





Fannie Mae and Freddie Mac Uniform Mortgage Data Program

Specification Update Impact Memo Version 2.1

Date: December 20, 2022

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Revision History

Version 2.1	December 20, 2022
Version 2.0	July 26, 2022
Version 1.0	• ,

Summary of Changes

Impact Memo Section	Date	Change Type	Change Description
Correction to the recording fee total amount guidance	December 20, 2022	Modified	Clarifying correction made to processing of recording fee amounts.
New Data Point	July 26, 2022	Modified	Revised dates when the GSEs will begin accepting and requiring the new data point.
Enumeration Changes	July 26, 2022	Modified	Warning messages will be generated if the "Genworth" enumeration is used in UCD XML files.
Changes	July 26, 2022	Added	Valid values for Taxes and Other Government Fees.
Critical Edit Impacts	July 26, 2022	Added	New table <i>Updated UCD Requirements for Phase</i> 3 lists differences between the UCD Critical Edits Matrix v5.1 (CEM) and the UCD Specification v1.5.
on the UCD Specification v1.5	July 26, 2022	Modified	Updates to the <i>Updated UCD Requirements for Phases 1 and 2</i> table lists differences between the CEM and the UCD Specification v1.5 for Phases 1 and 2.

Purpose

This Impact Memo announces the following changes to the Uniform Closing Dataset (UCD) Specification v1.5:

- The addition of a data point to capture the annual percentage rate (APR) for adjustable-rate mortgages (ARMs) with interest rate changes within the first five years.
- Enumeration Changes
 - Change to valid enumerations for mortgage insurance company names to support Genworth's name change to Enact.
 - Addition to valid values accepted for taxes and other government fees
- Table of changes to existing requirements communicated in the UCD Specification v1.5 as a result of the implementation of critical edits.

NOTE: Fannie Mae and Freddie Mac (the GSEs) are discussing when an update to the UCD Specification v1.5 will be published.

New Data Point

Overview

On December 29, 2020, the Consumer Financial Protection Bureau (CFPB) revised the General Qualified Mortgage (QM) loan definition in an amendment to the Truth in Lending Act's (TILA) interpretive regulation, Regulation Z. The GSEs have worked together to align on certain policies to implement QM requirements, as well as requirements related to loans that are exempt from the TILA or the Ability-to-Repay Rule.

In response to the policy changes under the revised General QM Rule, the GSEs have identified the need for an additional UCD data point that covers the Annual Percentage Rate (APR) data point specifically for Short Reset ARMs – ARMs that have an interest rate change within the first five years after the date on which the first regular periodic payment is due.

Requirement

Regulation Z Section: Section 12 C.F.R. § 1026.43(e)(2)(iv)

Data Point: gse:QualifiedMortgageShortResetARM_APRPercent

Definition: The annual percentage rate for the loan based on the accepted industry standard defined by Regulation Z (Section 12 C.F.R. § 1026.43(e)(2)(iv)) used for QMs that have an interest rate change within the first five years after the date on which the first regular periodic payment is due (e.g., 3/6 and 5/6 SOFR-indexed ARMs).

UCD XPath: This data point will be added to UCD as an EXTENSION of QUALIFIED_MORTGAGE_DETAIL:

```
.../LOAN
QUALIFIED_MORTGAGE
QUALIFIED_MORTGAGE_DETAIL
EXTENSION
OTHER
gse:QualifiedMortgageShortResetARM APRPercent
```

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Current Requirement (<u>Freddie Mac Single-Family Seller/Servicer Guide</u>): Greater of the note rate plus 2% or the fully indexed rate.

New Requirement (Freddie Mac Single-Family Seller/Servicer Guide): For all ARMs, lenders must use the loan amount over the loan term to calculate periodic payments of principal and interest. The Revised QM Rule's APR-APOR threshold test adds an APR data requirement for adjustable-rate QM loans that have an interest rate change within the first five years. The lender must use the maximum interest rate that could apply during the first five years after the first payment is due when calculating the qualifying rate.

- 3/6 ARMs: note rate plus lifetime cap
- 5/6 ARMs: note rate plus first rate change cap

Each GSE's UCD collection system can accept this data point at any time.

Mandate: This data point will be required for all ARMs meeting the definition on and after May 1, 2023.

