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# Know Before You Owe: 

Quantitative Study of the Current and Integrated TILA-RESPA Disclosures

## 



Projected Payments

## Payment Calculation

Principal \& interest

Estimated Taxes, Insurance \& Assessments Amount can increase over time See Details on Page 4

# Know Before You Owe: Quantitative Study of the Current and Integrated TILA-RESPA Disclosures 

Presented to the
Consumer Financial Protection Bureau
November 20, 2013

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## Acknowledgements

This work was completed under Contract CFP-12-Z-00004 with an award date of 9/28/12.
The Consumer Financial Protection Bureau (CFPB) team was led by Richard B. Horn, Senior Counsel \& Special Advisor. The team included David Friend and Nora Rigby, Counsels; Rachel Ross, Special Assistant; Xiaoling Ang, Ph.D. and Dustin Beckett, Ph.D., Economists; and Megan Thibos, Policy Analyst. We also want to acknowledge John Kraemer with the Office of Management and Budget (OMB) who assisted with the initial phases of the project while on detail to the CFPB.

The Kleimann Communication Group team consisted of the Kleimann team, Manoj Hastak, Ph.D., GfK Custom Research, and Graves Fowler Creative.

- The Kleimann team was led by Susan Kleimann, Ph.D., President. Three key members of Kleimann provided support to the project: Barbra Kingsley, Ph.D., Partner; Kristin Kleimann, Senior Manager; and Karina Eldredge, Analyst.
- Manoj Hastak, Ph.D., a professor at American University in the Kogod School of Business, served as the Project Director for the Quantitative Project and led the analysis.
- Christopher Moessner, Vice President and Consultant, GfK Custom Research, Public Affairs and Corporate Communications team, was responsible for overall management of the data collection and analysis. David Lintern, Senior Research Director, GfK Custom Research, Public Affairs and Corporate Communications team, led the in-field data collection management and all data processing tasks.
- Sue Bodde was the lead Art Director from Graves Fowler Creative. Additional support was provided by Terry Graves, President; Mariann Seriff, Creative Director; and Anya Kholodnov, Production Assistant.


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## Executive Summary

## Introduction

The Dodd-Frank Wall Street Reform and Consumer Protection Act (the DoddFrank Act) created the Consumer Financial Protection Bureau (CFPB). In the Act, the CFPB was directed to propose rules and disclosures that combine certain disclosures under the Truth in Lending Act (TILA) and sections 4 and 5 of the Real Estate Settlement Procedures Act (RESPA). ${ }^{1}$ In January 2011, the CFPB began the Mortgage Disclosure Project to integrate the TILA and RESPA disclosures using a User-Centered Design Process with two phases: a Qualitative Study and a Quantitative Study.

For the Qualitative Study, the CFPB team conducted ten rounds of consumer testing to develop and test the integrated disclosures-a Loan Estimate and a Closing Disclosure. ${ }^{2}$ The Loan Estimate was developed and tested with consumers in five rounds of testing, the Closing Disclosure in two rounds of testing, and the Loan Estimate and Closing Disclosure together in three rounds of testing. Through the qualitative testing, the CFPB obtained data showing that consumers could comprehend the proposed disclosures and explain a rationale for their choices. The data indicated that consumers could compare the information on two disclosures, choose a loan, and use the disclosures to compare initial and final loan terms and costs. In its Proposed Rule on July 9, 2012, the CFPB proposed the Loan Estimate, an integrated disclosure that would be provided after consumers apply for a mortgage loan, and the Closing Disclosure, an integrated disclosure that would be provided before the loan closing. ${ }^{3}$ The intent was that the Loan Estimate would replace the initial TILA disclosure and the Good Faith Estimate (GFE) provided at application and that the Closing Disclosure would replace the final TILA disclosure and the uniform settlement statement (the HUD-1).

After issuing the proposal, the CFPB began the Quantitative Study, which it planned to complete before issuing the Final Rule. The Quantitative Study focused on validating the effectiveness of the CFPB's integrated disclosures and evaluating their performance compared to the current disclosures.

[^0]During this same period, the CFPB received public comments on most aspects of the proposal until November 6, 2012. ${ }^{4}$ The CFPB team analyzed these comments for, among other things, suggested changes to the proposed disclosures. Based on these comments, the team made several minor changes to the proposed disclosures to increase consistency within and between the Loan Estimate and Closing Disclosure. ${ }^{5}$ The public comment period also produced three development suggestions for the disclosures: (1) a Spanish translation of the Loan Estimate and the Closing Disclosure; (2) a Loan Estimate and Closing Disclosure adapted for refinance transactions; and (3) concerns about Closing Costs in all transactions. Before issuing the final rule, the CFPB evaluated versions of the integrated disclosures that addressed these comments in additional qualitative testing, which is described in a separate report. ${ }^{6}$

This report presents the quantitative testing results of the current and proposed disclosures and the conclusions made based on those results. It also presents the final Loan Estimate and the final Closing Disclosure designs.

## The Quantitative Study

The Quantitative Study was conducted to validate the designs and performance of the integrated disclosures from the Qualitative Study and to compare the performance of the current disclosures and the CFPB's proposed integrated disclosures. The study used a controlled experiment to assess consumers' understanding and use of the current mortgage disclosures versus the proposed mortgage disclosures. It involved a $2 \times 2 \times 2 \times 2$ between-subjects factorial design that included the following factors:

1. Disclosure Type: current versus proposed;
2. Loan Type: fixed rate versus adjustable rate;
3. Difficulty: easier versus more challenging loans; and
4. Consumer: inexperienced versus experienced.

## Methodology

The study used in-person, proctored, small group sessions with 858 respondents divided into two groups-experienced respondents (424) and inexperienced respondents (434) - in 20 locations across the Census Bureau regions and sub-regions in the continental United States. To be eligible for the study, respondents needed to meet the following criteria:

[^1]- be 18 years or older;
- live in a household within 50 miles of the Designated Market Area (DMA) used for the interview;
- have purchased or refinanced a house in the last five years or have never purchased or have not purchased or refinanced a house in the last five years and have the intent to buy or refinance in the next two years; and
- agree to participate in the in-person session.

Respondents received initial and final disclosures with scenarios for the application and closing phases of the loan process. They only used either the current or proposed disclosures because this was a between-subjects design. All respondents received full-size disclosures, including a HUD-1 on legal-sized paper if they were in the current disclosures group. The disclosures were either fixed rate or adjustable rate loan sets and varied from easier to more challenging loans. More challenging loans contained negative amortization, interest only, or other such features. For all disclosures, the loan features changed from the initial disclosures to the final disclosures.

After completing a consent form and receiving a Privacy Act statement, each respondent completed a questionnaire with 48 questions during a 60-minute testing session. Respondents had to answer questions about both the initial and final disclosures. The questionnaire consisted of five parts:

- Part 1. Respondents reviewed two initial disclosures, selected which one they would choose, and provided a rationale for why they chose it (Task 1);
- Part 2. Respondents compared the terms of the two initial disclosures (Task 2);
- Part 3. Respondents answered questions about one of the two disclosures (Task 3);
- Part 4. Respondents compared one of the initial disclosures with a matching final disclosure (Task 4) and answered questions about the final disclosure (Task 5); and
- Part 5. Respondents rated the initial and final disclosures on three scales for ease of reading, ease of comparison, and ease of finding information.

The CFPB team developed the questionnaire using nine key topic areas identified by researchers and consumer advocates as critical for informed consumers. The topics included amortization, annual percentage rate (APR), closing costs/settlement charges, escrow account, interest rate, loan amount, monthly payments, mortgage insurance, and risk factors. The ninth topic-risk factors-included questions from the other 8 concept areas that relate to potential risks consumers would weigh in selecting a loan. These key topic areas are addressed by both the current and proposed disclosures.

## The Analysis

Of the 48 questions included in the study, the heart of the analysis focused on responses to 39 key questions (Question 3 through Question 41) in Parts 2, 3, and 4 for both the current and proposed disclosures. Responses were scored as having been answered correctly or incorrectly based on the answer keys developed by the CFPB team. For each question, respondents were assigned a score of "1" if they answered the question correctly or if they were required to skip the question because of a correct answer to a prior question. Respondents were assigned a score of " 0 " if they failed to answer
the question correctly or if they were required to skip the question based on an incorrect answer to a prior question. Multiple correct answers were possible for a few questions (for example, Question 17). For these, respondents could receive partial credit (for example, a score of $1 / 2$ ).

The analysis centered primarily on the accuracy scores assigned to respondents for these 39 key questions.

1. We looked at accuracy of responses with current versus proposed disclosures based on aggregate measures calculated across all the questions in Parts 2, 3, and 4. This analysis is similar to the analysis reported by the Federal Trade Commission (FTC) in its mortgage disclosure study in 2007.?
2. We looked at several sub-aggregate analyses that focused on questions grouped by the tasks performed by respondents and by the 9 specific content areas covered by the questions (for example, amortization, interest rate, and so on).
3. We examined the more detailed data by individual questions and whether the results varied by respondent experience levels, loan complexity, and loan type. The statistical comparisons in these analyses are reported on a question-by-question basis and are akin to those reported by the FTC in their 2007 report. ${ }^{8}$
4. For statistical testing, we compared points at the $95 \%$ confidence level using a two-tailed t-test. Most of the comparisons are based on subgroups of approximately 430 respondents. The Margin of Error (MOE) for these comparisons for responses around 50\% at the $95 \%$ confidence level is +/- 4.7 percentage points.

## The Results

## Aggregate Accuracy Results

Two aggregate indices designed to capture the overall accuracy of responses were created from scores assigned to the 39 individual questions. Both indices were intended to capture the percentage of correct responses that a respondent gave to the questions. However, they differed on how responses to questions that could be skipped were treated. One index was based on scores assigned to all 39 questions, while a second index was based only on the 29 "nonskippable" questions that all respondents were required to answer.

In the results for the first index, respondents exposed to the current disclosures answered $59.3 \%$ of all 39 questions correctly. The corresponding percentage for respondents exposed to the proposed disclosures is $76.2 \%$ of all 39 questions answered correctly. The difference ( 16.9 percentage points) was statistically significant? and persisted when we looked at it separately

[^2]within subgroups. Results for the second index showed a virtually identical pattern. Although the difference in performance for respondents with the proposed disclosures compared to the current disclosures was marginally smaller for the second index, it was statistically significant in favor of the proposed disclosures (14.8 percentage points).

In sum, both aggregate indices showed a statistically significant performance advantage of approximately 16 percentage points for the proposed disclosures. Furthermore, this advantage was quite similar in magnitude for experienced as well as inexperienced respondents, easier as well as more challenging loans, and fixed rate as well as adjustable rate loans (range 13.8 to 17.8 percentage point advantage).

## Results Grouped by Part and Task

In Parts 2, 3, and 4 of the questionnaire, the complete set of 39 questions (as well as the subset of 29 non-skippable questions) were divided into four groups corresponding to the four distinct tasks performed by respondents during these parts of the study. ${ }^{10}$ In this section, we compare the performance of the current and proposed disclosures separately for questions focused on each of these tasks.

For Task 2, comparison of two initial disclosures, on average, respondents exposed to the current disclosures answered $57.3 \%$ of the 8 questions correctly. Respondents exposed to the proposed disclosures answered $81.4 \%$ of the questions correctly (difference $=24.1$ percentage points). The comparable results for the 6 non-skippable measures were similar ( $63.8 \%$ for current disclosures, $83.3 \%$ for proposed disclosures, difference $=19.5$ percentage points). Both differences were statistically significant.

For Task 3, comprehension of a single initial disclosure, on average, respondents exposed to the current disclosures answered $70.0 \%$ of the 16 questions correctly. Respondents exposed to the proposed disclosures answered $80.5 \%$ of the questions correctly (difference $=10.5$ percentage points). The comparable results for the 14 non-skippable questions were somewhat weaker but still in favor of the proposed disclosures ( $74.0 \%$ for current disclosures, $80.9 \%$ for proposed disclosures, difference $=6.9$ percentage points). Both differences were statistically significant.

For Task 4, comparison of one initial and one final disclosure, on average, respondents exposed to the current disclosures answered $54.9 \%$ of the 8 questions correctly. Respondents exposed to the proposed disclosures answered $69.0 \%$ of the 8 questions correctly (difference $=14.1$ percentage points). The comparable results for the 4 non-skippable questions were somewhat stronger in favor of the proposed disclosures ( $61.6 \%$ for current disclosures, $79.0 \%$ for proposed disclosures, difference $=17.4$ percentage points). Both differences were statistically significant.

For Task 5, comprehension of a final disclosure, on average, respondents exposed to the current disclosures answered $42.1 \%$ of the 7 questions correctly. Respondents exposed to the proposed disclosures answered $68.5 \%$ of the 7 questions correctly (difference $=26.4$ percentage points). The comparable results for the 5 non-skippable questions were somewhat stronger in favor of the

[^3]proposed disclosures (40.7\% for current disclosures, $69.8 \%$ for proposed disclosures, difference $=$ 29.1 percentage points). Both differences were statistically significant.

In sum, the data showed that the proposed disclosures outperformed the current disclosures consistently for each of the four tasks performed by respondents in the study. On average, the advantage for the proposed disclosures varied from 26.4 percentage points (for comprehension of final disclosures) to 10.5 percentage points (for comprehension of initial disclosures).

## Results Grouped by Concept

In Parts 2, 3, and 4 of the study, the complete set of 39 questions (as well as the subset of 29 nonskippable questions) was divided into 8 groups corresponding to 8 distinct loan-related concepts or terms. These concept areas included amortization, annual percentage rate (APR), closing costs/ settlement charges, escrow account, interest rate, loan amount, monthly payments, and mortgage insurance. A ninth area - risk factor - included questions from the other 8 concept areas.

Amortization (3 questions). On average, respondents exposed to the current disclosures answered $68.5 \%$ of these questions correctly, while respondents exposed to the proposed disclosures answered $76.1 \%$ of the questions correctly (difference $=7.6$ percentage points). This difference was statistically significant.

APR (2 questions). On average, respondents exposed to the current disclosures answered 74.4\% of the 2 questions correctly, while respondents exposed to the proposed disclosures answered $83.6 \%$ of the 2 questions correctly (difference $=9.2$ percentage points). This difference was statistically significant.

Closing Costs/Settlement Charges (7 questions). On average, respondents exposed to the current disclosures answered $66.5 \%$ of the 7 questions correctly, while respondents exposed to the proposed disclosures answered $72.9 \%$ of the 7 questions correctly (difference $=6.4$ percentage points). The comparable results for the 6 non-skippable questions were somewhat better for both disclosures ( $69.8 \%$ for current disclosures, $77.1 \%$ for proposed disclosures, difference $=7.3$ percentage points). Both differences were statistically significant.

Escrow Account (4 questions). On average, respondents exposed to the current disclosures answered $63.4 \%$ of the 4 questions correctly, while respondents exposed to the proposed disclosures answered $71.5 \%$ of the 4 questions correctly (difference $=8.1$ percentage points). The comparable results for the 3 non-skippable questions were somewhat better for both disclosures ( $66.6 \%$ for current disclosures, $75.4 \%$ for proposed disclosures, difference $=8.8$ percentage points). Both differences were statistically significant.

Interest Rate (6 questions). On average, respondents exposed to the current disclosures answered $81.9 \%$ of the 6 questions correctly, while respondents exposed to the proposed disclosures answered $86.6 \%$ of the 6 questions correctly (difference $=4.7$ percentage points). The comparable results for the 4 non-skippable questions were somewhat better for both disclosures ( $87.0 \%$ for current disclosures, $91.2 \%$ for proposed disclosures, difference $=4.2$ percentage points).

Both differences were statistically significant.

Loan Amount (6 questions). On average, respondents exposed to the current disclosures answered $44.4 \%$ of the 6 questions correctly, while respondents exposed to the proposed disclosures answered $79.6 \%$ of the 6 questions correctly (difference $=35.2$ percentage points). For the 5 non-skippable questions, the comparable results were somewhat better for both disclosures ( $47.4 \%$ for current disclosures, $83.0 \%$ for proposed disclosures, difference $=35.6$ percentage points). Both differences were statistically significant.

Monthly Payments (9 questions). On average, respondents exposed to the current disclosures answered $46.1 \%$ of the 9 questions correctly, while respondents exposed to the proposed disclosures answered $70.9 \%$ of the 9 questions correctly (difference $=24.8$ percentage points). The comparable results for the 5 non-skippable questions were similar, although the difference was smaller ( $49.7 \%$ for current disclosures, $71.4 \%$ for proposed disclosures, difference $=21.7$ percentage points). Both differences were statistically significant.

Mortgage Insurance (2 questions). On average, respondents exposed to the current disclosures answered $32.7 \%$ of the 2 questions correctly, while respondents exposed to the proposed disclosures answered $71.1 \%$ of the 2 questions correctly (difference $=38.4$ percentage points). However, this large difference was due entirely to one of the two questions that was skippable (Q26). The difference was statistically significant.

Risk Factors (8 questions). On average, respondents exposed to the current disclosures answered $64.6 \%$ of the 8 questions correctly, while respondents exposed to the proposed disclosures answered $76.0 \%$ of the 8 questions correctly (difference $=11.6$ percentage points). The comparable results for the 7 non-skippable questions were somewhat better for both disclosures ( $68.4 \%$ for current disclosures, $76.4 \%$ for proposed disclosures, difference $=8.0$ percentage points). Both differences were statistically significant.

In sum, the proposed disclosures outperformed the current disclosures consistently for each of the nine loan concept areas, including risk factors. On average, the advantage for the proposed disclosures ranged from 35.2 (for loan amount) to 4.7 percentage points difference (for interest rate).

## Results across Experience, Loan Type, and Loan Complexity

While there were some variations in results across respondent experience, loan complexity, and loan type for particular questions, the data were fairly similar, especially for Tasks 2, 3, and 5. For example, when we examined the average data for the 8 questions in Task 2 (comparison of initial disclosures), the difference between accuracy levels for the proposed versus current disclosures were in a fairly narrow range of 15.1 to 33.0 percentage points. This was true when compared across respondent experience, loan complexity, and loan type levels. However, the variation was somewhat larger for Task 4 (comparison of initial and final disclosures) with a range of 4.7 to 23.4 percentage points, suggesting larger differences in accuracy of responses to these questions within subgroups. Nonetheless, all differences were statistically significant.

## Results for Task 1

The open-ended question (Question 2) in Part 1, Task 1 asked respondents to provide reasons for their choice of loan in Part 1 of the study. We focused on the total number of reasons and comments provided by respondents as a function of the initial disclosure (current versus proposed) they examined. Although not the central focus of our analyses, these data can shed light on the degree to which the current and proposed disclosures differentially influenced the ability of respondents to develop and articulate reasons justifying or explaining their selection.

Out of the 858 study respondents, 852 provided at least one reason or comment while 4 respondents said "don't know" and 2 respondents did not say anything. Respondents provided various comments and arguments, including comments about loan terms, costs, and risk factors, comments about the disclosures themselves, and comments related to personal experiences. Overall, respondents exposed to the current disclosures made an average of 2.68 comments. The corresponding average for respondents exposed to the proposed disclosures was 3.09 comments. The difference ( 0.41 ) was statistically significant. Furthermore, the difference persisted when we looked at it separately within subgroups. These results suggested that respondents exposed to the proposed disclosures could articulate and explain more reasoning behind their choice. This was the case regardless of their experience, difficulty of the loan, and whether the loan was a fixed rate or adjustable rate loan.

## Conclusions

The results of the study lead to five conclusions, all in favor of the proposed disclosures:

1. The proposed disclosures performed better on aggregate measures.
2. The proposed disclosures, on average, performed better for Tasks 2-5.
3. The proposed disclosures, on average, performed better for all concept areas.
4. The proposed disclosures performed better regardless of respondent experience, loan type, or loan complexity.
5. Respondents using the proposed disclosures listed more comments while explaining their choice in Task 1.

## Limitations

Two features of the Quantitative Study limit the generalizability of the results. First, the sampling was done in each of the 20 DMAs to be as representative of each DMA as possible, with the only real limitation being rural respondents. ${ }^{11}$ Second, the study was a controlled experiment

[^4]conducted in a supervised, distraction-free environment. In addition, although respondents generally had enough time to complete the various tasks at their own pace, time limits were imposed on each part of the study to keep the total session length to approximately 60 minutes. The extent to which these results will replicate in noisy, distracting, real-world settings with no externally imposed time limits is unclear. This is an interesting conjecture worthy of assessment in future research.

## Importance of Consumer Testing

The Mortgage Disclosure Project shows the advantages and benefits of two types of consumer testing: Qualitative Testing and Quantitative Testing.

## Qualitative Testing

The Qualitative Study ensured that consumers could comprehend the basic facts about a loan, could compare two initial loan disclosures, and could state their reasons for making that choice. The study also allowed the CFPB to design the proposed disclosures on an iterative basis, using the qualitative testing results of one round to refine the designs of the integrated disclosures for the next round. Further, it allowed the development of the Closing Disclosure with the Loan Estimate to enable better comparison between the initial and final disclosures. In addition, the inclusion of industry representatives in the qualitative testing allowed the CFPB to ensure that industry personnel could understand the disclosures and explain them to consumers. The CFPB understands that consumers do not obtain or close loans in isolation and often discuss the disclosures with loan officers and settlement agents. As a supplement to the Qualitative Study, the public posting of the design iterations on its Know Before You Owe website further allowed the CFPB to anticipate concerns these stakeholders might have.

## Quantitative Testing

The Quantitative Study looked at both the current and the proposed disclosures used at application and at closing. Thus, the study allowed the CFPB to compare the performance of the proposed disclosure to the current disclosure to ensure that the proposed disclosure showed significant improved performance. The CFPB wanted to ensure that it was not merely changing the disclosures, but improving and streamlining the mortgage disclosures for consumers.

The Quantitative Study confirmed that the proposed disclosures indeed performed better and we can extrapolate that the disclosures then provided benefits in ease of use and understanding for consumers. Importantly, the differences between the current and proposed disclosures were statistically significant whether considering all respondents, experienced versus inexperienced respondents, easier versus more challenging loans, or fixed versus adjustable rate loans.

The results also provided an added advantage to the CFPB by allowing it to identify areas in which the proposed disclosures did not perform well before issuing the Final Rule. For only 4 questions did the current disclosures perform better and only one of those was statistically significant-

Question 16-about the closing costs. ${ }^{12}$ Based on these results, the CFPB examined the answers to Question 16, identified why respondents answered incorrectly, further improved the disclosure, and tested the change with consumers in an additional round of qualitative testing before issuing the Final Rule. Thus, the results of the quantitative testing helped to ensure even better performance on the disclosures before issuing the Final Rule. ${ }^{13}$

The CFPB has placed great importance on consumer testing in its design of the integrated disclosures mandated by the Dodd-Frank Act. The thoroughness of the qualitative testing ensured that the disclosures resulted in improved consumer comprehension, comparison, and more knowledgeable choices. The quantitative testing documents the benefits of the new disclosures. As the study by Lacko and Pappalardo also advocated:

The development of effective consumer disclosures requires careful analysis of what information consumers really need, how consumers will interpret and use the information, how to convey the information in a way that can be easily understood and used by consumers, and, combining all of this, careful analysis of the benefits and costs of the disclosures. Consumer testing is a critical part of this analysis. ${ }^{14}$

[^5]

## Introduction

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) was enacted, which created the Consumer Financial Protection Bureau (CFPB). ${ }^{1}$ As part of its broad mandate, the CFPB assumed certain responsibilities for the Truth in Lending Act (TILA) and the Real Estate Settlement Procedures Act (RESPA). The Dodd-Frank Act directed the CFPB to publish a rule that combines certain disclosures under TILA and sections 4 and 5 of RESPA into a single, integrated disclosure for mortgage loan transactions covered by those laws. ${ }^{2}$

TILA was enacted in 1968 with the purpose of assuring a meaningful disclosure of credit terms to promote the informed use of credit by consumers, mainly through clear and conspicuous disclosures of the cost of credit and other core loan terms. TILA requires a consumer to receive a disclosure of the credit terms within three days of a consumer's application for a mortgage loan (the initial TILA disclosure). Redisclosure is required three days before closing if certain terms have changed (the final TILA disclosure). The CFPB implements TILA under Regulation Z.

RESPA was enacted in 1974 to provide more effective advance disclosure to borrowers and sellers of their settlement charges. RESPA requires a consumer to receive a Good Faith Estimate of the closing costs (the Good Faith Estimate or GFE) within three days of a consumer's application for

[^6]a mortgage loan. RESPA also requires a consumer to receive a uniform settlement statement (the HUD-1) at closing, listing all the costs of the loan transaction and any accompanying home transaction. The CFPB implements RESPA under Regulation X.

On July 9, 2012, as directed by the Dodd-Frank Act, the CFPB issued a Proposed Rule and proposed disclosures (the Proposed Rule). ${ }^{3}$ The Proposed Rule proposed to combine the disclosures required under TILA and sections 4 and 5 of RESPA for mortgage loan transactions covered by those laws. The CFPB proposed an integrated disclosure that would be provided after consumers apply for a mortgage loan (the Loan Estimate) and an integrated disclosure that would be provided before the loan closing (the Closing Disclosure). The Loan Estimate is intended to replace the initial TILA disclosure and the GFE provided at application. The Closing Disclosure is intended to replace the final TILA disclosure and the HUD-1.

## The Mortgage Disclosure Project

In January 2011, the CFPB began the Mortgage Disclosure Project to integrate the TILA and RESPA disclosures. The CFPB used a User-Centered Design Process with two phases: a Qualitative Study and a Quantitative Study. See Figure 1. User-Centered Design Process. ${ }^{4}$ After the Proposed Rule in July 2012, the CFPB received comments on the integrated disclosures and, based on these comments, made additional consistency changes to the disclosures before the Quantitative Study. ${ }^{5}$

FIGURE 1. User-Centered Design Process


[^7]
## The Qualitative Testing

The Qualitative Study focused on three parts of the User-Centered Design Process: understanding the context setting for industry and consumers, formatively developing the disclosures, and iteratively testing the disclosures with consumers and industry participants. ${ }^{6}$ For this phase of the Mortgage Disclosure Project, the CFPB team used extensive consumer testing to develop and test the disclosures. The Loan Estimate was developed and tested with consumers in five rounds of testing; the Closing Disclosure in two rounds of consumer testing; and a final three rounds of testing ensured that consumers could use the Loan Estimate and Closing Disclosure together.

Through the 10 rounds of qualitative testing, the CFPB received extensive evidence that consumers could comprehend the proposed disclosures, compare the information on two disclosures, choose a loan and explain a rationale for their choice, and use the disclosures to compare initial and final loan terms and costs. These proposed disclosures were included in the Proposed Rule that the CFPB issued on July 9, 2012.

## Public Comments on the Proposed Disclosures

Public comments on most of the Proposed Rule were accepted until November 6, $2012 .{ }^{7}$ The CFPB analyzed these comments for, among other things, suggested changes to the two proposed disclosures. Many of the disclosure-related comments suggested minor modifications to the disclosures to ensure greater consistency within and between the Loan Estimate and Closing Disclosure. See Table 1. Consistency Changes Made for the Quantitative Testing Based on Public Comments on the next page. For example, one comment about the Loan Estimate suggested adding the word Estimated to the term Total Monthly Payment, as used in the Loan Terms table, so it matched the "Estimated Total Monthly Payment" term used in Projected Payments. The CFPB incorporated these minor design changes into the proposed disclosures to improve consistency within and between the Loan Estimate and Closing Disclosure before the Quantitative Study began.

[^8]TABLE 1. Consistency Changes Made for the Quantitative Testing Based on Public Comments

| Loan Estimate | Closing Disclosure | Change |
| :---: | :---: | :---: |
| $\checkmark$ | $\checkmark$ | Changed Assumption language to make it more consistent between the two disclosures |
| $\checkmark$ | $\checkmark$ | Changed directional language in Loan Terms to refer to Estimated Total Monthly Payment so the reference to total payment was consistent between Loan Terms and Projected Payments |
| $\checkmark$ | $\checkmark$ | Changed directional language in Loan Terms and Projected Payments to sentence case in order to increase readability |
|  | $\checkmark$ | On page 1, specified Settlement Agent in the closing information section |
|  | $\checkmark$ | On page 3, removed the word Borrower from the Borrower's Loan Amount in Summaries of Transactions, for consistency with the use of Loan Amount on page 1 |
|  | $\checkmark$ | On page 4, on the Escrow table, changed row headings Initial Payment and Monthly Payment to Initial Escrow Payment and Monthly Escrow Payment for consistency with Estimated Escrow on page 1 |
|  | $\checkmark$ | On page 4, changed Escrow Account checkbox for "no escrow" to delete "require or" to reflect that this option is already accounted for in the "decline" checkbox |

The public comment period produced three significant development suggestions for both the Loan Estimate and Closing Disclosure: (1) a Spanish translation of the Loan Estimate and the Closing Disclosure; (2) a modified Loan Estimate and Closing Disclosure for refinance transactions; and 3) a concern about Closing Costs. The CFPB evaluated versions of the integrated disclosures that addressed these comments in additional qualitative testing, as described below. ${ }^{8}$

## Spanish Translations

In the first two rounds of testing for the Mortgage Disclosure Project, prior to issuing the Proposed Rule, the CFPB had translated the early prototypes of the Loan Estimate into Spanish and tested the translations with Spanish-speaking participants. The CFPB had intended to codevelop Spanish language versions of the integrated disclosures to ensure the design aided consumer understanding in both English and Spanish. The testing results showed that issues with

[^9]the Loan Estimate were mostly related to translation and not to differences in how the information was presented. As a result, as discussed in the Proposed Rule, the CFPB delayed testing of the translated disclosures until after the designs of both the Loan Estimate and Closing Disclosure were fully developed. After issuing the Proposed Rule, the proposed disclosures were translated and then tested with consumers in four rounds of testing in Arlington, VA; Phoenix, AZ; Miami, FL; and Baltimore, MD from October 2012 through July 2013.

## Refinance Transaction

Although the Proposed Rule included specific versions of a Loan Estimate and Closing Disclosure for a refinance transaction, the CFPB received public comments suggesting that the proposed disclosures could be confusing to consumers for such transactions. Accordingly, the CFPB evaluated potential modifications to them and conducted additional testing of these modified versions of the Loan Estimate and the Closing Disclosure for refinance transactions. In addition, Spanish testing in Baltimore, MD was conducted using these modified refinance versions of the integrated disclosures to ensure the performance of the Spanish translations on the refinance-specific disclosures. This testing was completed in June and July 2013 in Bethesda, MD; Baltimore, MD; and Richmond, VA.

## Closing Costs

Based on the public comments about the Closing Disclosure generally and results from the Quantitative Study, the CFPB team also tested a modification to the Loan Estimate and Closing Disclosure that would apply to all transactions. This testing occurred in Baltimore, MD and Richmond, VA.

## The Quantitative Study

As part of the Mortgage Disclosure Project, the Quantitative Study focused on validating the effectiveness of the proposed disclosures and their performance compared to the current disclosures. To validate the performance of the proposed disclosures from qualitative testing, and to compare the performance of the proposed and current disclosures, the CFPB conducted a baseline comparison of the proposed disclosures with the current disclosures. The Quantitative Study began in October 2012 with the development of the experimental design, the quantitative questionnaire, and the disclosures used for testing. ${ }^{9}$ The Quantitative Study was fielded from May 2013 through June 2013 at 20 sites throughout the continental United States.

The key previous study, conducted by staff at the Federal Trade Commission (FTC), Improving Consumer Mortgage Disclosures, ${ }^{10}$ used prototype disclosure designs and compared their performance with the initial TILA disclosure and the GFE that were in use before 2010. That study, however, focused solely on the disclosures that consumers receive after applying for a mortgage. The CFPB designed its Quantitative Study to provide a similar baseline comparison against the current initial disclosures. However, in contrast to the FTC study, it also compared the disclosures

[^10]provided at closing, that is, a baseline comparison of the performance of the final TILA disclosure and the HUD-1 versus the proposed Closing Disclosure. Further, the CFPB's Quantitative Study included a baseline comparison of performance when respondents compared initial and final disclosures.

The loans used in testing included fixed rate and adjustable rate loans, which were further subdivided into easier and more challenging loans. The more challenging loans included negative amortization and interest only loan features, as well as prepayment penalties. In addition, when the respondents compared the application disclosures to the closing disclosures, the more challenging loans had more differences.

