> American Indian or Alaska Native – Enter name of enrolled or principal tribe: _____ <input type="checkbox"/> Asian <input type="checkbox"/> Asian Indian <input type="checkbox"/> Chinese <input type="checkbox"/> Filipino <input type="checkbox"/> Japanese <input type="checkbox"/> Korean <input type="checkbox"/> Vietnamese <input type="checkbox"/> Other Asian – Enter race: _____ <i>Examples: Hmong, Laotian, Thai, Pakistani, Cambodian, etc.</i> <input type="checkbox"/> Black or African American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> Native Hawaiian <input type="checkbox"/> Guamanian or Chamorro <input type="checkbox"/> Samoan <input type="checkbox"/> Other Pacific Islander – Enter race: _____ <i>Examples: Fijian, Tongan, etc.</i> <input type="checkbox"/> White <input type="checkbox"/> I do not wish to provide this information
--	--

**To Be Completed by Financial Institution (for application taken in person):**

Was the ethnicity of the Borrower collected on the basis of visual observation or surname?    NO    YES  
 Was the sex of the Borrower collected on the basis of visual observation or surname?    NO    YES  
 Was the race of the Borrower collected on the basis of visual observation or surname?    NO    YES

**The Demographic Information was provided through:**

Face-to-Face Interview (includes Electronic Media w/ Video Component)    Telephone Interview    Fax or Mail    Email or Internet

[https://www.fanniemae.com/content/guide\\_form/urla-demographic-addendum.pdf](https://www.fanniemae.com/content/guide_form/urla-demographic-addendum.pdf)

What About Reporting when there are more than five selections?

1. The requirement:  
Aggregate first, then subcategories.
2. The options when more than five
  - a. Alphabetical
  - b. "Other" First
  - c. Require Manually Select

We are freaking out and CFPB thinks it will happen in less than 2% of cases.



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# Determining Loan Amount

- **Closed End Loans**
  - Closed Loans – Amount to be repaid on legal obligation.
  - Counter Offer – Amount of counter offer if accepted, else amount applied for.
  - Approved Not Accepted (or Preapproval Request Approved Not Accepted) – Amount approved for.
  - Denied, Withdrawn, Closed for Incompleteness – Amount applied for.
  - Multi-Purpose – Entire amount (entire amount on Home Improvement even if only portion is being used for improvements).



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## Determining Loan Amount

- **Purchased Loans**  
Unpaid Principal Balance at purchase
- **Assumed Loans**  
Unpaid Principal Balance at assumption
- **Open-End Line of Credit**  
Entire amount of credit available
- **Reverse Mortgage**  
Initial Principal Limit



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## Warning: Data “Relied On”

### • New Standard that MAY Differ from your LOS automation

#### 1. Gross Average Income

- Report verified Gross Annual Income if relied upon in credit decision.
- If not relied upon, report amount identified in application.

#### 2. Credit Scores<sup>1</sup>

- May report as “Not Applicable” if no credit decision is made or if a credit decision is made that does rely upon a credit score (even if scores are obtained).

#### 3. Debt to Income Ratio<sup>1</sup>

#### 4. Combined Loan to Value<sup>1</sup>

- Use secondary market investor’s calculation if more than one CLTV calculation exists.

#### 5. Property Value

#### 6. AUS System – Standard is about the same (Used to Evaluate).



<sup>1</sup> Purchased covered loans are excluded.



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## The AUS System Selection Waterfall

Comment 4(a)(35)-3: "To determine what AUS (or AUSs) and result (or results) to report under § 1003.4(a)(35), a financial institution follows each of the principles that is applicable to the application in question, in the order in which they are set forth below."