Enumeration Changes

MI Company Name Change

Overview

On February 7, 2022, Genworth Mortgage Insurance Corporation officially began doing business as Enact Mortgage Insurance Corporation. The UCD captures MI names in Unique ID (UID) 3.017MICompanyNameType and 3.029 MICompanyNameTypeOtherDescription. Currently, the enumeration for "Genworth" is captured in 3.017 MICompanyNameType.

Requirement

The UCD file has been updated to add "Enact" as a valid value for MICompanyNameTypeOtherDescription (UID 3.029). This change became effective for Enact-insured loans delivered to Fannie Mae on and after February 17, 2022, and for Enact-insured loans delivered to Freddie Mac on and after February 11, 2022. Both GSEs will continue to accept the old value "Genworth" in the UCD files. However, on June 27, 2022 (Fannie Mae) and August 1, 2022 (Freddie Mac), UCD files containing the "Genworth" value will receive warning messages.

UCD XPath: Enact should be provided as follows in the UCD file:

.../LOAN MI_DATA MI_DATA_DETAIL

<mismo:MICompanyNameType>Other</mismo:MICompanyNameType</p><mismo:MICompanyNameTypeOtherDescription>Enact</mismo:MICompanyNameTypeOtherDescription>

Addition of Valid Values for Taxes and Other Government Fees Overview

The GSEs continue to collaborate on the development and implementation of the Phase 3 UCD Critical Edits. As we reviewed section *E. Taxes and Other Government Fees* on Closing Disclosures (CDs) and in accompanying UCD files, we frequently saw usual and customary recording fees, transfer taxes and other government fees that are not currently supported by UCD v1.5. Today, when these values are delivered in FeeType in the UCD file, warning edits may fire but the loan can still be delivered to the GSEs. With the Phase 3 implementation these values would have triggered critical edits even though they are legitimate charges for the closing process. To prevent this from happening, we are expanding the UCD-supported enumerations for CD *Section E. Taxes and Other Government Fees*.

Requirement

The following table of MISMO v3.3 FeeType enumerations related to recording fees, transfer taxes and other government fees will be accepted in Unique ID 8.196-Fee Type when accompanied by UID 8.004-Integrated Disclosure Section Type = "Taxes And Government Fees." The GSEs' collection system will be modified to accept these new values as part of the implementation of Phase 3 UCD Critical Edits.

New Fee Types Allowed for Taxes and Other Government Fees Unique ID 8.196 - FeeType

	Offique to 6.130 - Fee Type
UCD Supported Enumerations	MISMO Definitions
Filing Fee	Fee paid when submitting a document to the clerk of a court for the court's immediate consideration and for storage in the court's files.
Municipal Lien Certificate Fee	Fee charged by a municipality to release a lien or injunction after payment of fines for property non- compliance have been completed.
Power Of Attorney Recording Fee	Fee assessed by a government authority to record and index a Power of Attorney as required under State or local law. Recording fees are assessed based on the type of document to be recorded or its physical characteristics, such as the number of pages. Unlike transfer taxes, recording fees are not based on the sales price of the property or loan amount.
Recording Fee For Assignment	Fee assessed by a government authority to record and index an assignment as required under State or local law. Recording fees are assessed based on the type of document to be recorded or its physical characteristics, such as the number of pages. Unlike transfer taxes, recording fees are not based on the sales price of the property or loan amount.
Recording Fee For Municipal Lien Certificate	Fee assessed by a government authority to record and index a municipal lien certificate as required under State or local law. Recording fees are assessed based on the type of document to be recorded or its physical characteristics, such as the number of pages. Unlike transfer taxes, recording fees are not based on the sales price of the property or loan amount.
Recording Fee For Release	Fee assessed by a government authority to record and index a release as required under State or local law. Recording fees are assessed based on the type of document to be recorded or its physical characteristics, such as the number of pages. Unlike transfer taxes, recording fees are not based on the sales price of the property or loan amount.
Recording Fee For Subordination	Fee assessed by a government authority to record and index Subordination Documents as required under State or local law. Recording fees are assessed based on the type of document to be recorded or its physical characteristics, such as the number of pages. Unlike transfer taxes, recording fees are not based on the sales price of the property or loan amount.
Documentary Stamp Fee	A fee or tax placed on documents used for the legal transfer of ownership of assets or real property.
Tax Stamp For City Deed	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the city for the deed.
Tax Stamp For City Mortgage	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the city for the mortgage.
Tax Stamp For County Deed	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the county for the deed.
Tax Stamp For County Mortgage	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the county for the mortgage.

