Periodic Mortgage Statements

General Information, Samples and Configuration

INTRODUCTION

This booklet provides information on periodic mortgage statements required for qualifying credit unions per Regulation Z as of January 2014. Many credit unions are exempt from the regulation and therefore do not produce these statements. More information about Regulation Z is available on the CFPB.gov site.

Mortgage statements are a separate run produced independently of regular member statements and credit card statements.

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GENERAL INFORMATION

SPECIFICS OF THE REGULATION

In 2013, the Consumer Financial Protection Bureau (CFPB) made regulatory amendments impacting closed-end mortgages, requiring that specific information is presented, in certain groupings/locations on a separate mortgage statement. Regulation Z requires financial institutions subject to the rules to produce a separate periodic statement for each billing cycle after the payment due date or at the end of the courtesy pay period provided for the previous billing cycle.

In addition, the regulation requires that the periodic statement be delivered or placed in the mail within a reasonably prompt time after the payment due date or at the end of any courtesy period. Delivering, emailing or placing the periodic statement in the mail within four days of close of the courtesy period or the previous billing cycle generally is considered reasonably prompt.

Our mortgage statement content and layout models the format in the appendix of the regulation.

Exceptions

<u>Partial Payment Information</u> This relates to balance sweep accounts where a member deposits money to a share account until sufficient funds are available to make the complete payment to the loan account. This type of payment activity is not consistently applied across our credit unions.

<u>Prepayment Penalty</u> – This element does not exist on the system and our experience suggests that very few if any credit unions charge a prepayment penalty. We default this section to "no prepayment penalty".

<u>Coupon Book Exceptions</u> – This process is being reviewed. At this time, only the periodic mortgage statement has been programmed to meet the regulation requirements.

BEST PRACTICES RECOMMENDATIONS

To display appropriately on the statement, the mortgage loan should meet the following criteria:

- Loan payment due date between the 1st and 7th of the month
- Grace period end date within the same month as the loan due date
- Payment frequency for the loan is monthly

Results will vary for mortgage loans that use settings other than these, due to layout and data elements on mortgage statements.

MORTGAGE STATEMENT DETAILS

- Can be generated for loans with Process Type M, excluding commercial loans (Master type MO)
- Activation flag in statement configuration allows selection of all Process Type M mortgages or for only specific loan categories
- Separate statement run and not included with the regular member statements*
- Top section is perforated to be used as a coupon similar to our credit card statement
- eStatements generated separately, similar to how credit card statements work
- For credit unions with Sage Direct as vendor, available in one generic statement style at this time
- Will be generated even if there is no activity for the month (adhering to Statement Mail Group settings as well as existing eStatement enrollments relative to delivery)
- Loans closed in the statement period will receive a statement (and a future due date will display even though the loan is paid off)
- The mortgage statement will not show account nicknames

*If mortgage statement option not activated, mortgage loan will appear on the regular member statement as it does today.

TIMING OF MORTGAGE STATEMENTS

Starting in March 2015, mortgage statements generate mid-month instead of end-of-month. For online credit unions this is the 17th of the month.* Not only does a mid-month cutoff better meet the rules of the CFPB, it also has the following advantages:

- Takes into account the typical grace days for member to make their payment before a late fee
- Serves as a bill indicating the amount due in advance of the payment due date
- Allows adequate time for producing, mailing, and receiving statement before the due date

If the cutoff day is a not a business date and there is no end-of-day cycle run, then the cutoff day will be the next business day that end-of-day is run. For month end cutoff, this will always be the last day of the month because CU*BASE requires an end-of-day process on the last day of every month. For mid-month cutoff, the statement end date can vary from month to month, based on holidays and weekends.

* Self-processors can specify a different cutoff day than the 17th, but the recommendation is between the 16th and the 20th.

> Important Note: Many steps are required for setting up a credit union for mid-month statements. Contact Client Services at 616-285-5711 or csr@cuanswers.com if you are interested in mortgage statements.

TIMING OF ESCROW ANALYSIS

Annually, escrow accounts tied to mortgage loans are analyzed to determine the impact of deposits and disbursements on the loan payment. New payments are calculated and adjusted for the coming year.

When creating the Escrow Analysis* (MNEXLN menu) for loans with midmonth mortgage statements, be sure that the *New payment effective date* is a business day on or before the date that the mortgage statement is generated (generally the 17th). This ensures that the mortgage statement will contain the correct amount due.