**i. Loan type.** If two or more AUS results and "the AUS generating one of those results corresponds to the loan type reported pursuant to § 1003.4(a)(2)" report that AUS name and result. If more than one corresponds to the loan type, then –

**ii. Purchaser type.** If two or more AUS results and "the AUS generating one of those results corresponds to the purchaser, insurer, or guarantor" report that AUS name and result. If not, then –

**iii. Closest in time.** If two or more AUS results and (1) none of the systems generating those results correspond to the purchaser type, or (2) more than one AUS result is generated by a system that corresponds to either the loan type or the purchaser, insurer, or guarantor, report "the AUS result generated closest in time to the credit decision and the name of the AUS that generated that result." If not, then –

**iv. Report them all.** If none of the first three rules apply, report them all, but no more than five. If more than five, you may choose any five among them to report.



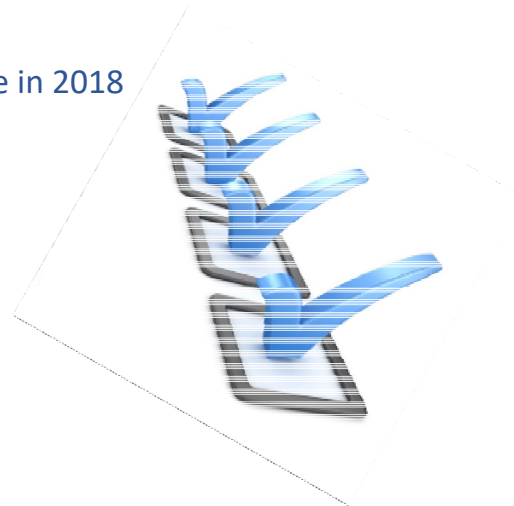
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## Practical and Technical Issues As of March 5, 2018

- **Issues QuestSoft is Seeing in the Field**
  - Validity Errors Not Aligning to Past Decade in 2018
  - Duplicate ULI is Only a Quality Error
  - ULI Concerns – Batch ULI's
  - Companies Without LEI's
  - Demographic Information –
    - New Race/Sex/Ethnicity Boxes
  - Restrictive CFPB Submission Process
  - Geocoding and the Safe Harbor
  - Lack of a CFPB HMDA LAR
  - Errors in CFPB Supplied Tools



## Demographic Information Errors

- Maybe you can use aggregated information for 2017 applications

**BUT...**

If action date is in 2018 you **MUST** complete 3 fields (not just one as in 2017)

**Demographic Information Addendum.** This section asks about your ethnicity, sex, and race.

**Demographic Information of Borrower**

The purpose of collecting this information is to help ensure that all applicants are treated fairly and that the housing needs of communities and neighborhoods are being fulfilled. For residential mortgage lending, federal law requires that we ask applicants for their demographic information (ethnicity, sex, and race) in order to monitor our compliance with equal credit opportunity, fair housing, and home mortgage disclosure laws. You are not required to provide this information, but are encouraged to do so. The law provides that we may not discriminate on the basis of this information, or on whether you choose to provide it. However, if you choose not to provide the information and you have made this application in person, federal regulations require us to note your ethnicity, sex, and race on the basis of visual observation or surname. The law also provides that we may not discriminate on the basis of age or marital status information you provide in this application. **Instructions:** You may select one or more "Hispanic or Latino" origins and one or more designations for "Race." If you do not wish to provide some or all of this information, select the applicable check box.

**Ethnicity**

Hispanic or Latino

Mexican  Puerto Rican  Cuban

Other Hispanic or Latino - Enter origin: \_\_\_\_\_

Examples: Argentinian, Colombian, Dominican, Nicaraguan, Salvadoran, Spanish, etc.

Not Hispanic or Latino

I do not wish to provide this information

**Sex**

Female

Male

I do not wish to provide this information

**Race**

American Indian or Alaska Native - Enter name of enrolled or principal tribe: \_\_\_\_\_

Asian

Asian Indian  Chinese  Filipino

Japanese  Korean  Vietnamese

Other Asian - Enter race: \_\_\_\_\_

Examples: Hmong, Laotian, Thai, Pakistani, Cambodian, etc.

Black or African American

Native Hawaiian or Other Pacific Islander

Native Hawaiian  Guamanian or Chamorro  Samoan

Other Pacific Islander - Enter race: \_\_\_\_\_

Examples: Fijian, Tongan, etc.