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New Fee Types Allowed for Taxes and Other Government Fees Unique ID 8.196 - FeeType

UCD Supported Enumerations	MISMO Definitions
Tax Stamp For State Deed	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the state for the deed.
Tax Stamp For State Mortgage	Fee for a tax stamp to be affixed to a taxable lien to indicate that the appropriate tax has been paid to the state for the mortgage.

Impact on Phase 3 Critical Edits for Taxes and Other Government Fees

To allow our Sellers to deliver legitimate tax-related fees while at the same time minimizing the impact to your efforts to comply with the Phase 3 Critical Edits, we limited the changes to the Critical Edits Matrix (CEM).

1. The requirements for CEM Sort IDs 39 – 45 do not change (UID 8.206 | 8.195 – FeeType = "RecordingFeeForDeed | Recording FeeForMortgage" and UID 8.197 – FeeType = "RecordingFeeTotal").

Correction

2. The GSEs are clarifying what value is expected for RecordingFeeTotal in CEM Sort ID 45 (UID 8.193-FeeActualPaymentAmount). CFPB's Integrated Disclosure regulation states that the amount for RecordingFeeTotal should be the sum of the amounts for ALL recording fees that are part of the transaction. Consequently, we are removing previous guidance (shown in strike-through below) that the value be the sum of only the FeeActualTotalAmounts for RecordingFeeforDeed and RecordingFeeforMortgage. Additionally, the critical edits corresponding with this change have been withdrawn.

If there are recording fees in addition to RecordingFeeForMortgage and RecordingFeeforDeed, those fees should be included in the RecordingFeeTotal. The additional recording fees may be itemized and included by the lender under CD Section E. Taxes and Other Government Fees as well as in the UCD file. However, the GSEs will not be enforcing the additional recording fee data or validating sums via critical edits.

The GSEs are clarifying that the value expected for RecordingFeeTotal in CEM Sort ID 45 (UID 8.193- FeeActualPaymentAmount) is the sum of the UID 8.206 | 8.195- FeeTotalPaymentAmount values for when FeeType="RecordingFeeForDeed" | "RecordingFeeForMortgage" only.

3. **Only one row in CEM is changing.** The additional tax-related enumerations have been added to CEM Sort ID 46. All the critical edits associated with what are currently labeled "Transfer Taxes" (CEM Sort IDs 46-50) will apply to FeeTypes with these new enumerations—including new FeeTypes values for Recording Fees and any other non-transfer taxes. The new enumerations will also be added to UID 8.196-FeeType, currently designated for "Transfer Taxes" and associated with CD Field IDs 8.3.n.

	Preview of Update to Critical Edits Matrix (One Cell Only)						
UID	MISMO v3.3.0 Data Point Name	UCD Supported Enumerations (blue underlined text indicates new accepted value)	Criteria/Conditionality	Critical Edit will fire when:	Required for Complete Line Item		
8.196	FeeType	DocumentaryStampFee FilingFee MortgageSurchargeCountyOrParish MortgageSurchargeMunicipal MortgageSurchargeState MunicipalLienCertificateFee Other	No change Must exist for all loans when tax listed in Col F in an amount ≠ "0" is reported on the CD	No change	No change		

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		Preview of Update to Critical Edits Ma	trix (One Cell Only)		
UID	MISMO v3.3.0 Data Point Name	UCD Supported Enumerations (blue underlined text indicates new accepted value)	Criteria/Conditionality	Critical Edit will fire when:	Required for Complete Line Item
		PowerOfAttorneyRecordingFee	under E. Taxes And		
		RecordingFeeForAssignment	Other Government		
		RecordingFeeForMunicipalLienCertificate	Fees		
		RecordingFeeForRelease			
		RecordingFeeForSubordination			
		TaxStampForCityDeed			
		TaxStampForCityMortgage			
		TaxStampForCountyDeed			
		TaxStampForCountyMortgage			
		TaxStampForStateDeed			
		<u>TaxStampForStateMortgage</u> <u>TransferTaxTotal</u>			

 Do not use UID 8.234-FeeTypeOtherDescription unless you have recorded on the CD a taxrelated fee that is <u>not covered by one of the UCD-supported enumerations</u>. All MISMO v3.3 FeeTypes related to taxes are now supported by UCD.