## About This Report

This report has 6 chapters with appendices that include the Quantitative Study materials:

- Chapter 2. A Comparison of the Current and Proposed Disclosures compares the content of the initial TILA disclosure, the GFE, the final TILA disclosure, and the HUD-1 versus the content of the proposed Loan Estimate and Closing Disclosure.
- Chapter 3. Methodology describes the methodology of the project.
- Chapter 4. Results reports on the key findings of the analysis.
- Chapter 5. Conclusions provides the conclusions and limitations of the Quantitative Study.
- Chapter 6. The Final Disclosures provides a description of the final Loan Estimate and the final Closing Disclosure.
- The appendices (A-Z) provide documentation for the study, including copies of the current and proposed disclosures used in testing.


## A Comparison of the Current and Proposed Disclosures

In this chapter, we have provided samples of the initial and final disclosures used in the Quantitative Study. The Quantitative Study used names of fictitious banks to enhance the ability of respondents to engage in the scenario. Both the current and the proposed initial disclosures shown are for the fictitious Aspen Bank. Both the current and proposed final disclosures shown are for a more challenging loan from the fictitious Fir Bank. Appendices $J$ - Q include copies of the current disclosures used in the Quantitative Study. Appendices $R-Y$ include copies of the proposed disclosures used in the Quantitative Study.

## Current Initial Disclosure

Currently under TILA and Regulation Z, consumers who apply for a loan receive an initial TILA disclosure, which was originally issued by the Board of Governors of the Federal Reserve System (FRB).11

Page 1 includes:

- Basic transaction information, such as the lender's name and borrowers' names.
- Key Truth-In-Lending information, such as Annual Percentage Rate (APR), Finance Charge, Amount Financed, and Total of Payments.
- Interest Rate and Payment Summary table that discloses the Estimated

11 While the FRB originally published the regulations and model forms for this disclosure and the final TILA disclosure, and HUD originally published the regulations and standard forms for the GFE and the HUD-1, as noted below, the CFPB generally assumed rule writing responsibilities for these disclosures and the TILA and RESPA on July 21, 2011, pursuant to the Dodd-Frank Act.

Monthly Payment.

- Listing of loan details, such as Demand Feature, Variable Rate Feature, Required Deposit, Security Interest, Filing/Recording Fees, Late Charge, and Assumption.
- Two statements that state that the borrower can request an itemization of the Amount Financed and a statement that "There is no guarantee that you will be able to refinance to lower your rate and payments."

Page 2 includes:

- Property Insurance sections that state the options regarding from whom the borrower can get insurance.
- Insurance section that states insurance is not required to get credit and has the borrower sign if he wants Credit Life, Credit Disability, or Credit Life and Disability insurance.
- Prepayment section that states if the loan has a prepayment penalty and if the borrower may get a refund on part of the finance charge.

FIGURE 2. Aspen Bank Initial TILA Disclosure (Current)


Currently, under RESPA and Regulation X, consumers also receive a three-page GFE under RESPA requirements, which was originally issued by the Department of Housing and Urban Development (HUD).

Page 1 includes:

- Basic transaction information, such as lender name, borrower name, address, loan number, and date.
- Purpose statement that tells consumers where to get additional information.
- Statement that tells borrowers to shop for the best loan and a reference to a table on page 3.
- Important dates, which lists the time limits on the interest rate, other settlement charges, settlement after locking the rate, and the last date for locking the rate.
- Summary of your loan, which provides basic loan details, such as loan amount, loan term, initial interest rate; includes information about if and when the interest rate, loan amount, and payments can rise; states if the loan has a prepayment penalty and balloon payment.
- Escrow Account Information, which identifies if the loan requires escrow.
- Summary of your Settlement Charges, which breaks down and then totals the Estimated Settlement Charges.

Page 2 includes:

- Your Adjusted Origination Charges, which lists Origination Charges and Credits or Charges for the Specific Rate Chosen.
- Your Charges for All Other Settlement Services, which lists, with short definitions, each of the 11 categories of services the borrower will or may pay for in a purchase transaction.

Page 3 provides three tables:

- A table with three groupings of charges: those that cannot change, those that can increase up to $10 \%$, and those that have no limit on change.
- A Tradeoff Table that compares the loan offer, a loan with a higher interest rate and lower settlement charges, and a loan with a lower interest rate and higher settlement charges.
- A fillable Shopping Chart that Lenders can voluntarily complete to encourage borrowers to shop.
- A statement that the lender could sell the loan after settlement.

FIGURE 3. Aspen Bank GFE (Current)


## Proposed Initial Disclosure

The three-page proposed Loan Estimate developed by the CFPB team integrates the information from the two current initial disclosures. It also contains new disclosures required by the DoddFrank Act, including (1) Total Interest Percentage (TIP), and (2) Liability after Foreclosure (for refinance loans).

Page 1 includes:

- Basic transaction information, such as lender name, applicant name, address, loan number, and date.
- Table of Loan Terms, including the Loan Amount, Interest Rate, and Monthly Principal \& Interest, as well as a Yes/No statement if the terms could change and details about the changes. Also includes a Yes/No statement of the presence of a Prepayment Penalty and Balloon Payment and details if they do exist.
- Table of Projected Payments, which that shows the payment calculation for the Estimated Total Monthly Payment, as well as Estimated Taxes, Insurance \& Assessments and whether these are escrowed into the payment.
- Cash to Close section that gives the Estimated Cash to Close and the Estimated Closing Costs, including a breakdown of Loan Costs, Other Costs, and Lender Credits. It also includes a reference to the details on page 2 .

Page 2 includes:

- Loan Costs, which breaks down the Origination Charges, Services You Cannot Shop For, and Services You Can Shop For.
- Other Costs, which breaks down the Taxes and Other Government Fees, Prepaids, Initial Escrow Payment at Closing, and Other Costs.
- Calculating Cash to Close table, which shows total Closing Costs, Financed Costs, Down Payment, Deposit, Funds for Borrower, Seller Credits, and Adjustments and Other Credits.
- Adjustable Payment (AP) Table and an Adjustable Interest Rate (AIR) Table, if the loan has either of these features.

Page 3 includes:

- Contact Information for the Lender and Mortgage Broker (if any).
- Table of three measures to use to compare with other loans:
- In 5 Years that shows the total paid in principal, interest, mortgage insurance, and loan costs compared to principal paid off
- Annual Percentage Rate (APR)
- Total Interest Percentage (TIP) that shows total amount of interest as a percentage of the loan
- Table of Other Considerations that can include various disclosures, including Appraisal, Assumption, Homeowner's Insurance, Late Payment, Refinance, and Servicing.

FIGURE 4. Aspen Bank Loan Estimate (Proposed)


## Current Final Disclosure

Currently under TILA and Regulation Z, consumers who close on a loan receive a typically twopage final TILA disclosure which was originally issued by the Federal Reserve Board (FRB).

The final TILA disclosure covers the same information that is in the initial TILA disclosure but contains final information. In addition, the content can change if the loan is an adjustable rate mortgage loan or has interest only or negative amortization features. The final TILA disclosure includes the following:

Page 1 includes:

- Basic transaction information, such as the lender's name and borrowers' names.
- Key Truth-In-Lending information, such as Annual Percentage Rate (APR), Finance Charge, Amount Financed, and Total of Payments.
- Interest Rate and Payment Summary table that discloses the Estimated Monthly Payment.
- Listing of loan details, such as Demand Feature, Variable Rate Feature, Required Deposit, Security Interest, Filing/Recording Fees, Late Charge, and Assumption.
- Two statements that state that the consumer can request an itemization of the Amount Financed and a statement that There is no guarantee that you will be able to refinance to lower your rate and payments.

Page 2 includes:

- Property Insurance sections that state the vendors from whom the borrower can get insurance.
- Insurance section that states insurance is not required to get credit and has the borrower sign if he wants Credit Life, Credit Disability, or Credit Life and Disability insurance.
- Prepayment section that states if the loan may have a prepayment penalty and if the borrower may get a refund on part of the finance charge.

FIGURE 5. Fir Bank Final TILA Disclosure (Current)


Currently under RESPA and Regulation X, consumers also receive a three-page HUD-1, the uniform settlement statement, which was issued by HUD.

Page 1 includes:

- Type of Loan includes information on the File Number, Loan Number, Mortgage Insurance Case Number, a statement about how the disclosure provides the actual Settlement Charges, Name and Address of Borrower, Seller, Lender, Property Location, Settlement Agent, Settlement Date, and Place of Settlement.
- Summary of Borrower's Transaction includes details about Sales Price, Seller Credits, Adjustments, and so on.
- Summary of Seller's Transaction includes parallel information to the Summary of Borrower's Transaction.

Page 2 includes:

- Settlement Charges with an itemized list of charges with a Total Settlement Charges line at the bottom of the page.

Page 3 includes:

- Comparison of Good Faith Estimate (GFE) and HUD-1 Charges lists basic fees for both disclosures that cannot change.
- Charges That in Total Cannot Increase More Than 10\% lists GFE and HUD-1 fees and indicates a percentage of difference and potential violations.
- Charges That Can Change lists the items that can change with no tolerances.
- Loan Terms lists basic loan terms similar to page 1 of the GFE.

FIGURE 6. Fir Bank HUD-1 (Current)


## Proposed Final Disclosure

The five-page proposed Closing Disclosure integrates the information from the current final disclosures. It also contains additional new disclosures required by the Dodd-Frank Act, including (1) Total Interest Percentage (TIP), (2) Negative Amortization, (3) Partial Payment, (4) Escrow Account, and (5) Liability after Foreclosure.

Page 1 includes:

- The same information in the same format featured on page 1 of the proposed Loan Estimate.
- Basic information including key closing, transaction, and loan information.
- Loan Terms including the Loan Amount, Interest Rate, Monthly Principal \& Interest, Prepayment Penalty, and Balloon Payment information.
- Projected Payments, which includes a table with the payment calculation for the total number of years of the loan. The table itemizes lines by Principal \& Interest, Mortgage Insurance, Estimated Escrow, Estimated Total Monthly Payment, and Estimated Taxes, Insurance \& Assessments.
- Cash to Close section, which gives the Cash to Close amount and the Closing Costs, including a breakdown of Loan Costs, Other Costs, and Lender Credits. It also includes a reference to the details on page 2 .

Page 2 includes:

- Page 2 breaks down the closing cost details into two main sections, Loan Costs and Other Costs, with an organization that matches the proposed Loan Estimate.

Page 3 includes:

- The Calculating Cash to Close table, which compares what has changed between the Loan Estimate and the Closing Disclosure.
- Summaries of Transactions in two separate detailed sections for Borrower's Transactions and Seller's Transactions.

Page 4 includes:

- Additional Information About This Loan which provides more details about the loan:
- Loan Disclosures, which includes information on Assumption, Demand Feature, Late Payment, Negative Amortization, Partial Payment, Security Interest, and Escrow Account.
- On adjustable rate mortgages or loans with certain other features, there are two additional tables that provide the borrower with detailed information: Adjustable Payment (AP) Table and Adjustable Interest Rate (AIR) Table.

Page 5 includes:

- Loan Calculations, Other Disclosures, Contact Information, and a line to Confirm Receipt. In addition, it provides a Questions box indicating where the borrower can get more information and make a complaint.
- Loan Calculations section, which includes information on Total of Payments, Finance Charge, Amount Financed, Annual Percentage Rate (APR), Total Interest Percentage (TIP), and Approximate Cost of Funds.
- Other Disclosures section, which includes information on Appraisal, Contract Details, Liability after Foreclosure, Refinance, and Tax Deductions.
- Contact Information section, which includes Contact Information for the Lender, Mortgage Broker, Real Estate Broker for both borrower and seller, and the settlement agent.
- Confirm Receipt section, which allows the borrower to confirm receipt of this disclosure.

FIGURE 7. Fir Bank Closing Disclosure (Proposed)


## Methodology

The Quantitative Study used a controlled experiment to examine the extent to which respondents could understand and use the current mortgage disclosures versus the CFPB's proposed mortgage disclosures. The study included both current and proposed initial disclosures-initial TILA disclosure and GFE versus the Loan Estimate. It also included both the current and proposed final disclosures_final TILA disclosure and HUD-1 versus the Closing Disclosure. The Quantitative Study involved a $2 \times 2 \times 2 \times 2$ between-subjects factorial design. ${ }^{12}$ The factors were:

1. Disclosure Type: current versus proposed (initial and final disclosures)
2. Loan Type: fixed rate versus adjustable rate
3. Difficulty: easier versus more challenging loans
4. Consumer: inexperienced versus experienced

During May and June 2013, the study used in-person, proctored, small group sessions with 858 consumers divided into two groups-experienced respondents (424) and inexperienced respondents (434) —in 20 locations across the Census Bureau regions and sub-regions in the continental United States. The CFPB team chose the 20 locations to include geographic diversity to reach populations in both large and small Designated Market Areas (DMAs) and to be able to reach into rural markets. Respondents answered questions only about either current or proposed disclosures and used both the initial

[^11]and final disclosures. For each set of disclosures, respondents received either fixed rate or adjustable rate loan sets. Within both sets, the loans included various loan features from easier to more challenging fixed rate or adjustable rate loans. The more challenging features included complicated loan features, such as negative amortization, interest only, and other such features. In addition, the loan features changed from the initial disclosures to the final disclosures. Some of these changes were fairly simple and obvious, while others involved more challenging and subtle changes. Each test group at each site was mixed by the factors, that is, by the disclosure type, the loan types and characteristics, the difficulty of the loans, and consumer experience.

## The Current and Proposed Disclosures

For the Quantitative Study, about half of the respondents (428) used the current initial disclosures (initial TILA disclosure and GFE) and the current final disclosures (final TILA disclosure and the HUD-1). ${ }^{13}$ The remaining respondents (430) used the proposed initial disclosure (the Loan Estimate) and proposed final disclosure (the Closing Disclosure). All respondents received full-size disclosures, including the HUD-1 on legal-sized paper. For this chapter, we refer to the current and proposed disclosures in the following way:

- Current Initial Disclosure includes the initial TILA disclosure and the GFE,
- Current Final Disclosure includes the final TILA disclosure and the HUD-1,
- Proposed Initial Disclosure is the Loan Estimate, and
- Proposed Final Disclosure is the Closing Disclosure.

Primarily because of amendments to the statutory requirements made by the Dodd-Frank Act, the proposed disclosures include more information than the current disclosures. In addition, to reduce the paperwork burden for both industry and consumers, the CFPB incorporated disclosures under other statutory provisions that are currently provided as separate pages. For example, the proposed Loan Estimate includes an Appraisal notice required by the Equal Credit Opportunity Act and a Servicing disclosure required under section 6 of RESPA.

We did not alter the current disclosures used in this study to reflect the information required by the Dodd-Frank Act or the other disclosures integrated into the proposed disclosures. There are no current regulations that implement the new Dodd-Frank Act statutory disclosures, and thus, there is no "baseline" for them. In addition, lenders currently present the disclosures required under other current statutory provisions separately from the mortgage disclosures and in varied formats. As a consequence, there is no "baseline" for mortgage disclosures that include these other statutory requirements. Accordingly, the current disclosures used in this study included only the initial current TILA disclosures and final current TILA disclosures, the GFE and the HUD-1 disclosures, required by TILA and sections 4 and 5 of RESPA. ${ }^{14}$

13 The CFPB determined that for the TILA disclosures used in the study it would adhere to the regulatory text of 12 CFR 1026.18 for some elements of the disclosures, rather than the model disclosures in Appendix H of Regulation Z, which may differ in some ways from the regulatory text. Accordingly, for some of the loan products in the study, there may be differences between the TILA disclosures and the model disclosures in Appendix H of Regulation Z.
14 As implemented by current 12 CFR parts 1024 and 1026.

The CFPB intended from the start to set up this study as a comparison of the current and proposed disclosures. As noted by Lacko and Pappalardo in their key study:

Including both current and prototype disclosures in these tests greatly increases our ability to understand and evaluate the test results. Each version of the disclosure acts as a benchmark and control for testing the other. If we tested only current disclosures, we would not know, regardless of the results, whether we could continue to improve consumer understanding of the information. A seemingly poor performance by the current disclosures may be the best performance possible given the limits of consumer comprehension and a seemingly good performance might still be significantly improved. These questions can only be answered through testing possible alternatives. Similarly, if we tested only the proposed disclosures, we would not know whether it provided any improvement over the current disclosures. A seemingly mediocre performance by the proposed disclosures may still represent a substantial improvement over the current disclosures, and an excellent performance may not differ significantly from the performance of the current disclosures. The study design used here which tests both current and proposed disclosures, provides for direct comparison of the two alternatives and as informed assessment of the performance of both. ${ }^{15}$

## Test Procedures

In every city, each small group of respondents met at a scheduled time at a market research field service center. ${ }^{16}$ Each session lasted approximately 60 minutes. Groups were mixed by the factors of the study: disclosure type, loan type and characteristics, difficulty of the loans, and consumer experience. The number of small groups varied across sites. See Appendix A. Final Questionnaire Name Set Distribution.

When respondents arrived, each completed a Respondent Questionnaire to confirm his or her information from the initial screening survey. Each respondent also received a Privacy Statement and Consent Form to sign and a Privacy Act Statement the respondents could keep. Both the Consent Form and Privacy Act Statement described how we would maintain the privacy of the respondent's personal identity.

A trained researcher who acted as a proctor led each 60-minute test session. Before testing, each proctor went through a two-hour briefing and practice session to ensure compliance with all instructions. In addition, the data collection leader viewed each proctor's first test session to make sure the process was followed completely. The proctor read the Proctor Instructions to the respondents and was available to answer procedural, but not content, questions. See Appendix B. Proctor Script. At the end of the session, the proctor collected all disclosures and completed questionnaires and directed respondents to the reception area to pick up their incentive payment.

[^12][^13]respondent in a particular test session had a different set of loans than the other respondents. In addition, in preparing the packages, the initial loans that respondents saw were also randomized. No respondent could "copy" from another respondent, and the proctor stated that each set of materials used by each respondent in the session was different. Administering the structured questionnaires in small groups with no individual respondent having the same set of disclosures reduced any possible bias because of the proctor—intentional or unintentional—as could occur in a one-on-one interview.

## The Session Structure

The 60-minute session used 5 minutes at the beginning for an introduction and 5 minutes at the end for the logistics of collecting materials. Respondents used the remaining 50 minutes to complete the five parts of the questionnaire:

- In Part 1 (10 minutes), respondents reviewed two initial disclosures, selected which one they would choose, and provided a rationale for why they chose it.
- In Part 2 (10 minutes), respondents compared the terms of the same two initial disclosures.
- In Part 3 (15 minutes), respondents answered questions about one of the two initial disclosures.
- In Part 4 (10 minutes), respondents compared one of the initial disclosures with a matching final disclosure. They also answered questions about only the final disclosure.
- In Part 5 (5 minutes), respondents rated the initial disclosures and the final disclosures on three scales for ease of reading, ease of comparison, and ease of finding information.

For each part, the respondents received a different colored envelope that contained the relevant part of the questionnaire and the related disclosures. Each color corresponded to its own part of the questionnaire. At the end of each timed part, respondents replaced the questionnaire and disclosures they had worked with into the original envelope and set it aside. They then removed another envelope which contained the next part of the questionnaire and the related disclosures. No respondent saw the entire set of disclosures or the entire questionnaire at the beginning of the session or at any other time.

## The Questionnaire

During the development of the questionnaire, the CFPB team identified nine key topic areas that researchers and consumer advocates agreed were critical for informed consumers and were addressed by both the current and proposed disclosures. The CFPB team also decided that only questions that could be answered by information on both the current and proposed disclosures would be included. For example, although the proposed initial disclosure prominently displays the "Cash to Close" amount, we did not include a question about that topic during Part 2 and Part 3 (which included only the initial disclosures), since the current initial disclosures do not include that information. See Appendix C. Questionnaire.

The nine key topics included amortization, annual percentage rate (APR), closing costs/settlement charges, escrow account, interest rate, loan amount, monthly payments, mortgage insurance, and risk factors. Risk Factors included questions from the other 8 concept areas. For this latter topic, we had no separate questions, but incorporated questions that asked about changes over time that occurred after closing to the interest rate, principal and interest payments, and the loan amount. Risk factors also included whether the loan had an escrow payment, interest only payments, a prepayment penalty, or negative amortization. See Table 2. Key Topics, Questionnaire Parts, Tasks, and Related Questions for more detail.

In general, respondents were either comparing two disclosures or looking at an individual disclosure. Thus, questions varied in their phrasing. Some questions were fill-ins in which the respondent needed to write-in a specific number. Some questions were multiple-choice. Some questions were phrased using the exact terms on the disclosures, such as annual percentage rate (APR). Some questions paraphrased the language, such as Question 22 about prepayment penalties. A few questions were open-ended in which respondents could fill in any response. Because respondents used both initial and final disclosures, the topic sometimes was addressed by juxtaposed questions, but generally the questions were scattered across Parts 2, 3, and 4 of the questionnaire.

Questionnaires for the current and proposed disclosures were identical with two exceptions:

1. Each questionnaire referred to the loan disclosures that the respondent was using by a fictitious bank name. For example, Questions 1-10 used a specific fictitious bank name even in the multiple-choice questions.
2. For the current initial and final disclosures, we used the term "settlement" as applicable, to reflect the language on the current GFE. For the proposed initial and final disclosures, we used the term "closing" as applicable, to reflect the language of the Loan Estimate.

Within the questionnaires, three sections included questions that were different from the core questions in Parts 2, 3, and 4.

- In Part 1, the initial two questions attempted to collect a broader perspective about performance. The respondents were given two initial disclosures, asked to examine them, and then selected which of the two they preferred. As described in the section about the loans below, neither loan was a "better" loan, so our analysis made no judgment about which loan was selected. However, respondents were then asked, "Why did you make that selection? Please explain your thinking in as much detail as possible in the space below." Our goal was two-fold. First, we wanted to identify the characteristics respondents would select without any of the indirect prompting that occurs when any question is asked. An asked question inevitably marks an area of interest to the researchers. To a limited extent, respondents' answers could give us insight into the tradeoffs made when selecting a loan. Second, we wanted to identify the number of reasons a respondent would list. Fully aware that the respondent would control the number of reasons listed because of time or interest, we believed that the number would give us a proxy measure of how easily respondents could identify key terms and synthesize them into their conscious decision-making.
- In Part 4, Question 42, we asked respondents if they had any other comments about the disclosures.
- In Part 5, the final 6 questions asked respondents to rate the initial disclosure and the final disclosure on ease of comprehending, comparing, and finding information.

TABLE 2. Key Topics, Questionnaire Parts, Tasks, and Related Questions

| Key Topic | Part 2. Task 2: Comparison of 2 Initial Disclosures | Part 3. Task 3: Comprehension of 1 Initial Disclosure | Part 4. Task 4: Comparison of Initial and Final Disclosures | Part 4. Task 5: Comprehension of Final Disclosure |
| :---: | :---: | :---: | :---: | :---: |
| Amortization |  | 20 When is your final payment? <br> 22 Do you have a penalty if you want to refinance? <br> 24 How much principal will you pay in 5 years? |  |  |
| Annual Percentage Rate (APR) | 7 How does APR compare? | 23 What is the APR? |  |  |
| Closing Costs/ <br> Settlement Charges |  | 16 What are your estimated closing costs/settlement charges? <br> 19 Which costs can you shop for? | 32 How do closing costs/settlement charges compare? <br> 33 List one item that has a different amount. | 36 What is the amount of cash you need at closing/ settlement? |
| Escrow Account | 6 How does escrow account compare? | 21 Does the lender collect payments for escrow? | 34 How does escrow account compare? <br> 35 List one escrow item that is different. |  |
| Interest Rate | 4 How does interest rate in year 1 compare? | 12 What is interest rate in year 1? <br> 13 Can interest rate in year 1 change? <br> 14 When can interest rate change? | 30 How does interest rate compare on the initial and closing/settlement disclosure? <br> 31 Why are interest rates different? |  |
| Loan Amount | 3 How does amount borrowing compare? | 11 What is loan amount? | 27 What is the loan amount on the final disclosure? <br> 28 How does the loan amount compare on the initial and closing disclosures? <br> 29 Why did loan amount change? | 37 Will your loan amount increase after closing? |

TABLE 2. continued

| Key Topic | Part 2. Task 2: Comparison of 2 Initial Disclosures | Part 3. Task 3: <br> Comprehension of 1 Initial <br> Disclosure | Part 4. Task 4: Comparison of Initial and Final Disclosures | Part 4. Task 5: <br> Comprehension of Final Disclosure |
| :---: | :---: | :---: | :---: | :---: |
| Monthly Payments | 8 How does the change in estimated total monthly payment compare? <br> 9 Which loan changes the total monthly payment first? <br> 10 Which loan has the highest estimated total monthly payment | 15 Can principal and interest change? <br> 18 How much is first total monthly payment? |  | 38 What is the highest possible monthly principal and interest payment? <br> 39 Does the monthly principal \& interest change after closing? <br> 40 When does principal \& interest first change? <br> 41 How often can principal \& interest change? |
| Mortgage Insurance |  | 25 Does this loan have mortgage insurance? <br> 26 What is the first monthly payment for it? |  |  |
| Risks |  | 10 Which loan has the highest estimated total monthly payment? <br> 13 Can interest rate in year 1 change? <br> 15 Can principal and interest change? <br> 21 Does the lender collect payments for escrow? <br> 22 Do you have a penalty if you want to refinance? <br> 24 How much principal will you pay in 5 years? |  | 37 Will your loan amount increase after closing/ settlement? <br> 39 Does the monthly principal \& interest change after closing/settlement? |

## About the Loans

To create the loan products for testing, we set up two parallel sets of current and proposed disclosures. See Table 3. Loan Types for more detail. Within those two sets, loans were either fixed or adjustable rate loans. Within the fixed rate and adjustable rate loans, we created sets of easier and more challenging loans-and within the easier and more challenging classification, we created two versions of the loans, $A$ and $B$. Each $A$ and $B$ version of the loans included both initial and final disclosures. ${ }^{17}$ See Appendices J-Q for the current disclosures used in testing. See Appendices R-Y for the proposed disclosures used in testing.

TABLE 3. Loan Types

| Current Disclosure Loans |  |  |  |  |  |  |  | Proposed Disclosure Loans |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Fixed |  |  |  | Adjustable |  |  |  | Fixed |  |  |  | Adjustable |  |  |  |
|  |  | More Challenging |  | Easier |  | More Challenging |  | Easier |  | More Challenging |  | Easier |  | More Challenging |  |
| A | B | A | B | A | B | A | B | A | B | A | B | A | B | A | B |

## Loan Characteristics

In this between-subjects design, respondents used either the current or the proposed disclosures, not both. Respondents were assigned to either fixed rate loans or to adjustable rate loans. Once assigned, they did not receive the other type of loan. Each loan used by a respondent had the name of a fictitious bank. To some extent, we named the banks to increase the comfort of respondents as they dealt with the abstractness of numbers and the multiple factors they needed to consider as they examined the loans. To reduce the possibility of bias against the names of the lenders, each cell of the loan type was given two specific names. For example, the Current Disclosure, Fixed, Easier, A loan was named Aspen Bank or Maple Bank. The corresponding Proposed Disclosure, Fixed, Easier, A loan also used Aspen Bank or Maple Bank. As a result, for both the current and proposed disclosures, half of the respondents who received Fixed, Easier A loans received disclosures from Aspen Bank and half received disclosures from Maple Bank.

Within a type, the loans reflected easier or more challenging loan characteristics to test the effectiveness of the disclosures for different loan types and features. Easier loans were relatively straightforward in their loan terms and closing details. More challenging loans offered more complex loan terms and closing details. Even though more prevalent in years before the recent financial crisis, loan features, such as interest only payments, prepayment penalties, negative amortization, and optional payments are still possible, and some are currently available to consumers. These features present unique risks to consumers in the form of potentially increased

[^14]payments, principal balances, and costs of refinancing. In addition, new product features may be developed that also contain such risks. The existence of such a risk in a loan is an important aspect of the loan for a consumer to consider in evaluating the loan. Accordingly, the more challenging loans included several loans with such features to evaluate the performance of the proposed disclosures in particular for such risks. See Table 4. Key Differences Across Initial and Final Disclosure Sets.

For the initial disclosures, neither Version A nor Version B was clearly a less expensive or "better" loan. We wanted the loans to reflect more real-life scenarios where consumers must evaluate loans based on multiple factors or loans that have differences for which the advantages and disadvantages are not easily discernible. So, each loan included many elements that required the respondents to make trade-offs as they decided between loans in Part 1, Task 1 of the study. Similarly, in the final disclosures, neither Version A nor Version B was clearly a "better" loan than the loan presented in the initial disclosure. However, each final disclosure included multiple changes from the initial disclosure.

- For the easier fixed rate and easier adjustable rate loans, the changes included simple changes in interest rate, closing costs, or cash to close.
- For the more challenging fixed rate and more challenging adjustable rate loans, the changes included more complicated changes in loan product, loan amount, financed closing costs, interest rate, closing costs, or cash to close.