Note: Remember that the "New payment effective date" for the Escrow Analysis cannot be a holiday or non-business day. Therefore, be sure to review the actual date the mortgage statement will be generating for that month when determining the "New payment effective date".

*Refer to the *Escrow Processing with CU*BASE* booklet for more information on Escrow Analysis.

CREDIT UNION LOGOS

A specific logo image can be requested for the front of the mortgage statements or the logo can match the other statement types. Keep in mind that Regulation Z does have specific requirements about listing contact information, so you might need a special layout for your mortgage statement logo that includes a different phone number than what is used on your regular and credit card statements. For credit unions using Sage Direct, we will use the same logo Sage already uses for your regular/credit card statements unless notified otherwise.

Contact Client Services at 616-285-5711 or <u>csr@cuanswers.com</u> to request logo changes. Normal lead times and fees apply for changes to logo artwork.

BACK PAGE OF STATEMENT

The back page of the mortgage statement consists of the credit union remit to return address formatted to fit in window envelope (For CU*Spy eStatements, there is no PDF equivalent of the back page).

For Sage Direct clients, the "remit to" address for the back of the statement is pulled from the credit unions General Ledger Chart of Accounts. If a different return address is desired, a request can be made through Client Services. Normal programming fees and lead times apply.

SAGE DIRECT PRICING

Sage Direct is our standard statement vendor. If the credit union uses another vendor, refer to that vendor for pricing. You can request for Sage Direct to produce mortgage statements even if another vendor is used for regular member and credit card statements.

Mortgage statements printed by Sage Direct are \$0.18 per statement, which includes printing, paper, and envelope, <u>plus postage</u>. Members with more than one mortgage will receive multiple envelopes.

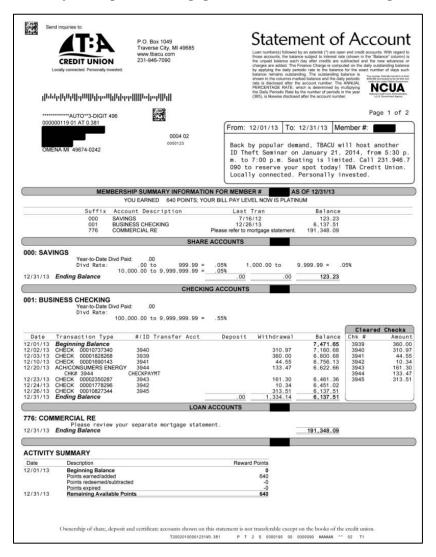
- CU one-time layout setup charge is \$330 which includes, logo and payment coupon setup, proof reading and proof copies
- Future logo modifications are \$95 per statement type*
- No minimums, just a fee per printed statement

*Note: There is a charge for each unique logo type that requires a change.

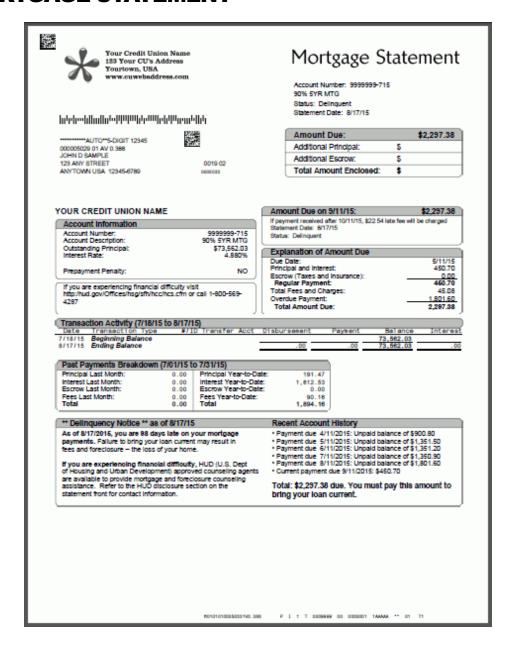
HOW DOES THE REGULAR MEMBER STATEMENT CHANGE?

If the mortgage loan is set up to receive separate mortgage statements, it will still appear on the regular monthly statement but with minimal detail. In the summary portion, the Suffix, Account Description and Ending Balance is listed along with "Please refer to mortgage statement".

In the detail section, the loan suffix/description is listed along with "Please refer to your separate mortgage statement" and the ending balance.