Critical Edit Impacts on the UCD Specification v1.5 Overview

The following tables list differences between the UCD Critical Edits Matrix (CEM) and the UCD Specification v1.5 (Appendix_I_Uniform_Closing_Dataset, Version 1.5).

Phase 3 edits are listed first in Closing Disclosure order to match the order of the CEM. The order of the specification conditionality details or the CEM requirements may be changed to facilitate comparison. The CEM requirement that differs from the spec is noted in blue underline text. If a Spec Requirement no longer applies, it is noted in red strikeout text. Phases 1 and 2 follow this table. Details for Phase 4 will be published in the future.

NOTE: Data point and enumeration values are not shown in upper camel case for ease of reading. They do need to be in upper camel case in the UCD XML file.

	Updated UCD Requirements for Phase 3 (different from UCD Specification v1.5)						
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD Specification v1.5	Superseding CEM Requirement		
3	7.006	Fee Total Percent	Discount Points	1. Required 2. Must be >= "0"	 Required Fee Actual Payment Amount ≠ "0" May be negative, zero or positive 		
3	7.010	Fee Actual Payment Amount	Discount Points	 Fee Type = "Loan Discount Points" Fee Total Percent ≠ "0" 	 Must exist for all loans when FeeType = "LoanDiscountPoints" Integrated Disclosure Section Type = "Origination Charges" Fee Total Percent ≠ "0" 		
3	7.081	Fee Paid To Type	Origination Charges	Fee Type exists Integrated Disclosure Section Type "Origination Charges"	Fee Type exists Integrated Disclosure Section Type = "Origination Charges"		
3	7.077	Fee Payment Paid By Type		Type = "Origination Charges"	"Origination Charges" 3. Fee Actual Payment Amount ≠ "0"		
3	7.073	Fee Paid To Type		1. Fee Type exists	1. Fee Type exists		

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	Updated UCD Requirements for Phase 3 (different from UCD Specification v1.5)						
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD Specification v1.5	Superseding CEM Requirement		
3	7.029	Fee Payment Paid By Type	Services Borrower Did Not Shop For	Integrated Disclosure Section Type = "Services Borrower Did Not Shop For"	 Integrated Disclosure Section Type = "Services Borrower Did Not Shop For" Fee Actual Payment Amount ≠ "0" 		
3	7.074	Fee Paid To Type	Services Borrower	1. Fee Type exists	1. Fee Type exists		
3	7.049	Fee Payment Paid By Type	Did Shop For	Integrated Disclosure Section Type = "Services Borrower Did Shop For"	 Integrated Disclosure Section Type = "Services Borrower Did Shop For" Fee Actual Payment Amount ≠ "0" 		
3	8.153	Fee Payment Paid By Type	Recording Fee Total	Fee Type = "Recording Fee Total"	 Fee Type = "Recording Fee Total" Integrated Disclosure Section Type = "Taxes And Other Government Fees" Fee Actual Payment Amount ≠ "0" 		
3	8.196	FeeType	Transfer Taxes and Other Government Fees	UCD-supported transfer tax enumerations: MortgageSurchargeCountyOrParish MortgageSurchargeMunicipal MortgageSurchargeState Other TransferTaxTotal	UCD Supported Tax-related enumerations: DocumentaryStampFee Filing Fee MortgageSurchargeCountyOrParish MortgageSurchargeMunicipal MortgageSurchargeState MunicipalLienCertificateFee Other PowerOfAttorneyRecordingFee RecordingFeeForAssignment RecordingFeeForMunicipalLienCertificate RecordingFeeForRelease RecordingFeeForSubordination TaxStampForCityDeed TaxStampForCountyDeed TaxStampForCountyDeed TaxStampForCountyDeed TaxStampForStateDeed TaxStampForStateDeed TaxStampForStateMortgage TaxStampForStateMortgage TaxStampForStateMortgage TransferTaxTotal		
3	8.190	Fee Payment Paid By Type	Transfer Taxes and Other Government Fees	 Fee Type exists Integrated Disclosure Section Type = "Taxes And Other Government Fees" 	 Fee Type exists Integrated Disclosure Section Type = "Taxes And Other Government Fees" Fee Actual Payment Amount ≠ "0" 		
3	8.170 8.243 8.273 8.301	Fee Paid To Type	Prepaids (other than	Prepaid ItemType <> "Prepaid	Prepaid Item Type exists Integrated Disclosure Section Type = "Prepaids"		
3		Prepaid Item Payment Paid By Type	prepaid interest)	Interest"	3. Prepaid Item Actual Payment Amount ≠ "0"		
3	8.248	Prepaid Item Per Diem Amount	Prepaid Interest	Prepaid ItemType = "Prepaid Interest"	 Prepaid Item Type = "Prepaid Interest" Integrated Disclosure Section Type = "Prepaids" Prepaids" Prepaid Item Actual Payment Amount ≠ "0" 		
3	8.250	Prepaid Item Paid From Date		1. Prepaid Item Type =	1. Prepaid Item Type = "Prepaid Interest" 2. Prepaid Item Per Diem Amount > 0 2. Prepaid Item Per Diem Amount > 0 3. Prepaid Item Per Diem Amount > 0 4. Prepaid Item Per Diem Amount > 0 5. Prepaid Item Per Diem Amount > 0 6. Pr		
3	8.251	Prepaid Item Paid Through Date	Prepaid Interest	"Prepaid Interest" 2. Prepaid Item Per Diem Amount > "0"	 3. Integrated Disclosure Section Type = "Prepaids" 4. Prepaid Item Actual Payment Amount ≠ 		
3	8.257	Fee Paid To Type			<u>"0"</u>		