White

I do not wish to provide this information

**To Be Completed by Financial Institution (for application taken in person):**

Was the ethnicity of the Borrower collected on the basis of visual observation or surname?  NO  YES

Was the sex of the Borrower collected on the basis of visual observation or surname?  NO  YES

Was the race of the Borrower collected on the basis of visual observation or surname?  NO  YES

**The Demographic Information was provided through:**

Face-to-Face Interview (includes Electronic Media w/ Video Component)  Telephone Interview  Fax or Mail  Email or Internet



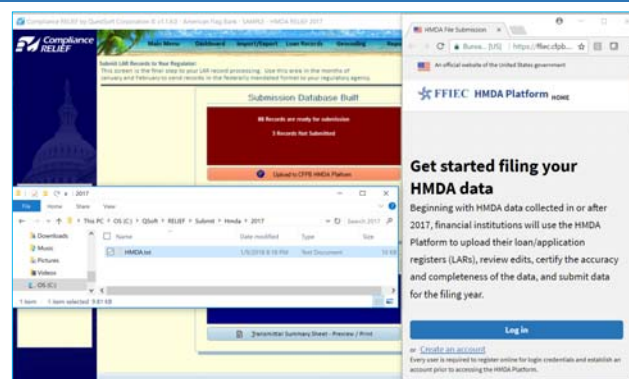
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## Restrictive CFPB Submission Process

- Submission Issues
  - Must obtain a User Login
    - Based on email domain
    - Very strong password
  - Cannot create an account if you have not submitted before. ([hmdahelp@CFPB.gov](mailto:hmdahelp@CFPB.gov))
- NO testing environment for developers



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## Geocoding and Safe Harbor

There are several sections in the CFPB Revisions of the [final revised rules released on August 28, 2017](#) that discuss geocoding and Safe Harbor. Pages 117-119 indicate the following:



Safe Harbor

**"The Bureau believes that an accurate census tract should be reported in as many cases as possible. At the same time, however, a financial institution should not face compliance risk for inaccuracies resulting from information provided by the geocoding tool on the Bureau's website."**

**"The Bureau did not intend, as commenters appear to have inferred, that only census tract errors generated by the geocoding tool on the Bureau's website are bona fide errors."**

Current § 1003.6 states that an error in compiling or recording data for a covered loan or application is not a violation if the error was unintentional and occurred despite the maintenance of procedures reasonably adapted to avoid such an error, and neither the 2015 HMDA Final Rule nor this final rule changes that provision. New comment 6(b)-2 merely clarifies that the geocoding tool on the Bureau's website serves as one example of a procedure reasonably adapted to avoid incorrect entries for census tract numbers. Obtaining census tract numbers using other geocoding tools may constitute a procedure reasonably adapted to avoid geocoding errors, depending on the facts and circumstances. **If a financial institution chooses to use an alternative geocoding tool that constitutes a procedure reasonably adapted to avoid census tract errors, the financial institution will receive the same Safe Harbor protections."**



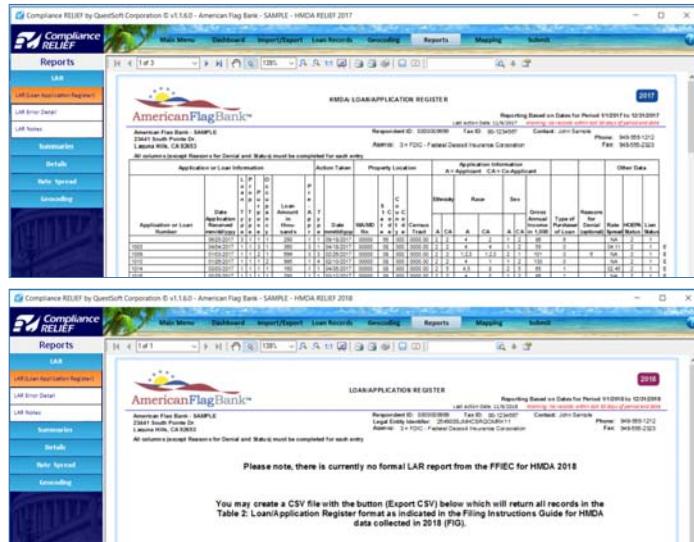
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## There is NO CFPB HMDA LAR Report