TABLE 4. Key Differences Across Initial and Final Disclosure Sets

| Name of Bank (Current) | Name of Bank (Proposed) | Type of Loan | Loan Estimate |  | Closing Disclosure |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Maple Bank | Aspen Bank <br> Maple Bank | Easier Fixed A | Term | 30 year | Term | 30 year |
| Aspen Bank |  |  | Product | Fixed Rate | Product | Fixed Rate |
|  |  |  | Loan Amount | \$162,000 | Loan Amount | \$162,000 |
|  |  |  | Interest Rate | 3.875\% | Interest Rate | 3.875\% |
|  |  |  | Closing Costs/ Settlement Charges | \$8,054 | Closing Costs/ Settlement Charges | \$9,712.10 |
|  |  |  | Cash to Close | \$16,504 | Cash to Close | \$14,147.26 |
|  |  |  | Sale Price | \$180,000 | Sale Price | \$180,000 |
| Nandina Bank <br> Balsam Bank | Balsam Bank <br> Nandina Bank | Easier Fixed B | Term | 30 year | Term | 30 year |
|  |  |  | Product | Fixed Rate | Product | Fixed Rate |
|  |  |  | Loan Amount | \$162,000 | Loan Amount | \$162,000 |
|  |  |  | Interest Rate | 4.25\% | Interest Rate | 4.50\% |
|  |  |  | Closing Costs/ Settlement Charges | \$4,736 | Closing Costs/ Settlement Charges | \$8,722.39 |
|  |  |  | Cash to Close | \$12,736 | Cash to Close | \$14,574.35 |
|  |  |  | Sale Price | \$180,000 | Sale Price | \$180,000 |
| Oak Bank | Cottonwood Bank <br> Oak Bank | More <br> Challenging <br> Fixed A | Term | 30 year | Term | 30 year |
| Cottonwood Bank |  |  | Product | Fixed Rate | Product | 10 year Interest Only Fixed Rate |
|  |  |  | Loan Amount | \$315,000 | Loan Amount | \$315,000 |
|  |  |  | Interest Rate | 4.25\% | Interest Rate | 4.25\% |
|  |  |  | Closing Costs/ Settlement Charges | \$14,056 | Closing Costs/ <br> Settlement Charges | \$16,606.53 |
|  |  |  | Cash to Close | \$39,056 | Cash to Close | \$39,896.55 |
|  |  |  | Sale Price | \$350,000 | Sale Price | \$350,000 |
|  |  |  | Prepayment Penalty | Yes 2\%/2 years | Prepayment Penalty | No |

TABLE 4. continued

| Name of Bank (Current) | Name of Bank (Proposed) | Type of Loan | Loan Estimate |  | Closing Disclosure |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Pine Bank | Dogwood Bank | More <br> Challenging Fixed B | Term | 30 year | Term | 30 year |
|  |  |  | Product | 5 year Interest Only Fixed Rate | Product | 5 year Interest Only Fixed Rate |
| Dogwood Bank | Pine Bank |  | Loan Amount | \$315,000 | Loan Amount | \$317,000 |
|  |  |  | Interest Rate | 4.875\% | Interest Rate | 4.875\% |
|  |  |  | Closing Costs/ <br> Settlement <br> Charges | \$11,199 | Closing Costs/ <br> Settlement <br> Charges | \$16,671.51 |
|  |  |  | Cash to Close | \$36,199 | Cash to Close | \$37,993.53 |
|  |  |  | Sale Price | \$350,000 | Sale Price | \$350,000 |
|  |  |  | Other | None | Other | Financed \$2,000 <br> Closing Costs |
| Quince Bank | Elm Bank | Easier ARM A | Term | 30 year | Term | 30 year |
| Elm Bank | Quince Bank |  | Product | 7/1 <br> Adjustable Rate | Product | 7/1 <br> Adjustable <br> Rate |
|  |  |  | Loan Amount | \$121,000 | Loan Amount | \$121,000 |
|  |  |  | Interest Rate | 3.75\% | Interest Rate | 3.75\% |
|  |  |  | Index + Margin | LIBOR <br> (Assumption $=.75 \%)+4 \%$ | Index + Margin | LIBOR <br> (Assumption $=.75 \%)+4 \%$ |
|  |  |  | Lifetime Min | 4.25\% | Lifetime Min | 4.25\% |
|  |  |  | Lifetime Max | 9\% | Lifetime Max | 9\% |
|  |  |  | First Change Limit | 3\% | First Change Limit | 3\% |
|  |  |  | Subsequent Change Limit | 2\% | Subsequent Change Limit | 2\% |
|  |  |  | Closing Costs/ <br> Settlement <br> Charges | \$4,803 | Closing Costs/ <br> Settlement Charges | \$7,264.75 |
|  |  |  | Cash to Close | \$13,803 | Cash to Close | \$15,101.55 |
|  |  |  | Sale Price | \$135,000 | Sale Price | \$135,000 |

TABLE 4. continued

| Name of Bank (Current) | Name of Bank (Proposed) | Type of Loan | Loan Estimate |  | Closing Disclosure |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Redbud Bank | Fir Bank <br> Redbud Bank | Easier ARM B | Term | 30 year | Term | 30 year |
| Fir Bank |  |  | Product | 3/3 <br> Adjustable <br> Rate | Product | 3/3 <br> Adjustable Rate |
|  |  |  | Loan Amount | \$121,000 | Loan Amount | \$121,000 |
|  |  |  | Interest Rate | 3.375\% | Interest Rate | 3.375\% |
|  |  |  | Index + Margin | COFI <br> (Assumption $=1.33 \%)+4 \%$ | Index + Margin | COFI <br> (Assumption $=1.5 \%)+4 \%$ |
|  |  |  | Lifetime Min | 5\% | Lifetime Min | 5\% |
|  |  |  | Lifetime Max | 9\% | Lifetime Max | 9\% |
|  |  |  | First Change Limit | 2\% | First Change Limit | 2\% |
|  |  |  | Subsequent Change Cap | 2\% | Subsequent Change Cap | 2\% |
|  |  |  | Closing Costs/ Settlement Charges | \$5,668 | Closing Costs/ Settlement Charges | \$7,702.63 |
|  |  |  | Cash to Close | \$14,668 | Cash to Close | \$15,472.43 |
|  |  |  | Sale Price | \$135,000 | Sale Price | \$135,000 |

TABLE 4. continued

| Name of Bank (Current) | Name of Bank (Proposed) | Type of Loan | Loan Estimate |  | Closing Disclosure |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Spruce Bank <br> Gingko Bank | Ginkgo Bank Spruce Bank | More Challenging ARM A | Term | 30 year | Term | 30 year |
|  |  |  | Product | 5 Year Interest <br> Only, 5/3 <br> Adjustable <br> Rate | Product | 5 year Negative Amortization, 5/3 Adjustable Rate |
|  |  |  | Loan Amount | \$211,000 | Loan Amount | \$211,000 |
|  |  |  | Interest Rate | 4\% | Interest Rate | 4\% |
|  |  |  | Index + Margin | MTA <br> (Assumption $=$ .16\%) + 4\% | Index + Margin | MTA <br> (Assumption = .25\%) $+4 \%$ |
|  |  |  | Lifetime Min | 3.25\% | Lifetime Min | 3.25\% |
|  |  |  | Lifetime Max | 12\% | Lifetime Max | 12\% |
|  |  |  | First Change Limit | 2\% | First Change Limit | 2\% |
|  |  |  | Subsequent Change Limit | 2\% | Subsequent <br> Change Cap | 2\% |
|  |  |  | Closing Costs/ Settlement Charges | \$8,791 | Closing Costs/ Settlement Charges | \$13,519.43 |
|  |  |  | Cash to Close | \$27,791 | Cash to Close | \$30,589.43 |
|  |  |  | Sale Price | \$240,000 | Sale Price | \$240,000 |

TABLE 4. continued

| Name of Bank (Current) | Name of Bank (Proposed) | Type of Loan | Loan Estimate |  | Closing Disclosure |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Tulip Bank | Hornbeam Bank | More Challenging ARM B | Term | 30 year | Term | 30 year |
| Hornbeam <br> Bank | Tulip Bank |  | Product | 7 year <br> Interest <br> Only 7/1 <br> Adjustable <br> Rate | Product | 5 year <br> Negative Amortization, 7/1 Adjustable Rate, |
|  |  |  | Loan Amount | \$211,000 | Loan Amount | \$214,000 |
|  |  |  | Interest Rate | 4.25\% | Interest Rate | 4.125\% |
|  |  |  | Index + <br> Margin | LIBOR <br> (Assumption <br> $=.86 \%)+4 \%$ | Index + <br> Margin | LIBOR <br> (Assumption $=$ $1.00 \%)+4 \%$ |
|  |  |  | Lifetime Min | 4.5\% | Lifetime Min | 4.5\% |
|  |  |  | Lifetime Max | 8\% | Lifetime Max | 8\% |
|  |  |  | First Change Limit | 1\% | First Change Limit | 1\% |
|  |  |  | Subsequent Change Limit | 1\% | Subsequent Change Limit | 1\% |
|  |  |  | Closing <br> Costs/ <br> Settlement <br> Charges | \$7,296 | Closing <br> Costs/ <br> Settlement <br> Charges | \$13,742.87 |
|  |  |  | Cash to Close | \$26,296 | Cash to Close | \$27,787.87 |
|  |  |  | Sale Price | \$240,000 | Sale Price | \$240,000 |
|  |  |  | Other | None | Other | 1. Increases exceed legal limits by \$2,140 2. \$3,000 closing costs incorporated into loan amount |

## Site Locations

For this study, the CFPB team selected 20 sites from each of the Census Bureau regions and subregions in the continental United States. In addition, some cities had a rural population within 50 miles of the site so the sample included variations of urban, suburban, and rural populations. We defined large cities as any with a DMA population greater than 5 million and medium cities with a population of 1 million or more and less than 5 million. Population figures are based on information at http://www.censusbureau.gov/popest/data/metro/totals/2012. See Figure 8. Site Locations below.

FIGURE 8. Site Locations


[^15]
## Recruitment

For the Quantitative Study, a sample of adults within the 20 selected DMAs was screened. To qualify for the main survey, respondents had to:

- be 18 years old or older;
- live in a household within 50 miles of the MSA/location used for the interview;
- have purchased or refinanced a home in the last five years or have never purchased or have not purchased or refinanced in the last five years and have the intent to purchase or refinance in the next two years; and
- agree to participate in the in-person interview.

Respondents were paid an incentive of $\$ 75.00$ to compensate for travel time, expenses, and the session.

The screening for the main study period occurred between April 16, 2013, and June 12, 2013. Participants completed the main screener survey in 7 minutes (median). See Appendix D. Recruiting Script.

The completion rates for the screening questions and main interview, and the incidence/eligibility rate are presented in Table 5. Key Survey Response Statistics.

TABLE 5. Key Survey Response Statistics

| Key Survey Response Statistics | $\mathbf{N}$ <br> Sampled | $\mathbf{N}$ <br> Qualified Complete | Qualified Respondent <br> in Home Rate |
| :--- | :---: | :---: | :---: |
| Pass All Screening Criteria | 10,761 | 1,030 | $9.6 \%$ |
| Not Qualified | 10,761 | 5,947 | $55.3 \%$ |
| Non-Responder | 10,761 | 3,553 | $33.0 \%$ |

In addition, in 231 homes, the screening survey was started but was incomplete and the potential respondent was determined to be "not qualified." The total number of completed surveys in the field was 858. For those respondents who did not show up at the field facility for the interview, replacements were recruited at the site, using the Quantitative Study's definition of experienced and inexperienced mortgage borrowers.

## The Recruitment Panel

To recruit the sample population, the CFPB team used a probability-based web panel, the KnowledgePanel ${ }^{T \mathrm{M}}$, a proprietary panel operated by Knowledge Networks, within the DMA. KnowledgePanel is the first online research panel based on probability sampling covering both the online and offline populations in the United States. Although often used to recruit online survey respondents, the Quantitative Study used the panel to recruit respondents for in-person test groups in the 20 different DMAs—randomly selecting individuals within each market.

## The KnowledgePanel

KnowledgePanel members are recruited through a nationally representative sample-at an unweighted level, originally by telephone and now exclusively through postal mail addressedbased sampling. Households receive access to the Internet and hardware if needed. ${ }^{18}$ See Appendix E. KnowledgePanel Background.

According to the Centers for Disease Control and Prevention (January-June 2010), approximately $28.6 \%$ of all United States households cannot be contacted through random digit dialing (RDD) sampling-26.6\% because of cell-phone-only households (CPOHH) status and 2\% because they have no telephone service whatsoever. Among some age segments, the RDD non-coverage would be substantial: $40 \%$ of young adults, ages $18-24$, reside in CPOHHs, $51 \%$ of those ages 25-29 reside in CPOHHs, as do $40 \%$ of those ages 30-34. ${ }^{19}$

Because of these changing demographics, KnowledgePanel recruitment uses dual sampling frames that include both listed and unlisted telephone numbers, telephone and non-telephone households, and cell-phone-only households, as well as households with and without Internet access. Only persons sampled through these probability-based techniques are eligible to participate on KnowledgePanel. Unless invited to do so as part of these national samples, no one can volunteer to be on the panel. To offset attrition, multiple recruitment samples are fielded evenly throughout the calendar year.

## The Consumers for Testing

In the recruitment script, we excluded from participation consumers who answered that they never intended to purchase or refinance a house because they were not a part of the intended target audience. We also excluded those who worked in the mortgage loan or title insurance industries, or who had participated in the earlier qualitative research on developing the proposed disclosures. We determined if respondents were experienced or inexperienced based on the following criteria:

[^16]- Respondents who stated that they had previously purchased or refinanced a house within the past 5 years were considered experienced. The study used a five-year time frame, rather than a shorter time frame, to acknowledge the difficulties of obtaining financing in 2010-2012 during the housing crisis when credit standards tightened. To further refine respondents' level of experience, we asked the potential respondents to identify how many times they had purchased a home with a mortgage loan or refinanced a mortgage loan.
- Respondents who had never purchased a home or who had not purchased or refinanced a home in the past 5 years and intended to do so in the next 2 years were considered inexperienced.

Experienced (424) and inexperienced (434) respondents were randomly assigned to the levels of the remaining factors, creating, within the $2 \times 2 \times 2 \times 2$ design, 16 cells with approximately equal numbers of respondents.

In addition, we recruited for a mix of respondents across standard demographics, including gender, age, marital status, education, household income, and location. Recruitment resulted in a balanced number of respondents in nearly all demographic categories. ${ }^{20}$ See Table 6. Percentages of Demographic Characteristics of Respondents by Current and Proposed Disclosures. Further, recruitment resulted in an equally balanced number of respondents across the other categories, that is, fixed rate and adjustable rate loans, easier and more challenging loans, and experienced and inexperienced respondents.

[^17]TABLE 6. Percentages of Demographic Characteristics of Respondents by Current and Proposed Disclosures

| Characteristic | Total (858) Percentage | Current (428) Percentage | Proposed (430) Percentage |
| :---: | :---: | :---: | :---: |
| Gender | \% | \% | \% |
| Male | 45 | 45 | 45 |
| Female | 54 | 53 | 54 |
| Age |  |  |  |
| 18-24 | 4 | 3 | 5 |
| 25-34 | 24 | 22 | 26 |
| 35-44 | 20 | 19 | 21 |
| 45-54 | 21 | 24 | 19 |
| 55-64 | 19 | 19 | 20 |
| 65-74 | 8 | 10 | 7 |
| 75 or older | 2 | 2 | 1 |
| Marital Status |  |  |  |
| Married | 50 | 51 | 49 |
| Widowed | 2 | 1 | 2 |
| Divorced | 11 | 12 | 10 |
| Separated | 2 | 2 | 1 |
| Never married | 24 | 22 | 26 |
| Living with partner | 10 | 10 | 11 |
| No answer | 1 | 1 | 1 |
| Education |  |  |  |
| Less than high school | 0 | 0 | 1 |
| High school graduate | 6 | 7 | 5 |
| Technical/trade school | 1 | 1 | 1 |
| Some college | 28 | 29 | 27 |
| College graduate | 63 | 61 | 64 |
| No answer | 2 | 2 | 1 |
| Ethnicity |  |  |  |
| White, Caucasian | 74 | 71 | 76 |
| Black, African-American | 15 | 16 | 14 |
| Asian, Asian-American | 1 | 1 | 1 |
| American Indian, Alaska Native | 0 | 0 | 1 |
| Some other race | 4 | 4 | 4 |
| No answer | 6 | 7 | 4 |

TABLE 6. continued

| Characteristic | Total (858) Percentage | Current (428) Percentage | Proposed (430) Percentage |
| :---: | :---: | :---: | :---: |
| Household Income | \% | \% | \% |
| Less than \$35,000 | 12 | 10 | 13 |
| \$35,000 to 49,999 | 15 | 16 | 15 |
| \$50,000 to 74,999 | 26 | 27 | 25 |
| \$75,000 to 99,999 | 20 | 20 | 20 |
| \$100,000 to 124,999 | 11 | 11 | 11 |
| \$125,000 to 149,999 | 6 | 6 | 6 |
| \$150,000 to 174,999 | 4 | 4 | 4 |
| \$175,000 or more | 5 | 5 | 5 |
| No answer | 1 | 1 | 1 |
| Living Quarters |  |  |  |
| Owned or being bought by you or someone in your household | 63 | 64 | 62 |
| Rented for cash | 33 | 32 | 33 |
| Occupied without payment of cash rent | 3 | 2 | 4 |
| No answer | 1 | 2 | 1 |
| Location |  |  |  |
| Atlanta | 5 | 5 | 6 |
| Boston | 6 | 5 | 6 |
| Chicago | 7 | 7 | 7 |
| Columbus | 4 | 4 | 4 |
| Dallas | 6 | 6 | 6 |
| Denver | 5 | 5 | 4 |
| Houston | 5 | 5 | 5 |
| Kansas City | 2 | 2 | 2 |
| Minneapolis | 7 | 8 | 7 |
| Nashville | 3 | 3 | 4 |
| Orlando | 6 | 5 | 6 |
| Paramus | 3 | 4 | 3 |
| Philadelphia | 7 | 7 | 8 |
| Phoenix | 4 | 4 | 4 |
| Pittsburgh | 5 | 5 | 5 |
| Raleigh | 4 | 4 | 4 |
| San Diego | 5 | 5 | 4 |
| San Francisco | 6 | 6 | 6 |
| Seattle | 5 | 5 | 5 |
| St. Louis | 6 | 6 | 6 |

## Quality Assurance Techniques

In a study of this complexity, quality assurance is of critical importance. For this project, we took precautions at multiple stages to ensure accuracy.

## Loan Preparation

The CFPB team prepared the numbers for each loan. These numbers were checked internally and again by the Kleimann team as they filled in the disclosures for the testing. Because the current and proposed disclosures used the same numbers in their paired groups, the Kleimann team further checked that the numbers matched in each paired set of loans.

## Rotations

Within each loan package, the order of the loans was varied in terms of the initial loan that was seen when removed from the package, which loan was used for Part 3, and the matching final disclosure that was used for Parts 4 and 5. The Kleimann team developed the rotations and the instructions for the rotations, and the data collection team lead checked each package as a final step.

## Pretesting

The questionnaire had two rounds of pre-testing on February 27, 2013, in Bethesda, MD and on April 11, 2013, in Baltimore, MD. Nine respondents were recruited for each site and met the same recruiting criteria as described above. The proctor used the Proctor Script and worked with both individuals and small groups. Respondents looked at both the current and the proposed disclosure sets. The goal was to identify questions in which the phrasing was ambiguous, misleading, or resulted in responses we did not expect. In addition, we verified the timing of the 5 parts, the logistics of the packaging of the disclosures, and the length of time respondents using the current or proposed disclosures needed to complete the parts of the study.

Pretesting confirmed that respondents could comprehend the questions and provide usable responses, with only minor modifications necessary to the questionnaire and instructions. Although the overall length was appropriate at 60 minutes, we adjusted the time allotted to individual parts. Finally, the pretesting showed that the packaging was feasible and that the differences in time it took to complete a task with the current or proposed disclosures were not excessive.

## Answer Keys

We developed multiple answer keys. First, each loan had different numbers. Second, for the current and proposed disclosures, the numbers presented on the disclosures were different due to numbers that could be rounded on the Loan Estimate. Third, the answer keys also provided the possible and acceptable answers to each question and reflected the difference in language about closing costs and settlement charges. As a result, the CFPB team developed separate answer keys
and verified them with each loan package. These answer keys were used for entering the data. See Appendix F. Answer Key for a sample answer key.

## Open-ended Coding for Questions 2 and 42

The CFPB team developed coding lists for each of the two open-ended questions, Questions 2 and 42. All open-ended questions were coded using standard market research industry standards. This included developing a code list using the first $40 \%$ of the responses. The responses were coded into like content categories or codes. The draft code list was reviewed by the CFPB team to determine if all codes were appropriate, expansive, and complete. Once the code list was approved, the coding team coded all open-ended responses. See Appendix G. Coding Lists.

## Survey Cooperation

- A reminder letter was sent to scheduled respondents giving the time of the session and directions to the testing facility.
- A phone call reminder was made prior to the scheduled time.
- Email reminders to non-responders were sent every three days during the field period to encourage participation.


## Data Cleaning of Parts 2, 3, and 4

- A closed end-cleaning program was written for each of the survey options based on the programming logic in the final questionnaires and any additional instructions provided by the project manager.
- The Data Processing team began writing the cleaning program as soon as the final data layout was available from the project team.
- The cleaning program checked that respondents had followed the correct skip logic according to the final questionnaire provided.
- The program confirmed that the correct punches were present for all questions that should be answered and conversely that questions that should be skipped were blank in the data file.
- Any errors found were addressed before a final clean file was output. This included going back to the original survey documents to make sure the proper code was given to each respondent answer.
- Apart from the standard cleaning, we used the answer keys provided by the CFPB to assist in the data clean to finalize skip patterns and appropriate answer ranges to count as a correct answer. The answer keys were also used to design the scoring system as described in the report. We created a special data tabulation banner of the 32 questionnaire versions in order to confirm the answer keys and to confirm the scoring system.
- Once the cleaning process was complete, the data was merged with the open-end code data.


## Data Coding

- Members of GfK's Public Affairs and Corporate Communications Team, along with support from GfK's Government and Academic Research practice, managed the data collection, data processing, and data delivery tasks for this study. The data collection team leader, a key member of the CFPB Quantitative Study team, was responsible for the overall management of this project and the senior research director was responsible for in-field data collection management and all data processing tasks, including the delivery of the final data sets and scoring cross tabulations.
- The data collection team leader and senior research director both monitored the implementation of the study and provided a quality assurance oversight role to ensure that the study was conducted according to the study's design. Upon completion of the data collection in the field, data entry staffers entered all questionnaires, including all open- and close- ended questions, and imported respondent demographic information from the KnowledgePanel database to finalize each respondent record. Those records were then checked for accuracy and cleaned of any personally identifiable information (PII) before being included in the final data set. The data files were then fitted for additional analysis through the development of analytical banners/crosstabs by demographics (age, region, household income, gender), behavioral metrics (experienced/inexperienced), and characteristics of the loan disclosure (fixed/adjustable rate, easier/more challenging) from the screening and in-field questionnaires. The final cross-tabulation banners were checked and cleaned before final delivery to the CFPB.


## Results

As noted earlier, this study involved 5 distinct parts to the questionnaire and 6 tasks within those parts. The heart of our study was focused on Questions 3 through 41, which occurred in Parts 2, 3, and 4, and included Tasks 2, 3, 4, and 5. See Table 2. Key Topics, Questionnaire Parts, Tasks, and Related Questions for a matching of questions to parts and tasks. For this chapter, we focus first on the results in Parts 2, 3, and 4 (Tasks 2-5) and then on Part 1 (Task 1). ${ }^{21}$

## Plan of Analyses for Parts 2, 3, and 4

For Parts 2, 3, and 4, each respondent for both current and proposed disclosures answered a total of 39 questions (Question 3 through Question 41) that could be scored as having been answered correctly or incorrectly based on the answer keys. For each question, respondents were assigned a score of " 1 " if they answered the question correctly or if they were required to skip the

[^18]question because of a correct answer to a prior question. Respondents were assigned a score of " 0 " if they failed to answer the question correctly or if they were required to skip the question based on an incorrect answer to a prior question. Multiple correct answers were possible for a few questions (for example, Question 17). For these, respondents could receive partial credit (for example, a score of $1 / 2$ ).

Our analysis centered primarily on the accuracy scores assigned to respondents for these 39 key questions.

1. We looked at accuracy of responses with current versus proposed disclosures based on aggregate measures computed across all of the questions in Parts 2, 3, and 4. This analysis is similar to the analysis reported by the FTC in its mortgage disclosure study in 2007.22
2. We looked at several sub-aggregate analyses that focused on questions grouped by the parts and tasks performed by respondents and by specific content areas covered by the questions (for example, amortization, interest rate, and so on).
3. We examined the more detailed data generated by individual questions and whether the results varied by respondent experience levels, loan complexity, and loan type. The statistical comparison in these analyses was completed on a question-by-question basis and is akin to those reported by the FTC in their 2007 report. ${ }^{23}$
4. For statistical testing, we compared points at the $95 \%$ confidence level using a two-tailed t -test. Most of the comparisons are based on subgroups of approximately 430 respondents. The Margin of Error (MOE) for these comparisons for responses around 50\% at the 95\% confidence level is + /- 4.7 percentage points.

## Aggregate Accuracy Results

Two aggregate indices designed to capture the overall accuracy of responses were created from scores assigned to the 39 individual questions. Both indices were intended to capture the percentage of correct responses that a respondent gave to the questions. However, they differed on how responses to questions that could be skipped were treated. One index was based on scores assigned to all 39 questions, while a second index was based only on the 29 "nonskippable" questions that all respondents were required to answer.

Table 7. Percentage of Questions Answered Correctly with Current Versus Proposed Disclosures: Aggregate Results compares the percentage of correct responses for respondents exposed to the current disclosures versus proposed disclosures based on these two indices. The upper half of the table displays results for the first index (based on 39 questions), while the lower half of the table shows comparable results for the second index (based on 29 "non-skippable" questions).

[^19]TABLE 7. Percentage of Questions Answered Correctly with Current Versus Proposed Disclosures: Aggregate Results

| Category | Current <br> Disclosures |  | Proposed <br> Disclosures |  | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Base of 39 Questions | $59.3 \%$ | $76.2 \%$ | $16.9^{\star}$ |  |  |
| All Respondents (428/430) | $62.9 \%$ | $78.9 \%$ | $16.0^{*}$ |  |  |
| Experienced Respondents <br> $(215 / 209)$ | $55.7 \%$ | $73.5 \%$ | $17.8^{*}$ |  |  |
| Inexperienced Respondents <br> $(213 / 221)$ | $61.9 \%$ | $79.4 \%$ | $17.5^{\star}$ |  |  |
| Easier Loan (217/215) | $56.6 \%$ | $72.8 \%$ | $16.2^{\star}$ |  |  |
| More Challenging Loan (211/215) | $57.6 \%$ | $75.2 \%$ | $17.6^{\star}$ |  |  |
| Fixed Rate Loan (214/215) | $61.0 \%$ | $77.1 \%$ | $16.1^{*}$ |  |  |
| Adjustable Rate Loan (214/215) |  |  |  |  |  |

Base of 29 Questions

| All Respondents (428/430) | $64.5 \%$ | $79.3 \%$ | $14.8^{\star}$ |
| :--- | :---: | :---: | :---: |
| Experienced Respondents <br> (215/209) | $68.1 \%$ | $81.9 \%$ | $13.8^{\star}$ |
| Inexperienced Respondents <br> (213/221) | $60.8 \%$ | $76.7 \%$ | $15.9^{\star}$ |
| Easier Loan (217/215) | $65.6 \%$ | $81.0 \%$ | $15.4^{\star}$ |
| More Challenging Loan (211/215) | $63.3 \%$ | $77.5 \%$ | $14.2^{\star}$ |
| Fixed Rate Loan (214/215) | $63.6 \%$ | $79.0 \%$ | $15.4^{\star}$ |
| Adjustable Rate Loan (214/215) | $65.3 \%$ | $79.5 \%$ | $14.2^{\star}$ |

Notes: (1) Figures in parentheses are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in the average proportion of questions answered correctly, with * indicating significance at the five percent level.

In the results for the first index, respondents exposed to the current disclosures answered 59.3\% of all 39 questions correctly. The corresponding percentage for respondents exposed to the proposed disclosures was $76.2 \%$ of all 39 questions answered correctly. The difference (16.9 percentage points) was statistically significant ${ }^{24}$ and persisted when we looked at it separately within subgroups. For example, although experienced respondents performed better overall than inexperienced respondents (about 6 percentage points better, on average), the proposed disclosures outperformed the current disclosures by an approximately 17 percentage point margin within each of these two groups. A similar pattern was evident when we looked at the results for easier versus more challenging loans and for fixed rate versus adjustable rate loans.

[^20]In each instance, the difference in performance for respondents exposed to the current versus the proposed disclosures was in the 16 to 17.8 percentage point range in favor of the proposed disclosures.

Results for the second index showed a virtually identical pattern, except that the difference in performance for respondents exposed to the current versus the proposed disclosures was marginally smaller ( 14.8 percentage point advantage across all respondents) and in the 13.8 to 15.9 percentage point range in favor of the proposed disclosures across the subgroups.

In sum, both aggregate indices showed a statistically significant performance advantage of approximately 16 percentage points for the proposed disclosures. Furthermore, this advantage was quite similar in magnitude for experienced as well as inexperienced respondents, easier as well as more challenging loans, and fixed rate as well as adjustable rate loans (a 13.8 to 17.8 percentage point range advantage).

## Results Grouped by Part and Task

In Parts 2, 3, and 4 of the questionnaire, the complete set of 39 questions (as well as the subset of 29 non-skippable questions) was divided into four groups corresponding to four distinct tasks within those parts (Part 2-Task 2, Part 3-Task 3, Part 4-Task 4, and Part 4-Task 5) performed by respondents during the study. In this section, we compare the performance of the current and proposed disclosures separately for questions within each of these tasks. For our discussion, we have broken out each part and task and placed questions in the order of the highest difference to the lowest difference. Appendix H. Table 8. Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures-Grouped by Task shows a complete table of results. ${ }^{25}$

## Part 2. Task 2. Comparison of Initial Disclosures for Two Loans

For Part 1, Task 1, respondents examined initial disclosures for two loans (two initial TILA disclosures and two GFEs for current disclosures or two Loan Estimates for the proposed disclosures), made a choice, and listed reasons for that choice. For Part 2, Task 2, respondents answered a series of 8 questions involving comparisons between the terms and costs associated with the two loans from Task 1. These questions included Questions 3 through 10. The nonskippable questions were Questions 3 through 8 with the 2 skippable questions asking for more detail about Question 8.

Table 8.1. Part 2, Task 2. Comparison of Initial Disclosures: Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered 57.3\% of the 8 questions correctly, while respondents exposed to the proposed disclosures answered 81.4\% of the questions correctly (difference $=24.1$ percentage points). The comparable results for the 6 non-skippable measures were similar ( $63.8 \%$ for current disclosures, $83.3 \%$ for proposed disclosures, difference $=19.5$ percentage points). Both differences were statistically significant.

25 For this section, we have divided Table 8 into four smaller tables relevant to the discussion.

Table 8.1 also shows that respondents exposed to the proposed disclosures answered all 8 of the questions more accurately than did respondents exposed to the current disclosures. The difference in percentage of correct responses was statistically significant for 7 of 8 questions and was relatively large ( 20 or more) for 4 of 8 questions. For non-skippable questions, the difference in percentages of correct responses was statistically significant for 5 of 6 questions and was relatively large ( 20 or more) for 2 of 6 questions.

TABLE 8.1. Part 2, Task 2. Comparison of Initial Disclosures: Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Questions | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 8 Questions | $57.3 \%$ | $81.4 \%$ | $24.1^{\star}$ |
| Average for 6 Non-skippable <br> Questions | $63.8 \%$ | $83.3 \%$ | $19.5^{\star}$ |
| Amount Borrowed - Q3 | $32.5 \%$ | $81.4 \%$ | $48.9^{*}$ |
| Change in Total <br> Monthly Payment - Q9** | $39.0 \%$ | $77.9 \%$ | $38.9^{\star}$ |
| Total Monthly Payment - Q8 | $49.5 \%$ | $86.3 \%$ | $36.8^{\star}$ |
| Highest Total Monthly <br> Payment - Q10** | $36.9 \%$ | $73.0 \%$ | $36.1^{\star}$ |
| Escrow Account - Q6 | $80.4 \%$ | $94.4 \%$ | $14.0^{\star}$ |
| Points Paid - Q5 | $55.8 \%$ | $62.8 \%$ | $7.0^{\star}$ |
| Interest Rate Year 1 - Q4 | $81.3 \%$ | $87.4 \%$ | $6.1^{*}$ |
| APR - Q7 | $83.2 \%$ | $87.7 \%$ | 4.5 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Part 3. Task 3. Comprehension of Initial Disclosure for One Loan

In Part 3 of the study, respondents answered 16 questions about the terms and costs detailed in the initial disclosure for one of the two loans they had just compared (one GFE and initial TILA disclosure for the current disclosures or one Loan Estimate for the proposed disclosures). These questions included Questions 11 through 26. The 14 non-skippable questions included all except Questions 14 and 26, both of which asked for more detail about the previous question.

Table 8.2. Part 3, Task 3. Comprehension of Initial Disclosure: Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures (Ordered by Percent Point Difference) shows that, on average, respondents exposed to the current disclosures answered $70.0 \%$ of the 16 questions correctly, while respondents exposed to the proposed disclosures answered $80.5 \%$ of the questions correctly (difference $=10.5$ percentage points). The comparable results for the 14 non-skippable questions were somewhat weaker but still in favor of the proposed disclosures (74.0\% for current disclosures, $80.9 \%$ for proposed disclosures, difference $=6.9$ percentage points). Both differences were statistically significant.

Table 8.2 also shows that respondents exposed to the proposed disclosures answered 12 of the 16 questions more accurately than did respondents exposed to the current disclosures. The difference in percentage of correct responses was statistically significant for 9 of 16 questions in favor of the proposed disclosures, and for 1 of 16 questions in favor of the current disclosures. The difference in percentage of correct responses was relatively large ( 20 percentage points or more) for 4 of 16 questions in favor of the proposed disclosures and for 1 of 16 questions in favor of the current disclosures. For the non-skippable questions, the difference in percentage of correct responses was statistically significant for 7 of 14 questions in favor of the proposed disclosures, and for 1 of 14 questions in favor of the current disclosures. The difference in percentage of correct responses was relatively large ( 20 percentage points or more) for 3 of 14 questions in favor of the proposed disclosures and for 1 of 14 questions in favor of the current disclosures.

TABLE 8.2. Part 3, Task 3. Comprehension of Initial Disclosure. Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Questions | Current <br> Disclosures $(\mathrm{N}=428)$ | Proposed <br> Disclosures ( $\mathrm{N}=430$ ) | Percentage Point Difference |
| :---: | :---: | :---: | :---: |
| Average for 16 Questions | 70.0\% | 80.5\% | 10.5* |
| Average for 14 Non-skippable Questions | 74.0\% | 80.9\% | 6.9* |
| Mortgage Insurance - Q26** | 2.3\% | 65.1\% | 62.8* |
| Loan Amount - Q11 | 60.5\% | 99.1\% | 38.6* |
| Closing/Settlement Services Can Shop For - Q19 | 62.8\% | 92.9\% | 30.1* |
| First Monthly Payment - Q18 | 43.7\% | 64.7\% | 21.0* |
| Principal Paid Off in 5 Years - Q24 | 59.1\% | 78.6\% | 19.5* |
| Mortgage Insurance - Q25 | 63.1\% | 77.0\% | 13.9* |
| APR - Q23 | 65.7\% | 79.5\% | 13.8* |
| Timing of Interest Rate Change - Q14** | 80.6\% | 90.0\% | 9.4* |
| Interest Rate Year 1 - Q12 | 92.1\% | 96.7\% | 4.6* |
| Final Payment Timing - Q20 | 93.2\% | 94.9\% | 1.7 |
| Refinance Cost - Q22 | 53.3\% | 54.9\% | 1.6 |
| Interest Rate Change - Q13 | 92.8\% | 93.3\% | 0.5 |
| Principal \& Interest Payment Change - Q15 | 90.4\% | 89.3\% | -1.1 |
| Closing Costs /Settlement Charges Items - Q17 | 90.3\% | 86.5\% | -3.8 |
| Escrow Fund - Q21 | 83.4\% | 79.5\% | -3.9 |
| Closing Costs /Settlement Charges - Q16 | 86.2\% | 46.3\% | -39.9* |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Part 4. Task 4. Comparison of Initial Disclosure and Final Disclosure for One Loan

In Part 4 of the study, respondents were given a final disclosure for the same loan they had used in Part 3 (one HUD-1 disclosure and one final TILA disclosure for the current disclosures or one Closing Disclosure for the proposed disclosures). They answered 8 questions requiring a comparison between the two disclosures. These questions included Questions 28 through 35. The 4 non-skippable questions were Questions 28, 30, 32, and 34 with each skippable question asking for more detail about the previous question.