	Updated UCD Requirements for Phase 3 (different from UCD Specification v1.5)						
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD Specification v1.5	Superseding CEM Requirement		
3	8.253	Prepaid Item Payment Paid By Type					
3	8.171 8.140 8.277 8.285	,	Ecorous	Escrow Item Type exists	Escrow Item Type exists Integrated Disclosure Section Type = "Initial Escrow Payment At Closing"		
3	8.173 8.142 8.279 8.287	Escrow Item Payment Paid By Type	Escrows	Escrow item Type exists	3. Escrow Item Actual Payment Amount ≠ "0"		
3	8.189 8.179 8.282 8.290	Fee Paid To Type	Escrows	Escrow Monthly Payment Amount > "0"	 Escrow Monthly Payment Amount > 0 Escrow Item Type exists Integrated Disclosure Section Type = "Initial Escrow Payment At Closing" Escrow Item Actual Payment Amount ≠ "0" 		
3	8.180	Fee Paid To Type		Fee Type exists	1. Fee Type exists		
3	8.107	Fee Payment Paid By Type	Other Costs	Integrated Disclosure Section Type = "Other Costs"	 Integrated Disclosure Section Type = "Other Costs" Fee Actual Payment Amount ≠ "0" 		
3	8.223	Lender Credit Tolerance Cure Amount	Lender Credits	 Integrated Disclosure Subsection Type = "Lender Credits" Lender must provide a tolerance cure 	 Integrated Disclosure Subsection Type = "Lender Credits" Lender must provide a tolerance cure Integrated Disclosure Subsection Payment Amount ≠ "0") 		

	Updated UCD Requirements for Phases 1 and 2 (different from UCD Specification v1.5)					
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD v1.5 Specification	Superseding CEM Requirement	
1	4.039	Average Prime Offer Rate Percent	GSE – Reg Z / QM	Must exist for all loans	Must exist for all loans Must be greater than "0"	
1	12.004	APR Percent	GSE Specific – Reg Z / QM	Must exist for all loans	 Must exist for all loans Must be greater than "0" 	
1	7.087	Regulation Z Excluded Bona Fide Discount Points Indicator	GSE – Reg Z / QM	Must exist for all loans	 Must exist for all loans Fee Type = "Loan Discount Points" Fee Total Percent is greater than "0" 	
1	7.088	Regulation Z Excluded Bona Fide Discount Points Percent	GSE – Reg Z / QM	Regulation Z Excluded Bona Fide Discount Points Indicator = "true"	Regulation Z Excluded Bona Fide Discount Points Indicator = "true" Fee Total Percent is greater than "0"	
1	4.034	Regulation Z Total Loan Amount	GSE – Reg Z / QM	1. Must exist for all loans 2. Must be > = "0"	Must exist for all loans Must be greater than "0"	

