

	A	B	C	D	E	F	G
1	TRID Typical Fee Tolerance/Variance Buckets						
2	WARNING: THE TRID CLASSIFICATIONS OF THE FEES BELOW ARE PPDOS "BEST GUESSES" ON THIS DATE. CLIENTS SHOULD CHECK BACK WITH US OFTEN RE UPDATES/CHANGES AS THE CFPB OFFERS FURTHER OFFICIAL AND UNOFFICIAL GUIDANCE/DIRECTION. VER 9-16-2015						
3							
4	Bold Fees= Treatment should not vary. Unbold Fees= Treatment can vary based upon if "Paid to Creditor or Creditor Affiliate", "Required by Creditor", "Allowed to Shop" and "Chose from List" variations.						
5							
6	Typical Zero Tolerance Examples						
7							
8	Affiliate of Creditor fees (unless not required by Creditor)						
9	Application fee						
10	Appraisal (if required by Creditor and Borrower may not shop for the Provider)						
11	Appraisal management fee (if required by Creditor and Borrower may not shop for the Provider)						
12	Buydown						
13	Credit report (if required by Creditor and Borrower may not shop for the Provider)						
14	Discount fee						
15	Escrow waiver fee						
16	FHA mortgage insurance (if required by Creditor)						
17	Final inspection (if required by Creditor and Borrower may not shop for the Provider)						
18	Flood determination fee (if required by Creditor and Borrower may not shop for the Provider)						
19	Flood monitoring fee (if required by Creditor and Borrower may not shop for the Provider)						
20	Government funding fee (if required by Creditor and Borrower may not shop for the Provider)						
21	Homeowner's association certification fee (if required by Creditor)						
22	Lender's attorney fee-Doc Prep (if required by Creditor and Borrower may not shop for the Provider)						
23	Lender/Creditor credits-General and Specific (credits may increase, but cannot decrease)						
24	LLPs						
25	Loan broker compensation						
26	Mortgage insurance (if required by Creditor and Borrower may not shop for the Provider, excluding escrowed MI)						
27	Origination fee						
28	Other Creditor fees						
29	Points						
30	Processing fee (if required by Creditor and Borrower may not shop for the Provider)						
31	Rate lock fee (if required by Creditor and Borrower may not shop for the Provider)						
32	Survey (if required by Creditor and Borrower may not shop for the Provider)						
33	Tax monitoring fee (if required by Creditor and Borrower may not shop for the Provider)						
34	Tax status research fee (if required by Creditor and Borrower may not shop for the Provider)						
35	Third-party subordination fee (if required by Creditor)						
36	Title-closing protection letter fee (if required by Creditor and Borrower may not shop for the Provider)						

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37	Title-lender's title insurance policy (if required by Creditor and Borrower may not shop for the Provider)						
38	Title-e Recording fee (if required by Creditor and Borrower may not shop for the Provider)						
39	Transfer taxes (per Reg)						
40	Underwriter fee (if required by Creditor and Borrower may not shop for the Provider)						
41	Verification fee (if required by Creditor and Borrower may not shop for the Provider)						
42							
43	Any other Unbold Fees (if required by Creditor and Borrower NOT allowed to shop)						
44							
45	Typical 10% Cumulative Examples (See Footnote #1)						
46	Courier or express mail (if required by Creditor, allowed to shop & Borrower chose from the list)(<u>common refinance scenario</u>)						
47	Pest inspection (if required by Creditor, allowed to shop & Borrower chose from the list)						
48	Survey (if required by Creditor, allowed to shop & Borrower chose from the list)						
49	Tax status research fee (if required by Creditor, allowed to shop & Borrower chose from the list)						
50	Title-Any other title insurance required fees (List each as "Title-(fee name)" if itemized)(if required by Creditor, allowed to shop & Borrower chose from the list) (<u>common refinance scenario</u>)						
51	Title-e Recording fee (if required by Creditor, allowed to shop & Borrower chose from the list)						
52	Title-Escrow fees (if required by Creditor, allowed to shop & Borrower chose from the list)(<u>common refinance scenario</u>)						
53	Title-Lender's Title Insurance (if required by Creditor, allowed to shop & Borrower chose from the list)(<u>common refinance scenario</u>)						
54	Title-Owner's Title Insurance (optional)(if required by Creditor, allowed to shop & Borrower chose from the list) (<u>common refinance scenario</u>)						
55	Title-Tax status research fee (if required by Creditor, allowed to shop & Borrower chose from the list)						
56	Recording fees (per Reg)						
57							
58	Any other 3rd party fee (if required by Creditor, allowed to shop & Borrower chose from the list)						
59							
60	Typical "No Tolerance" Examples						
61	Condominium fees (See Footnote #2)						
62	Cooperative fees (See Footnote #2)						
63	Courier or express mail (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)(<u>common purchase scenario</u>)						
64	Escrow fees (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)(<u>common purchase scenario</u>)						
65	Escrows (insurance, taxes and MI) (per Reg)						
66	Flood insurance (per Reg)						
67	Homeowner's association dues (See Footnote #2)						
68	Pest inspection (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)						
69	Prepaid interest (per Reg)						
70	Property inspection (if not required by Creditor)						
71	Property insurance (per Reg)(See Footnote #2)						
72	Property taxes (See Footnote #2)						
73	Real estate commissions						
74	Survey (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)						
75	Title-Owner's Title Insurance (optional)(if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)(<u>common purchase scenario</u>)						

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76	Title-Lender's Title Insurance (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)(common purchase scenario)						
77	Title-Any other title insurance required fees (List each as "Title-(fee name)" if itemized)(if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)(common purchase scenario)						
78							
79	Any other fee (if required by Creditor, allowed to shop & NOT chosen from the list; or NOT required by Creditor)						
80							
81	Footnotes:						
82	#1 To qualify for the inclusion into the "10%" tolerance fee group, a Creditor must at least include the applicable provider charging the fee on their "List of Services You Can Shop For". However, it is currently unclear whether						
83	#2 There are conflicting provisions in the CFPB TRID regulations, preamble and sample forms. We think that the intended classification of these fees is correct based upon current available information. See thread: https://v						
84							
85							
86	<u>Decision Tree Matrix</u>						
87	Specified Treatment Per Reg	Required Svc	Paid to Creditor	Paid to Broker or Affiliate of Creditor or Broker	Can Shop	Borrower Chose From List	Tolerance
88	Y-Transfer taxes (per Reg)						0
89	Y-Lender credits-General and Specific (credit may increase, but cannot decrease)						0
90	Y-Recording fees (per Reg)						10
91	Y-Title-Owner's Title Insurance (optional) (per Reg)				Y	Y	10
92	Y-Title-Owner's Title Insurance (optional) (per Reg)				Y	N	none
93	Y-Prepaid interest (per Reg)						none
94	Y-Property ins premium (per Reg)						none
95	Y-Escrow/Impound/Reserve acct (per Reg)						none
96	N	Y	Y				0
97	N	Y		Y			0
98	N	Y	N	N	N		0
99	N	Y	N	N	Y	Y	10
100	N	Y	N	N	Y	N	none
101	N	N	N	N		Y	none
102	N	N	N	N		N	none
103	N	N	Y				0
104	N	N		Y			none
105							