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Expere Knowledge Base – TRID Content Guide

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Preface

The Expere Knowledge Base Content Guide (“the guide”) describes Wolters Kluwer Financial Services’ authoritative compliance documentation released in the Expere Knowledge Base. Expere Knowledge Base compliance documents are available for different lines of business, including: Residential Lending, Commercial Lending, Consumer Direct Lending, Home Equity Lending, Deposit (Accounts) and Consumer Mortgage Lending.

How to Use This Document

This guide provides an introduction to Wolters Kluwer Financial Services core competency: Compliance Intelligence. Wolters Kluwer Financial Services’ focused compliance intelligence expertise, enhanced through technology, allows us to deliver the compliance documentation to meet your needs.

Following sections provide information on:

Products and Transactions Supported - refer to this information for an overview of the line of business products supported or planned for future support by the compliance documents;

Flexibilities within Transactions - refer to this section for an understanding of the transaction features such as parties to the transaction, collateral, etc. supported or planned for future support by the content within the compliance documents;

Features not Supported - refer to this information to review product, transactions, and transaction flexibilities that are not planned to be supported by the compliance documentation;

Release Content - refer to this section for a complete list of compliance documents supported in the released Expere Knowledge Base.

Who Should Use This Document?

This guide is intended for enterprise business managers, line of business managers, and compliance staff implementing compliance documentation through Expere Integrated Enterprise (Expere IE), as well as those expanding lines of business, products, or jurisdiction coverage.

Additionally, financial institutions seeking to purchase the Expere IE system will gain insight into the available and planned compliance documentation capabilities of the Expere Knowledge Base through review of this guide.

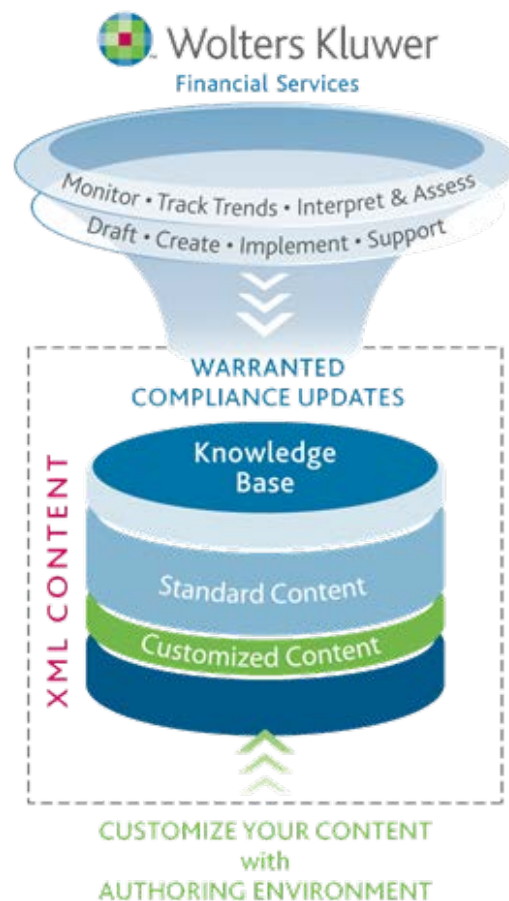
Compliance Intelligence

Compliance has become a major force in the way today's financial institutions conduct business. As the issues grow more complex and delivery channels expand, even the slightest inefficiencies in the document development process can add up to significant losses and compromised integrity. Wolters Kluwer Financial Services solutions represent over five decades of market intelligence and industry experience dealing with thousands of regulatory changes each year. Wolters Kluwer Financial Services is the most experienced and knowledgeable national provider in compliance research, tracking, and business translation. Wolters Kluwer Financial Services has marshaled this experience together in the Expere Knowledge Base, which addresses the unique compliance and market pressures faced by financial institutions today.

Compliance Monitoring

The Expere Knowledge Base is industry-recognized for providing financial institutions with accurate and practical content for complex rules and requirements. The Expere Knowledge Base content represents extensive compliance-related experience and analysis. Wolters Kluwer Financial Services' compliance experts (primarily attorneys and compliance analysts) review and monitor literally thousands of bills each year in all 50 state jurisdictions, the District of Columbia, and at the federal level. All bills are assessed for impact on Wolters Kluwer Financial Services documents, data requirements, business rules, styles, and formatting.