		-	- [ases 1 and 2 (different from UCD	
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD v1.5 Specification	Superseding CEM Requirement
1	3.030	Regulation Z Total Points And Fees Amount	GSE – Reg Z / QM	1. Must exist for all loans Must be > = "0"	 Must exist for all loans Must be > = 0 Must be no greater than the amount allowed by Revised General QM Rule for the loan amount range Must be no greater than the applicable percent of the Regulation Z Total Loan Amount
1	4.038	Loan Price Quote Interest Rate Percent	GSE – Reg Z / QM	Regulation Z Excluded Bona Fide Discount Points Indicator = "true"	 Regulation Z Excluded Bona Fide Discount Points Indicator = "true" Must be greater than "0"
2	4.001 10.032	Note Amount		Must exist for all loans	Must exist for all loans Must be greater than "0"
2	10.038	Closing Adjustment Item Type = "Seller Credit"		 Loan Purpose Type = "Purchase" Seller credit paid already by or on behalf of the borrower at closing is part of the transaction. 	 LoanPurposeType = "Purchase" Seller credit paid already by or on behalf of the borrower at closing is part of the transaction.
2	10.036	Closing Adjustment Item Amount		 Loan Purpose Type = "Purchase" Closing Adjustment Item Type = "Seller Credit" 	 Loan Purpose Type = "Purchase" Closing Adjustment Item Type = "Seller Credit" Must be greater than or equal to "0"
2	10.028	Funds Type = "Deposit On Sales Contract"		 Loan Purpose Type = "Purchase" Deposit is present in the transaction. 	 Loan Purpose Type = "Purchase" Deposit is present in the transaction.
2	10.029	CLOSING_COST_ FUND / Closing Cost Fund Amount		 Loan Purpose Type = "Purchase" Funds Type = "Deposit On Sales Contract" 	 LoanPurposeType = "Purchase" Funds Type = "Deposit On Sales Contract" Must be greater than or equal to "0"
2	5.035	Projected Payment Estimated Taxes Insurance Assessment Total Amount		Must exist for all loans	Must exist for all loans Must be greater than or equal to "0"
2	10.002	INTEGRATED DISCLOSURE SECTION SUMMARY DETAIL / Integrated Disclosure Section Total Amount	K. Due from Borrower at Closing - Amount	1. Loan Purpose Type = "Purchase"	 Loan Purpose Type = "Purchase" Integrated Disclosure Section Type = "Due From Borrower At Closing" Must be greater than or equal to "0"

Updated UCD Requirements for Phases 1 and 2 (different from UCD Specification v1.5)					
Phase	UID	Data Point + Enum	Form Field Name / Context	UCD v1.5 Specification	Superseding CEM Requirement
2	6.015 10.141	Cash From Borrower At Closing Amount	Cash to Close - Amount CALCULATION - Cash to Close From / To Borrower	1. Loan Purpose Type = Purchase AND Total Due From Borrower at Closing (K) > Total Paid Already By or on Behalf of Borrower at Closing (L) OR 2. Loan Purpose Type = "Refinance" AND Loan Amount < Total Closing Costs (J) + Total Closing Cost Paid Before Closing + Total Payoffs and Payments (K)	 Cash To Borrower At Closing Amount does not exist Must be greater than or equal to "0"
2		Cash To Borrower At Closing Amount		1. Loan Purpose Type = "Purchase" AND Total Due From Borrower at Closing (K) < Total Paid Already By or on Behalf of Borrower at Closing (L) OR 2. Loan Purpose Type = "Refinance" AND Loan Amount >Total Closing Costs (J) + Total Closing Cost Paid Before Closing + Total Payoffs and Payments (K)	Cash From Borrower At Closing Amount does not exist Must be greater than or equal to "0"

Additional Information

Should you require assistance, please contact your account representative or submit your questions to our UCD mailboxes: <a href="https://www.uccommons.org/leaf-accommons-uccommons.org/leaf-accommons.org/leaf-accommons-uccommons.org/leaf-accommons-uccommon