SAMPLE MORTGAGE STATEMENT



UNDERSTANDING THE MORTGAGE STATEMENT

Field Descriptions

Field Name	Description
Account Information	
Account Number	Loan account number and suffix
Account Description	Loan account description
Outstanding Principal	Loan account principal balance as of the statement date
Interest Rate	Loan account interest rate

Field Name	Description
Rate in effect until	The date that the rate is in effect until in MM/DD/YY format. If this date is zeroes, this line is suppressed.
	Note: This line should appear for group, update and contract type variable rate loans.
Prepayment Penalty	Defaults to "NO", prepayment penalties do not apply
Financial difficulty blurb	The "If you are experiencing financial difficultly please visit" disclosure is required per the regulation.
Amount Due on MM/DD/YY	This is the future amount due and due date as of the statement cutoff date. The future due date is the due date for the next loan payment past the statement date. Future amount due is the regular payment amount (including escrow) unless the next payment due date is less than the statement end date. Note: If the loan is paid off in the current statement period, the amount due will show as zeroes with a future next due date.
If payment received after MM/DD/YY, XX.XX late fee will be	MM/DD/YY is the next payment due date plus the grace period per the <i>Loan Fines Configuration</i> on the Loan Products (MNCNFB) menu.
charged	XX.XX is the future late fee calculated per the <i>Loan Fines Configuration</i> on the Loan Products (MNCNFB) menu.
	Note: If the calculated date and late fee are zeroes, this line is suppressed on the statement.
Statement Date	The effective date of the statement (the cutoff date).
Status	The status of the loan (Active, New, Closed, Delinquent or Frozen). If the loan is both Delinquent and Frozen, the status will show as Delinquent.
Explanation of Amount Due	This section includes breakdown of principal plus interest, escrow amount due, along with fees and overdue payment amounts as of the statement period end (cutoff day).
Due Date	This is the actual next due date of the loan (could be in the past).
Principal and Interest	The total amount for the principal plus interest included with the payment.
Escrow (Taxes and Insurance)	The escrow amount included with the payment (including taxes and insurance).
Regular Payment	The regular payment amount for the loan.
Total Fees and Charges	The delinquent fine amount for the loan.
Overdue payment	The delinquent amount for the loan (DLQBAL from the MEMBER file).
Total Amount Due	The total amount due for the loan.
Transaction Activity (MM/DD/YY to MM/DD/YY)	This section contains transaction activity for the statement period including the Date, Transaction Type, #/ID, Transfer Acct, Disbursement, Payment, Balance, Interest. Note: If there is no transaction activity, a statement will still generate displaying only Beginning Balance and Ending Balance.

Field Name	Description
Past Payments Breakdown	This section includes last month and year-to-date totals for principal, interest, escrow and fees as of the last day of the previous calendar month.
Principal Last Month	The amount of principal paid in the last calendar month. Note: Reversals may not be included.
Interest Last Month	The amount of interest paid in the last calendar month. Note: Reversals may not be included.
Escrow Last Month	The amount of escrow paid in the last calendar month. Note: Reversals may not be included.
Fees Last Month	The amount of fees paid in the last calendar month. Note: Reversals may not be included.
Principal Year-to- Date	The amount of principal paid year-to-date as of the last calendar month. Note: Credit unions new to CU*BASE in the current year may not show principal for the full year in this field.*
Interest Year-to-Date	The amount of interest paid year-to-date as of the last calendar month. Note: Credit unions new to CU*BASE in the current year may not show interest for the full year in this field.*
Escrow Year-to-Date	The amount of escrow paid year-to-date as of the last calendar month. Note: Credit unions new to CU*BASE in the current year may not show escrow for the full year in this field.*
Fees Year-to-Date	The amount of fees paid year-to-date as of the last calendar month. Note: Credit unions new to CU*BASE in the current year may not show fees for the full year in this field.*
Delinquency Notice as of MM/DD/YY	This section only displays for loans that are more than 45 days delinquent. Delinquency history information including due dates and unpaid balances for up to five prior periods display. See page 9 for more information.

^{*} If a credit union turns on mortgage statements mid-year, the year-to-date information will start accumulating in the month that the mortgage statements start. For converted credit unions, the year-to-date information will be populated, if available, from the previous data provider.

WHAT IS INCLUDED IN THE PAST PAYMENTS BREAKDOWN SECTION?