Additionally, Wolters Kluwer Financial Services reviews case law, monitors industry trends, and talks with thousands of users on an ongoing basis to obtain first-hand input on financial-related issues. This perspective helps Wolters Kluwer Financial Services develop compliance content that improves virtually every area of a financial institution's documentation. As new or updated regulations are enacted, we translate appropriate requirements and market knowledge into practical, accurate, and understandable content that can be accessed through the Expere Knowledge Base.



The Expere Knowledge Base provides content addressing the lending and accounts document requirements related to the monitoring of federal and state legislation, federal and state case law, underwriter agents, and business best practices.

The Expere Knowledge Base provides content addressing the lending and document requirements of federal regulatory agencies, including:

Consumer Financial Protection Bureau (CFPB)	Federal Deposit Insurance Corporation (FDIC)
Federal Reserve Board (FRB)	Federal Trade Commission (FTC)
U.S. Department of the Treasury	Federal Financial Institutions Examination Council (FFIEC)
Office of the Comptroller of the Currency (OCC)	U.S. Department of Housing and Urban Development (HUD)
Financial Crimes Enforcement Network (FINCEN)	Fannie Mae and Freddie Mac
Office of Foreign Assets Control (OFAC)	

The Expere Knowledge Base provides lending document content for regulatory and legislative mandated disclosures and documents, including:

Truth in Lending Act (TILA)-CFPB Regulation Z	Fair Credit Reporting Act (FCRA)
Real Estate Settlement Procedures Act (RESPA)-CFPB Regulation X	Unfair or Deceptive Acts of Practices-FRB Regulation AA
Equal Credit Opportunity Act (ECOA)-CFPB Regulation B	Servicemembers Civil Relief Act (SCRA)
Home Mortgage Disclosure Act (HMDA)-CFPB Regulation C	IRS Regulations
Community Reinvestment Act (CRA)-FRB Regulations BB and G	USA Patriot Act
Federal Flood Insurance Program	Privacy of Consumer Information-CFPB Regulation P
FRB Regulation O-Loans to Executive Officers, Directors and Principal Shareholders of Member Banks	Federal Interest Rate Preemption (Depository Institutions Deregulation and Monetary Control Act of 1980, DIDMCA)
	Alternative Mortgage Transactions Parity Act (AMPTA or the Parity Act)

Expere Knowledge Base Overview

The Expere Knowledge Base is based on a flexible data model that is designed to manage many different content components to deliver compliance integrity. The Expere Knowledge Base contains compliance language, graphics, rules (e.g., document selection and assembly rules), stylesheets, and standard data elements as discrete objects in the data model. With the exception of graphics, all content objects used to produce compliance documents are coded in XML.

The business rules that govern the selection and assembly of documents are driven by transaction data supplied to the Expere Document Engine's selection and assembly facility. Transaction data may be supplemented with *Default Data* and *Policy Data* values. Default Data is the Expere Knowledge Base term for information that is used across multiple documents and transactions (e.g., financial institution name, address, etc.). Policy Data are rules-driven; the rules use transaction characteristics (e.g., applicable law state or the type of loan) or institutional policies to determine what data to add to a document. When the data is used for document selection and assembly, it must be in a single XML document and that document must be valid according to an XML *transaction schema*.

Dynamic Documents

Expere TRIDs are dynamic documents, which include text that changes according to the specific characteristics of a transaction. More specifically, dynamic content is assembled only when it is requested. Dynamic documents within the Expere Knowledge Base conform to the Instances schema. The document identification for a dynamic document will begin with an INS prefix.

TRID Content

The Expere Knowledge Base TRID Content Guide provides additional information on the types of products and features that are supported for the TRIDs. The TRIDs are new disclosures promulgated by the Consumer Financial Protection Bureau (CFPB) as part of the Dodd-Frank Wall Street Reform and Consumer Protection Act to combine the Truth-In-Lending Act (TILA) disclosures with the Real Estate Settlement Procedures Act (RESPA) disclosures. This Content Guide should be used by lenders who are using only Expere TRID content. Lenders who are using Expere Home Equity or Residential Lending content should consult their respective Content Guides for covered features and products for the TRIDs and other documents.

Products and Transactions Supported

Following is an overview of the content supported for the Expere TRIDs. See the next section, Flexibilities within Transactions, for more options.

