

**TILA-RESPA Integrated Disclosures Implementation**  
(published 06/24/2015)

Creative Thinking has completed its analysis and evaluation of the TILA-RESPA Integrated Disclosures, published by the Consumer Financial Protection Bureau (CFPB), which provided an initial implementation date of August 1, 2015, which will likely be delayed to October 3, 2015, based upon the CFPB proposed amendment issued on June 24, 2015. (The effective date of August 1<sup>st</sup> will be used in this documentation until the extension is finalized.)

The changes brought about by the CFPB's Final Rule will impact organizations in the mortgage lending industry and bring about a significant transition in the key documents utilized in the mortgage loan process. This Rule will combine the existing disclosures under TIL and RESPA into new combined documents. The new Loan Estimate will take the place of the Good Faith Estimate and Initial Truth In Lending, while the new Closing Disclosure will replace the HUD Settlement Statement and Final Truth In Lending.

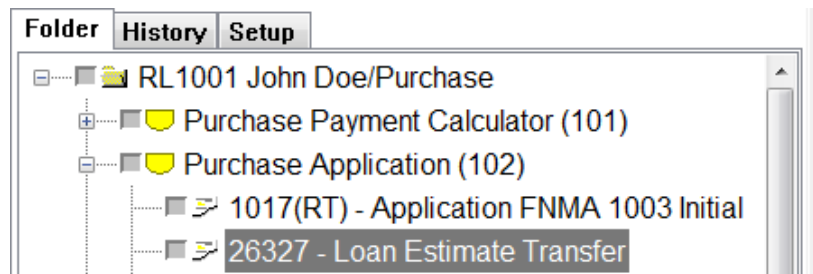
A summary of the changes made in CreativeVisions to implement the TILA-RESPA Integrated Disclosures can be found below. The information below is designed to facilitate the execution of the new documents but it should not replace the formal examination and review of the Final Rule by your organization. Information about the Consumer Financial Protection Bureau's Final Rule can be found by visiting: <http://www.consumerfinance.gov/regulatory-implementation/tila-respa/>. As always, Creative Thinking highly recommends consulting with your legal counsel and compliance manager for additional guidance.

**Review the Loan Estimate Transfer**

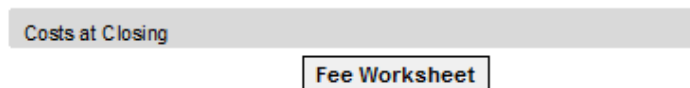
**For loans with an Application Date on or after August 1, 2015**, a new Loan Estimate Transfer, 26327, has been created in CreativeVisions and provided in the Application Stage of all applicable Goals. This form has been designed in CreativeVisions to provide a review of the information needed for the new Loan Estimate. In addition, it is also the tool which will be used to order the Loan Estimate from FocusAgent (CTI's latest software product).

The Loan Estimate appears by default below the FNMA Loan Application in the Application Stage, but may appear further down in the forms list if the forms in that stage have been reordered.

(Please see <http://help.creativethinkinginc.com/CVFAQs/ReorderingForms.pdf> for instructions on reordering forms if needed.)



Please use this document to review all loan terms, monthly payment, summary and other information for each loan in which a Loan Estimate is required. Also included on the Loan Estimate Transfer, in the Costs at Closing section, is a button to launch a Fee Worksheet:



This new Fee Worksheet, task 26451, provides a means to edit and/or review all fee information in a particular loan. Information can be edited directly from this Worksheet as needed. In addition, a button to access the "Fee Worksheet" can be found in the Application and Closing Stages of all personal closed end real estate loans. (This button will continue to load the current GFE/HUD Worksheet, task 21720, for loans with an Application Date prior to August 1, 2015. Task 21720 should only be used for loans with an Application Date prior to August 1, 2015.)

Prior to generating the Loan Estimate, there are a few questions your firm should consider regarding specific information which may be included on the new form. The following questions can be preset in the appropriate preset vision for each product:

**Include Homeowner's Insurance Statement** – This field has been preset to Yes, which indicates that the statement regarding "Homeowner's Insurance" should be included on page three (as seen below).

**Homeowner's Insurance**

This loan requires homeowner's insurance on the property, which you may obtain from a company of your choice that we find acceptable.

**Include Confirmation Receipt** – This question can be preset to Yes if your firm will include a signature section on the last page, allowing the borrower to confirm receipt of the document.

**Confirm Receipt**

By signing, you are only confirming that you have received this form. You do not have to accept this loan because you have signed or received this form.

Applicant Signature

Date

Co-Applicant Signature

Date

**Alternate Closing Costs Table** – This field can be preset to Yes if your firm will provide the Alternate Closing Costs Table, for refinance and equity loans.