Table 8.3. Part 4, Task 4. Comparison of Initial and Final Disclosure: Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $54.9 \%$ of the 8 questions correctly, while respondents exposed to the proposed disclosures answered $69.0 \%$ of the 8 questions correctly (difference $=14.1$ percentage points). The comparable results for the 4 non-skippable questions were somewhat stronger in favor of the proposed disclosures ( $61.6 \%$ for current disclosures, $79.0 \%$ for proposed disclosures, difference = 17.4 percentage points). Both differences were statistically significant.

Table 8.3 also shows that respondents exposed to the proposed disclosures answered all 8 of 8 questions more accurately than did respondents exposed to the current disclosures. The difference in percentage of correct responses was statistically significant for 5 of 8 questions in favor of the proposed disclosures, and was relatively large ( 20 percentage points or more) for 2 of 8 questions. For the non-skippable questions, the difference in percentage of correct responses was statistically significant for all 4 of the 4 questions in favor of the proposed disclosures and was relatively large ( 20 percentage points or more) for 1 of the 4 questions.

TABLE 8.3. Part 4, Task 4. Comparison of Initial and Final Disclosure. Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Questions | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 8 Questions | $54.9 \%$ | $69.0 \%$ | $14.1^{*}$ |
| Average for 4 Non-skippable <br> Questions | $61.6 \%$ | $79.0 \%$ | $17.4^{*}$ |
| Reason for Loan Amount <br> Change - Q29** | $29.4 \%$ | $62.6 \%$ | $33.2^{*}$ |
| Loan Amount at Closing - Q28 | $50.9 \%$ | $82.8 \%$ | $31.9^{*}$ |
| Closing Costs /Settlement <br> Charges - Q32 | $77.6 \%$ | $94.0 \%$ | $16.4^{\star}$ |
| Escrow Account - Q34 | $36.0 \%$ | $52.1 \%$ | $16.1^{*}$ |
| One Different Escrow <br> Item - Q35** | $54.0 \%$ | $60.0 \%$ | 6.0 |
| Interest Rate in Year 1 - Q30 | $81.8 \%$ | $87.2 \%$ | $5.4^{*}$ |
| Reason for Different Interest <br> Rates - Q31** | $62.6 \%$ | $65.1 \%$ | 2.5 |
| One Different Closing Cost/ <br> Settlement Charge - Q33** | $47.0 \%$ | $47.9 \%$ | 0.9 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Part 4. Task 5. Comprehension of Final Disclosure for One Loan

Part 4 of the study also included 7 questions focused solely on the final disclosure document (one HUD-1 disclosure and one final TILA disclosure for the current disclosures or one Closing Disclosure for the proposed disclosure). The 7 questions included Question 27 and Questions 36 through 41. The 5 non-skippable questions included Questions $27,36,37,38$, and 39 .

Table 8.4. Part 4, Task 5. Comprehension of Final Disclosure: Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $42.1 \%$ of the 7 questions correctly, while respondents exposed to the proposed disclosures answered $68.5 \%$ of the 7 questions correctly (difference $=26.4$ percentage points). The comparable results for the 5 non-skippable questions were somewhat stronger in favor of the proposed disclosures (40.7\% for current disclosures, $69.8 \%$ for proposed disclosures, difference $=$ 29.1 percentage points). Both differences were statistically significant.

Table 8.4 also shows that respondents exposed to the proposed disclosures answered all 7 of 7 questions more accurately than did respondents exposed to the current disclosures. The difference in percentage of correct responses was statistically significant for 7 of 7 of the questions and 5 of 5 non-skippable questions, and was relatively large (20 percentage points or more) for 5 of 7 questions and for 4 of 5 non-skippable questions.

TABLE 8.4. Part 4, Task 5. Comprehension of Final Disclosure: Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Questions | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 7 Questions | $42.1 \%$ | $68.5 \%$ | $26.4^{\star}$ |
| Average for 5 <br> Non-skippable Questions | $40.7 \%$ | $69.8 \%$ | $29.1^{\star}$ |
| Loan Amount - Q27 | $43.9 \%$ | $86.7 \%$ | $42.8^{\star}$ |
| Cash needed for Closing/ <br> Settlement - Q36 | $45.8 \%$ | $80.2 \%$ | $34.4^{\star}$ |
|  <br> Interest Payment - Q38 | $14.5 \%$ | $43.0 \%$ | $28.5^{\star}$ |
| Monthly Principal \& Interest <br> Payment Change - Q39 | $50.2 \%$ | $74.0 \%$ | $23.8^{\star}$ |
|  <br> Interest Payment Change - <br> Q40** | $46.3 \%$ | $67.9 \%$ | $21.6^{\star}$ |
| Principal \& Interest Payment <br> Change Frequency - Q41** | $44.6 \%$ | $62.3 \%$ | $17.7^{\star}$ |
| Loan Amount Increase After <br> Closing/Settlement - Q37 | $49.3 \%$ | $65.1 \%$ | $15.8^{\star}$ |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Summary

The data in Tables 8.1-8.4 show that the proposed disclosures outperformed the current disclosures consistently for each of the four tasks performed by respondents in the study. On average, the advantage for the proposed disclosures varied from 26.4 percentage points (for comprehension of final disclosures) to 10.1 percentage points (for comprehension of initial disclosures).

## Results Grouped by Specific Loan Concepts

In Parts 2, 3, and 4 of the study, the complete set of 39 questions (as well as the subset of 29 nonskippable questions) was divided into 8 groups corresponding to 8 distinct loan-related concepts or terms. These concept areas included amortization, annual percentage rate (APR), closing costs/ settlement charges, escrow account, interest rate, loan amount, monthly payments, and mortgage insurance. A ninth area - risk factor - included questions from several of the other 8 concept areas. See Table 2: Key Topics, Questionnaire Parts, Tasks, and Related Questions.

Appendix I. Table 9. Percentage of Respondents Answering Correctly With Current Versus Proposed Disclosures — Grouped by Concept shows a complete table of results. ${ }^{26}$ Table 9 also shows the 8 questions that are related to respondent comprehension of risk factors associated with the loan.

In this section, we compare the performance of the current and proposed disclosures separately for questions focused on each of these nine concept areas. For our discussion below, we have broken out each concept and placed questions in the order of the highest difference to the lowest difference.

## Concept 1. Amortization

The study included three questions on amortization. These questions included questions 20, 22, and 24 - all from Part 3 of the study and all were non-skippable questions. Table 9.1: Amortization: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $68.5 \%$ of these questions correctly, while respondents exposed to the proposed disclosures answered $76.1 \%$ of the questions correctly (difference $=7.6$ percentage points). This difference was statistically significant.

Table 9.1 also shows that respondents exposed to the proposed disclosures answered all 3 of 3 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 1 of the 3 questions, and was relatively large ( 20 percentage points or more) for none of the questions.

[^21]TABLE 9.1. Amortization: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Amortization |  |  |  |
| :--- | :---: | :---: | :---: |
| Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| Average for 3 Questions <br> (all non-skippable) | $68.5 \%$ | $76.1 \%$ | $7.6^{*}$ |
| Principal Paid Off in <br> 5 Years - Q24 | $59.1 \%$ | $78.6 \%$ | $19.5^{\star}$ |
| Final Payment Timing - Q20 | $93.2 \%$ | $94.9 \%$ | 1.7 |
| Refinance Cost - Q22 | $53.3 \%$ | $54.9 \%$ | 1.6 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level.

## Concept 2. Annual Percentage Rate (APR)

The study included 2 non-skippable questions on APR. The questions included Questions 7 and 23 from Parts 2 and 3.

Table 9.2. Annual Percentage Rate (APR): Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $74.4 \%$ of the 2 questions correctly, while respondents exposed to the proposed disclosures answered 83.6\% of the 2 questions correctly (difference $=9.2$ percentage points). This difference was statistically significant.

Table 9.2 also shows that respondents exposed to the proposed disclosures answered both questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 1 of the 2 questions, and the difference was relatively large ( 20 percentage points or more) for none of the questions.

TABLE 9.2. Annual Percentage Rate (APR): Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point of Difference)

| APR Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 2 Questions <br> (both non-skippable) | $74.4 \%$ | $83.6 \%$ | $9.2^{\star}$ |
| APR - Q23 | $65.7 \%$ | $79.5 \%$ | $13.8^{\star}$ |
| APR - Q7 | $83.2 \%$ | $87.7 \%$ | 4.5 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level.

## Concept 3. Closing Costs/Settlement Charges

The study included 7 questions on closing costs/settlement charges with 6 non-skippable questions. The 7 questions included Questions 5, 16, 17, 19, 32, 33, and 36 which were spread across Parts, 2, 3, and 4 of the questionnaire. All questions were non-skippable except Question 33.

Table 9.3: Closing Costs/Settlement Charges: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $66.5 \%$ of the 7 questions correctly, while respondents exposed to the proposed disclosures answered $72.9 \%$ of the 7 questions correctly (difference $=6.4$ percentage points). The comparable results for the 6 non-skippable questions were somewhat better for both disclosures ( $69.8 \%$ for current disclosures, $77.1 \%$ for proposed disclosures, difference $=7.3$ percentage points). Both differences were statistically significant.

Table 9.3 also shows that respondents exposed to the proposed disclosures answered 5 of 7 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 4 of 7 questions in favor of the proposed disclosures. For the non-skippable questions, respondents exposed to the proposed disclosures answered 4 of 6 questions more accurately than respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 4 of 6 non-skippable questions.

Two of 7 questions and 2 of 6 non-skippable questions were answered more accurately in favor of the current disclosures, and 1 of these was statistically significant.

Finally, the difference was relatively large (20 percentage points or more) in favor of the proposed disclosures for 2 of 7 questions and 2 of 6 non-skippable questions. By comparison, the difference was relatively large for 1 of 7 questions and 1 of 6 non-skippable questions in favor of the current disclosures.

TABLE 9.3. Closing Costs/Settlement Charges: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Closing Costs/Settlement <br> Charges Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 7 Questions | $66.5 \%$ | $72.9 \%$ | $6.4^{\star}$ |
| Average for 6 Non-skippable <br> Questions | $69.8 \%$ | $77.1 \%$ | $7.3^{\star}$ |
| Cash needed for Closing/ <br> Settlement - Q36 | $45.8 \%$ | $80.2 \%$ | $34.4^{\star}$ |
| Closing/Settlement Services <br> Can Shop For - Q19 | $62.8 \%$ | $92.9 \%$ | $30.1^{\star}$ |
| Closing Costs/Settlement <br> Charges - Q32 | $77.6 \%$ | $94.0 \%$ | $16.4^{\star}$ |
| Points Paid - Q5 | $55.8 \%$ | $62.8 \%$ | $7.0^{\star}$ |
| One Different Closing Cost/ <br> Settlement Charge - Q33** | $47.0 \%$ | $47.9 \%$ | 0.9 |
| Closing Costs/Settlement <br> Charges Items - Q17 | $90.3 \%$ | $86.5 \%$ | -3.8 |
| Closing Costs/Settlement <br> Charges - Q16 | $86.2 \%$ | $46.3 \%$ | $-39.9^{\star}$ |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 4. Escrow Account

The study included 4 questions on escrow account with 3 non-skippable questions. The questions included Questions 6, 21, 34, and 35 from Parts 2, 3, and 4. Only Question 35 was skippable.

Table 9.4. Escrow Account: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $63.4 \%$ of the 4 questions correctly, while respondents exposed to the proposed disclosures answered $71.5 \%$ of the 4 questions correctly (difference $=8.1$ percentage points). The comparable results for the 6 nonskippable questions were somewhat better for both disclosures ( $66.6 \%$ for current disclosures, $75.4 \%$ for proposed disclosures, difference $=8.8$ percentage points). Both differences were statistically significant.

Table 9.4 also shows that respondents exposed to the proposed disclosures answered 3 of 4 questions (2 of 3 non-skippable questions) more accurately than did respondents exposed to
the current disclosures. The difference in the percentage of correct responses was statistically significant for 2 of 4 questions in favor of the proposed disclosures, and for 0 of 4 questions in favor of the current disclosures. The difference in the percentage of correct responses was statistically significant for 2 of 3 non-skippable questions. Finally, the difference was relatively large (20 percentage points or more) for none of the questions.

TABLE 9.4. Escrow Account: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Escrow Account <br> Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 4 Questions | $63.4 \%$ | $71.5 \%$ | $8.1^{\star}$ |
| Average for 3 Non-skippable <br> Questions | $66.6 \%$ | $75.4 \%$ | $8.8^{\star}$ |
| Escrow Account - Q34 | $36.0 \%$ | $52.1 \%$ | $16.1^{\star}$ |
| Escrow Account - Q6 | $80.4 \%$ | $94.4 \%$ | $14.0^{\star}$ |
| One Different Escrow <br> Item - Q35** | $54.0 \%$ | $60.0 \%$ | 6.0 |
| Escrow Fund - Q21 | $83.4 \%$ | $79.5 \%$ | -3.9 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 5. Interest Rate

The study included 6 questions on interest rate with 4 non-skippable questions. These questions included Questions 4, 12, 13, 14, 30, and 31 from Parts 2, 3, and 4; the non-skippable questions included Questions 4, 12, 13, and 30. Table 9.5: Interest Rate: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $81.9 \%$ of the 6 questions correctly, while respondents exposed to the proposed disclosures answered $86.6 \%$ of the 6 questions correctly (difference $=4.7$ percentage points). The comparable results for the 4 non-skippable questions were somewhat better for both disclosures ( $87.0 \%$ for current disclosures, $91.2 \%$ for proposed disclosures, difference $=4.2$ percentage points). Both differences were statistically significant.

Table 9.5 also shows that respondents exposed to the proposed disclosures answered all 6 of 6 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 4 of 6 of the questions ( 3 of 4 non-skippable questions), and was relatively large ( 20 percentage points or more) for none of the 6 questions.

TABLE 9.5. Interest Rate: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Interest Rate <br> Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 6 Questions | $81.9 \%$ | $86.6 \%$ | $4.7^{\star}$ |
| Average for 4 Non-skippable <br> Questions | $87.0 \%$ | $91.2 \%$ | $4.2^{\star}$ |
| Timing of Interest Rate <br> Change - Q14** | $80.6 \%$ | $90.0 \%$ | $9.4^{*}$ |
| Interest Rate Year 1 - Q4 | $81.3 \%$ | $87.4 \%$ | $6.1^{*}$ |
| Interest Rate in Year 1 - Q30 | $81.8 \%$ | $87.2 \%$ | $5.4^{\star}$ |
| Interest Rate Year 1 - Q12 | $92.1 \%$ | $96.7 \%$ | $4.6^{\star}$ |
| Reason for Different Interest <br> Rates - Q31** | $62.6 \%$ | $65.1 \%$ | 2.5 |
| Interest Rate Change - Q13 | $92.8 \%$ | $93.3 \%$ | 0.5 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 6. Loan Amount

The study included 6 questions on loan amount with 5 non-skippable questions. Questions included Questions 3, 11, 27, 28, 29, and 37 from Parts 2, 3, and 4; only Question 29 was a skippable question. Table 9.6: Loan Amount: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $44.4 \%$ of the 6 questions correctly, while respondents exposed to the proposed disclosures answered $79.6 \%$ of the 6 questions correctly (difference $=35.2$ percentage points). For the 5 non-skippable questions, the comparable results were somewhat better for both disclosures ( $47.4 \%$ for current disclosures, $83.0 \%$ for proposed disclosures, difference $=35.6$ percentage points). Both differences were statistically significant.

Table 9.6 also shows that respondents exposed to the proposed disclosures answered all 6 of 6 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 6 of 6 of the questions and 5 of 5 non-skippable questions, and was relatively large ( 20 percentage points or more) for 5 of 6 questions and 4 of 5 non-skippable questions.

TABLE 9.6. Loan Amount: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Loan Amount <br> Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 6 Questions | $44.4 \%$ | $79.6 \%$ | $35.2^{\star}$ |
| Average for 5 Non-skippable <br> Questions | $47.4 \%$ | $83.0 \%$ | $35.6^{\star}$ |
| Amount Borrowed - Q3 | $32.5 \%$ | $81.4 \%$ | $48.9^{\star}$ |
| Loan Amount - Q27 | $43.9 \%$ | $86.7 \%$ | $42.8^{\star}$ |
| Loan Amount - Q11 | $60.5 \%$ | $99.1 \%$ | $38.6^{\star}$ |
| Reason for Loan Amount <br> Change - Q29** | $29.4 \%$ | $62.6 \%$ | $33.2^{\star}$ |
| Loan Amount at Closing/ <br> Settlement - Q28 | $50.9 \%$ | $82.8 \%$ | $31.9^{\star}$ |
| Loan Amount Increase After <br> Closing/Settlement - Q37 | $49.3 \%$ | $65.1 \%$ | $15.8^{\star}$ |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 7. Monthly Payments

The study included 9 questions on monthly payments with 5 of them being non-skippable. These questions included Questions $8,9,10,15,18,38,39,40$, and 41 . The 5 non-skippable questions included Questions 8, 15, 18, 38, and 39 spread across Parts 2, 3, and 4.

Table 9.7. Monthly Payments: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $46.1 \%$ of the 9 questions correctly, while respondents exposed to the proposed disclosures answered $70.9 \%$ of the 9 questions correctly (difference $=24.8$ percentage points). The comparable results for the 5 non-skippable questions were similar, although the difference was smaller (49.7\% for current disclosures, $71.4 \%$ for proposed disclosures, difference $=21.7$ percentage points). Both differences were statistically significant.

Table 9.7 also shows that respondents exposed to the proposed disclosures answered 8 of 9 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 8 of 9 questions in favor of the proposed disclosures, and 0 of 9 questions in favor of the current disclosures.

For the non-skippable questions, the difference in the percentages of correct responses was statistically significant for 4 of 5 non-skippable questions. The difference was relatively large ( 20 percentage points or more) for 7 of 9 questions and for 4 of 5 non-skippable questions.

TABLE 9.7. Monthly Payments: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Monthly Payments Question Number | Current <br> Disclosures $(\mathrm{N}=428)$ | Proposed <br> Disclosures ( $\mathrm{N}=430$ ) | Percentage Point Difference |
| :---: | :---: | :---: | :---: |
| Average for 9 Questions | 46.1\% | 70.9\% | 24.8* |
| Average for 5 Non-skippable Questions | 49.7\% | 71.4\% | 21.7* |
| Change in Total Monthly Payment - Q9** | 39.0\% | 77.9\% | 38.9* |
| Total Monthly Payment - Q8 | 49.5\% | 86.3\% | 36.8* |
| Highest Total Monthly Payment - Q10** | 36.9\% | 73.0\% | 36.1* |
| Highest Monthly Principal \& Interest Payment - Q38 | 14.5\% | 43.0\% | 28.5* |
| Monthly Principal \& Interest Payment Change - O39 | 50.2\% | 74.0\% | 23.8* |
| First Monthly Principal \& Interest Payment Change Q40** | 46.3\% | 67.9\% | 21.6* |
| First Monthly Payment - Q18 | 43.7\% | 64.7\% | 21.0* |
| Principal \& Interest Payment Change Frequency - Q41** | 44.6\% | 62.3\% | 17.7* |
| Principal \& Interest Payment Change - Q15 | 90.4\% | 89.3\% | -1.1 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in the averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 8. Mortgage Insurance

The study included 2 questions on mortgage insurance. The questions included Questions 25 and 26, both from Part 3. Question 25 was non-skippable.

Table 9.8. Mortgage Insurance: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on
average, respondents exposed to the current disclosures answered $32.7 \%$ of the 2 questions correctly, while respondents exposed to the proposed disclosures answered $71.1 \%$ of the 2 questions correctly (difference = 38.4 percentage points). However, this large difference was due entirely to one of the two questions that was skippable (Q26). The difference was statistically significant.

Table 9.8 also shows that respondents exposed to the proposed disclosures answered both questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for both questions, and the difference was relatively large ( 20 percentage points or more) for one of the two questions.

TABLE 9.8. Mortgage Insurance: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Mortgage Insurance <br> Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 2 Questions | $32.7 \%$ | $71.1 \%$ | $38.4^{\star}$ |
| Mortgage Insurance - Q26** | $2.3 \%$ | $65.1 \%$ | $62.8^{\star}$ |
| Mortgage Insurance - Q25 | $63.1 \%$ | $77.0 \%$ | $13.9^{\star}$ |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in the averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Concept 9. Risk Factors

The study included 8 questions in risk-related loan characteristics, such as change in interest rates or change in loan amount after closing. These questions included Questions 10, 13, 15, 21, 22, 24, 37, and 39. All questions were non-skippable except Question 10.

Table 9.9. Risk Factors: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) shows that, on average, respondents exposed to the current disclosures answered $64.6 \%$ of the 8 questions correctly, while respondents exposed to the proposed disclosures answered $76.0 \%$ of the 8 questions correctly (difference $=11.6$ percentage points). The comparable results for the 7 non-skippable questions were somewhat better for both disclosures ( $68.4 \%$ for current disclosures, $76.4 \%$ for proposed disclosures, difference $=8.0$ percentage points). Both differences were statistically significant.

Table 9.9 also shows that respondents exposed to the proposed disclosures answered 6 of 8 questions more accurately than did respondents exposed to the current disclosures. The difference in the percentage of correct responses was statistically significant for 4 of the 8 questions, and the difference was relatively large (20 percentage points or more) for 2 of 8
questions. The difference in the percentage of correct responses was statistically significant for 3 of 7 non-skippable questions.

Table 9.9. Risk Factors: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference)

| Risk Factors <br> Question Number | Current <br> Disclosures (N=428) | Proposed <br> Disclosures (N=430) | Percentage <br> Point Difference |
| :--- | :---: | :---: | :---: |
| Average for 8 Questions | $64.4 \%$ | $76.0 \%$ | $11.6^{\star}$ |
| Average for 7 Non-skippable <br> Questions | $68.4 \%$ | $76.4 \%$ | $8.0^{\star}$ |
| Highest Total Monthly <br> Payment - Q10** | $36.9 \%$ | $73.0 \%$ | $36.1^{\star}$ |
| Monthly Principal \& Interest <br> Payment Change - Q39 | $50.2 \%$ | $74.0 \%$ | $23.8^{\star}$ |
| Principal Paid Off in <br> 5 Years - Q24 | $59.1 \%$ | $78.6 \%$ | $19.5^{\star}$ |
| Loan Amount Increase After <br> Closing/Settlement - Q37 | $49.3 \%$ | $65.1 \%$ | $15.8^{\star}$ |
| Interest Rate Change - Q13 | $92.8 \%$ | $93.3 \%$ | 0.5 |
| Refinance Cost - Q22 | $53.3 \%$ | $54.9 \%$ | 1.6 |
| Principal \& Interest Payment <br> Change - Q15 | $90.4 \%$ | $89.3 \%$ | -1.1 |
| Escrow Fund - Q21 | $83.4 \%$ | $79.5 \%$ | -3.9 |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in the averages, with * indicating significance at the five percent level. (3) An ** marks a skippable question.

## Summary

The data in Tables 9.1 - 9.9 show that the proposed disclosures outperformed the current disclosures consistently for each of the nine loan concept areas (including risk factors) addressed by the study. On average, the advantage for the proposed disclosures ranged from 35.2 (for loan amount) to 4.7 percentage points difference (for interest rate).

## Results Broken Down by Experience, Loan Type, and Loan Complexity

In this section, we examine whether the relatively superior performance associated with the proposed disclosures varied with the experience level of the respondent (experienced versus inexperienced respondent), loan complexity (easier versus more challenging loans), and loan type (fixed rate versus adjustable rate loans), or was largely independent of these factors.

Table 10. Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type provides a detailed breakdown of percentage of correct responses for each of the 39 questions in the study. The data were presented separately for experienced versus inexperienced respondents, easier versus more challenging loans, and fixed rate versus adjustable rate loans, and the questions are grouped by task.

Overall, Table 10 suggests that while there were some variations in results across respondent experience, loan complexity, and loan type for particular questions, the data were fairly similar especially for Tasks 2, 3, and 5. For example, when we examined the average data for the 8 questions in Task 2 (comparison of initial disclosures), the difference between accuracy levels for the proposed versus current disclosures were in a fairly narrow range of 15.1 to 33.0 percentage points when compared across respondent experience, loan complexity, and loan type levels.

A similar conclusion emerged for the average data for Task 3 (comprehension of initial disclosure) with a range of 8.4 to 12.7 percentage points, and Task 5 (comprehension of final disclosure) with a range of 19.5 to 33.2 percentage points. However, the variation was somewhat larger for Task 4 (comparison of initial and final disclosures) with a range of 4.7 to 23.4 percentage points, suggesting larger differences in accuracy of responses to these questions within subgroups. For example, there appeared to be considerable variation in accuracy of responses to Questions 28, $29,30,31$, and 34 for easier versus more challenging loans.
TABLE 10. Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type

|  | Experienced Respondent |  |  | Inexperienced Respondent |  |  | Easier Loan |  |  | More Challenging Loan |  |  | Fixed Rate Loan |  |  | Adjustable Rate Loan |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Curr } \\ & \text { (215) } \end{aligned}$ | Prop (209) | Diff | $\begin{aligned} & \text { Curr } \\ & (213) \end{aligned}$ | Prop (221) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (217) } \end{aligned}$ | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (211) } \end{aligned}$ | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (214) } \end{aligned}$ | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (214) } \end{aligned}$ | Prop (215) | Diff |
| Part 2: Task 2. Comparison of Initial Disclosures |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Q3 | 35.3\% | 82.8\% | 47.5* | 29.6\% | 80.1\% | 50.5* | 35.0\% | 82.8\% | 47.8* | 29.9\% | 80.0\% | 50.1* | 29.0\% | 82.3\% | 53.3 | 36.0\% | 80.5\% | 44.5* |
| Q4 | 80.5\% | 87.6\% | 7.1* | 82.2\% | 87.3\% | 5.1 | 81.1\% | 91.2\% | 10.1* | 81.5\% | 83.7\% | 2.2 | 83.6\% | 82.8\% | -0.8 | 79.0\% | 92.1\% | 13.1* |
| Q5 | 67.0\% | 72.2\% | 5.2 | 44.6\% | 53.8\% | 9.2 | 57.1\% | 64.7\% | 7.6 | 54.5\% | 60.9\% | 6.4 | 57.0\% | 63.3\% | 6.3 | 54.7\% | 62.3\% | 7.6 |
| Q6 | 80.9\% | 95.7\% | 14.8* | 79.8\% | 93.2\% | 13.4* | 84.8\% | 95.3\% | 10.5* | 75.8\% | 93.5\% | 17.7* | 89.7\% | 98.1\% | 8.4* | 71.0\% | 90.7\% | 19.7* |
| Q7 | 81.4\% | 89.5\% | 8.1* | 85.0\% | 86.0\% | 1.0 | 83.4\% | 84.7\% | 1.3 | 82.9\% | 90.7\% | 7.8* | 91.1\% | 93.5\% | 2.4 | 75.2\% | 81.9\% | 6.7 |
| Q8 | 48.8\% | 88.5\% | 39.7* | 50.2\% | 84.2\% | 34.0* | 51.6\% | 87.0\% | 35.4* | 47.4\% | 85.6\% | 38.2* | 13.1\% | 77.2\% | 64.1* | 86.0\% | 95.3\% | 9.3* |
| Q9** | 39.1\% | 79.9\% | 40.8* | 39.0\% | 76.0\% | 37.0* | 37.8\% | 78.6\% | 40.8* | 40.3\% | 77.2\% | 36.9* | 3.7\% | 72.1\% | 68.4* | 74.3\% | 83.7\% | 9.4* |
| Q10** | 36.3\% | 74.2\% | 37.9* | 37.6\% | 71.9\% | 34.3* | 44.2\% | 75.8\% | 31.6* | 29.4\% | 70.2\% | 40.8* | 7.5\% | 69.8\% | 62.3* | 66.4\% | 76.3\% | 9.9* |
| Avg (8) | 58.7\% | 83.8\% | 25.1* | 56.0\% | 79.1\% | 23.1* | 59.4\% | 82.5\% | 23.1* | 55.2\% | 80.2\% | 25.0* | 46.9\% | 79.9\% | 33.0* | 67.8\% | 82.9\% | 15.1* |
| Avg (6) | 65.7\% | 86.0\% | 20.3* | 61.9\% | 80.8\% | 18.9* | 65.5\% | 84.3\% | 18.8* | 62.0\% | 82.4\% | 20.4* | 60.6\% | 82.9\% | 22.3* | 67.0\% | 83.8\% | 16.8* |


| Part 3: Task 3. Comprehension of Initial Disclosures |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Q11 | 61.4\% | 99.5\% | 38.1* | 59.6\%* | 98.6\% | 39.0* | 57.6\% | 98.6\% | 41.0* | 63.5\% | 99.5\% | 36.0* | 56.5\% | 99.1\% | 42.6* | 64.5\% | 99.1\% | 34.6* |
| Q12 | 93.5\% | 97.6\% | 4.1* | 90.6\% | 95.9\% | 5.3* | 90.3\% | 96.3\% | 6.0* | 93.8\% | 97.2\% | 3.4 | 86.4\% | 95.8\% | 9.4* | 97.7\% | 97.7\% | 0 |
| Q13 | 95.3\% | 94.3\% | -1.0 | 90.1\% | 92.3\% | 2.2 | 96.8\% | 94.0\% | -2.8 | 88.6\% | 92.6\% | 4.0 | 86.0\% | 87.0\% | 1.0 | 99.5\% | 99.5\% | 0 |
| Q14** | 84.7\% | 92.8\% | 8.1* | 76.5\% | 87.3\% | 10.8* | 89.9\% | 90.7\% | 0.8 | 71.1\% | 89.3\% | 18.2* | 86.0\% | 87.0\% | 1.0 | 75.2\% | 93.0\% | 17.8* |
| Q15 | 91.2\% | 89.5\% | -1.7 | 89.7\% | 89.1\% | -0.6 | 89.4\% | 85.1\% | -4.3 | 91.5\% | 93.5\% | 2.0 | 84.6\% | 80.0\% | -4.6 | 96.3\% | 98.6\% | 2.3 |
| Q16 | 89.3\% | 50.7\% | -38.6* | 83.1\% | 42.1\% | -41.0* | 89.9\% | 45.6\% | -44.3* | 82.5\% | 47.0\% | -35.5* | 84.6\% | 46.0\% | -38.6* | 87.9\% | 46.5\% | -41.4* |