This period totals for principal, interest, escrow and fees come from the TRANS2 file and are captured as indicated below. Transactions flagged with a REVFLG=R (reversal) in the TRANS record are not included.

Principal Last Month

Tran code 22/All tran types = add PRINCP (principal amount)

Tran code 23/ Tran type not 60 or 61 = add PRINCP

Tran code 23/ Tran type 61 = subtract TRAMTP (Transaction amount)

Tran code 24/ Tran type 85 = add PRINCP

Tran code 25/ Tran type 95 = subtract PRINCP

(Type 60 is fine payment and 61 is escrow payment. Type 85 is credit/post

payment and type 95 is debit/reverse payment.)

Interest Last Month

Tran code 22/All tran types = add INTAMT (Interest amount)

Tran code 24 /Tran type 85 = add INTAMT

Tran code 25/Tran type 95 = subtract INTAMT

(Type 85 is credit/post payment and type 95 is debit/reverse payment.)

Escrow Last Month

Tran code 23/Tran type 61 = add TRAMTP

Note: Since we do not have specific tran codes for escrow adjustments, these amounts are not included if applicable.

(Type 61 is escrow payment.)

Fees Last Month

Tran code 23/Tran type 60 = add TRAMTP

Note: Since we do not have specific tran codes for fee adjustments, these amount are not included if applicable.

• Note: Tran code 22 is Loan Payments, Tran Code 23 is Loan Disbursements, Tran Code 24 is Loan Error Correction Credits, and Tran Code 25 is Loan Error Correction Debits.

Year-to-Date Totals

The mortgage statement history file (MTGSTMHST) accumulates the principal, interest, escrow and fee information each month to determine the YTD totals.

• Note: If a transaction has been suppressed on the statement (via MNUPDA, *Update Transactions Desc/State* or MNSERV, *Reverse Tran/Adj Tlr Drawer*), it is not included in either "This Period" or "Year-to-Date" totals.

WHAT IS INCLUDED IN THE DELINQUENCY NOTICE SECTION?

The Delinquency Notice section displays for loans that are more than 45 days delinquent. This section will not display for zero balance or written off loans.

Delinquent account history including due dates and unpaid balances for up to five prior periods display. The unpaid balance is the overdue payment amount as of the statement date. Prior periods will only display if the overdue payment amount was greater than zero when the statement generated.

Delinquency Notice as of 8/17/15 As of 8/17/2015, you are 77 days late on your mortgage payments. Failure to bring your loan current may result in fees and foreclosure – the loss of your home. If you are experiencing financial difficulty, HUD (U.S. Dept of Housing and Urban Development) approved counseling agents are available to provide mortgage and foreclosure counseling assistance. Refer to the HUD disclosure section on the statement front for contact information. **Recent Account History **Payment due 4/01/2015: Fully paid on 4/30/2015 **Payment due 6/01/2015: Unpaid balance of \$556.52 **Payment due 6/01/2015: Unpaid balance of \$1,113.04 **Payment due 9/01/2015: Unpaid balance of \$1,1491.30 **Current payment due 9/01/2015: \$578.26 **Total: \$2,138.60 due. You must pay this amount to bring your loan current.

In the example above, as of the 8/17/15 statement this loan is 77 days past due. The unpaid balance listed next to the payment due date represents the unpaid balance as of the corresponding statement date. For example, the Unpaid balance for the 7/17/15 statement was \$1,113.04. The last time that the account was paid-to-date (not past due) was as of 4/30/15.

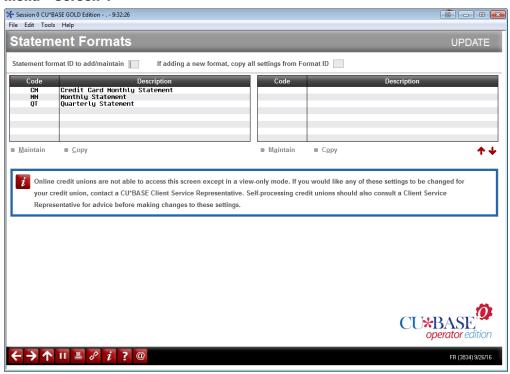
CONFIGURING MORTGAGE STATEMENTS

If your credit union would like to turn on these statements, please contact Lender*VP at 616-285-5711, x190 for Rob Meijer or x344 for Laura Zazakis. Separate mortgage statements can be activated for all mortgages or for specified mortgages by loan category.