- Too much data in 2018
  - Can't print it on even Legal size paper
- The most practical way to produce something close to a LAR at the moment is an Excel spreadsheet.
  - Need to be mindful of security concerns if this is a direction you wish to take.



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## Errors in CFPB Supplied Tools

- **Don't use the CFPB Rate Spread Calculator for 2017 Action Years**
  - There is a calculation error.
  - Also CFPB Rate Spread does not ask for lien status.
- **FFIEC Geocoder Concerns**
- **CFPB Respondent Format**



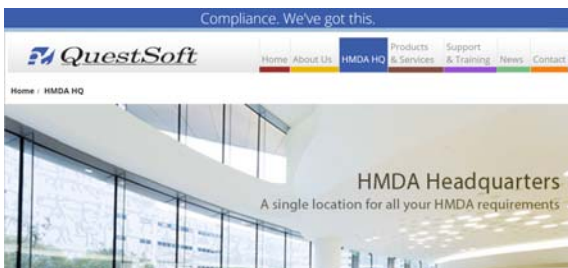
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## CFPB HMDA Resources

- **Accessing Information on New HMDA Rules**
  - [www.questsoft.com/hmdahq](http://www.questsoft.com/hmdahq)
  - [www.consumerfinance.gov/regulatory-implementation/hmda/](http://www.consumerfinance.gov/regulatory-implementation/hmda/)




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# New HMDA Guide – Feb 2018

- **Surprise!**
  - <https://www.ffiec.gov/hmda/guide.htm>
  - All 327 pages
  - A little different from Filing Instruction Guide (FIG)



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# Multiple Year Tracking and Organization

Requirement	2018	2017	2016	Prior Years
HMDA RELIEF	Total Records: 96 Last Action: 12/27/17 3:32:34 PM	Total Records: 96 Last Action: 12/22/17 11:06:00 AM	No Records Recorded	Prior Years: 2015 2014
CRA RELIEF	Total Records: 396 Last Action: 12/27/17 3:32:47 PM	Total Records: 396 Last Action: 12/22/17 11:08:37 AM	No Records Recorded	Prior Years: 2015 2014 2013
Call Report RELIEF	Total Records: 25 Last Action: 12/27/17 3:33:46 PM	Total Records: 25 Last Action: 12/22/17 11:08:36 AM	No Records Recorded	Prior Years: 2015 2014
South Carolina MLS	Total Records: 30 Last Action: 12/27/17 3:32:15 PM	Total Records: 30 Last Action: 12/22/17 11:02:42 AM	No Records Recorded	Prior Years: 2015 2014
Instant Geocoder	Geocode 2018 Records Total Records: 402	Geocode 2017 Records Total Records: 402	Geocode 2016 Records Total Records: 0	Prior Years: 2015 2014 2013



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# LOS Report Card – Instant HMDA and Compliance EAGLE

## LOS's Committing to Year 2018 Instant HMDA Upgrades and Enhancements:

- Associated Software Consultants Inc. (ASC) – PowerLender
- Black Knight – Empower.NET
- Byte Software – BytePro
- Calyx – Point
- Ellie Mae – Encompass\*
- FICS – Loan Producer
- Fiserv – EasyLender
- Fiserv – PC Lender
- LendingQB
- OpenClose – LenderAssist
- Specialized Data System – RemoteLender



**Compliance EAGLE**

Borrower Name: BORR, TEST    Loan ID: 98989898    Lender Loan ID: 98989898    CLID: 114