TABLE 10. continued

|  | Experienced Respondent |  |  | Inexperienced Respondent |  |  | Easier Loan |  |  | More Challenging Loan |  |  | Fixed Rate Loan |  |  | Adjustable Rate Loan |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Curr } \\ & \text { (215) } \end{aligned}$ | Prop (209) | Diff | Curr (213) | Prop (221) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (217) } \end{aligned}$ | Prop (215) | Diff | Curr <br> (211) | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (214) } \end{aligned}$ | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & (214) \end{aligned}$ | Prop (215) | Diff |
| Part 3: Task 3. Comprehension of Initial Disclosures continued |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Q17 | 91.6\% | 92.6\% | 1.0 | 89.0\% | 80.8\% | -8.2* | 88.5\% | 87.0\% | -1.5 | 92.2\% | 86.0\% | -6.2 | 90.9\% | 88.6\% | -2.3 | 89.7\% | 84.4\% | -5.3 |
| Q18 | 45.1\% | 67.5\% | 22.4* | 42.3\% | 62.0\% | 19.7* | 44.7\% | 57.7\% | 13.0* | 42.7\% | 71.6\% | 28.9* | 38.8\% | 78.6\% | 39.8* | 48.6\% | 50.7\% | 2.1 |
| Q19 | 63.7\% | 92.8\% | 29.1* | 61.8\% | 93.0\% | 31.2* | 62.7\% | 93.3\% | 30.6* | 62.9\% | 92.5\% | 29.6* | 62.9\% | 93.9\% | 31.0* | 62.6\% | 91.9\% | 29.3* |
| Q20 | 95.8\% | 97.1\% | 1.3 | 90.6\% | 92.8\% | 2.2 | 93.1\% | 94.4\% | 1.3 | 93.4\% | 95.3\% | 1.9 | 95.8\% | 94.9\% | -0.9 | 90.7\% | 94.9\% | 4.2 |
| Q21 | 92.1\% | 91.9\% | -0.2 | 74.6\% | 67.9\% | -6.7 | 86.2\% | 76.7\% | -9.5* | 80.6\% | 82.3\% | 1.7 | 81.8\% | 81.4\% | -0.4 | 85.0\% | 77.7\% | -7.3 |
| Q22 | 70.7\% | 66.0\% | -4.7 | 35.7\% | 44.3\% | 8.6 | 54.4\% | 54.4\% | 0 | 52.1\% | 55.3\% | 3.2 | 59.8\% | 67.9\% | 8.1 | 46.7\% | 41.9\% | -4.8 |
| Q23 | 71.6\% | 79.9\% | 8.3* | 59.6\% | 79.2\% | 19.6* | 66.4\% | 81.4\% | 15.0* | 64.9\% | 77.7\% | 12.8* | 66.4\% | 80.9\% | 14.5* | 65.0\% | 78.1\% | 13.1* |
| Q24 | 67.4\% | 80.4\% | 13.0* | 50.7\% | 76.9\% | 26.2* | 58.1\% | 80.9\% | 22.8* | 60.2\% | 76.3\% | 16.1* | 59.3\% | 80.9\% | 21.6* | 58.9\% | 76.3\% | 17.4* |
| Q25 | 65.1\% | 78.9\% | 13.8* | 61.0\% | 75.1\% | 14.1* | 68.2\% | 74.4\% | 6.2 | 57.8\% | 79.5\% | 21.7* | 68.2\% | 72.1\% | 3.9 | 57.9\% | 81.9\% | 24.0* |
| Q26** | 3.7\% | 71.3\% | 67.6* | 0.9\% | 59.3\% | 58.4* | 2.8\% | 63.3\% | 60.5* | 1.9\% | 67.0\% | 65.1* | 2.3\% | 61.9\% | 59.6* | 2.3\% | 68.4\% | 66.1* |
| Avg (16) | 73.9\% | 83.9\% | 10.0* | 66.0\% | 77.3\% | 11.3* | 71.2\% | 79.6\% | 8.4* | 68.7\% | 81.4\% | 12.7* | 69.4\% | 81.0\% | 11.6* | 70.5\% | 80.0\% | 9.5* |
| Avg (14) | 78.1\% | 84.2\% | 6.1* | 69.9\% | 77.9\% | 8.0* | 74.7\% | 80.0\% | 5.3* | 73.3\% | 81.9\% | 8.6* | 73.0\% | 81.9\% | 8.9* | 75.1\% | 79.9\% | 4.8* |
| Part 4: Task 4.Comparison of Initial and Final Disclosures |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Q28 | 55.3\% | 85.6\% | 30.3* | 46.5\% | 80.1\% | 33.6* | 35.5\% | 87.4\% | 51.9* | 66.8\% | 78.1\% | 11.3* | 49.5\% | 81.9\% | 32.4* | 52.3\% | 83.7\% | 31.4* |
| Q29** | 34.4\% | 67.0\% | 32.6* | 24.4\% | 58.4\% | 34.0* | 35.5\% | 87.4\% | 51.9* | 23.2\% | 37.7\% | 14.5* | 29.9\% | 60.9\% | 31.0* | 29.0\% | 64.2\% | 35.2* |
| Q30 | 86.0\% | 90.0\% | 4.0 | 77.5\% | 84.6\% | 7.1 | 79.3\% | 97.7\% | 18.4* | 84.4\% | 76.7\% | -7.7* | 84.1\% | 82.8\% | -1.3 | 79.4\% | 91.6\% | 12.2* |
| Q31** | 66.5\% | 65.6\% | -0.9 | 58.7\% | 64.7\% | 6.0 | 59.9\% | 73.5\% | 13.6* | 65.4\% | 56.7\% | -8.7 | 64.5\% | 58.6\% | -5.9 | 60.7\% | 71.6\% | 10.9* |
| Q32 | 83.7\% | 92.8\% | 9.1* | 71.4\% | 95.0\% | 23.6* | 79.7\% | 94.4\% | 14.7* | 75.4\% | 93.5\% | 18.1* | 78.0\% | 94.9\% | 16.9* | 77.1\% | 93.0\% | 15.9* |

TABLE 10. continued

|  | Experienced Respondent |  |  | Inexperienced Respondent |  |  | Easier Loan |  |  | More Challenging Loan |  |  | Fixed Rate Loan |  |  | Adjustable Rate Loan |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\begin{aligned} & \text { Curr } \\ & \text { (215) } \end{aligned}$ | Prop (209) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (213) } \end{aligned}$ | Prop (221) | Diff | $\begin{aligned} & \text { Curr } \\ & (217) \end{aligned}$ | Prop (215) | Diff | Curr <br> (211) | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (214) } \end{aligned}$ | Prop (215) | Diff | $\begin{aligned} & \text { Curr } \\ & \text { (214) } \end{aligned}$ | Prop (215) | Diff |
| Part 4: Task 4.Comparison of Initial and Final Disclosures continued |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Q33** | 52.6\% | 50.7\% | -1.9 | 41.3\% | 45.2\% | 3.9 | 53.0\% | 52.1\% | -0.9 | 40.8\% | 43.7\% | 2.9 | 49.5\% | 45.6\% | -3.9 | 44.4\% | 50.2\% | 5.8 |
| Q34 | 45.1\% | 51.2\% | 6.1 | 26.8\% | 52.9\% | 26.1* | 36.9\% | 66.5\% | 29.6* | 35.1\% | 37.7\% | 2.6 | 40.7\% | 49.8\% | 9.1 | 31.3\% | 54.4\% | 23.1* |
| Q35** | 56.7\% | 60.8\% | 4.1 | 51.2\% | 59.3\% | 8.1 | 65.0\% | 73.0\% | 8.0 | 42.7\% | 47.0\% | 5.3 | 30.4\% | 51.2\% | 20.8* | 77.6\% | 68.8\% | -8.8* |
| Avg (8) | 60.1\% | 70.5\% | 10.4* | 49.7\% | 67.5\% | 17.8* | 55.6\% | 79.0\% | 23.4* | 54.2\% | 58.9\% | 4.7* | 53.3\% | 65.7\% | 12.4* | 56.5\% | 72.2\% | 15.7* |
| Avg (4) | 67.6\% | 79.9\% | 12.3* | 55.5\% | 78.2\% | 22.7* | 57.8\% | 86.5\% | 28.7* | 65.4\% | 71.5\% | 6.1* | 63.1\% | 77.3\% | 14.2* | 60.1\% | 80.7\% | 20.6* |
| Part 4: Task 5. Comprehension of Final Disclosures |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Q27 | 47.9\% | 86.1\% | 38.2* | 39.9\% | 87.3\% | 47.4* | 48.4\% | 93.0\% | 44.6* | 39.3\% | 80.5\% | 41.2* | 48.1\% | 83.7\% | 35.6* | 39.7\% | 89.8\% | 50.1* |
| Q36 | 49.8\% | 80.4\% | 30.4* | 41.8\% | 80.1\% | 38.3* | 48.4\% | 89.3\% | 40.9* | 43.1\% | 71.2\% | 28.1* | 45.8\% | 75.8\% | 30.0* | 45.8\% | 84.7\% | 38.9* |
| Q37 | 49.8\% | 70.8\% | 21.0* | 48.8\% | 59.7\% | 10.9* | 53.5\% | 71.2\% | 17.7* | 45.0\% | 59.1\% | 14.1* | 54.2\% | 66.5\% | 12.3* | 44.4\% | 63.7\% | 19.3* |
| Q38 | 13.0\% | 43.5\% | 30.5* | 16.0\% | 42.5\% | 26.5* | 27.2\% | 48.8\% | 21.6* | 1.4\% | 37.2\% | 35.8* | 8.4\% | 35.8\% | 27.4* | 20.6\% | 50.2\% | 29.6* |
| Q39 | 55.8\% | 79.9\% | 24.1* | 44.6\% | 68.3\% | 23.7* | 53.5\% | 74.4\% | 20.9* | 46.9\% | 73.5\% | 26.6* | 50.5\% | 74.9\% | 24.4* | 50.0\% | 73.0\% | 23.0* |
| Q40** | 52.1\% | 72.7\% | 20.6* | 40.4\% | 63.3\% | 22.9* | 63.1\% | 79.1\% | 16.0* | 28.9\% | 56.7\% | 27.8* | 69.2\% | 70.2\% | 1.0 | 23.4\% | 65.6\% | 42.2* |
| Q41** | 50.7\% | 68.4\% | 17.7* | 38.5\% | 56.6\% | 18.1* | 61.8\% | 78.1\% | 16.3* | 27.0\% | 46.5\% | 19.5* | 58.4\% | 64.2\% | 5.8 | 30.8\% | 60.5\% | 29.7* |
| Avg (7) | 45.6\% | 71.7\% | 26.1* | 38.6\% | 65.4\% | 26.8* | 50.8\% | 76.3\% | 25.5* | 33.1\% | 60.7\% | 27.6* | 47.8\% | 67.3\% | 19.5* | 36.4\% | 69.6\% | 33.2* |
| Avg (5) | 43.3\% | 72.2\% | 28.9* | 38.2\% | 67.6\% | 29.4* | 46.2\% | 75.4\% | 29.2* | 35.2\% | 64.3\% | 29.1* | 41.4\% | 67.4\% | 26.0* | 40.1\% | 72.3\% | 32.2* |

Notes: (1) "Diff" column refers to difference between percentages. (2) Figures in parentheses in the title are the number of respondents exposed to the current/proposed disclosures. (3) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in the averages, with * indicating significance at the five percent level. (4) "Curr" refers to current disclosures and "Prop" refers to proposed disclosures. (5) An **marks a skippable question.

Table 11. Summary Data Comparisons Between Current and Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type provides a different, more aggregate view on the same issue. This table compares the proportion of questions (out of 39, or 29 nonskippable questions) for which the proposed disclosures had a higher accuracy score than the current disclosures for different levels of respondent experience, loan complexity, and loan type. The proportion was computed three different ways - (1) based simply on higher accuracy scores, (2) based on higher scores that are significantly different at $p<.05$, and (3) based on scores that are higher by 20 percentage points or more.

The results on all three measures were very similar across the subgroups. For example, the data showed that the proportion of questions for which the percentage of correct responses were higher for the proposed disclosures ranged from 30 of 39 or $76.9 \%$ (for fixed rate loans) to 35 of 39 or $89.7 \%$ for inexperienced respondents, as well as for more challenging loans. Similarly, the proportion of questions for which the percentage of correct responses for the 29 non-skippable questions were statistically significantly higher for the proposed disclosures ranged from 17 of 29 or $58.6 \%$ (for more challenging loans) to 19 of 29 or $65.5 \%$ (for easier loans and for experienced respondents). In general, these data suggested that the magnitude of accuracy performance advantage for the proposed disclosures over the current disclosures was fairly consistent across levels of respondent experience, loan complexity, and loan type.

TABLE 11. Summary Data Comparisons Between Current and Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type

| Proportion of Questions With Higher Accuracy \% For Proposed Disclosures | Overall | Experienced Borrower | Inexperienced Borrower | Easier Loan | More Challenging Loan | Fixed Rate Loan | Adjustable Rate Loan |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 39 Questions | 35/39 | 32/39 | 35/39 | 32/39 | 35/39 | 30/39 | 32/39 |
| 29 Questions | 25/29 | 24/29 | 25/29 | 23/29 | 26/29 | 22/29 | 23/29 |
| Proportion of Questions With Significantly Higher Accuracy \% For Proposed Disclosures (at p<.05) | Overall | Experienced Borrower | Inexperienced Borrower | Easier Loan | More Challenging Loan | Fixed <br> Rate <br> Loan | Adjustable Rate Loan |
| 39 questions | 28/39 | 26/39 | 25/39 | 26/39 | 24/39 | 21/39 | 26/39 |
| 29 questions | 21/29 | 19/29 | 18/29 | 19/29 | 17/29 | 16/29 | 18/29 |
| Proportion of Questions With Accuracy \% Higher by 20\%+ For Proposed Disclosures | Overall | Experienced Borrower | Inexperienced Borrower | Easier Loan | More Challenging Loan | Fixed <br> Rate <br> Loan | Adjustable Rate Loan |
| 39 questions | 15/39 | 16/39 | 17/39 | 15/39 | 14/39 | 16/39 | 14/39 |
| 29 questions | 10/29 | 11/29 | 12/29 | 11/29 | 10/29 | 11/29 | 10/29 |

## Responses to Part 1, Task 1. Open-Ended Question

## Plan of Analysis for Part 1

We also examined responses to the open-ended question (Question 2) in Part 1, Task 1 that asked respondents to provide reasons for their choice of loan in Part 1 of the study. We focused on the total number of reasons and comments provided by respondents as a function of the initial disclosure (current versus proposed) they examined. Although not the central focus of our analyses, these data can shed light on the degree to which the current and proposed disclosures differentially influenced the ability of respondents to develop and articulate reasons justifying or explaining their selection.

In Part 1 of the study, respondents first made a selection between two loans based on the initial disclosure about each loan (Question 1) and then provided reasons for their selection (Question 2). Out of the 858 study respondents, 852 provided at least one reason or comment, while 4 respondents said "don't know" and 2 respondents did not say anything. Respondents provided a variety of comments and arguments including comments about loan terms, costs, and risk factors, comments about the disclosures themselves, and comments related to personal experiences.

In this section, we examine the differences, if any, in the total number of reasons and comments provided by respondents as a function of the current or proposed initial disclosure they examined. This measure was intended to suggest the degree to which the current and proposed disclosures differentially influenced the ability of respondents to develop and state reasons justifying or explaining their selection.

## Results

Table 12. Part 1, Task 1. Mean Number of Mentions in Response to Question 2 Asking About Reasons for Choice compares the average number of comments by respondents exposed to the current disclosures versus the proposed disclosures. Overall, respondents using the current disclosures made an average of 2.68 comments. The corresponding average for respondents using the proposed disclosures was 3.09 . The difference (0.41) was statistically significant. Furthermore, the difference persisted when we looked at it separately within subgroups. For example, although experienced respondents generated more comments, on average, than did inexperienced respondents ( 3.02 versus 2.68 , difference significant at $\mathrm{p}<.05$ ), the proposed disclosures significantly outperformed the current disclosures by approximately the same margin within each of these two groups.

A similar pattern was evident when we looked at the results for easier versus more challenging loans and for fixed rate versus adjustable rate loans. In each instance, the difference in performance for respondents exposed to the current versus the proposed disclosures was in favor of the proposed disclosures and was statistically significant. These results suggest that respondents exposed to the proposed disclosures were able to articulate and explain more reasoning behind their choice, and this was the case regardless of their level of experience, the difficulty of the loan, and whether the loan was a fixed rate or adjustable rate loan.

TABLE 12. Part 1, Task 1. Mean Number of Mentions in Response to Question 2 Asking About Reasons for Choice

| Category | Current <br> Disclosures | Proposed <br> Disclosures | Difference |
| :--- | :---: | :---: | :---: |
| All Respondents (428/430) | 2.68 | 3.09 | $0.41^{*}$ |
| Experienced Borrowers (215/209) | 2.80 | 3.25 | $0.45^{\star}$ |
| Inexperienced Borrowers (213/221) | 2.57 | 2.95 | $0.38^{\star}$ |
| Easier Loan (217/215) | 2.71 | 3.23 | $0.52^{*}$ |
| More Challenging Loan (211/215) | 2.65 | 2.96 | $0.31^{*}$ |
| Fixed Rate Loan (214/215) | 2.63 | 2.98 | $0.35^{*}$ |
| Adjustable Rate Loan (214/215) | 2.74 | 3.20 | $0.46^{*}$ |

Notes: (1) Figures in parentheses are the number of respondents exposed to the current/proposed disclosures. (2) A
Student's t-test of significance (two-tailed) was used to test for differences in average number of mentions, with * indicating significance at the five percent level.

## Conclusions

The results of the study lead to several conclusions, all of them in favor of the proposed disclosures:

1. The proposed disclosures performed better than the current disclosures when compared on the accuracy of responses to 39 key questions and 29 non-skippable questions on aggregate measures;
2. The performance advantage for the proposed disclosures was consistent across Tasks 2-5 performed by respondents;
3. The performance advantage for the proposed disclosures was consistent across all content areas;
4. The performance advantage for the proposed disclosures was similar across the factors of the study: for experienced as well as inexperienced respondents, easier as well as more challenging loans, and fixed as well as adjustable rate loans; and
5. Respondents who received the proposed disclosures generated more reasons and comments when prompted to explain their loan choice, suggesting that the proposed disclosures might enable respondents to better articulate and explain the rationale for their decisions.

## Conclusion 1. The Proposed Disclosures Performed Better on Aggregate Measures

We created two aggregate indices designed to capture the overall accuracy of responses to the 39 key questions. One index was based on scores assigned to all 39 questions, while a second index was based only on the 29 "non-skippable" questions that all respondents were required to answer. Both aggregate indices showed a significant performance advantage of about 16 percentage points for the proposed disclosures. See Table 7: Percentage of Questions Answered Correctly with Current Versus Proposed Disclosures: Aggregate Results.

We also examined the number of questions (out of all 39 questions as well as 29 nonskippable questions) that showed a performance advantage for the proposed disclosures. See Table 11: Summary Data Comparisons Between Current and Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type. The results showed that the proposed disclosures outperformed the current disclosures on 35 of 39 questions and 25 of 29 non-skippable questions ( $89.7 \%$ and $86.2 \%$, respectively). Furthermore, the performance advantage for the proposed disclosures was statistically significant for 28 of 39 questions and 21 of 29 non-skippable questions ( $71.8 \%$ and $72.4 \%$, respectively). In comparison, the current disclosures outperformed the proposed disclosures for 4 of 39 questions and 4 of 29 non-skippable questions ( $10.3 \%$ and $13.8 \%$, respectively), and only one of these differences in favor of the current disclosures was statistically significant.

## Conclusion 2. The Proposed Disclosures, On Average, Performed Better for Tasks 2 through 5

We compared the performance of the current and proposed disclosures separately for questions within each of the four distinct tasks - comparing two initial loan disclosures, reviewing a single initial loan disclosure, comparing an initial disclosure with a final disclosure, and comprehending a final disclosure. The results showed that the proposed disclosures outperformed the current disclosures consistently for each of these four tasks. See Tables 8.1-8.4 and Appendix H. Table 8: Percentage of Respondents Answering Correctly with Current and Proposed Disclosures-Grouped by Task. On average, the advantage for the proposed disclosures ranged from 26.4 percentage points (for comprehension of the final disclosure) to 10.5 percentage points (for review of initial disclosures).

## Conclusion 3. The Proposed Disclosures, On Average, Performed Better for All Concept Areas

We also compared the performance of the current and proposed disclosures separately for questions focused on nine different loan concept areas. See Tables 9.1 through 9.9 and Appendix I. Table 9: Percentage of Respondents Answering Correctly with Current and Proposed DisclosuresGrouped by Concept. These areas were amortization, loan amount, interest rate, monthly payments, closing costs, escrow account, annual percentage rate (APR), mortgage insurance, and risk factors. The results showed that the proposed disclosures outperformed the current
disclosures consistently for each of these nine loan concept areas addressed by the study. On average, the advantage for the proposed disclosures ranged from 35.2 percentage points (for loan amount) to 4.7 percentage points (for interest rate).

## Conclusion 4. The Proposed Disclosures Performed Better Regardless of Respondent Experience, Loan Type, or Loan Complexity

We examined whether the relatively superior performance associated with the proposed disclosures varied with the experience level of the respondents (experienced versus inexperienced respondents), loan complexity (easier versus more challenging loans), and/or loan type (fixed rate versus adjustable rate loans), or was largely independent of these factors.

We conducted several different analyses to address this question. In general, our results across the analyses were fairly consistent in indicating that the performance advantage for the proposed disclosures did not vary by level of respondent experience, loan type, or loan complexity. For example, our aggregate analysis based on responses to 39 questions (Table 7: Percentage of Questions Answered Correctly with Current Versus Proposed Disclosures: Aggregate Results) showed a performance advantage for the proposed disclosures that was within a fairly narrow range (16 to 17.8 percentage points) for experienced as well as inexperienced respondents, easier as well as more challenging loans, and fixed rate as well as adjustable rate loans. Similarly, when we looked at the proportion of questions for which the proposed disclosures had a performance advantage across different types of respondents and loans, we found that the range across these groups was fairly narrow - between 30 and 35 (out of 39) questions for which the proposed disclosures performed better, and between 21 and 28 questions for which they performed significantly better. See Table 11: Summary Data Comparisons Between Current and Proposed Disclosures: Broken Down by Respondent Experience, Loan Complexity, and Loan Type. Finally, when we looked at the accuracy of responses to individual questions, we found (with some exceptions) reasonable consistency of responses to most questions - especially for Tasks 2, 3, and 5. See Table 10: Percentage of Respondents Answering Questions Correctly With Current Versus Proposed Disclosures: Broken Down by Experience, Loan Complexity, and Loan Type. Overall, these results suggested that the superior performance associated with the proposed disclosures was fairly consistent across different levels of respondent experience, loan complexity, and loan type.

## Conclusion 5. Respondents Using the Proposed Disclosure Listed More Comments While Explaining Their Choice

We examined the mean number of comments made by respondents using the current disclosures versus the proposed disclosures when they explained their choice between two loans. Overall, respondents exposed to the proposed disclosures made statistically significantly more comments than did respondents exposed to the current disclosures (average of 3.09 versus 2.68 comments). Furthermore, the difference was about the same when we looked at it separately within subgroups. These results suggested that respondents exposed to the proposed disclosures were more likely to be better able to state and explain the reasoning behind their choice.

## Limitations

Two features of the study that limit the generalizability of the results should be noted. First, the sampling was done in each of the 20 DMAs to be as representative of each DMA as possible, with the only real limitation being rural respondents. Rural populations may be under-represented in the sample due to the on-site, in-person data collection method, as these sites may have been too far for respondents to want to drive to to participate at the incentive level offered. Second, the study was a controlled experiment conducted in a supervised, distraction-free environment. Although respondents generally had enough time to complete the various tasks at their own pace, time limits were imposed on each part of the study to keep total session length to approximately 60 minutes. The extent to which these results will replicate in noisy, distracting, real-world settings with no externally imposed time limits is unclear. This is an interesting conjecture worthy of assessment in future research.

## The Importance of Consumer Testing

The Mortgage Disclosure Project shows the advantages and benefits of two types of consumer testing: Qualitative Testing and Quantitative Testing.

## Qualitative Testing

The Qualitative Study for the Mortgage Disclosure Project ensured that consumers could comprehend the basic facts about a loan, could compare two initial disclosures and state their reasons for making that choice. Further, it allowed the development of the companion Closing Disclosure to enable better comparison between the initial and final disclosures. Including industry representatives allowed us to ensure that industry personnel could understand the disclosures and explain them to consumers. The CFPB understands that consumers do not obtain or close loans in isolation and often discuss the disclosures with loan officers and settlement agents. As a supplement to the Qualitative Testing, the public posting of the design iterations further allowed the CFPB to anticipate concerns these stakeholders might have.

## Quantitative Testing

The Quantitative Study for the Mortgage Disclosure Project looked at both the current and the proposed disclosures. As the FTC study states, in advocating for studies with a control group:

The tests may show, for example, that a proposed disclosure is not understood by a significant proportion of consumers but a control group might make clear that this is still a substantial improvement over the current disclosures. Conversely, the tests may show that nearly all consumers understand a proposed disclosure, but a control group might show that the same is true for the current disclosures, indication that the revisions provide little benefit. ${ }^{27}$

[^22]The Quantitative Study shows that the proposed disclosures indeed provide benefits to consumers. The proposed disclosures outperformed the current disclosures from nearly every perspective. The differences between the current and proposed disclosures were statistically significant whether considering experienced versus inexperienced respondents, easier versus more challenging loans, or fixed versus adjustable rate loans. In a question-by-question breakdown by task, the proposed disclosures performed better for 35 of the 39 questions, and for 28 of those 35 questions the differences were statistically significant. In addition, 19 questions for the proposed disclosures had a percentage point difference of 20 percentage points or more in contrast to only 1 question for the current disclosures. In fact, for only 4 questions did the current disclosures perform better and only one of those was statistically significant—Question 16.28

In this respect the Quantitative Study provided an additional advantage to the CFPB, as it enabled the CFPB to examine the results of Question 16 and further improve the integrated disclosures before it issued the final rule.

The Qualitative Study and the Quantitative Study have accomplished what the FTC study also advocated:

The development of effective consumer disclosures requires careful analysis of what information consumers really need, how consumers will interpret and use the information, how to convey the information in a way that can be easily understood and used by consumers, and, combining all of this, careful analysis of the benefits and costs of the disclosures. Consumer testing is a critical part of this analysis. ${ }^{29}$

[^23]
## The Final Disclosures

The integrated Loan Estimate and the integrated Closing Disclosure were developed under one phase of the Mortgage Disclosure Project. ${ }^{30}$ As part of that project, the team tested the disclosures in 10 rounds of qualitative testing prior to issuing the Proposed Rule on July 9, 2012 (5 rounds for the Loan Estimate, 2 rounds for the Closing Disclosure, and 3 rounds for the interaction of the two disclosures). An analysis of the comments received during the public comment period resulted in the CFPB team making some additional changes to the proposed disclosures as indicated in Chapter 1.

The Quantitative Study, Phase 2 of the Mortgage Disclosure Project, revealed one question in which the current disclosures significantly outperformed the proposed disclosures. Based on the language used on the disclosure, Question 16 asked respondents for the current initial disclosure: "How much are your estimated settlement charges?" and asked respondents for the proposed initial disclosure: "How much are your estimated closing costs?" In the design of the GFE, Summary of your settlement charges is a prominent heading on page 1, but the Cash to Close amount is not included on the GFE. In contrast, the design of the proposed Loan Estimate deliberately places Estimated Cash to Close in a prominent heading. Closing Costs are present, but are deemphasized by being placed in a smaller font to the right of the Estimated Cash to Close amount. The concept of closing costs/settlement charges is important, and the CFPB team wanted to include a question on the concept. However, because the cash to close amount was not on the GFE, the CFPB team chose to ask a question about closing costs/settlement charges, rather than about the cash needed to close.

[^24]The CFPB team anticipated that respondents who worked with the GFE might perform better on this question, but did not anticipate the difference to be better at a statistically significant level. For respondents using the GFE, $86.2 \%$ answered this question correctly, but only $46.3 \%$ of respondents using the Loan Estimate answered this question correctly—a 39.9 percentage point difference. See Table 8.2: Part 3, Task 3.Comprehension of Initial Disclosures: Percentage of Respondents Answering Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference) and Table 9.3: Closing Costs/Settlement Charges: Percentage of Respondents Answering Questions Correctly with Current Versus Proposed Disclosures (Ordered by Percentage Point Difference).

Given that Question 16 was the only question in which the current disclosure performed statistically significantly better, the CFPB team did additional analysis by looking at the specific answers to this question. Across those viewing the Loan Estimate, 51.6\% of the respondents provided the estimated cash to close amount and $46.3 \%$ respondents provided the closing costs amount. Only $2.1 \%$ of respondents provided an answer other than these two. Based on this analysis, we hypothesized that many respondents may have found the right location on the Loan Estimate, but assumed that the question was asking for the amount that the disclosure design emphasized.

To deal with this issue, the CFPB team decided to modify the design of the proposed initial disclosure and the proposed final disclosure in order to keep the two designs consistent. The Cash to Close section was renamed Costs at Closing and split into two rows-one for Closing Costs and one for Cash to Close. This change underwent further qualitative consumer testing in July 2013 in Baltimore, MD and Richmond, VA with 12 additional consumer participants to confirm that consumers could understand the changes. ${ }^{31}$ The testing indicated that the revised design was working as intended. The final disclosures—both the Loan Estimate and the Closing Disclosurereflect this change as well as the modifications discussed in Chapter 1 and are presented on the following pages with annotations.

[^25]
## Loan Estimate Details

The design of the final Loan Estimate allows sufficient flexibility for the disclosure of fixed rate loans as well as adjustable rate and interest only loans on a standard form. It is also able to show loans with certain other features, such as negative amortization, a balloon payment, or a prepayment penalty. The design uses a simple structure for the three-page disclosure that places a one-page summary of the Loan Terms, Projected Payments, and Costs at Closing in front of the detailed information on pages 2 and 3:

- Page 1 provides a summary of the key Loan Terms, Projected Payments, and Costs at Closing. The page contains separate sections that show the basic Loan Terms, including the Monthly Principal \& Interest payment and Loan Costs. Two sections provide consumers with affordability information. For example, it provides a schedule of Projected Payments. Including the Estimated Taxes, Insurance \& Assessments on the property. It also shows the Costs at Closing, including Closing Costs and Cash to Close. If any of the basic Loan Terms can change after closing, a simple, yet easily visible, "yes" or "no" in bold font and capitalized letters provides that information. A series of bullets in that row provide details about any possible changes, including, for example, specific numbers for how high the change can be and a year for when the change can occur.
- Page 2 itemizes the costs associated with the loan and with the real estate transaction. It also provides a Calculating Cash to Close table to summarize the transaction costs. It also provides Adjustable Rate Table and Adjustable Payment Table when needed.
- Page 3 provides three figures that consumers can use to compare loan offers: In 5 Years, the Annual Percentage Rate (APR), and the Total Interest Percentage (TIP). It also lists disclosures mandated by statute, including new disclosures required by the Dodd-Frank Act. These disclosures can include Appraisal, Assumption, Homeowner's Insurance, Late Payments, Loan Acceptance, Liability after Foreclosure, Refinancing, and Servicing. Page 3 has space for an optional signature line so that the lender can document receipt of the disclosure.

The Loan Estimate includes two disclosures required under statutory provisions other than TILA and sections 4 and 5 of RESPA, which are currently typically provided as separate pages, as well as certain new disclosures under the Dodd-Frank Act. For example, the Loan Estimate includes an Appraisal disclosure currently required under the Equal Credit Opportunity Act and a Servicing disclosure currently required under section 6 of RESPA. The Loan Estimate incorporates the three pages of the current GFE, the two pages of the typical TILA disclosure, as well as the onepage Appraisal notice, and the one-page Servicing disclosure. Accordingly, the Loan Estimate incorporates at least seven pages of current disclosures into three pages of an integrated disclosure.

## Page 1 of Loan Estimate

Transaction information and includes a reminder to save the Loan Estimate to compare with the Closing Disclosure.

2
Loan Terms: Shows the basic terms of the loan, whether they may increase or change, and the timing and highest change possible.
(3) Projected Payments: Shows affordability information, including how and when Monthly Principal \& Interest payments can change over time, an estimate of Estimated Taxes, Insurance \& Assessments for the property, and the Estimated Total Monthly Payment, including if taxes and insurance are escrowed or excluded from the loan payment.

4 Costs at Closing: This section shows another aspect of affordability in order to purchase the house.


Estimated Closing Costs:
Shows the total of Loan Costs and Other Costs from page 2-and allows shopping on the basis of the cost of obtaining the mortgage loan.