This section explains the steps required for setting up mortgage statements and configuring the cutoff day.

MEMBER STATEMENT CONFIGURATION

"Member Statement Config" on the Credit Union Configurations 1 (MNOP09) menu – Screen 1

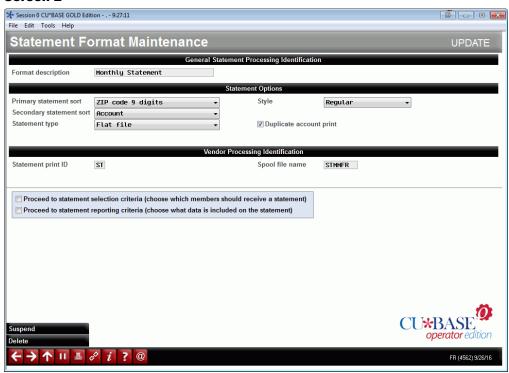


This first screen is used to select which statement format will be updated. Both the quarterly format (QT) and the monthly format (MN) must be flagged for the mortgage statements.

There is not a separate format for mortgage statements because of the stringent requirements for the mortgage statements. For example, interest rate, next payment due date, payment amount must display. Also, only the flat file format is allowed.

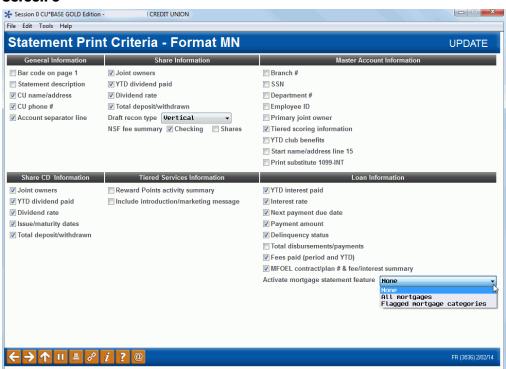
Select the format for the statement to be maintained and use Enter to proceed to the second screen.

Screen 2



Check the box "Proceed to statement reporting criteria (choose what data is included on the statement)".

Screen 3



The mortgage statements can be activated for "All mortgages" or "Flagged mortgage categories".

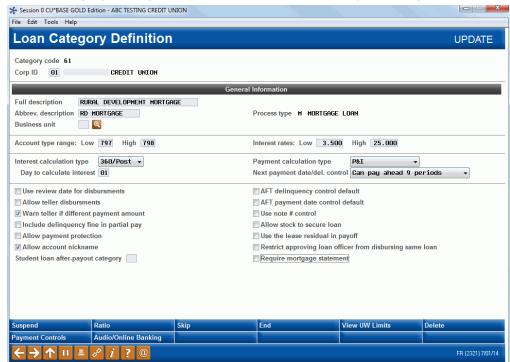
If "Flagged mortgage categories" is selected, then additional maintenance is required to the *Loan Category Configuration* on the Loan Products (MNCNFB)

menu for each loan category to receive mortgage statements (see next section).

If one of the mortgage statement feature options is activated, then the fields in the Loan Information section (YTD interest paid, Interest rate, etc.) are ignored on regular member statements for mortgage loans. The criteria would still apply for other types of loans on the regular member statements.

LOAN CATEGORY CONFIGURATION

This maintenance in this section is applicable only if "Flagged mortgage categories" was selected on the Member Statement Configuration (see previous section).



"Loan Category Configuration" on the Loan Products (MNCNFB) menu

The "Require mortgage statement" field is used to determine if the loan category will generate mortgage statements. If this field is checked and the Statement Format Configuration has the "Activate mortgage statement feature" set to "Flagged mortgage categories", a mortgage statement will generate for loans with that loan category.

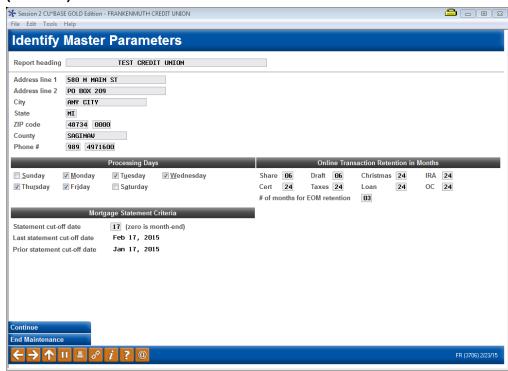
Note: The "Require mortgage statement" flag will not display on the Loan Category Definition" if the Statement Format Configuration is set to "All Mortgages".