**AVAILABLE SCREENS**  
 Current Status: Reports    [Edit Loan](#)

**BORROWER/LOAN DATA**

Loan Number: 98989898  
 Property Address: 7304 St Agnes Way, Fairburn, GA 30213  
 Base Loan Amount: 120000.00  
 Gross Loan Amount: 122100.00  
 Loan Type: Purchase  
 Property Type: SFR Detached  
 Mortgage Type: FHA  
 Loan Term: 360  
 Loan Status: 1  
 Orig. Type: Fixed  
 Documentation: Full  
 Occupancy: Primary  
 Housing Ratio: 48.717  
 Debt Ratio: 175000.00  
 Sales Price: 175000.00  
 Appraised Value: 175000.00  
 Branch Code: 817  
 Origination Type: Retail  
 Primary Borrower: John Doe

**Current Status / Order Services**  
 This screen is a snapshot of this loan record's current status. From this screen you can order or monitor services as well as track previous requests.

[Order Selected Services](#)    [CE XML](#)    [Administration](#)

Check/Uncheck All

Service	Status	Date	Ordered By	History
<input type="checkbox"/> Mavent Review	ORDER			
<input type="checkbox"/> High Cost Review	ORDER			
<input type="checkbox"/> NMLS License Review	ORDER			
<b>Instant HMDA</b>				
<input type="checkbox"/> HMDA Review	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> Genocide / Demographics	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> Rate Spread Check	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> CRA Eligibility Review	PASS	8/22/2017	Jennifer Mathwig	History
<b>Instant NMLS MCR</b>				
<input type="checkbox"/> NMLS Mortgage Call Report Review	FAIL	8/22/2017	Jennifer Mathwig	History

\*Instant HMDA Only

# Compliance EAGLE – Amazing Services All in 30 Seconds

**Compliance EAGLE**

Borrower Name: BORR, TEST    Loan ID: 98989898    Lender Loan ID: 98989898    CLID: 114733

**AVAILABLE SCREENS**  
 Current Status: Reports    [Edit Loan](#)

**BORROWER/LOAN DATA**

Loan Number: 98989898  
 Property Address: 7304 St Agnes Way, Fairburn, GA 30213  
 Base Loan Amount: 120000.00  
 Gross Loan Amount: 122100.00  
 Loan Type: Purchase  
 Property Type: SFR Detached  
 Mortgage Type: FHA  
 Loan Term: 360  
 Loan Status: 1  
 Orig. Type: Fixed  
 Documentation: Full  
 Occupancy: Primary  
 Housing Ratio: 48.717  
 Debt Ratio: 175000.00  
 Sales Price: 175000.00  
 Appraised Value: 175000.00  
 Branch Code: 817  
 Origination Type: Retail  
 Primary Borrower: John Doe

**Current Status / Order Services**  
 This screen is a snapshot of this loan record's current status. From this screen you can order or monitor services as well as track previous requests.

[Order Selected Services](#)    [CE XML](#)    [Administration](#)

Check/Uncheck All

Service	Status	Date	Ordered By	History
<input type="checkbox"/> Mavent Review	ORDER			
<input type="checkbox"/> High Cost Review	ORDER			
<input type="checkbox"/> NMLS License Review	ORDER			
<b>Instant HMDA</b>				
<input type="checkbox"/> HMDA Review	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> Genocide / Demographics	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> Rate Spread Check	PASS	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> CRA Eligibility Review	PASS	8/22/2017	Jennifer Mathwig	History
<b>Instant NMLS MCR</b>				
<input type="checkbox"/> NMLS Mortgage Call Report Review	FAIL	8/22/2017	Jennifer Mathwig	History
<b>Fraud/Risk Services</b>				
<input type="checkbox"/> CoreLogic Risk Manager	ORDER			
<input type="checkbox"/> CoreLogic Fraud Manager	ORDER			
<input type="checkbox"/> CoreLogic Collateral Manager	ORDER			
<b>Additional Services</b>				
<input type="checkbox"/> Escrow/Title List	FAIL	8/22/2017	Jennifer Mathwig	History
<input type="checkbox"/> RESPA Closing Fees	ORDER			
<input type="checkbox"/> Flood ProCert	ORDER			
<input type="checkbox"/> Flood Certification	ORDER			
<input type="checkbox"/> Transfer Tax/Recording Fees	ORDER			
<input type="checkbox"/> LEP Check	ORDER			
<input type="checkbox"/> Income Review	ORDER			
<input type="checkbox"/> SSN Review	ORDER			
<input type="checkbox"/> LoanScoreCard QM Findings	ORDER			