- Agency Mortgages - Fannie Mae, Freddie Mac
- Government Mortgages -FHA, VA, and “other” types of government-insured products such as USDA, WHEDA, SDHDA
- Proprietary loans that are not sold to Fannie Mae or Freddie Mac or insured by the government
- Mortgage loans within 51 U.S. Jurisdictions
- Purchase Money, Refinance, Construction, and Home Equity Mortgages

Flexibilities within Transactions

Following is an overview of the TRID transaction features supported by the Expere Knowledge Base.

Flexibilities Within Transactions	Available in Expere Knowledge Base
Channel Sources	
Banks	X
Brokers - Traditional*	X
Brokers - Table Funded*	X
Correspondents (Investors)	X
Credit Unions	X
Licensed Lenders	X
Savings Banks (includes savings associations and thrifts)	X
<i>*We support loans brokered to lenders, lenders acting as brokers, and loans that are brokered to a lender that close in the name of the broker. We support licensed brokers and brokers who are exempt from licensing.</i>	
Parties to the Transaction	
Individual	X
Intervivos (Living)Trusts with individual or institutional trustees	X
Irrevocable Trusts	X

Flexibilities Within Transactions	Available in Expere Knowledge Base
Illinois Land Trusts	X
Sole Proprietorship	X
Nested Entity Signatures	X
Power of Attorney Signatures	X
Payment Information	
<i>Interest Rate Type:</i>	
Fixed Rate	X
Adjustable Rate	X
<i>Repayment Methods:</i>	
Installment without Balloon (fully amortized payments)	X
Installment with Balloon	X
Interest Only	X
Single Payment	X
<i>Payment Frequencies:</i>	
Monthly	X
Biweekly	X
Quarterly	X
Semiannual	X
Annual	X
Single	X
Daily	X
Weekly	X
Bimonthly	X
Semimonthly	X
<i>Indexes:</i>	
1 Year Treasury Bill (CMT)	X
3 Year Treasury Bill (CMT)	X
5 Year Treasury Bill (CMT)	X
10 Year Treasury Bill (CMT)	X
1 Month Wall Street Journal (WSJ) LIBOR	X

Flexibilities Within Transactions	Available in Expere Knowledge Base
6 Month Wall Street Journal (WSJ) LIBOR	X
1 Year Wall Street Journal (WSJ) LIBOR	X
Cost of Funds (COFI)	X
6 Month Certificates of Deposit (CD)	X
JP Morgan Chase Bank Prime	X
National Average Contract Rate	X
Wall Street Journal US Prime Rate	X
"Other" lender-specified index	X
Loan Features	
Construction Loans— supported for single-phase loan with a single-closing (construction only or permanent financing only, with or without escrow accounts) or a single-closing, two-phase construction-to-perm loan with one note and one security instrument and with only the following features: 1) the same fixed interest rate amount in both phases; 2) a fixed rate interest rate in the 1 st phase and a variable rate in the 2 nd phase and any initial rate hold for the variable rate phase is the same as the subsequent rate change frequency (ex. 1/1 or 5/5); 3) a variable interest rate in both phases and the only difference between the 2 phases is that the 1 st phase is interest-only (index, margin, rate change frequency, and payment frequency are identical in both phases); and 4) without an escrow account in either phase or an escrow account only in the 2 nd phase. For construction-only loans and two-phase construction-to-perm loans, we also do not support a purchase from a seller who is not the builder constructing the house (the seller of the raw land and the builder are not the same party).	X-limited support
Prepayment penalties	X
Late Charges	X
High Cost Mortgages	X
Private Mortgage Insurance	X
Initial Escrow	X
Optional or Required Credit Life & Disability Insurance	X
Negative Amortization	X
No Cost Loans	X
Demand	X
Skipped (Seasonal) Payments	X
Two Settlement Agents	X

Flexibilities Within Transactions	Available in Expere Knowledge Base
Four Real Estate Agents (2 for borrower, 2 for seller)	X
Assumable Loans	X
Partial Payments	X
Temporary Interest Rate Buydowns	X
Collateral Categories and Types	
<i>Real Estate or Residence:</i>	
1 - 4 Family Dwelling	X
Condominium	X
Cooperatives (If treated as real estate under applicable law)	X
Townhome (PUD)	X
Manufactured Homes Permanently Attached to Real Estate	X
Multi-Family Residences	X
Raw Land	X
Agricultural Land	X
Multiple Real Property Collateral-- The TRIDs will support multiple real estate collaterals in the same transaction. Lenders must select one purpose for the transaction (i.e. refinance, purchase). The same valuation must be passed (i.e. all sales price, all appraised values or all estimated values) for each real estate collateral.	X-limited support
Mixed collateral (real property and personal property in same transaction)	X

Features Not Supported

The following features are not supported. If a feature is not supported, it means that Wolters Kluwer Financial Services does not warrant that base content complies with applicable law, or agency or government requirements. Lenders face the following risks if they use base content to generate a loan transaction with an unsupported feature: there may be missing language or unnecessary language or the contract terms may not be accurately depicted. This may expose lenders to regulatory or civil actions, and lenders may not be able to enforce the terms of the contract.