STATEMENT CUTOFF DAY

Due to timing considerations, any changes to the statement cutoff day must be coordinated with Client Services at 616-285-5711 or csr@cuanswers.com.

This section shows where the statement cutoff day is configured.

"Master CU Parameter Config" on the Credit Union Configurations 1 (MNOP09) menu – Screen 1



In the Mortgage Statement Criteria section of the screen, the day of the month (in most cases the 17th) is entered in "Statement cut-off date". This is the statement end date. For month end statements, enter 00.

The "Last statement cut-off date" and "Prior statement cutoff date" display here for informational purposes.

ESTATEMENT NOTIFICATION MESSAGE

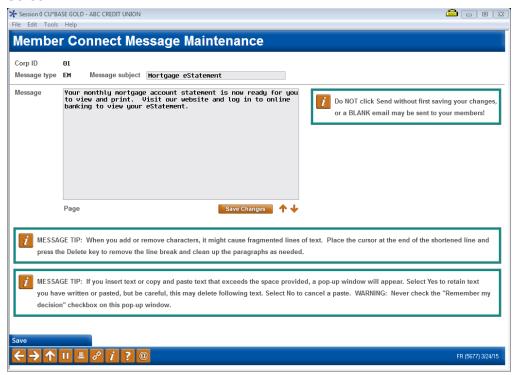
A different eStatement notification message can be used for mortgage statements versus regular statements. Follow the steps below to define your email message for mortgage eStatements.

"Update Monthly eStatement Emails" on the Member Communication (MNPRTC) menu – Screen 1



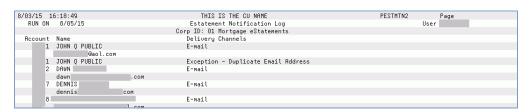
Select "Mortgage eStatement notification email".

Screen 2



Both the subject line and message can be updated on the above screen.

To obtain a list of mortgage eStatement notifications that were generated, refer to the EStatement Notification log (PESTMTN2) shown below.



MORTGAGE STATEMENT HISTORY

Past payment history for mortgage loans is stored in a mortgage statement history file. The last month and year-to-date figures for the "Past Payments Breakdown" section of the mortgage statement are populated from this file. In rare instances, data in this file may need to be adjusted, such as due to error correction or incorrect fee posting. This allows the "Past Payments Breakdown" information (as of the previous month end) to be corrected prior to the statement being produced (mid-month).

Adjustments made via the screens in the section impact only the mortgage statement history file. Separate maintenance may also be necessary to the member account or member transaction history.

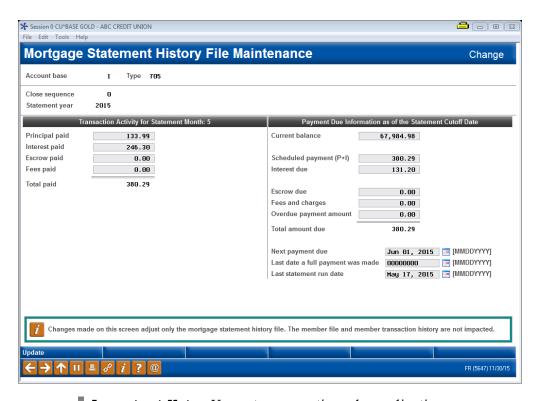
Important Note: Security access to mortgage statement history should be given only to mortgage experts.

Adjustments to mortgage statement history are made via *Mortgage Statement History* on the Update Function 1 (MNUPDT) menu.

Session 0 CU*BASE GOLD - ABC CREDIT UNION Mortgage Statement History File Maintenance Change Account base Q Туре Statement year Month **Amount Paid** Next Payment Due Date Close Statement Escrow 0.00 Seq Year Month Principal 114.92 Interest 294.60 Fees Total 0.00 1 - 705 2014 409.52 06/01/2014 2014 2014 2014 2014 2014 2014 08/01/2014 09/01/2014 11/01/2014 11/01/2014 12/01/2015 02/01/2015 03/01/2015 05/01/2015 06/01/2014 07/01/2014 09/01/2014 09/01/2014 106.65 95.08 130.69 122.68 131.59 302.87 285.21 249.60 257.61 248.70 256.37 256.06 230.72 255.13 246.30 323.34 322.82 322.81 321.79 1-705 0.00 380.29 380.29 380.29 380.29 380.29 380.29 380.29 468.82 468.82 468.82 468.82 2014 2014 -705 -705 2015 2015 2015 2015 2015 2014 2014 2014 2014 -705 -705 -705 -705 -790 -790 -790 ■ Change ■ Delete ■ <u>V</u>iew FR (5646) 11/30/15