Standard Table:

Calculating Cash to Close
Total Closing Costs (J)
Closing Costs Financed (Paid from your Loan Amount)
Down Payment/Funds from Borrower
Deposit
Funds for Borrower
Seller Credits
Adjustments and Other Credits
<b>Estimated Cash to Close</b>

Alternate Table:

Calculating Cash to Close
Loan Amount
Total Closing Costs (J)
Estimated Total Payoffs and Payments
<b>Estimated Cash to Close</b> <input type="checkbox"/> From <input type="checkbox"/> To Borrower
Estimated Closing Costs Financed (Paid from your Loan Amount)

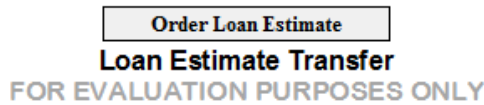
The Real Estate Program presets vision, CTI1036.VSN, includes the fields above and covers the following types of transactions: Purchase, Refinance, Construction Permanent, Second Mortgage, Bridge and Closing Goals. The following additional visions have been modified for other real estate Goals: CTI1070.VSN – Construction Only, CTI1092.VSN – Home Equity Closed End, CTI1063.VSN – Assumption, CTI1087.VSN – Modification and CTI1432 – Consumer Real Estate.

The Construction Permanent presets vision, CTI1081.VSN, has also been modified to include the question “Include Construction Revision Option” to print this language:

**New Construction** We may issue a revised Loan Estimate, at any time, up to 60 calendar days prior to closing.

**Order the Loan Estimate**

After the Loan Estimate Transfer is reviewed and you are ready to order the Loan Estimate, please scroll to the top of the form and click on the “Order Loan Estimate” button.



An upload dialog will appear, gathering all fields for the transfer. The Status will appear as Connecting, followed by Stabilizing, Printing and then READY.



Click on the “Download Result” button and answer “Yes” to open or save the file. The completed Loan Estimate will appear in XPS format. The printer icon can be used to print the document or File -> Save As can be used to save the file. After the document has been printed, click on the red X in the upper right hand corner of the XPS file to exit the XPS file, then click on the black X in the upper right hand corner of the web service window to return to the Loan Estimate Transfer.

**Your Home Loan Toolkit**

The new CFPB Special Information Booklet, Your Home Loan Toolkit, can be found in the Application Stage of applicable Goals in CreativeVisions as task 26438.

**Coming Soon!**

Creative Thinking is working on the final touches for the Closing Estimate Transfer, which will be accessible from the Closing Stage of all applicable Goals.

A standard Settlement Service Provider List will also be provided prior to August 1, 2015.

## Additional Details

- Keep in mind that access to the Loan Estimate Transfer is provided only for loans with an Application Date on or after August 1, 2015.
- The Loan ID# on the Integrated Disclosures will be the object ID of the loan file in CreativeVisions. This will guarantee that the number is unique within your organization.
- The Rate Lock hours for your organization can be defined for each location/branch from the Company Worksheet of the Lender, as an additional option under "Business Hours". A right click on the "Rate Lock" field will allow access to an "Alternate Lock In Expiration Time" on a loan by loan basis.
- The Closing Costs Expiration hour for your organization can be defined for each location/branch from the Company Worksheet of the Lender, as an additional option under "Business Hours". A right click on the "Closing Costs Expiration" field will allow access to an alternate "Closing Costs Expiration Date" on a loan by loan basis.
- Title Charges can now be defined in different ways, which will affect a fee's placement on the new Integrated Disclosures. The following questions were added to the new RESPA preset visions for all Title Services to accommodate these options:
  - Origination Charge
  - Shop For Service
  - Service Not Required
- If your organization has set opinions on the Details of Transaction section of the FNMA Application to exclude seller fees, removing the opinions may be recommended. Since seller fees are included on the Loan Estimate, best practice may be to also include the seller changes in the Details of Transaction section. If the Details shows a full picture of the transaction, this will make it easier for borrowers and lenders to compare these two forms and the figures included on them.
- The current Good Faith Estimate, HUD Settlement Statements, Truth In Lending Disclosures, Questions/Answers RE: TIL and Itemized Origination Charges will disappear from the Stages in Goals for all loans with an Application Date on or after August 1, 2015.
- The standard Servicing Disclosure, task 21575, has also been removed from the Application Stage of all applicable Goals with an Application Date on or after August 1, 2015, as this language is now included on the new Loan Estimate.
- The TIL Disclosure Report, 22078.RPT, has now been removed from all Stages in Goals. This history can now be obtained by clicking on the "Disclosure History" button of any current Truth In Lending form (such as 23285) and clicking on the "Generate Report" button, found in the bottom left hand corner of that window.
- The following outdated documents have been removed from all Stages in all applicable Goals, as these forms should no longer be utilized:

7886	Good Faith Estimate
1081	Truth In Lending
1355	Truth In Lending Disclosure
1065	Servicing Disclosure Statement
3347	HUD-1 PG 1
7862	HUD-1 PG 2
8476	HUD Settlement (Refinance)
1332	HUD-1 PG 1
8590	HUD-1B PG 2

Creative Thinking will provide additional information about the remaining forms as soon as it becomes available. Please contact your Customer Support Representative if you have any questions.