Transaction Features not Supported

Transaction Features Not Supported:

- Optional Payments
- Construction loans that do not match the covered features described above in “Loan Features”
- Graduated Payment Mortgages (Step-Rates)
- Preferred Rates
- Electronic Signatures

Release Content

TRID (TILA-RESPA Integrated Disclosures)

Document	Description	Jurisdictions, Variations, and/or Versions
Changed Circumstances	Changed Circumstances is an internal document that is used by the lender to document changed circumstances and changed fees that resulted in the lender providing a revised Loan Estimate to the borrower. This form is used for loans subject to the integrated TILA-RESPA disclosure requirements with an application date on or after October 3, 2015. It replaces the Good Faith Estimate Changed Circumstances form. This form should be retained in the lender file and is not provided to the borrower.	Multistate
Closing Disclosure	The Closing Disclosure is a combined disclosure that shows the loan terms for Truth-in-Lending and the actual closing costs for RESPA in connection with a closed-end consumer purpose loan secured by real estate whose application is received by the lender on or after October 3, 2015. It replaces the RESPA HUD-1 or HUD-1A Settlement Statement as well as the Truth-In-Lending Disclosure. The Closing Disclosure may be one of three versions: Borrower-Only and Combined Borrower/Seller for use in purchase transactions, and No-Seller for non-purchase transactions. A Seller-Only version for use in purchase transactions with the Borrower-Only version is described below.	Multistate
Closing Disclosure Addendum	The Closing Disclosure Addendum is used in conjunction with the Closing Disclosure to list additional party information or signatures, collateral information and summary of transaction items when there is not enough space on the Closing Disclosure.	Multistate

Document	Description	Jurisdictions, Variations, and/or Versions
Closing Disclosure - Seller Only	The Closing Disclosure - Seller Only is for a Seller-Only copy of the Closing Disclosure and does not contain the Loan Terms, Projected Payments, Calculating Cash to Close, Borrower's Transaction Summary, and Escrow tables or other disclosure information that the borrower receives in the Closing Disclosure. This is a combined disclosure that replaces the RESPA HUD-1 Settlement Statement - Seller Only as well as the Truth-In-Lending Disclosure, and shows the actual closing costs for RESPA in connection with a closed-end consumer purpose loan secured by real estate whose application is received by the lender on or after October 3, 2015.	Multistate
Closing Disclosure - Seller Only Addendum	The Closing Disclosure - Seller Only Addendum is used in conjunction with the Closing Disclosure - Seller Only to list additional party information or signatures, and summary of transaction items when there is not enough space on the Closing Disclosure - Seller Only.	Multistate
Escrow Closing Notice	The Escrow Closing Notice discloses that the escrow account for the loan is being closed and that borrowers are now responsible for paying the property costs (that were being escrowed) directly and notifies them of the possible consequences for failing to pay the property costs.	Multistate
Loan Estimate	The Loan Estimate provides early estimated disclosures of closing costs for RESPA as well as loan terms (i.e. interest rates and payments) for Truth-in-Lending. It replaces the Good Faith Estimate and early Truth-In-Lending Disclosure and is used in a closed-end consumer purpose transaction secured by real estate for which the lender receives an application on or after October 3, 2015.	Multistate

Document	Description	Jurisdictions, Variations, and/or Versions
Loan Estimate Addendum	The Loan Estimate Addendum is used in conjunction with the Loan Estimate to list additional party information or signatures, collateral information when there is not enough space on the Closing Disclosure, and Services Borrower Can Shop for if lender indicates to overflow such additional charges to the addendum.	Multistate
Written List of Providers	The Written List of Providers is the lender's list of providers that provide services for which the borrower can shop, and in some cases may also list providers for which the Borrower cannot shop, if the lender elects to include this information. This form accompanies the Loan Estimate and replaces the Settlement Services Providers List for applications received on or after October 3, 2015.	Multistate