"Mortgage Statement History" on the Update Functions 1 (MNUPDT) menu

The screen above contains an entry for each month where either a payment was made or a mortgage statement was generated. Mortgage statement history records can be added, changed or viewed. The corresponding year-to-date amount(s) will be adjusted based on the change. The next screen is used to add or change a history record:



Important Note: Use extreme caution when adjusting mortgage statement history. Be sure you understand the impact of the change (described in detail below). Adjustments affect only the mortgage statement history file. The statement itself is not impacted unless you are changing transaction activity (principal, interest, escrow, fees) for the current statement month prior to the statement cutoff date.

Field Descriptions

Field Name	Description
Transaction Activity for Statement Month	This section gets populated when a payment is made for the statement month or a statement is generated. For example, if it is the $10^{\rm th}$ of Nov. and a payment was made on the 5th, the transaction activity section contains the Nov. $5^{\rm th}$ payment information. If it is the $4^{\rm th}$ of Nov. and no payments have been made, a record for statement month November will not exist.
Principal Paid	Adjusts the principal paid for the statement month. Year-to-date totals for principal paid will also be adjusted.
	Current statement month: If principal is adjusted prior to the statement cutoff day, the statement will reflect the adjusted principal figures. If principal is adjusted after the statement cutoff day, year-to-date figures will be adjusted, but the statement itself is not impacted.
	Prior statement month: Adjustments will not impact the statement itself, but the appropriate year-to-date figures will be adjusted.
Interest Paid	Adjusts the interest paid for the statement month. Year-to-date totals will also be adjusted.
	Current statement month: If interest is adjusted prior to the statement cutoff day, the statement will reflect the

Field Name	Description
	adjusted interest figures. If interest is adjusted after the statement cutoff day, year-to-date figures will be adjusted, but the statement itself is not impacted.
	Prior statement month: Adjustments will not impact the statement itself, but the appropriate year-to-date figures will be adjusted.
Escrow Paid	Adjusts the escrow paid for the statement month. Year-to-date totals will also be adjusted.
	Current statement month: If escrow is adjusted prior to the statement cutoff day, the statement will reflect the adjusted escrow figures. If escrow is adjusted after the statement cutoff day, year-to-date figures will be adjusted, but the statement itself is not impacted.
	Prior statement month: Adjustments will not impact the statement itself, but the appropriate year-to-date figures will be adjusted.
Fees Paid	Adjusts the fees paid for the statement month. Year-to-date totals will also be adjusted
	Current statement month: If fees are adjusted prior to the statement cutoff day, the statement will reflect the adjusted fee amounts. If fees are adjusted after the statement cutoff day, year-to-date figures will be adjusted, but the statement itself is not impacted.
	Prior statement month: Adjustments will not impact the statement itself, but the appropriate year-to-date figures will be adjusted.
Payment Due Information as of the Statement Cutoff Date	This section reflects what was reported on the mid-month statement (the 17 th in most cases). If it is prior to the 17 th of the current month and a payment was made this month, this information will not be populated until the statement is generated.
	The information in this section is used for populating the delinquency section of the mortgage statement.
	CHANGING ANY OF THESE FIELDS DOES NOT AFFECT THE MEMBER FILE!
Current balance	The current balance as of the cutoff date for the statement month.
Scheduled payment	The scheduled payment as of the cutoff date for the statement month.
Interest due (included in scheduled pmt)	The interest due (included in the scheduled payment) as of the cutoff date for the statement month.
Escrow due	The escrow due as of the cutoff date for the statement month.
Fees and charges	The fees and charges as of the cutoff date for the statement month.
Overdue payment amount	The overdue payment amount as of the cutoff date for the statement month.
Total amount due	The total amount due as of cutoff date for the statement month.
Next payment due	The next payment due date as of the cutoff date for the statement month.
Last date a full payment was made	The last date a full payment was made as of the cutoff date for the statement month.

Field Name	Description
Last statement run date	The last statement run date as of the cutoff date for the statement month.