FICUS BANK
4321 Random Boulevard • Somecity, ST 12340
Save this Loan Estimate to compare with your Closing Disclosure.

| Loan Estimate |  | LOAN TERM | 30 years |
| :---: | :---: | :---: | :---: |
|  |  | PURPOSE | Purchase |
| DATE ISSUED | 2/15/2013 | PRODUCT | 5 Year Interest Only, 5/3 Adjustable Rate |
| APPLICANTS | Michael Jones and Mary Stone | LOAN TYPE | ® Conventional $\square$ FHA $\square$ VA $\square \ldots$ |
|  | 123 Anywhere Street | LOANID \# | 123456789 |
|  | Anytown, ST 12345 | RATE LOCK | - NO 区 YES, until 4/16/2013 at 5:00 p.m. EDT |
| PROPERTY | 456 Somewhere Avenue |  | Before closing, your interest rate, points, and lender credits can |
|  | Anytown, ST 12345 |  | change unless you lock the interest rate. All other estimated |
| SALE PRICE | \$240,000 |  | closing costs expire on 3/4/2013 at 5:00 p.m. EDT |


| Loan Terms 2 | Can this amount increase after closing? |  |  |
| :---: | :---: | :---: | :---: |
| Loan Amount | \$211,000 | NO |  |
| Interest Rate | 4\% | YES | - Adjusts every 3 years starting in year 6 <br> - Can go as high as $\mathbf{1 2 \%}$ in year 15 <br> - See AIR Table on page 2 for details |
| Monthly Principal \& Interest <br> See Projected Payments below for your Estimated Total Monthly Payment | \$703.33 | YES | - Adjusts every 3 years starting in year 6 <br> - Can go as high as $\mathbf{\$ 2 , 0 6 8}$ in year 15 <br> - Includes only interest and no principal until year 6 <br> - See AP Table on page 2 for details |
|  | Does the loan have these features? |  |  |
| Prepayment Penalty | NO |  |  |
| Balloon Payment | NO |  |  |


| Payment Calculation | Years 1-5 | Years 6-8 | Years 9-11 | Years 12-30 |
| :---: | :---: | :---: | :---: | :---: |
| Principal \& Interest | $\$ 703.33$ only interest | $\$ 1,028$ min 51,359 max | $\$ 1,028$ min $\$ 1,604$ max | $\begin{aligned} & \$ 1,028 \min \\ & \$ 2,068 \text { max } \end{aligned}$ |
| Mortgage Insurance | + 109 | + 109 | + 109 | + - |
| Estimated Escrow Amount can increase over time | + 0 | + 0 | + 0 | + 0 |
| Estimated Total Monthly Payment | \$812 | \$1,137-\$1,468 | \$1,137-\$1,713 | \$1,028-\$2,068 |
| Estimated Taxes, Insurance \& Assessments Amount can increase over time | $\$ 533$ | This estimate includes |  | In escrow? |
|  |  | 区 Property Taxes <br> x Homeowner's Insurance <br> $\square$ Other: |  |  |
|  |  | $\square$ Other: <br> See Section G on page 2 for escrowed property costs. You must pay for other property costs separately. |  |  |


| Costs at Closing 4 |  |  |  |
| :--- | :--- | :--- | :--- |
| Estimated Closing Costs | $\$ 8,791$ | 5 | Icludes $\$ 5,851$ in Loan Costs $+\$ 2,940$ in Other Costs $-\$ 0$ <br> in Lender Credits. See page 2 for details. |
| Estimated Cash to Close | $\$ 27,79^{1}$ | 6 | icludes Closing Costs. See Calculating Cash to Close on page 2 for details. |

## Page 2 of Loan Estimate

## Closing Cost Details



| Adjustable Payment (AP) Table |
| :--- |
| Interest Only Payments? YES for your first 60 payments <br> Optional Payments? NO <br> Step Payments? NO <br> Seasonal Payments? NO <br> Monthly Principal and Interest Payments  <br> First Change/Amount $\$ 1,028-\$ 1,359$ at 61 st payment  <br> Subsequent Changes  <br> Maximum Payment  | | \$2,068 starting at 169th payment |
| :--- |

## LOAN ESTIMATE



PAGE 2 OF $3 \cdot$ LOAN ID \# 123456789

Loan Costs: Lists the costs that are generally associated with the loan, including the lender's charges and required services. These required services are grouped by services for which consumers can or cannot shop for through their own service providers.

2
Other Costs: Lists the costs that are generally not determined by the lender, including taxes, insurance premiums, and optional services.


## Calculating Cash to

Close Table: Lists the costs that make up the Cash to Close, including the Deposit and Seller Credits and Other Credits.

4

## Adjustable Payment

(AP) Table: Lists payments that can adjust, such as Interest Only payments.

Adjustable Interest Rate
(AIR) Table: Lists the details for an adjustable interest rate.

## Page 3 of Loan Estimate

1. 

Lender Details: Provides basic contact and identification information for the Lender and Mortgage Broker, if needed.

2 Comparisons: Provides three different ways a consumer can compare one loan to another-the total costs paid and principal paid in 5 years (In 5 Years), the Annual Percentage Rate (APR), and the Total Interest Percentage (TIP) or the total interest paid over the life of the loan as a percentage of the original Loan Amount.


Other Considerations:
Includes several current and new disclosure statements required by the Dodd-Frank Act.

4
Confirm Receipt
(optional): Allows for consumer signatures to document receipt of the disclosure.

Additional Information About This Loan

|  |  |  |
| :--- | :--- | :--- |
| LENDER | Ficus Bank | 1 |
| NMLS/_LICENSE ID |  | MORTGAGE BROKER |
| LOAN OFFICER | Joe Smith | NMLS/_LICENSEID |
| NMLS/_LICENSEID | 12345 | LOAN OFFICER |
| EMAIL | joesmith@ficusbank.com | NMLS/_LICENSEID |
| PHONE | $123-456-7890$ | EMAIL |
| PHONE |  |  |


| Comparisons |  | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- | :---: |
| In 5 Years | $\$ 54,944$ <br> $\$ 0$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> Principal you will have paid off. |  |
| Annual Percentage Rate (APR) | $4.617 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |  |
| Total Interest Percentage (TIP) | $81.18 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |  |

## Other Considerations 3

| Appraisal | We may order an appraisal to determine the property's value and charge you for this <br> appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close <br> You can pay for an additional appraisal for your own use at your own cost. |
| :--- | :--- |
| Assumption | If you sell or transfer this property to another person, we <br> $\square$ will allow, under certain conditions, this person to assume this loan on the original terms. <br> a will not allow assumption of this loan on the original terms. |
| Homeowner's This loan requires homeowner's insurance on the property, which you may obtain from a <br> company of your choice that we find acceptable. <br> Insurance  | If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly <br> principal and interest payment. |

Refinance Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

Servicing
We intend
$\square$ to service your loan. If so, you will make your payments to us.
$\mathbf{x}$ to transfer servicing of your loan.

## 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 |
| :--- | :--- | :---: | :---: |
| LOAN ESTIMATE |  | PAGE 3 OF 3 • LOAN ID \#123456789 |  |

## Closing Disclosure Details

To enable comparison with the Loan Estimate, the Closing Disclosure uses the same design principles, basic structure, and format as the Loan Estimate. The matching of these design elements was particularly important because the Closing Disclosure must provide significantly more information - often in significantly greater detail - than the Loan Estimate, such as an itemized summary of the borrower's and seller's transaction. One goal of the matching was to help consumers feel less overwhelmed as they encountered a longer, more detailed disclosure because they would recognize the opening page and the overall structure and format. In short, they could build on an existing cognitive map based on the Loan Estimate.

The basic structure of the Closing Disclosure is as follows:

- Page 1 of the Closing Disclosure essentially mirrors page 1 of the Loan Estimate for ease of comparison. Like page 1 of the Loan Estimate, it gives a basic summary of the Loan Terms and affordability information (Projected Payments and Costs to Close).
- Page 2 of the Closing Disclosure, like page 2 of the Loan Estimate, provides information about Closing Costs, but in significantly more detail because it records more detail regarding the loan and the real estate transaction.
- In contrast to the Loan Estimate, page 3 of the Closing Disclosure provides a Calculating Cash to Close table and detailed Summaries of Transactions for borrowers and sellers. The table is an expanded version of the Calculating Cash to Close table from the Loan Estimate. The table helps the borrower place the previous page of Costs at Closing into the larger context of the other elements that are included when determining the Cash to Close, such as the Down Payment. It also documents changes in the Cash to Close between the Loan Estimate and the Closing Disclosure and briefly explains why the change occurred or where the detail of the change is found on the disclosure. It also notes when a violation of the regulatory limitations on increases from the estimated charges has occurred. In combination with page 2, the Summaries of Transactions document the loan and real estate transaction fees for both the borrower and seller. They include items not present on the Loan Estimate, such as prorated property costs paid at closing or whether the seller's loans are paid off.
- Pages 4 and 5 are similar to page 3 of the Loan Estimate. Like that page, they provide statements required by statute and additional useful information. The section titled Loan Disclosures on page 4 provides loan-specific disclosures for Assumption, Demand Feature, Late Payment, Negative Amortization, Partial Payment, Security Interest, and Escrow Account. It also includes the Adjustable Payment (AP) Table and the Adjustable Interest Rate (AIR) Table, if needed. The section titled Loan Calculations on page 5 provides a chart of loan-specific calculations, including Total of Payments, Finance Charge, Amount Financed, Annual Percentage Rate (APR), and Total Interest Percentage (TIP). The page also provides more general disclosures in a section titled Other Disclosures, including disclosures for Appraisal, Contract Details, Liability after Foreclosure, Loan Acceptance, Refinancing, and Tax Deductions. In addition, a chart contains Contact Information for the Lender, Mortgage Broker, two Real Estate Brokers, and a Settlement Agent. The page
also includes a Questions box to refer consumers to the CFPB website and others in the Contact Information table. An optional signature line allows the lender to document receipt of the disclosure.

As with the Loan Estimate, the Closing Disclosure reduces the number of pages the consumer would receive during the settlement process. By our calculation, the five-page Closing Disclosure replaces the three-page HUD-1, the two-page Truth in Lending disclosure, and several additional separate and/or new disclosures, which potentially could have resulted in at least seven additional pages. These separate disclosures include the new disclosures required by the Dodd-Frank Act: (1) Total Interest Percentage, (2) Negative Amortization, (3) Partial Payment, (4) Escrow Account, and (5) Liability after Foreclosure.

## Page 1 of Closing Disclosure



Loan Details: Shows
Transaction information.

2
Loan Terms: Shows the basic Loan Terms, whether they may increase or change, and the timing and highest possible change.
(3) Projected Payments: Shows affordability information, including how and when Monthly Principal \& Interest payments can change over time, Estimated Taxes, Insurance \& Assessments for the property, and the Estimated Total Monthly Payment, including if taxes and insurance payments are escrowed or excluded from the loan payment.
(4) Costs at Closing: This section shows another aspect of affordability in order to purchase the house.

5
Closing Costs: Shows the total of Loan Costs and Other Costs from page 2-and allows shopping on the basis of the cost of getting a mortgage.

6
Cash to Close: Shows the additional cost to close the loan and the real estate transaction.

## Page 2 of Closing Disclosure

Loan Costs: Lists the costs that are generally associated with the loan, including the lender's charges and required services. These required services are grouped by services for which the consumer can or cannot shop for through their own providers. It also identifies who paid the costs and when.

2
Other Costs: Lists the costs that are generally not determined by the lender, including taxes, insurance premiums, and optional services. It also identifies who paid the costs and whether the cost was paid at or before the closing.

3 Total Closing Costs:
Calculates the Closing Costs for the borrower factoring in any Lender Credits, including credits for when a violation of the regulatory limits on increases from the estimated charges has occurred.

Closing Cost Details



## Page 3 of Closing Disclosure



## Calculating Cash to <br> Close: Like the Loan

Estimate, this section lists the elements that make up the Cash to Close, including any deposit and credits. It lists the amounts from the Loan Estimate and the final costs to show changes and briefly explains why the change occurred or where more detail is located on the disclosure. It also notes when a violation of the regulatory limitations on increases from the estimated charges has occurred.

## 2 Summaries of

Transactions: A carryover from the HUD-1 revised to have more plain language, it summarizes the distribution of funds, including adjustments in amounts owed to the borrower or seller for prorated property costs, such as property taxes.

## Page 4 of Closing Disclosure

1. 

Loan Disclosures: Includes several current and newlyrequired disclosure statements, such as Assumption, Demand Feature, Late Payment, Negative Amortization, Partial Payments, and Security Interest.

2 Escrow Account: Provides
details about the Escrow Account and an estimate of costs due if there is no escrow account.

## Additional Information About This Loan

## Loan Disclosures (1)

Assumption
If you sell or transfer this property to another person, your lende
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\boldsymbol{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

## Negative Amortization (Increase in Loan Amount)

Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{x}$ do not have a negative amortization feature.

## Partial Payments

Your lender
$\mathbf{X}$ may accept payments that are less than the full amount due (partial payments) and apply them to your loan.
$\square$ may hold them in a separate account until you pay the rest of the payment, and then apply the full payment to your loan.
$\square$ does not accept any partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan

Escrow Account
For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow <br> Escrowed <br> Property Costs <br> over Year 1 <br> $\$ 2,473.56$ <br> Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes <br> Non-Escrowed <br> Property Costs <br> over Year 1 <br> $\$ 1,800.00$Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> Homeowner's Association Dues <br> You may have other property costs. |  |  |
| :--- | :---: | :--- |
| Initial Escrow <br> Payment | $\$ 412.25$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 206.13$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1. You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail o pay your property taxes, your state or local government may (1) mpose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add you fail to pay any of your property costs, your lender may (1) add the amouns to your loan balance, (2) add an escrow account to your oan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Page 5 of Closing Disclosure



Loan Calculations:
Consolidates several new and previously required disclosures under TILA. The section does not contain the Approximate Cost of Funds that was included in the Proposed Rule because the CFPB determined to delete this item from the disclosure based on consumer testing results and public comments.

## 2

## Other Disclosures:

Includes several current and newly-required disclosure statements, such as Appraisal, Contract Details, Liability after Foreclosure, Refinance, Loan

Acceptance, and Tax Deductions.

3
Questions: Lists the CFPB website as a general resource and refers consumers to the Contact Information table.

4
Contact Information:
Groups Contact
Information in a usable reference table.

## Confirm Receipt

(optional): Allows for consumer signatures to document receipt of the disclosure.

## List of Appendices

Appendix A. Final Questionnaire Name Set Distribution

Appendix B. Proctor Script
Appendix C. Questionnaire
Appendix D. Recruiting Script
Appendix E. KnowledgePanel Background
Appendix F. Answer Keys
Appendix G. Coding Lists
Appendix H. Table 8. Percentage of Respondents Answering Correctly with Current and Proposed Disclosures-Grouped by Task

Appendix I. Table 9. Percentage of Respondents Answering Correctly with Current and Proposed Disclosures-Grouped by Concept

Appendix J. Current Easier Fixed A Disclosures
Appendix K. Current Easier Fixed B Disclosures
Appendix L. Current More Challenging Fixed A Disclosures
Appendix M. Current More Challenging Fixed B Disclosures
Appendix N. Current Easier ARM A Disclosures
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Appendix Z. References


Final Questionnaire Name Set Distribution

With the final sample size of 858 completed interviews, the following table represents the distribution of interviews across each name set ( 32 sets, to account for first seen randomization) and experience level.

| Package Number | Testing Set Number | Status | Type | Version | Name Set | Questionnaire (11 pages) | Answer Key | Initial TIL (2 pages) | $\begin{array}{\|c\|} \hline \text { GFE } \\ \text { (3 pages) } \end{array}$ | Final TIL (2 pages) | $\begin{gathered} \text { HUD-1 } \\ \text { Legal } \\ \text { (3 pages) } \end{gathered}$ | Loan Est. (3 pages) | Closing Disc. (5 pages) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 1 | C | Easier Fixed | A | NS1 Maple | CEF-NS1 | EF-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 1 | 1 | C | Easier Fixed | B | NS1 Nandina | CEF-NS1 | EF-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 2 | 2 | P | Easier Fixed | A | NS1 Aspen | PEF-NS1 | EF-NS1 |  |  |  |  | S3 | S5 |
| 2 | 2 | P | Easier Fixed | B | NS1 Balsam | PEF-NS1 | EF-NS1 |  |  |  |  | S3 | S5 |
| 3 | 3 | C | Easier Fixed | A | NS2 Aspen | CEF-NS2 | EF-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 3 | 3 | C | Easier Fixed | B | NS2 Balsam | CEF-NS2 | EF-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 4 | 4 | P | Easier Fixed | A | NS2 Maple | PEF-NS2 | EF-NS2 |  |  |  |  | S3 | S5 |
| 4 | 4 | P | Easier Fixed | B | NS2 Nandina | PEF-NS2 | EF-NS2 |  |  |  |  | S3 | S5 |
| 5 | 5 | C | More Challenging Fixed | A | $\begin{aligned} & \text { NS1 } \\ & \text { Oak } \end{aligned}$ | CMCF- <br> NS1 | $\begin{aligned} & \text { MCF- } \\ & \text { NS1 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 5 | 5 | C | More Challenging Fixed | B | NS1 Pine | $\begin{aligned} & \text { CMCF- } \\ & \text { NS1 } \end{aligned}$ | $\begin{aligned} & \text { MCF- } \\ & \text { NS1 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 6 | 6 | P | More Challenging Fixed | A | NS1 <br> Cottonwood | $\begin{aligned} & \text { PMCF- } \\ & \text { NS1 } \end{aligned}$ | $\begin{aligned} & \text { MCF- } \\ & \text { NS1 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 6 | 6 | P | More Challenging Fixed | B | NS1 <br> Dogwood | $\begin{aligned} & \text { PMCF- } \\ & \text { NS1 } \end{aligned}$ | $\begin{aligned} & \text { MCF- } \\ & \text { NS1 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 7 | 7 | C | More Challenging Fixed | A | NS2 <br> Cottonwood | $\begin{aligned} & \text { CMCF- } \\ & \text { NS2 } \end{aligned}$ | $\begin{aligned} & \text { MCF- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 7 | 7 | C | More Challenging Fixed | B | NS2 <br> Dogwood | CMCF- <br> NS2 | $\begin{aligned} & \text { MCF- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal v3 |  |  |


| Package <br> Number | Packaging Instructions | Green | Yellow | Red | Blue | Orange | Number of Copies of this Package | Experienced | Inexperienced |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $1$ <br> 1 |  | Maple Initial TIL, Maple GFE, Nandina Initial TIL, Nandina GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Maple Initial TIL, Maple GFE, Questionnaire Part 3 Red | Maple Final TIL, Maple HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $2$ $2$ |  | Aspen Loan Estimate, Balsam Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Aspen Loan Estimate, Questionnaire Part 3 Red | Aspen Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $3$ $3$ |  | Aspen Initial TIL, Aspen GFE, Maple Initial TIL, Maple GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Aspen Initial TIL, Aspen GFE, Questionnaire Part 3 Red | Aspen Final TIL, Aspen HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 4 <br> 4 |  | Maple Loan Estimate, Nandina Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Maple Loan Estimate, Questionnaire Part 3 Red | Maple Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $5$ <br> 5 |  | Oak Initial TIL, Oak GFE, Pine Initial TIL, Pine GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Oak Initial <br> TIL, Oak GFE, Questionnaire Part 3 Red | Oak Final TIL, Oak HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 6 <br> 6 |  | Cottonwood Loan <br> Estimate, Dogwood Loan <br> Estimate, Questionnaire <br> Part 1 Green | Questionnaire Part 2 Yellow | Cottonwood Loan Estimate, Questionnaire Part 3 Red | Cottonwood Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $7$ <br> 7 |  | Cottonwood Initial TIL, Cottonwood GFE, Dogwood Initial TIL, Dogwood GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Cottonwood Initial TIL, Cottonwood GFE, <br> Questionnaire Part 3 Red | Cottonwood Final TIL, Cottonwood HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |



| Package <br> Number | Testing Set Number | Status | Type | Version | Name Set | Questionnaire (11 pages) | Answer Key | Initial TIL (2 pages) | $\begin{gathered} \text { GFE } \\ (3 \text { pages }) \end{gathered}$ | Final TIL (2 pages) | $\begin{gathered} \text { HUD-1 } \\ \text { Legal } \\ (3 \text { pages }) \end{gathered}$ | Loan Est. (3 pages) | Closing Disc. (5 pages) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 8 | 8 | P | More Challenging Fixed | A | NS2 Oak | $\begin{aligned} & \text { PMCF- } \\ & \text { NS2 } \end{aligned}$ | HF-NS2 |  |  |  |  | S3 | S5 |
| 8 | 8 | P | More Challenging Fixed | B | NS2 Pine | PMCFNS2 | HF-NS2 |  |  |  |  | S3 | S5 |
| 9 | 9 | C | Easier ARM | A | NS1 Quince | CEA-NS1 | EA-NS1 | S2 | S3 | S2 | al 3 |  |  |
| 9 | 9 | C | Easier ARM | B | NS1 Redbud | CEA-NS1 | EA-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 10 | 10 | P | Easier ARM | A | NS1 Elm | PEA-NS1 | EA-NS1 |  |  |  |  | S3 | S5 |
| 10 | 10 | P | Easier ARM | B | NS1 Fir | PEA-NS1 | EA-NS1 |  |  |  |  | S3 | S5 |
| 11 | 11 | C | Easier ARM | A | NS2 Elm | CEA-NS2 | EA-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 11 | 11 | C | Easier ARM | B | NS2 Fir | CEA-NS2 | EA-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 12 | 12 | P | Easier ARM | A | NS2 Quince | PEA-NS2 | EA-NS2 |  |  |  |  | S3 | S5 |
| 12 | 12 | P | Easier ARM | B | NS2 Redbud | PEA-NS2 | EA-NS2 |  |  |  |  | S3 | S5 |
| 13 | 13 | C | More Challenging ARM | A | NS1 Spruce | CMCANS1 | $\begin{aligned} & \text { MCA- } \\ & \text { NS1 } \end{aligned}$ |  | S3 | S2 |  |  |  |
| 13 | 13 | C | More Challenging ARM | B | NS1 Tulip | $\begin{gathered} \text { CMCA- } \\ \text { NS1 } \end{gathered}$ | $\begin{aligned} & \text { MCA- } \\ & \text { NS1 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 14 | 14 | P | More Challenging ARM | A | NS1 Gingko | PMCANS1 | $\begin{aligned} & \text { MCA- } \\ & \text { NS1 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 14 | 14 | P | More Challenging ARM | B | NS1 <br> Hornbeam | PMCANS1 | $\begin{aligned} & \text { MCA- } \\ & \text { NS1 } \end{aligned}$ |  |  |  |  | S3 | S5 |


| Package Number | Packaging Instructions | Green | Yellow | Red | Blue | Orange | Number of Copies of this Package | Experienced | Inexperienced |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 8 8 |  | Oak Loan Estimate, Pine Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Oak Loan Estimate, Questionnaire Part 3 Red | Oak Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 9 |  | Quince Initial TIL, Quince GFE, Redbud Initial TIL, Redbud GFE, <br> Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Quince Initial TIL, Quince GFE, Questionnaire Part 3 Red | Quince Final TIL, Quince HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $10$ <br> 10 |  | Elm Loan Estimate, Fir Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Elm Loan Estimate, Questionnaire Part 3 Red | Elm Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 11 <br> 11 |  | Elm Initial TIL, Elm GFE, Fir Initial TIL, Fir GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Elm Initial TIL, Elm GFE, Questionnaire Part 3 Red | Elm Final TIL, Elm HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $12$ <br> 12 |  | Quince Loan Estimate, Redbud Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Quince Loan Estimate, Questionnaire Part 3 Red | Quince Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $13$ $13$ |  | Spruce Initial TIL, Spruce GFE, Tulip Initial TIL, Tulip GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Spruce Initial TIL, Spruce GFE, Questionnaire Part 3 Red | Spruce Final <br> TIL, Spruce <br> HUD-1, <br> Questionnaire <br> Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 14 14 |  | Gingko Loan Estimate, Hornbeam Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Gingko Loan Estimate, Questionnaire Part 3 Red | Gingko Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |



| Package Number | Testing <br> Set <br> Number | Status | Type | Version | Name Set | Questionnaire (11 pages) | Answer Key | Initial TIL <br> (2 pages) | $\begin{array}{\|c\|} \hline \text { GFE } \\ \hline(3 \text { pages }) \\ \hline \end{array}$ | Final TIL (2 pages) | $\begin{gathered} \text { HUD-1 } \\ \text { Legal } \\ \text { (3 pages) } \end{gathered}$ | Loan Est. <br> (3 pages) | Closing Disc. (5 pages) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 15 | 15 | C | More Challenging ARM | A | NS2 Gingko | CMCANS2 | $\begin{aligned} & \text { MCA- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 15 | 15 | C | More Challenging ARM | B | NS2 <br> Hornbeam | $\begin{gathered} \text { CMCA- } \\ \text { NS2 } \end{gathered}$ | $\begin{aligned} & \text { MCA- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 16 | 16 | P | More Challenging ARM | A | NS2 Spruce | PMCANS2 | $\begin{aligned} & \text { MCA- } \\ & \text { NS2 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 16 | 16 | P | More Challenging ARM | B | NS2 Tulip | PMCANS2 | $\begin{aligned} & \text { MCA- } \\ & \text { NS2 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 17 | 1 | C | Easier Fixed | A | NS1 Maple | CEF-NS1 | EF-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 17 | 1 | C | Easier Fixed | B | NS1 <br> Nandina | CEF-NS1 | EF-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 18 | 2 | P | Easier Fixed | A | NS1 Aspen | PEF-NS1 | EF-NS1 |  |  |  |  | S3 | S5 |
| 18 | 2 | P | Easier Fixed | B | NS1 Balsam | PEF-NS1 | EF-NS1 |  |  |  |  | S3 | S5 |
| 19 | 3 | C | Easier Fixed | A | NS2 Aspen | CEF-NS2 | EF-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 19 | 3 | C | Easier Fixed | B | NS2 Balsam | CEF-NS2 | EF-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 20 | 4 | P | Easier Fixed | A | NS2 Maple | PEF-NS2 | EF-NS2 |  |  |  |  | S3 | S5 |
| 20 | 4 | P | Easier Fixed | B | NS2 <br> Nandina | PEF-NS2 | EF-NS2 |  |  |  |  | S3 | S5 |
| 21 | 5 | C | More Challenging Fixed | A | NS1 Oak | $\begin{aligned} & \text { CMCF- } \\ & \text { NS1 } \end{aligned}$ | MCF- NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 21 | 5 | C | More Challenging Fixed | B | NS1 Pine | CMCF- NS1 | MCFNS1 | S2 | S3 | S2 | Legal 3 |  |  |


| Package Number | Packaging Instructions | Green | Yellow | Red | Blue | Orange | Number of Copies of this Package | Experienced | Inexperienced |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $15$ $15$ |  | Gingko Initial TIL, Gingko GFE, Hornbeam Initial TIL, Hornbeam GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Gingko Initial TIL, Gingko GFE, Questionnaire Part 3 Red | Gingko Final TIL, Gingko HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $\begin{aligned} & 16 \\ & 16 \end{aligned}$ |  | Spruce Loan Estimate, Tulip Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Spruce Loan Estimate, Questionnaire Part 3 Red | Spruce Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $17$ $17$ |  | Maple Initial TIL, Maple GFE, Nandina Initial TIL, Nandina GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Nandina Initial TIL, Nandina GFE, Questionnaire Part 3 Red | Nandina Final TIL, Nandina HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $18$ $18$ |  | Aspen Loan Estimate, Balsam Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Balsam Loan Estimate, Questionnaire Part 3 Red | Balsam Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $19$ $19$ |  | Aspen Initial TIL, Aspen GFE, Maple Initial TIL, Maple GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Balsam Initial TIL, Balsam GFE, Questionnaire Part 3 Red | Balsam Final TIL, Balsam HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $20$ $20$ |  | Maple Loan Estimate, Nandina Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Nandina Loan Estimate, Questionnaire Part 3 Red | Nandina Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 21 $21$ |  | Oak Initial TIL, Oak GFE, Pine Initial TIL, Pine GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Pine Initial <br> TIL, Pine GFE, Questionnaire Part 3 Red | Pine Final TIL, Pine HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |


| Package Number | $\begin{gathered} \text { Testing } \\ \text { Set } \\ \text { Number } \end{gathered}$ | Status | Type | Version | Name Set | $\begin{aligned} & \text { Question- } \\ & \text { naire } \\ & \text { (11 pages) } \end{aligned}$ | Answer Key | Initial TIL <br> (2 pages) | $\begin{array}{\|c\|} \hline \text { GFE } \\ (3 \text { pages }) \end{array}$ | Final TIL (2 pages) | HUD-1 <br> Legal <br> (3 pages) | Loan Est. (3 pages) | $\begin{array}{\|c} \text { Closing } \\ \text { Disc. } \\ \text { (5 pages) } \end{array}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 22 | 6 | P | More Challenging Fixed | A | NS1 Cottonwood | PMCFNS1 | MCF- <br> NS1 |  |  |  |  | S3 | S5 |
| 22 | 6 | P | More Challenging Fixed | B | NS1 Dogwood | $\begin{gathered} \text { PMCF- } \\ \text { NS1 } \end{gathered}$ | $\begin{gathered} \text { MCF- } \\ \text { NS1 } \end{gathered}$ |  |  |  |  | S3 | S5 |
| 23 | 7 | C | More Challenging Fixed | A | NS2 <br> Cottonwood | $\begin{aligned} & \text { CMCF- } \\ & \text { NS2 } \end{aligned}$ | $\begin{aligned} & \hline \text { MCF- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 23 | 7 | C | More Challenging Fixed | B | NS2 <br> Dogwood | $\begin{aligned} & \text { CMCF- } \\ & \text { NS2 } \end{aligned}$ | $\begin{aligned} & \text { MCF- } \\ & \text { NS2 } \end{aligned}$ | S2 | S3 | S2 | Legal 3 |  |  |
| 24 | 8 | P | More Challenging Fixed | A | NS2 Oak | PMCFNS2 | $\begin{aligned} & \hline \text { MCF- } \\ & \text { NS2 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 24 | 8 | P | More Challenging Fixed | B | NS2 Pine | PMCFNS2 | $\begin{aligned} & \text { MCF- } \\ & \text { NS2 } \end{aligned}$ |  |  |  |  | S3 | S5 |
| 25 | 9 | C | Easier ARM | A | NS1 Quince | $\begin{aligned} & \text { CEA- } \\ & \text { NS1 } \end{aligned}$ | EA-NS1 | S2 | S3 | S2 |  |  |  |
| 25 | 9 | C | Easier ARM | B | NS1 <br> Redbud | $\begin{aligned} & \text { CEA- } \\ & \text { NS1 } \end{aligned}$ | EA-NS1 | S2 | S3 | S2 | Legal 3 |  |  |
| 26 | 10 | P | Easier ARM | A | NS1 Elm | PEA-NS1 | EA-NS1 |  |  |  |  | S3 | S5 |
| 26 | 10 | P | Easier ARM | B | NS1 Fir | PEA-NS1 | EA-NS1 |  |  |  |  | S3 | S5 |
| 27 | 11 | C | Easier ARM | A | NS2 Elm | $\begin{aligned} & \text { CEA- } \\ & \text { NS2 } \end{aligned}$ | EA-NS2 | S2 | S3 | S2 |  |  |  |
| 27 | 11 | C | Easier ARM | B | NS2 Fir | $\begin{aligned} & \text { CEA- } \\ & \text { NS2 } \end{aligned}$ | EA-NS2 | S2 | S3 | S2 | Legal 3 |  |  |
| 28 | 12 | P | Easier ARM | A | NS2 Quince | PEA-NS2 | EA-NS2 |  |  |  |  | S3 | S5 |
| 28 | 12 | P | Easier ARM | B | NS2 <br> Redbud | PEA-NS2 | EA-NS2 |  |  |  |  | S3 | S5 |


| Package Number | Packaging Instructions | Green | Yellow | Red | Blue | Orange | Number of Copies of this Package | $\begin{gathered} \text { Ex- } \\ \text { perienced } \end{gathered}$ | Inexperienced |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $22$ $22$ |  | Cottonwood Loan Estimate, Dogwood Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Dogwood Loan Estimate, Questionnaire Part 3 Red | Dogwood Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $23$ $23$ |  | Cottonwood Initial <br> TIL, Cottonwood GFE, Dogwood Initial TIL, Dogwood GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Dogwood Initial TIL, <br> Dogwood GFE, <br> Questionnaire <br> Part 3 Red | Dogwood Final TIL, Dogwood HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 24 24 |  | Oak Loan Estimate, Pine Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Pine Loan Estimate, Questionnaire Part 3 Red | Pine Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $25$ $25$ |  | Quince Initial TIL, Quince GFE, Redbud Initial TIL, Redbud GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Redbud <br> Initial TIL, <br> Redbud GFE, <br> Questionnaire <br> Part 3 Red | Redbud Final TIL, Redbud HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| 26 26 |  | Elm Loan Estimate, Fir Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Fir Loan Estimate, Questionnaire Part 3 Red | Fir Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $27$ $27$ |  | Elm Initial TIL, Elm GFE, Fir Initial TIL, Fir GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Fir Initial TIL, Fir GFE, Questionnaire Part 3 Red | Fir Final TIL, Fir HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $28$ $28$ |  | Quince Loan Estimate, Redbud Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Redbud Loan Estimate, Questionnaire Part 3 Red | Redbud Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |


QUANTITATIVE STUDY OF THE CURRENT AND INTEGRATED TILA-RESPA DISCLOSURES

|  |  | ~ $\sim \sim$ |  | $\stackrel{\sim}{\sim}$ |
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|  | $\cdots \sim$ |  | $\cdots$ |  |
|  | N N |  | N N |  |
|  | $\sum_{\Sigma}^{\dot{u}} \underset{z}{i} \sum_{i}^{\dot{u}} \bar{z}$ |  | $\frac{\dot{d}}{\substack{N}} \sum_{\Sigma}^{\dot{N}} \sum_{\Sigma}^{\dot{u}} \tilde{N}$ | $\sum_{2}^{ \pm}{ }^{\frac{1}{N}}$ |
|  | $\sum_{U}^{\dot{U}} \sum_{i}^{j} \sum_{U}^{\dot{U}} \bar{z}$ | $\sum_{n}^{\dot{U}} \sum_{i}^{j} \sum_{i}^{\dot{U}} \bar{n}$ |  |  |
| \% |  |  |  | $\underset{\sim}{\sim}$ |
| $\begin{aligned} & \stackrel{\delta}{\circ} \\ & \stackrel{.0}{\underline{x}} \\ & > \end{aligned}$ | $\varangle \quad \oplus$ | $\varangle \quad \infty$ | $\varangle \quad \infty$ | $\varangle \quad \infty$ |
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| Package <br> Number | Packaging Instructions | Green | Yellow | Red | Blue | Orange | Number of Copies of this Package | Experienced | Inexperienced |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $29$ $29$ |  | Spruce Initial TIL, Spruce GFE, Tulip Initial TIL, Tulip GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Tulip Initial <br> TIL, Tulip GFE, Questionnaire Part 3 Red | Tulip Final TIL, Tulip HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $30$ $30$ |  | Gingko Loan Estimate, Hornbeam Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Hornbeam Loan Estimate, Questionnaire Part 3 Red | Hornbeam Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $31$ $31$ |  | Gingko Initial TIL, Gingko GFE, Hornbeam Prelim TIL, Hornbeam GFE, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Hornbeam Initial TIL, Hornbeam GFE, Questionnaire Part 3 Red | Hornbeam Final TIL, Hornbeam HUD-1, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |
| $32$ $32$ |  | Spruce Loan Estimate, Tulip Loan Estimate, Questionnaire Part 1 Green | Questionnaire Part 2 Yellow | Tulip Loan Estimate, Questionnaire Part 3 Red | Tulip Closing Disclosure, Questionnaire Part 4 Blue | Questionnaire Part 5 Orange | 30 | 15 | 15 |

A-12


## "Read Aloud" Instructions for Study Proctor

## Introduction to Study (5 minutes)

Thank you for participating in our study. In the study, you will be asked to review certain documents and answer questions based on information presented in those documents. It may feel as if we are testing you, but we are interested in how well these documents work. Today, each of you will receive the same sets of questions. However, your documents may look different than those provided to other participants, and you may receive a different number of documents for each part. Also, the numbers in the documents may be different for each person in the room, so your answers may be different as well. Don't worry if your documents or answers do not look like those of your neighbor. Please work carefully. We are interested in your thoughtful responses to the documents presented to you. The entire study takes about 60 minutes and I will give you an estimate of how long each task may take. You can stop participating at any time.