# One Account, One Login, Extreme Accuracy and Efficiency

TRID SUMMARY / LEF / OTHER FEES	Disclosed Value	Disclosed Value	Reference	Source
Total Interest Percentage	64.538%	64.538%	8.000%	PLSR
30 Year: Total Principal	\$18,467.00	\$18,467.00	60.00	1755G
30 Year: Total Principal, Interest, RR & Escrow Costs	\$84,457.00	\$84,430.00	\$27.00	VARIOUS
Annual Percentage Rate	4.77%	4.77%	0.000%	1745C

Projected Payments (Disclosed)	Fixed Rate
Principal and Interest	\$1,329
Property and Insurance	\$1,329
Multiple Insurance	\$174
Transfer Tax	\$271
Recording Fees	\$1,228
Third Party Provider Fees	\$1,228
Portfolio Loan Rules Review	\$1,228
IRS Transcript Income Analysis	\$1,228
Flood Certs Directly Tied to Projected Investor	\$1,228
Vendor/Participant Exclusionary Lists	\$1,228
Instant HMDA	\$1,228
CRA Eligibility Review	\$1,228
Instant NMLS MCR	\$1,228
NMLS License & Eligibility	\$1,228

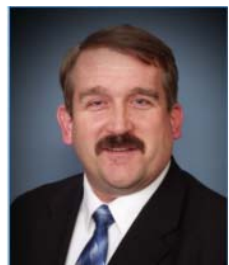
Charge / Total Charged Amount	Amount	Actual Fee	Disclosed (C) - Borrowing	Disclosed (Actual - Borrowing)
Fee Name	Amount	Actual Fee	Disclosed (C) - Borrowing	Disclosed (Actual - Borrowing)
Tax Charge for County Mortgage	\$741.50	\$0.00	\$741.50	(\$741.50)
Inspection Fee (prior to closing)	\$170.00	\$0.00	\$170.00	(\$170.00)
Loan Document Fee	\$124.44	\$0.00	\$124.44	(\$124.44)
Survey Fee	\$100.00	\$0.00	\$100.00	(\$100.00)
Home Inspection Fee	\$250.00	\$0.00	\$250.00	(\$250.00)
HOOR COSTS	\$10.25	\$0.00	\$10.25	(\$10.25)
HOOR COSTS	\$10.25	\$0.00	\$10.25	(\$10.25)
New Loan Administration Fee	\$1,000.00	\$0.00	\$1,000.00	(\$1,000.00)
Home Warranty Fee	\$514.00	\$0.00	\$514.00	(\$514.00)
Appraisal Fee	\$200.00	\$0.00	\$200.00	(\$200.00)
Mortgage Insurance Premium	\$3,141.00	\$0.00	\$3,141.00	(\$3,141.00)

## 30 Seconds to All of This!

- Complete TRID Analysis
- Certified LEF Submission to Regulators & Examiners
- Property Tax
- Transfer Tax
- Recording Fees
- Third Party Provider Fees
- Portfolio Loan Rules Review
- IRS Transcript Income Analysis to Borrower Provided Info
- Flood Certs Directly Tied to Projected Investor
- Vendor/Participant Exclusionary Lists
- Instant HMDA
- CRA Eligibility Review
- Instant NMLS MCR
- NMLS License & Eligibility



## Questions?



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For information on products referenced during this presentation, contact QuestSoft at 800-575-4632 option 1 or visit [www.questsoft.com](http://www.questsoft.com)