The study is divided into several parts:

- The materials for each part are in the LARGE GREEN envelope in front of you.
- Within the envelope are 5 colored envelopes, one for each part of our study today.
- As we begin each part, I will ask you to remove a particular colored envelope and to take out documents and/or a questionnaire. Remember that you may have a different number of documents than other people. Also, the questionnaire may refer to documents in the plural, but you may have only one. That is okay. Other people may have multiple documents.
- When you complete a part, please wait until I ask you to proceed. This will ensure that everyone is together at the start of each new part.
- I will also ask you to place your colored envelopes and completed materials back into the large GREEN envelope.
- I am happy to answer questions about the process and the testing procedures. However, I am not familiar with the content.

Are there any questions before we begin?

## Part 1 (10 minutes)

Let's get started on Part 1. Here is the scenario for Part 1:
Assume that you have found a home you want to purchase and are now shopping for a mortgage loan. You have talked to loan officers at two different banks about taking out a mortgage. Each of the two banks gives you application disclosures when you apply that explain the costs and features of their loan product.

Please remove the PURPLE envelope from your large GREEN envelope. Make sure that it is marked Part 1. Now, please open the PURPLE envelope and pull out the two paper clipped sets of information. These are the application disclosures you would receive from two different banks. Do NOT remove the questionnaire-which is on YELLOW paper.

Look through these application disclosures carefully and think about which loan you would prefer. You may mark on the documents if you want.

It should take you about 5 minutes to complete this part. I will let you know when you are halfway through the five minutes and will give you a one minute warning.

When you are finished, please put down your pencil and the documents and look up so I know you are finished. Ready? Please start.
(Wait 2.5 minutes and say: "We are now halfway through the time.")
(Wait 4 minutes and say: "You have one more minute to review the two documents.")
(Wait 5 minutes or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Now, please take out the questionnaire on YELLOW paper that is in the PURPLE envelope in front of you. Check to make sure that the questionnaire says "Part 1" on the top.

While you answer the questions, please look at the loan information you examined. Please work carefully. You have five minutes to complete this questionnaire. I will give you a one minute warning so you know how much time is left to complete this task.

When you are finished, put down the questionnaire and your pencil and look up so I know you are ready.

Ready to begin? Please start.
(Wait 4 minutes and say: "You have one more minute to complete this task.")
(Wait 5 minutes or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Thank you.
Please put the YELLOW questionnaire ONLY back into the PURPLE envelope and then put the PURPLE envelope back into the large GREEN envelope. Please keep the application disclosures in front of you.

## Part 2 (8 minutes)

Now take out the YELLOW envelope. You can take the YELLOW questionnaire out of the YELLOW envelope. Check to make sure that the questionnaire says "Part 2" on the top.

You will need to look at the same two application disclosures we used in part one to answer these questions in Part 2. Please work carefully. It should take you approximately 10 minutes to complete this task.

I will give you both a 5 minute warning when you are halfway through the 10 minutes and also give you a one minute warning.

When you are finished, put down the questionnaire and your pencil and look up so I know you are ready.

Ready to begin? Please start.
(Wait 4 minutes and say: "We are now halfway through the time.")
(Wait 3 more minutes and say: "You have one more minute to review the two documents.")
(Wait 8 minutes or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Thank you.

Please place the questionnaire you just completed AND all of the application disclosures you just reviewed into the YELLOW envelope and put the YELLOW envelope back into the large GREEN envelope.

## Part 3 (12 minutes)

Now take out the BROWN envelope. Remove the questionnaire and the application disclosure(s). Remember that you may have different numbers of documents. Check to make sure that the questionnaire says "Part 3" on the top. Note that this loan information is identical to one of the application disclosure(s) you just looked at. It may not be the loan you selected in Part 1, but we want you to use this loan.

You will need to look at the loan information to answer these questions. Please work carefully. You will have about 15 minutes to complete this part.

I will let you know when you are halfway through the 15 minutes and will also give you a one minute warning.

When you are finished, put down the questionnaire and look up so I know you are ready. Are you ready? Please start.
(Wait 6 minutes and say: "We are now halfway through the time.")
(Wait 6 more minutes and say: "You have one more minute to review the two documents.")
(Wait 1 MORE minute or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Please place the questionnaire back into the BROWN envelope and put the BROWN envelope back into the large GREEN envelope. Leave the application disclosure(s) you reviewed out in front of you for the next task.

## Part 4 (10 minutes)

Now assume that you have decided to get your loan from the bank whose application disclosure(s) are in front of you. This bank has approved your loan and you are now ready to close or settle on the loan. The bank now gives you final loan disclosures that provide the final details about the costs and features associated with your loan.

Now take out the BLUE envelope. Do NOT remove the questionnaire which is on YELLOW paper. Please remove the clipped set of information. This set is the final disclosure(s) and has the final information you will need to close/settle on your loan.

Look through the information on the final disclosure(s) and compare it to the information on the application disclosure(s).

You will have about 5 minutes to look over these documents. I will let you know when you are halfway through the 5 minutes and will also give you a one minute warning.

When you are finished, put down the documents and your pencil and look up so I know you are ready. Are you ready? Please start.
(Wait 5 minutes and say: "We are now halfway through the time.")
(Wait 4 more minutes and say: "You have one more minute to review the two documents.")
(Wait 5 minutes or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Now pull out the questionnaire that is on YELLOW paper in the BLUE envelope. Check to make sure that the questionnaire says "Part 4" on the top.

You will need to look at the application and final disclosure(s) to answer these questions. Please work carefully. This task should take you about 2 minutes to complete.

When you are finished, put down the questionnaire and your pencil and look up so I know you are ready. Ready? Please start.
(Wait 1 minute and say: "You have one more minute to review the two documents.")
(Wait 1 more minute or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Thank you.

Keep all of the loan documents you just reviewed out with you.

Please put ONLY the YELLOW questionnaire back in the BLUE envelope. Now put the BLUE envelope into the GREEN envelope.

## Part 5 (5 minutes)

Now take out the ORANGE envelope. Take out the YELLOW questionnaire in the ORANGE envelope. Check to make sure that the questionnaire says "Part 6" on the top.

Please look at the application and the final disclosures to answer these questions. Please work carefully. This task should take you about 5 minutes to complete.

I will let you know when you are halfway through the 5 minutes and will give you a one minute warning.

When you are finished, put down the questionnaire and your pencil and look up so I know you are ready. Ready? Please start.
(Wait 2.5 minutes and say: "We are now halfway through the time.")
(Wait 4 minutes and say: "You have one more minute to review the two documents.")
(Wait 5 minutes or until all participants have finished. If needed, give participants one additional minute, then say: "If you have not finished, that's fine. We are going to move on to the next section.")

Thank you.

Now, please place both the YELLOW questionnaire and all of the loan disclosures into the ORANGE envelope. Please put the ORANGE envelope into the GREEN envelope.

You have completed the entire set of tasks. Thank you for participating in the group. Please leave all materials in the GREEN envelope in front of you -- do not take any materials with you out of the room. You can pick up your check at the front desk.


## Questionnaire

A total of 16 different questionnaires were used for this survey based on the mortgage disclosure documents provided by the CFPB. Each of these questionnaires corresponds to a mortgage disclosure name set. The following questionnaire was used for the current disclosures and the Easier Fixed $A$ and $B$ (Maple Bank and Nandina Bank) loans. The questionnaires were identical except for the bank names and that the phrase "closing costs" instead of "settlement charges" was used for the proposed disclosures.

## CFPB Mortgage Study

## Part 1

(GREEN Envelope)

You can look at the paper-clipped application disclosures for the two loans from the GREEN envelope to answer these questions. Please work carefully.

1. If you were shopping for a mortgage loan and had to choose between these two loans, which one would you choose?
__ Maple Bank
__ Nandina Bank
__ Either is fine/ Prefer both equally
__ Don't know
2. Why did you make that selection? Please explain your thinking in as much detail as possible in the space below.
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$

WHEN YOU ARE FINISHED, PLEASE WAIT FOR FURTHER INSTRUCTIONS FROM THE PROCTOR.

## CFPB Mortgage Study <br> Part 2

(YELLOW Envelope)

You will need to look at the same paper-clipped application disclosures from Part 1 to answer these questions. Please work carefully.
3. How do these two loans compare in terms of the amount of money you are borrowing?
$\qquad$ I am borrowing less with Maple Bank
$\qquad$ I am borrowing less with Nandina Bank
__ I am borrowing the same amount with either Maple Bank or Nandina Bank
__ Don't know
4. How do these two loans compare in terms of interest rate in year 1?
__ Maple Bank has a higher interest rate in year 1
__ Nandina Bank has a higher interest rate in year 1
__ Maple Bank and Nandina Bank have the same interest rate in year 1
__ Don't know
5. How do these two loans compare in terms of points paid?
__ Maple Bank has more points
__ Nandina Bank has more points
__ Both Maple Bank and Nandina Bank have the same points
__ Don't know
6. How do these two loans compare in terms of escrow account?
__ Only Maple Bank shows an escrow account
__ Only Nandina Bank shows an escrow account
__ Both Maple Bank and Nandina Bank show an escrow account
__ Neither Maple Bank nor Nandina Bank shows an escrow account
__ Don't know
7. How do these two loans compare in terms of the Annual Percentage Rate (APR)?
__ Maple Bank has a lower APR
__ Nandina Bank has a lower APR
__ Both Maple Bank and Nandina Bank have the same APR
__ Don't know
8. How do these two loans compare in terms of changes in estimated total monthly payment?
__ Only the total monthly payment for Maple Bank will change (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR FURTHER INSTRUCTIONS.)
__ Only the total monthly payment for Nandina Bank will change (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR FURTHER INSTRUCTIONS.)
_- The total monthly payment for both banks will change (CONTINUE TO Q9.)
__ The total monthly payment for neither bank will change (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR FURTHER INSTRUCTIONS.)
__ Don't know (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR FURTHER INSTRUCTIONS.)
9. For which loan does the estimated total monthly payment change first?
_- Maple Bank
__ Nandina Bank
__ The estimated total monthly payment for both banks changes at the same time
__ Don't know
10. How do these two loans compare in terms of the highest estimated total monthly payment over the life of the loan?
__ The highest estimated total monthly payment for Maple Bank is larger
__ The highest estimated total monthly payment for Nandina Bank is larger
__ Both Maple Bank and Nandina Bank have the same highest estimated total monthly payment
__ Don't know
WHEN YOU ARE FINISHED, PLEASE WAIT FOR FURTHER INSTRUCTIONS FROM THE PROCTOR.

## CFPB Mortgage Study

## Part 3

(RED envelope)

You will need to look at the application disclosures from the RED envelope to answer these questions. Please work carefully.
11. What is the loan amount?
$\qquad$ Dollars
$\qquad$ Don't know
12. What is the interest rate in year 1 ?
$\qquad$ \%
$\qquad$ Don't know
13. Can the interest rate change over the life of the loan?
$\qquad$ Yes (CONTINUE TO Q14)
__ No (SKIP TO Q15)
__ Don't know (SKIP TO Q15)
14. When can the interest rate first change?

## $\qquad$ <br> Don't know

15. Can the scheduled principal and interest payment change over the life of the loan?
$\qquad$
__ No
__ Don't know
16. How much are your estimated settlement charges?
$\qquad$ Dollars
$\qquad$ Don't know
17. Which of the following, if any, are settlement charges you will pay for? Please check all that apply.
$\qquad$ Homeowner's association (HOA) dues
$\qquad$ Real estate agent fee
__ Appraisal fee
$\qquad$ Transfer taxes
__ Credit report fee
__ None of the above
__ Don't know
18. When you make your first total monthly payment, for how much will you write the check (or make an electronic payment)?
$\qquad$ Dollars
$\qquad$ Don't know
19. Which of the following settlement services, if any, can you shop for? Please check all that apply.
$\qquad$ Pest inspection
__ Appraisal
__ Credit report
__ Survey
__ Settlement agent
__ None of the above
__ Don't know
20. When is your final scheduled payment?
__ At the end of 5 years
__ At the end of 7 years
__ At the end of 15 years
__ At the end of 30 years
$\qquad$ None of the above
$\qquad$ Don't know
21. Does this lender collect payments from you for upcoming taxes, insurance, or other expenses, hold them in a reserve fund, and later make payments out of this fund on your behalf?
$\qquad$ Yes
$\qquad$ No
$\qquad$ Don't know
22. Suppose that you took out this loan and then one year later you wanted to refinance the loan with a different lender to get a better rate. To get out of this loan, will you have to:
$\qquad$ Pay off the remaining balance
$\qquad$ Pay off the remaining balance plus additional fees
__ Pay less than the remaining balance
$\qquad$ Don't know
23. What is the Annual Percentage Rate (APR) for this loan?
$\qquad$ \%
$\qquad$ Don't know
24. If you make all scheduled total monthly payments, how much principal will you have paid in 5 years?
__ More than the sum of your total monthly payments over 5 years
__ Less than the sum of your total monthly payments over 5 years
__ Equal to the sum of your total monthly payments over 5 years
__ Don't know
25. Does this loan have mortgage insurance?
__ Yes (CONTINUE TO Q26)
__ No (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR INSTRUCTIONS.)
__ Don't know (YOU ARE FINISHED WITH THIS SECTION. PLEASE WAIT FOR INSTRUCTIONS.)
26. How much is the first monthly payment for mortgage insurance?
$\qquad$ Dollars
$\qquad$ Don't know

WHEN YOU ARE FINISHED, PLEASE WAIT FOR FURTHER INSTRUCTIONS FROM THE PROCTOR.

## CFPB Mortgage Study <br> Part 4

(BLUE envelope)
You will need to look at the application and the final disclosures from the BLUE envelope to answer these questions. Please work carefully.
27. What is the loan amount on the final disclosures?
$\qquad$
28. How do the application disclosures and the final disclosures compare in terms of the loan amount at settlement?
$\qquad$ Loan amount is the same (SKIP TO Q30)
$\qquad$ Loan amount is not the same (CONTINUE TO Q29)
$\qquad$ Don't know (SKIP TO Q30)
29. Why did the loan amount change on the final disclosures?
$\qquad$
$\qquad$
$\qquad$ Don't know
30. How do the application disclosures and the final disclosures compare in terms of the interest rate in year 1?
__ Interest rate in year 1 is the same (SKIP TO Q32)
__ Interest rate in year 1 is not the same (CONTINUE TO Q31)
__ Don't know (SKIP TO Q32)
31. Why are the interest rates different?
32. How do the application disclosures and the final disclosures compare in terms of settlement charges?
__ Settlement charges are the same (SKIP TO Q34)
__ Settlement charges are not the same (CONTINUE TO Q33)
__ Don't know (SKIP TO Q34)
33. List the name of one settlement charge that has a different amount.
34. How do the application disclosures and the final disclosures compare in terms of an escrow account?
__ Only the application disclosures show an escrow account (SKIP TO Q36)
__ Only the final disclosures show an escrow account (SKIP TO Q36)
__ Both the application disclosures and the final disclosures show an escrow account, and the items included are the same (SKIP TO Q36)
__ Both the application disclosures and the final disclosures show an escrow account, but the items included are different (CONTINUE TO Q35)
__ Neither the application disclosures nor the final disclosures show an escrow account (SKIP TO Q36)
__ Don't know (SKIP TO Q36)
35. List the name of one escrow account item that is different.

LOOK ONLY AT THE FINAL DISCLOSURES TO ANSWER THE REMAINING QUESTIONS IN THIS SECTION.
36. Looking only at the final disclosures, what is the amount of cash you need at settlement?
$\qquad$ Dollars
$\qquad$ Don't know

37．Looking only at the final disclosures，if you make the scheduled total monthly payments，will the loan amount increase after closing？
＿＿Yes
＿＿No
$\qquad$ Don＇t know

38．Looking only at the final disclosures，what is the amount of the highest possible monthly principal and interest payment？
$\qquad$ Dollars
$\qquad$ Don＇t know

39．Looking only at the final disclosures，does the scheduled monthly principal and interest payment change after closing？
＿＿Principal and interest payments remain the same（SKIP TO Q42）
＿＿Principal and interest payments change（CONTINUE TO Q40）
＿＿Don＇t know（SKIP TO Q42）

40．Looking only at the final disclosures，when is the principal and interest payment first scheduled to change？
$\qquad$ （CONTINUE TO Q41）
＿＿＿Don＇t know（SKIP TO Q42）

41．After the first change，how often can the scheduled principal and interest payment change？
Every $\qquad$ year（s）
＿＿Never
＿＿Don＇t know

## CFPB Mortgage Study

## Part 5

(ORANGE envelope)

Please tell us how much you agree or disagree with each of the following statements about the application disclosures using the scale shown below.
$\left.\begin{array}{l|l|l|l|l|l} & \begin{array}{c}\text { Strongly } \\ \text { Disagree }\end{array} & \begin{array}{c}\text { Neither } \\ \text { Disagree } \\ \text { Nor Agree }\end{array} & \text { Agree }\end{array} \begin{array}{c}\text { Strongly } \\ \text { Agree }\end{array}\right]$

Please tell us how much you agree or disagree with each of the following statements about the final disclosures using the scale shown below.
$\left.\begin{array}{l|l|l|l|l|l} & \begin{array}{c}\text { Strongly } \\ \text { Disagree }\end{array} & \begin{array}{c}\text { Neither } \\ \text { Disagree } \\ \text { Nor Agree }\end{array} & \text { Agree }\end{array} \begin{array}{c}\text { Strongly } \\ \text { Agree }\end{array}\right]$


## Recruiting Script

## [DISPLAY]

To start, we have a few questions to make sure we ask the right questions of the right people.

## [SP]

[PROMPT IF SKIPPED]
Q1. Are you a mortgage loan broker, lender, loan originator, or settlement agent?

Yes......... 1
No
.. 2

## [TERMINATE IF Q1 = 1 OR REFUSED AND DISPLAY THE TEXT BELOW:]

We are sorry, but this study is focused on people who are less familiar with the real estate industry. Thank you for taking our survey.
[ASK IF Q1 = 2]

## [SP]

Q2. Are you a realtor, appraiser, or title insurer, or do you work in an office that deals with real estate transactions?

Yes......... 1
No ......... 2

## [TERMINATE IF Q2 = 1 OR REFUSED AND DISPLAY THE TEXT BELOW:]

We are sorry, but this study is focused on people who are less familiar with the real estate industry. Thank you for taking our survey.

## [ASK IF Q2 = 2]

[SP]
Q3. Would you be involved in the decision in your household about choosing and closing on a mortgage loan to buy a house or refinance?

> Yes, I am involved in the decision-making.................. 1

No ........................................ 2
[TERMINATE IF Q3 = 2 OR REFUSED AND DISPLAY THE TEXT BELOW:]
We are sorry, but the focus of our study requires us to get information from a person who is involved in making financial decisions. Thank you for taking our survey.

## [ASK IF Q3 = 1]

[SP]
[PROMPT IF SKIPPED] [TERMINATE IF Q4 REFUSED]
Q4. Next, have you ever bought a house and financed it with a mortgage loan?

Yes, bought ........................... 1
Yes, refinanced................... 2
No .3

## [IF Q4 = 1 OR 2 SKIP TO Q6] <br> [IF Q4 = 3 CONTINUE TO Q5]

## [SP]

Q5. Do you intend to buy a house and finance it with a mortgage loan within the next...?

5 years................................. 1
10 years ............................... 2
15 years............................... 3
No ...................................... 4
[IF Q5 = 1, 2 OR 3 SKIP TO Q14]
[TERMINATE IF Q5 = 4 OR REFUSED AND DISPLAY THE FOLLOWING TEXT:]
We are sorry, but the focus of this study is on people who will be taking out mortgages. Thank you for taking our survey.
[ASK IF Q4 = 1 OR 2]

## [SP]

Q6. Have you bought a house and financed it or refinanced a mortgage in the past 5 years?

Yes, bought ......................... 1
Yes, refinanced.................... 2
No .3
[ASK Q7 ONLY IF Q6 = 3; IF Q6 = 1 OR 2 SKIP TO Q8]
[SP]
Q7. Do you intend to buy a house and finance it with a mortgage loan again or refinance again within the next...?

5 years................................ 1
10 years............................... 2
15 years............................... 3
No ...................................... 4

## [IF Q7 = 1, 2 OR 3 SKIP TO Q14]

## [TERMINATE IF Q7 = 4 OR REFUSED AND DISPLAY THE FOLLOWING TEXT:]

We are sorry, but the focus of this study is on people who will be taking out mortgages. Thank you for taking our survey.

## [ASK Q8 ONLY IF Q6 = 1 OR 2]

[SP]
Q8. Have you experienced a delinquency, default, or foreclosure within the past 5 years?

Yes...................................... 1
No ...................................... 2
NO Q9 - Q13.

## [SP] <br> [PROMPT ONCE]

Q14. The Consumer Financial Protection Bureau has posted mortgage disclosure forms and a proposed rule about the forms on its website. Have you seen these forms, commented on them, or previously participated in a study about mortgage disclosure forms conducted by Kleimann Communication Group?

Yes......................................... 1
No ...................................... 2

## [TERMINATE IF Q14 = 1 OR REFUSED AND DISPLAY THE FOLLOWING TEXT:]

We are sorry, but you do not fit the background we need for participation in this particular study. Thank you for taking our survey.

## [ASK IF Q14 = 2] <br> \section*{[SP]}

Q14a. Which of the following statements comes closest to describing the amount of financial risk that you (and your husband/wife/partner) are willing to take when you save or make investments?
Take substantial financial risks expecting
to earn substantial returns................ 1
Take above average financial risks expecting
to earn above average returns ............. 2
Take average financial risks expecting to
earn average returns........................... 3
Not willing to take any financial risks... 4

## [SP]

Q14b. In planning or budgeting your (family's) saving and spending, which of the following time periods is most important to you (and your family living here)?

Next few months ................ 1
Next year............................ 2
Next few years .................... 3
Next 5-10 years ................... 4
Longer than 10 years .......... 5

## [SP]

Q14c. At this time, do you have a good idea of what your (family's) income for next year will be?

```
Yes.1
```

No ..... 2

## [SP]

Q14d. Do you usually have a good idea of what your (family's) next year's income will be?

Yes...................................... 1
No 2
[SP]
Q14e. Five years from now, do you think interest rates will be higher, lower, or about the same as today?

Higher................................ 1
Lower ................................... 2
About the same................... 3
Q14f. Would you describe the area you live in as...
Rural................................... 1
Suburban............................. 2
Urban .................................. 3
NO Q15.

## [ASK IF O14 = 2]

## [SP]

## [PROMPT IF SKIPPED]

Q16. Congratulations! You have qualified to receive 75,000 points by participating in an in-person interview. The interview sessions are conducted by GFK in the [CITY, STATE] area and will be held at the following location:

NAME
ADDRESS
ADDRESS 2
The interviews take approximately 60 minutes. During the interview, you will be asked to evaluate disclosures people receive when purchasing or refinancing a house. The interviews will take place between DATE1 and DATE2 in the evening hours.

Would you be willing to come to the office, participate in an observed session, and provide us with feedback about your experience?

```
Yes.................................... }
```

No . 2

## [Show Display if Q16 = 1] [DISPLAY]

Thank you! We are glad you are interested in participating. A GfK representative will call you to schedule your specific interview time.
[STANDARD KN CLOSE]


KnowledgePanel Background

KnowledgePanel members are recruited through national random samples, originally by telephone and now almost entirely by postal mail. Households are provided with access to the Internet and hardware, if needed. Unlike Internet convenience panels, also known as "opt-in" panels, that include only individuals with Internet access who volunteer themselves for research, KnowledgePanel recruitment uses dual sampling frames that include both listed and unlisted telephone numbers, telephone and non-telephone households, and cell-phone-only households, as well as households with and without Internet access. Only persons sampled through these probability-based techniques are eligible to participate on KnowledgePanel. Unless invited to do so as part of these national samples, no one can volunteer to be on the panel. To offset attrition, multiple recruitment samples are fielded evenly throughout the calendar year.

## Building the KnowledgePanel: RDD Sampling Methodology

KnowledgePanel recruitment methodology has used the quality standards established by selected RDD surveys conducted for the Federal government, such as the CDC-sponsored National Immunization Survey. To build the KnowledgePanel, the recruitment employed list-assisted RDD sampling techniques based on a sample frame of the U.S. residential landline telephone universe. For purposes of efficiency, only those banks of telephone numbers (a bank consists of 100 numbers) that had fewer than two directory listings were excluded. Additionally, an oversampling was conducted within a stratum of telephone exchanges that had high concentrations of African American and Hispanic households based on Census data. Recruitment sampling is done without replacement, thus numbers already fielded do not get fielded again.

A telephone number for which a valid postal address can be matched occurred in about 67-70\% of each sample. These address-matched cases were all mailed an advance letter informing them that they had been selected to participate in KnowledgePanel. For purposes of efficiency, the unmatched numbers were most recently under-sampled at a rate of 0.75 relative to the matched numbers. Both the minority over-sampling and this under-sampling of non-address households were adjusted appropriately in the panel's weighting procedures.

Following the mailings, telephone recruitment by trained interviewers/recruiters began for all sampled telephone numbers. Telephone numbers for cases sent to recruiters were dialed for up to 90 days, with at least 14 dial attempts for cases in which no one answered the phone, and for numbers known to be associated with households. Extensive refusal conversion was also performed. The recruitment interview, about 10 minutes in length, began with informing the household member that the household had been selected to join KnowledgePanel. If the household did not have a computer and access to the Internet, the household member was told that in return for completing a short survey weekly, the household would be provided with free monthly Internet access and a laptop computer (in the past, the household was provided with a WebTV device). All members of the household were enumerated, and some initial demographic and background information on prior computer and Internet use was collected.

Households that informed recruiters that they had a home computer and Internet access were asked to take surveys using their own equipment and Internet connection. Incentive points per survey, redeemable for cash, are given to these "PC" (personal computer) respondents for completing their surveys. Panel members provided with a laptop computer and free Internet access do not participate in this per-survey points-incentive program. However, all panel members receive special incentive points for select surveys to improve response rates and/or for all longer surveys as a modest compensation for the extra burden of their time and participation.

For those panel members receiving a laptop computer, each unit is custom-configured prior to shipment with individual email accounts so that it is ready for immediate use by the household. Most households are able to install the hardware without additional assistance, although a toll-free telephone line is available for technical support. The Call Center contacts household members who do not respond to e-mail and attempts to restore both contact and participation. PC panel members provide their own e-mail addresses and receive their weekly survey invitations at that e-mail account.

All new panel members receive an initial survey for the dual purpose of welcoming them as new panel members and introducing them to how online survey questionnaires work. New panel members also complete a separate profile survey that collects essential demographic information, such as gender, age, race, income, and education to create a personal member profile. This information can be used to determine eligibility for specific studies and is factored in for weighting purposes. Operationally, once the profile information is stored, it does not need to be re-collected as a part of each and every survey. This information is also updated annually for all panel members. Once new members have completed their profile surveys, they are designated as "active," and considered ready to be sampled for client studies. [Note: Parental or legal guardian consent is also collected for the purpose of conducting surveys with teenage panel members, aged 13 to 17.]

Once a household is recruited and each household member's e-mail address is either obtained or provided, panel members are sent survey invitations linked through a personalized e-mail message (instead of by phone or postal mail). This contact method permits surveys to be fielded quickly and economically, and also facilitates longitudinal research. In addition, this approach reduces the burden placed on respondents, since e-mail notification is less intrusive than telephone calls and allows research subjects to participate in research when it is convenient for them.

## Transitioning to an Address-Based Sampling (ABS) Methodology

For the first KnowledgePanel recruitment in 1999, the conventional opinion among survey experts was that probability-based sampling could be carried out cost effectively through the use of a national RDD sample. The RDD landline frame at the time allowed access to $96 \%$ of U.S. households. This is no longer the case. In 2009, the use of the ABS sample frame for panel recruitment reflected the real changes in society and telephony over recent years. Those changes that have reduced the long-term scientific viability of landline RDD sampling methodology are as follows:

- Declining respondent cooperation in telephone surveys as reflected in "do not call" lists, call screening, caller-ID devices, and answering machines;
- The dilution of the RDD sample frame as measured by the working telephone number rate; and
- The emergence of cell-phone-only households (CPOHH) because such households are excluded from the RDD frame because they have no landline telephone.

According to the Centers for Disease Control and Prevention (January-June 2010), approximately $28.6 \%$ of all U.S. households cannot be contacted through RDD sampling-26.6\% as a result of CPOHH status and $2 \%$ because they have no telephone service whatsoever. Among some age segments, the RDD non-coverage would be substantial: $40 \%$ of young adults, ages 18-24, reside in CPOHHs, $51 \%$ of those ages $25-29$ reside in CPOHHs, as do $40 \%$ of those ages $30-34.46$

After conducting an extensive pilot project in 2008, the decision was made to move toward an address-based sample (ABS) frame in response to the growing number of CPOHHs that are outside the RDD frame. Before conducting the ABS pilot, we also experimented with supplementing the RDD samples with cell-phone samples. However, this approach was not cost effective-and raised a number of other operational, data quality, and liability issues (for example, calling cell phones while respondents were driving).

[^26]
## Building the KnowledgePanel:

## Address-Based Sampling (ABS) Methodology

The key advantage of the ABS sample frame is that it allows sampling of almost all U.S. households. An estimated $97 \%$ of households are "covered" in sampling nomenclature. Regardless of household telephone status, those households can be reached and contacted through postal mail. Second, the ABS pilot project revealed several additional advantages beyond expected improvement in recruiting adults from CPOHHs :

- Improved sample representativeness for minority racial and ethnic groups
- Improved inclusion of lower educated and low income households
- Exclusive inclusion of the fraction of CPOHHs that have neither a landline telephone nor Internet access (approximately 4\% to 6\% of U.S. households).

ABS involves probability-based sampling of addresses from the U.S. Postal Service's Delivery Sequence File. Randomly sampled addresses are invited to join KnowledgePanel through a series of mailings and, in some cases, telephone follow-up calls to non-responders when a telephone number can be matched to the sampled address. Operationally, invited households have the option to join the panel by one of several ways:

- Completing and returning a paper form in a postage-paid envelope,
- Calling a toll-free hotline, or
- Going to a dedicated website and completing an online recruitment form.

After initially accepting the invitation to join the panel, respondents are then "profiled" online by answering key demographic questions about themselves. This profile is maintained through the same procedures that were previously established for RDD-recruited panel members. Respondents not having an Internet connection are provided a laptop computer and free Internet service. Respondents sampled from the ABS frame, like those sampled from the RDD frame, are offered the same privacy terms and confidentiality protections that have been developed over the years and that have been reviewed by dozens of Institutional Review Boards.

Large-scale ABS sampling for KnowledgePanel recruitment began in April 2009. As a result, sample coverage on KnowledgePanel of CPOHHs, young adults, and non-whites has been increasing steadily since that time.

Because KnowledgePanel members have been recruited from two different sample frames, RDD and ABS, several technical processes have been implemented to merge samples sourced from these frames. The approach preserves the representative structure of the overall panel for the selection of individual client study samples. An advantage of mixing ABS frame panel members in any KnowledgePanel sample is a reduction in the variance of the weights. ABS-sourced samples tend to align more closely to the overall demographic distributions in the population, and thus the associated adjustment weights are somewhat more uniform and less varied. This variance reduction efficaciously attenuates the sample's design effect and provides an advantage for study samples drawn from KnowledgePanel with its dual frame construction.


## Answer Keys

Separate answer sheets were prepared for each set of loan types. The answer sheet below was prepared for the easier fixed loans and included the bank names Aspen, Balsam, Maple, and Nandina. We also provided variations of answers to some questions, such as to allow for respondents to round numbers in their answers.

## QUANTITATIVE TEST ANSWER KEY

## Easier Fixed, Name Sets 1 and 2

| Question | Current Forms |  | Proposed Forms |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Maple (A NS1) <br> Nandina (B NS1) <br> Aspen (A NS2) <br> Balsam (B NS2) <br> Either <br> Don't know |  | Aspen (A NS1) <br> Balsam (B NS1) <br> Maple (A NS2) <br> Nandina (B NS2) <br> Either <br> Don't know |  |
| 2 | TBD |  | TBD |  |
| PART 2 | Comparison |  | Comparison |  |
| 3 | Same |  | Same |  |
| 4 | Balsam/Nandina is higher |  | Balsam/Nandina is higher |  |
| 5 | Aspen/Maple has more |  | Aspen/Maple has more |  |
| 6 | Both |  | Both |  |
| 7 | Aspen/Maple is lower |  | Aspen/Maple is lower |  |
| 8 | Both banks will change |  | Both banks will change |  |
| 9 | At the same time |  | At the same time |  |
| 10 | Balsam/Nandina |  | Balsam/Nandina |  |
| PART 3 | A (Maple/Aspen) | B (Nandina/Balsam) | A (Aspen/Maple) | B (Balsam/Nandina) |
| 11 | $\begin{aligned} & \$ 162,000.00 \text { or } \\ & \$ 162,000 \end{aligned}$ | $\begin{aligned} & \$ 162,000.00 \text { or } \\ & \$ 162,000 \end{aligned}$ | $\begin{aligned} & \$ 162,000.00 \text { or } \\ & \$ 162,000 \end{aligned}$ | $\begin{aligned} & \$ 162,000.00 \text { or } \\ & \$ 162,000 \end{aligned}$ |
| 12 | 3.875\% | 4.25\% | 3.875\% | 4.25\% |
| 13 | No | No | No | No |
| 14 <br> Any answer | Skip | Skip | Skip | Skip |
| 15 | No | No | No | No |
| 16 | $\begin{aligned} & \$ 8,052.84, \$ 8,052 \text {, or } \\ & \$ 8,053 \end{aligned}$ | $\begin{aligned} & \$ 4,735.55, \$ 4,735, \\ & \$ 4,736 \end{aligned}$ | $\$ 8,054.00$ or \$8,054 [Separate non-correct code for $\$ 16,054.00$ or $\$ 16,054]$ | $\$ 4,736.00$ or $\$ 4,736$ [Separate non-correct code for \$12,736.00 or \$12,736] |
| $\begin{gathered} 17 \\ \text { All answers } \end{gathered}$ | Appraisal Fee Credit Report Fee | Appraisal Fee Credit Report Fee | Appraisal Fee Credit Report Fee | Appraisal Fee Credit Report Fee |
| 18 | \$1,050.26 or \$1,050 | $\begin{aligned} & \$ 1,096.59, \$ 1,096 \text {, or } \\ & \$ 1,097 \end{aligned}$ | $\begin{aligned} & \$ 1,050.00, \$ 1,050 \text {, or } \\ & \$ 1,049.78 \end{aligned}$ | $\begin{aligned} & \$ 1,096.00, \$ 1,096 \text {, or } \\ & \$ 1,095.94 \end{aligned}$ |
| $\begin{gathered} \hline 19 \\ \text { All answers } \end{gathered}$ | - Pest Inspection <br> - Survey <br> - Settlement Agent | Pest Inspection <br> - Survey <br> - Settlement Agent | Pest Inspection <br> - Survey <br> - Settlement Agent | Pest Inspection <br> - Survey <br> - Settlement Agent |
| 20 | End of 30 years | End of 30 years | End of 30 years | End of 30 years |
| 21 | Yes | Yes | Yes | Yes |
| 22 | Remaining balance plus additional fees | Remaining balance | Remaining balance plus additional fees | Remaining balance |
| 23 | 4.274\% | 4.581\% | 4.274\% | 4.581\% |

QUANTITATIVE TEST ANSWER KEY continued

| Question | Current Forms |  | Proposed Forms |  |
| :---: | :---: | :---: | :---: | :---: |
| 24 | Less than | Less than | Less than | Less than |
| 25 | Yes | Yes | Yes | Yes |
| 26 | \$82.35 or \$82 | \$82.35 or \$82 | \$82.00 or \$82 | \$82.00 or \$82 |
| PART 4 | A (Aspen/Maple) | B (Balsam/Nandina) | A (Maple/Aspen) | B (Balsam/Nandina) |
| 27 | $\$ 162,000.00$ or \$162,000 | $\$ 162,000.00$ or \$162,000 | $\$ 162,000.00$ or \$162,000 | $\$ 162,000.00$ or \$162,000 |
| 28 | Same | Same | Same | Same |
| 29 | Skip | Skip | Skip | Skip |
| 30 | Same | Not the same | Same | Not the same |
| Either answer | Skip | - No Rate Lock <br> - Interest rate was not locked <br> - Interest rate was only available through 2/15/13 <br> - Interest rate can change until lock the rate | Skip | - No Rate Lock <br> - Interest rate was not locked <br> - Interest rate was only available through 2/15/13 <br> - Interest rate can change until lock the rate |
| 32 | Not the same | Not the same | Not the same | Not the same |
| $33$ <br> Any answer | - Flood Monitoring <br> - Credit Report <br> - Tax Status (or Tax Service) <br> - Daily Interest Charges <br> - Homeowner's Insurance <br> - Initial Deposit for your Escrow Account <br> - Title Services and Lender's Title Insurance <br> - Owner's Title Insurance <br> - Pest Inspection Fee <br> - Survey Fee | - Credit or Charge (points) <br> - Adjusted Origination Charge <br> - Daily Interest Charges <br> - Homeowner's Insurance <br> - Initial deposit for your escrow account <br> - Owner's Title Insurance <br> - Government Recording Charges <br> - Pest Inspection Fee | - Credit Report Fee <br> - Flood Monitoring <br> - Tax Status Research Fee <br> - Pest Inspection Fee <br> - Survey <br> - Title - Insurance Binder <br> - Title - Lender's Title Policy <br> - Title - Title Search <br> - Title - Settlement Agent Fee <br> - [Accept general statement "Title charges" because all title charges changed] <br> - Homeowner's Insurance Premium <br> - Prepaid Interest <br> - Property Taxes <br> - Initial Escrow Payment at Closing <br> - Title - Owner's Title Policy | - Lender Credits <br> - Pest Inspection Fee <br> - Recording Fees <br> - Homeowner's Insurance Premium <br> - Prepaid Interest <br> - Property Taxes <br> - Initial Escrow Payment at Closing <br> - Title - Owner's Title Policy |

## QUANTITATIVE TEST ANSWER KEY continued

| Question | Current Forms |  | Proposed Forms |  |
| :---: | :---: | :---: | :---: | :---: |
| 34 | Both show an escrow account but the items are the same | Both show an escrow account but the items are different | Both show an escrow account but the items are the same | Both show an escrow account but the items are different |
| $35$ <br> Any answer | Skip | Skip | Skip | Skip |
| 36 | \$14,147.26 or \$14,147 | \$14,574.35 or \$14,574 | \$14,147.26 or \$14,147 | \$14,574.35 or \$14,574 |
| 37 | No | No | No | No |
| 38 | \$761.78, \$761, or \$762 | $\begin{aligned} & \$ 820.83, \$ 820 \text {, or } \\ & \$ 821 \end{aligned}$ | \$761.78, \$761, or \$762 | $\begin{aligned} & \$ 820.83, \$ 820, \\ & \text { or } \$ 821 \end{aligned}$ |
| 39 | Remain the same | Remain the same | Remain the same | Remain the same |
| 40 <br> Any answer | Skip | Skip | Skip | Skip |
| 41 | Skip | Skip | Skip | Skip |
|  | Seller credit appeared at closing | - Interest rate increased from estimate <br> - Category of "charges that cannot increase" increased | - Seller credit appeared at closing | - Interest rate increased from estimate <br> - Increase in closing costs exceeds legal limits |

711074
Q14 When can the interest rate first change?

| $001 \mathrm{In} /$ after year three | 008 6/1/2018 |
| :--- | :--- |
| $002 \mathrm{ln} /$ after year four | 009 Cannot change |
| $003 \mathrm{In} /$ after year five | 010 6/1/2020 |
| $004 \mathrm{ln} /$ after year six | 011 Before closing |
| $005 \mathrm{ln} /$ after year seven | $0125 / 1 / 2016$ |
| $006 \mathrm{ln} /$ after year eight | 050 Other |
| 007 4/16/2013 | 997 Nothing |

Q2 If you were shopping for a mortgage loan and had to choose between these two loans, which ones would you choose? Why did you make that selection?
() Interest/APR (Net)

001 Don't/wouldn't want variable rate
002 Lower interest rate
003 Lower Annual Percentage Rate
004 It's a fixed/non-adjustable interest rate
005 Interest rate is locked in
006 Longer time before rates can change
007 Lower limit on how high interest can go
008 Lower total interest percentage
009 Interest only period
010 Rate changes/can be adjusted after eight (8) years

011 Interest rate not locked in 020 Other interest rate/APR comments
() Costs at Closing /Settlement (Net)

021 Lower closing costs/less cash needed to close

022 Lower origination fee/charge
023 No escrow deposit
024 Lower escrow deposit
025 Higher amount/dollar amount for extra services you can shop for

026 Recording/filing fees/costs
050 Other costs at closing comments
() Payment structure (Net)

051 Lower payment/monthly payment

052 Lower escrow monthly payment
053 No monthly escrow payment
054 Monthly payment does not increase
055 Pay more to principal
056 Pay less in interest
057 No prepayment penalty
058 No balloon payment
059 Lower balloon payment
060 Prefer steady monthly payments
061 Maximum amount you might pay monthly is less

062 Lower frequency of payment changes
063 Lower frequency of interest changes
064 Escrow amount included in monthly payment

065 No points
066 Total of payment is less
067 Lower finance charge
068 Lower amount financed
069 Lower total APR
070 Lower down payment
071 Prepayment penalty only in effect for two years

072 Favorable payment/payoff/interest terms after five years

073 Better mortgage insurance terms
074 Taxes are lower
100 Other payment structure comments
() Miscellaneous (Net)

101 Lower fees/charges (unspecified)
102 GFE is clear/easy to understand
103 GFE is more fully explained/more informative

104 Information easier to understand/read
105 Overall terms of loan/better product
106 Overall cost more reasonable/price is lower/saves money

107 Decision based on length of time planning to stay in home (any)

108 Less risky/safer/feel more secure

109 Don't like/want either loan
110 Need more information/more time to study the proposals

147 Other loan related comments
148 Other form related comments
149 Other self experience comments
150 Other miscellaneous comments

997 Nothing
998 Don't know

## Q29 Why did the loan amount change on the final disclosures?

| 001 Interest rate/APR increased | 016 Paying points |
| :--- | :--- |
| 002 Additional fees (unspecified) | 017 Changes in filing/recording/inspection fees |
| 003 Closing costs were financed | 018 Escrow changed |
| 004 Closing/settlement charges changed | 019 Interest rate/APR decreased |
| 005 Closing costs were wrapped into the loan | 020 Closing costs/settlement charges |
| increased |  |
| 006 Closing/settlement charges were estimates | 021 Increased insurance costs (unspecified) |
| 007 Seller-paid fees changed | 022 Upfront finance charge (unspecified) |
| 008 Original loan amount was an estimate | 023 Increase in finance charges (unspecified) |
| 009 Changes in loan rate/APR | 024 Increase in PMI |
| 010 Inclusion of homeowner's association fees | 025 Increase in principal |
| 011 Mortgage insurance amount changed | 050 Other |
| 012 Title charges |  |
| 013 Change in taxes | 997 Nothing |
| 014 Inclusion of settlement/loan origination | 998 Don't know |
| charges |  |

## Q31 Why are the interest rates different?

001 Variable/market-driven rate
002 Change in the disclosure rate
003 Loan amount/terms changed
004 Introductory rate which changes over time
005 Buyer paid points to lower interest rate
006 Change in mortgage insurance
007 Different banks
008 Rate increased/decreased (unspecified)
009 Negative amortization
010 Escrow
011 Changes in settlement
012 Decrease in rate/APR
013 Rate wasn't locked in

014 Because rate lock-in expired/expired before the close

015 Length of time between estimate and closing date

016 You pay only interest/escrow in the first years of the loan

017 Higher interest rate for first five years of the loan

050 Other

997 Nothing
998 Don't know
999 Can't code

## Q33 List the name of one closing/settlement charge that has a different amount.

001 Survey fee
002 Title insurance search/services fees
003 Title settlement agent's fee
004 Lender's title insurance fee
005 Recording/filing fees/costs
006 Pest inspection fee
007 Homeowner's association fees/associated costs

008 Credit report fee/charge
009 Homeowner's insurance
010 Points paid
011 Tax monitoring

012 Flood monitoring fee
013 Disclosure/closing disclosure
014 Loan costs (unspecified)
015 Other fees/costs (unspecified)
016 Property taxes
017 Origination fee/charges
018 HOA capital contribution
019 Tax status research fee
020 Closing costs/cash to close
021 Home warranty fee
022 Escrow account/payment
023 Prepaids (unspecified)

## Q33 continued

| 024 Daily interest | 050 Other |
| :--- | :--- |
| 025 Appraisal fee | 997 Nothing |
| 026 Prepaid interest | 998 Don't know |
| 027 Lender credits | 999 Can't code |

Q35 List the name of one escrow account item that is different.

001 HOA/Homeowners' association fee/dues
002 Mortgage insurance
003 Property taxes
004 Accrued interest
005 Homeowner's insurance
006 Escrow/additional escrow payments
007 Good Faith Estimate (GFE)
008 Disclosure/final disclosure
009 Initial deposit

010 Prepaid interest
011 Fees/costs (unspecified)
012 Taxes (unspecified)
013 Insurance (unspecified)
014 Title search/service/insurance
050 Other

997 Nothing
998 Don't know

Q40 Looking only at the final disclosures, when is the principal and interest payment first scheduled to change?

001 5/1/2018
002 6/1/2018
003 5/1/2020
004 6/1/2023
005 Year four
006 Year six
007 Year eight
008 Year eleven
009 Five years

010 Seven years
011 Three years
012 Never/doesn't change
013 5/1/2016
014 6/1/2020
050 Other

997 Nothing
998 Don't know

## Q42 Do you have any comments about the final loan terms and costs?

() Confusion (Net)

001 Confusing
002 Don't understand it
024 Initially confusing/confusing at first
030 Too confusing
034 Other confusion comments

003 I would ask questions
004 Simplify the information/a lot to absorb on one page

005 Why the changes between application and closing?

006 It's more than estimated/originally projected

007 Full disclosure of costs of the loan should be revealed before the closing date

008 Both the estimate and the final disclosure were the same

009 Don't like increase in interest rate
010 Don't understand why the interest rate changes

011 Interest charges over the course of the loan are too high

012 Cost at closing exceeded allowable limits
013 Dislike/don't understand changes in escrow

014 Too complicated
015 Are from a different lender/why did you switch banks?

016 Wouldn't be happy/dissatisfied with loan/ would walk out

017 HOA wasn't included originally/homeowners association fees not made clear

018 Homeowner's insurance unclear/ inaccurate/not on application

019 Don't like/understand why settlement/ closing charges changed

020 Don't like/understand why total of payment changed

021 Don't like/understand why monthly payment amount changed

022 Would feel swindled/have gotten the "bait \& switch"

023 Don't like/understand why property taxes changed

025 Changed to Negative Amortization (Neg Am) loan/Loan amount can now increase

026 Changed to Interest Only loan
027 Loan Terms changed
028 Settlement/closing charges Changed
029 Other Changes
031 Other loan related comments
032 Other transaction related comments
033 Form related comments
050 Other
051 Not enough time to read/respond

997 Nothing
998 Don't know


Table 8. Percentage of Respondents
Answering Correctly with Current and Proposed Disclosures - Grouped by Task

## APPENDIX H. TABLE 8. Percentage of Respondents Answering Correctly with Current and Proposed Disclosures - Grouped by Task

|  | Current Forms ( $\mathrm{N}=428$ ) | Proposed Forms ( $\mathrm{N}=430$ ) | Difference |
| :---: | :---: | :---: | :---: |
| TASK 2: Comparison of Initial Disclosures (PART 2) |  |  |  |
| Amount Borrowed - Q3 | 32.5\% | 81.4\% | 48.9\%* |
| Interest Rate Year 1 - Q4 | 81.3\% | 87.4\% | 6.1\%* |
| Points Paid - Q5 | 55.8\% | 62.8\% | 7.0\%* |
| Escrow Account - Q6 | 80.4\% | 94.4\% | 14.0\%* |
| Annual Percentage Rate (APR) - Q7 | 83.2\% | 87.7\% | 4.5\% |
| Total Monthly Payment - Q8 | 49.5\% | 86.3\% | 36.8\%* |
| Change in Total Monthly Payment - Q9** | 39.0\% | 77.9\% | 38.9\%* |
| Highest Total Monthly <br> Payment - Q10** | 36.9\% | 73.0\% | 36.1\%* |
| Average for 8 Questions | 57.3\% | 81.4\% | 24.1\%* |
| Average for 6 "Non-Skippable" Questions | 63.8\% | 83.3\% | 19.5\%* |
| TASK 3: Questions on Initial Disclosure (PART 3) |  |  |  |
| Loan Amount - Q11 | 60.5\% | 99.1\% | 38.6\%* |
| Interest Rate Year 1 - Q12 | 92.1\% | 96.7\% | 4.6\%* |
| Interest Rate Change - Q13 | 92.8\% | 93.3\% | 0.5\% |
| Timing of Interest Rate Change - Q14** | 80.6\% | 90.0\% | 9.4\%* |
| Principal \& Interest Payment Change - Q15 | 90.4\% | 89.3\% | -1.1\% |
| Closing Costs/Settlement Charges - Q16 | 86.2\% | 46.3\% | -39.9\%* |
| Closing Costs/Settlement Charges Items - Q17 | 90.3\% | 86.5\% | -3.8\% |
| First Monthly Payment - Q18 | 43.7\% | 64.7\% | 21.0\%* |
| Closing/Settlement Services Can Shop For - Q19 | 62.8\% | 92.9\% | 30.1\%* |
| Final Payment Timing - Q20 | 93.2\% | 94.9\% | 1.7\% |
| Escrow Fund - Q21 | 83.4\% | 79.5\% | -3.9\% |
| Refinance Cost - Q22 | 53.3\% | 54.9\% | 1.6\% |
| Annual Percentage Rate (APR) - Q23 | 65.7\% | 79.5\% | 13.8\%* |
| Principal Paid Off In 5 Years - Q24 | 59.1\% | 78.6\% | 19.5\%* |
| Mortgage Insurance - Q25 | 63.1\% | 77.0\% | 13.9\%* |
| Mortgage Insurance - Q26** | 2.3\% | 65.1\% | 62.8\%* |
| Average for 16 Questions | 70.0\% | 80.5\% | 10.5\%* |
| Average for 14 "Non-Skippable" Questions | 74.0\% | 80.9\% | 6.9\%* |


|  | Current Forms <br> (N=428) | Proposed Forms <br> (N=430) | Difference |
| :--- | :---: | :---: | :---: |
| TASK 4: Comparison of Initial and Final Disclosures (PART 4) |  |  |  |
| Loan Amount at Closing/ <br> Settlement - Q28 | $50.9 \%$ | $82.8 \%$ | $31.9 \%^{*}$ |
| Reason for Loan Amount <br> Change - Q29** | $29.4 \%$ | $62.6 \%$ | $33.2 \%^{*}$ |
| Interest Rate in Year 1 - Q30 | $81.8 \%$ | $87.2 \%$ | $5.4 \%^{*}$ |
| Reason for Different Interest <br> Rates - Q31** | $62.6 \%$ | $65.1 \%$ | $2.5 \%$ |
| Closing Costs/Settlement <br> Charges - Q32 | $77.6 \%$ | $94.0 \%$ | $16.4 \%^{*}$ |
| One Different Closing Cost/ <br> Settlement Charge - Q33** | $47.0 \%$ | $47.9 \%$ | $0.9 \%$ |
| Escrow Account - Q34 | $36.0 \%$ | $52.1 \%$ | $16.1 \%^{*}$ |
| One Different Escrow Item - Q35** | $54.0 \%$ | $60.0 \%$ | $6.0 \%$ |
| Average for 8 Questions | $54.9 \%$ | $69.0 \%$ | $14.1 \%^{*}$ |
| Average for 4 "Non-Skippable" | $61.6 \%$ | $79.0 \%$ | $17.4 \%^{*}$ |
| Questions |  |  |  |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed forms. (2) A Student's t-test of significance (two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) A ** marks a skippable question.

H-4


Table 9. Percentage of Respondents
Answering Correctly with Current and Proposed Disclosures - Grouped by Concept

APPENDIX I. TABLE 9. Percentage of Respondents Answering Correctly with Current and Proposed Disclosures - Grouped by Concept

|  | Current Forms <br> $(\mathbf{N}=428)$ | Proposed Forms <br> $(\mathbf{N}=430)$ | Difference |
| :--- | :---: | :---: | :---: |
| CONCEPT 1: Amortization |  |  |  |
| Final Payment Timing - Q20 | $93.2 \%$ | $94.9 \%$ | $1.7 \%$ |
| Refinance Cost - Q22 | $53.3 \%$ | $54.9 \%$ | $1.6 \%$ |
| Principal Paid Off in 5 Years - Q24 | $68.1 \%$ | $78.6 \%$ | $19.5 \%^{\star}$ |
| Average for 3 Questions | $76.1 \%$ | $7.6 \% *$ |  |

CONCEPT 2: Annual Percentage Rate

| APR - Q7 | $83.2 \%$ | $87.7 \%$ | $4.5 \%$ |
| :--- | :---: | :---: | :---: |
| APR - Q23 | $65.7 \%$ | $79.5 \%$ | $13.8 \%$ * |
| Average for 2 Questions | $74.4 \%$ | $83.6 \%$ | $9.2 \% *$ |

CONCEPT 3: Closing Costs/Settlement Charges

| Points Paid - Q5 | $55.8 \%$ | $62.8 \%$ | $7.0 \%^{*}$ |
| :--- | :---: | :---: | :---: |
| Closing Costs/Settlement <br> Charges - Q16 | $86.2 \%$ | $46.3 \%$ | $-39.9 \%^{*}$ |
| Closing Cost/Settlement Charges <br> Items - Q17 | $90.3 \%$ | $86.5 \%$ | $-3.8 \%$ |
| Closing/Settlement Services Can <br> Shop For - Q19 | $62.8 \%$ | $92.9 \%$ | $30.1 \%^{*}$ |
| Closing Costs/Settlement <br> Charges - Q32 | $77.6 \%$ | $94.0 \%$ | $16.4 \%^{\star}$ |
| One Different Closing Costs/ <br> Settlement Charge - Q33** | $47.0 \%$ | $47.9 \%$ | $0.9 \%$ |
| Cash Needed for Closing/ <br> Settlement - Q36 | $45.8 \%$ | $80.2 \%$ | $34.4 \%^{\star}$ |
| Average for 7 Questions | $66.5 \%$ | $72.9 \%$ | $6.4 \%^{\star}$ |
| Average for 6 "Non-Skippable" <br> Questions | $69.8 \%$ | $77.1 \%$ | $7.3 \%^{\star}$ |


| CONCEPT 4: Escrow Account | $80.4 \%$ | $94.4 \%$ | $14.0 \%^{\star}$ |
| :--- | :---: | :---: | :---: |
| Escrow Account - Q6 | $83.4 \%$ | $79.5 \%$ | $-3.9 \%$ |
| Escrow Fund - Q21 | $36.0 \%$ | $52.1 \%$ | $16.1 \%^{*}$ |
| Escrow Account - Q34 | $54.0 \%$ | $60.0 \%$ | $6.0 \%$ |
| One Different Escrow Item - Q35** | $63.4 \%$ | $71.5 \%$ | $8.1 \%^{*}$ |
| Average for 4 Questions | $66.6 \%$ | $75.4 \%$ | $8.8 \%^{*}$ |
| Average for 3 "Non-Skippable" <br> Questions |  |  |  |


|  | Current Forms $(\mathrm{N}=428)$ | $\begin{aligned} & \text { Proposed Forms } \\ & \qquad(\mathrm{N}=430) \end{aligned}$ | Difference |
| :---: | :---: | :---: | :---: |
| CONCEPT 5: Interest Rate |  |  |  |
| Interest Rate Year 1 - Q4 | 81.3\% | 87.4\% | 6.1\%* |
| Interest Rate Year 1 - Q12 | 92.1\% | 96.7\% | 4.6\%* |
| Interest Rate Change - Q13 | 92.8\% | 93.3\% | 0.5\% |
| Timing of Interest Rate Change - Q14** | 80.6\% | 90.0\% | 9.4\%* |
| Interest Rate in Year 1 - Q30 | 81.8\% | 87.2\% | 5.4\%* |
| Reason for Different Interest Rates - Q31** | 62.6\% | 65.1\% | 2.5\% |
| Average for 6 Questions | 81.9\% | 86.6\% | 4.7\%* |
| Average for 4 "Non-Skippable" Questions | 87.0\% | 91.2\% | 4.2\%* |
| CONCEPT 6: Loan Amount |  |  |  |
| Amount Borrowed-Q3 | 32.5\% | 81.4\% | 48.9\%* |
| Loan Amount - Q11 | 60.5\% | 99.1\% | 38.6\%* |
| Loan Amount - Q27 | 43.9\% | 86.7\% | 42.8\%* |
| Loan Amount at Closing/ <br> Settlement - Q28 | 50.9\% | 82.8\% | 31.9\%* |
| Reason for Loan Amount Change - Q29** | 29.4\% | 62.6\% | 33.2\%* |
| Loan Amount Increase After Closing/Settlement - Q37 | 49.3\% | 65.1\% | 15.8\%* |
| Average for 6 Questions | 44.4\% | 79.6\% | 35.2\%* |
| Average for 5 "Non-Skippable" Questions | 47.4\% | 83.0\% | 35.6\%* |
| CONCEPT 7: Monthly Payments |  |  |  |
| Total Monthly Payment - Q8 | 49.5\% | 86.3\% | 36.8\%* |
| Change in Total Monthly Payment - Q9** | 39.0\% | 77.9\% | 38.9\%* |
| Highest Total Monthly Payment - Q10** | 36.9\% | 73.0\% | 36.1\%* |
| Principal \& Interest Payment Change - Q15 | 90.4\% | 89.3\% | -1.1\% |
| First Monthly Payment - Q18 | 43.7\% | 64.7\% | 21.0\%* |
| Highest Monthly Principal \& Interest Payment - Q38 | 14.5\% | 43.0\% | 28.5\%* |
| Monthly Principal \& Interest Payment Change - Q39 | 50.2\% | 74.0\% | 23.8\%* |
| First Monthly Principal \& Interest Payment Change - Q40** | 46.3\% | 67.9\% | 21.6\%* |
| Principal \& Interest Payment Change Frequency - Q41** | 44.6\% | 62.3\% | 17.7\%* |
| Average for 9 Questions | 46.1\% | 70.9\% | 24.8\%* |
| Average for 5 "Non-Skippable" Questions | 49.7\% | 71.4\% | 21.7\%* |

## APPENDIX I. TABLE 9. continued

|  |  | Current Forms $(\mathrm{N}=428)$ | Proposed Forms ( $\mathrm{N}=430$ ) | Difference |
| :---: | :---: | :---: | :---: | :---: |
|  | CONCEPT 8: Mortgage Insurance |  |  |  |
|  | Mortgage Insurance - Q25 |  |  | 63.1\% |
|  | Mortgage Insurance - Q26** |  |  | 2.3\% |
|  | Average for 2 Questions |  |  | 32.7\% |
|  | CONCEPT 9: Risk Factors |  |  |  |
|  | Interest Rate Change - Q13 | 92.8\% | 93.3\% | 0.5\% |
|  | Principal \& Interest Payment Change - Q15 | 90.4\% | 89.3\% | -1.1\% |
|  | Escrow Fund - Q21 | 83.4\% | 79.5\% | -3.9\% |
|  | Refinance Cost - Q22 | 53.3\% | 54.9\% | 1.6\% |
| $\underset{\sim}{\text { ¢ }}$ | Principal Paid Off In 5 Years - Q24 | 59.1\% | 78.6\% | 19.5\% |
| $\xrightarrow{0}$ | Loan Amount Increase After Closing - Q37 | 49.3\% | 65.1\% | 15.8\% |
| $\bigcirc$ | Monthly Principal \& Interest Payment Change - Q39 | 50.2\% | 74.0\% | 23.8\% |
| ¢ | Average for 7 Questions | 68.4\% | 76.4\% | 8.0\% |

Notes: (1) Figures in parentheses in the title are the number of respondents exposed to the current/proposed forms. (2) A Student's t-test of significance (Two-tailed) was used to test for differences in proportions (for individual questions) as well as for differences in averages, with * indicating significance at the five percent level. (3) A ** marks a skippable question.


## Current Easier Fixed A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Maple Bank and Name Set 2 used Aspen Bank.

# Truth-In-Lending Disclosure Statement 

| Lender: Maple Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :---: |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | ख Preliminary | $\square$ Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{4 . 2 7 4 \%}$ | $\mathbf{\$ 1 2 0 , 7 0 0 . 8 7}$ | $\$ 160,129.40$ | $\$ 355,037.07$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

| Interest Rate | Rate \& Monthly Payment |
| :--- | :---: |
| Principal and Interest | $3.875 \%$ |
| Est. Taxes + Insurance (Escrow) <br> $\bullet$ Includes Private Mortgage Insurance | $\$ 761.78$ |
| Total Est. Monthly Payment | $\$ 288.48$ |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dem | feature as follows: |
| $\square$ Variable Rate Feature: $\begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage ra | ces not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 85.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | $\square$ may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, Easier, Fixed, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | I want credit life and disability insurance. |
|  |  |  |  |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| $\mathbf{Q}$ may | $\square$ will not | have to pay a penalty. |
| $\square$ may | $\boxed{x}$ will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

| Name of Originator Maple Bank |  |
| :--- | :--- |
| Originator <br> Address | 4321 Random Boulevard <br> Somecity，ST 12340 |
| Originator Phone Number 123－456－7890 |  |
| Originator Email joesmith＠maplebank．com |  |


| Borrower John A．and Mary B． |
| :--- | :--- |
| Property  <br> Address Anytown，ST 12345 <br> Date of GFE $2 / 15 / 2013$ ${ }^{\text {Dewhere Avenue }}$ |


| Purpose | This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan． For more information，see HUD＇s Special Information Booklet on settlement charges，your Truth－in－Lending Disclosures，and other consumer information at www．hud．gov／respa．If you decide you would like to proceed with this loan，contact us． |
| :---: | :---: |
| Shopping for your loan | Only you can shop for the best loan for you．Compare this GFE with other loan offers，so you can find the best loan．Use the shopping chart on page 3 to compare all the offers you receive． |
| Important dates | 1．The interest rate for this GFE is available through 4／16／2013 5：00PM EDT $\square$ After this time，the interest rate，some of your loan Origination Charges，and the monthly payment shown below can change until you lock your interest rate． |
|  | 2．This estimate for all other settlement charges is available through 3／22／2013 5：00PM EDT |
|  | 3．After you lock your interest rate，you must go to settlement within 60 $\square$ days（your rate lock period）to receive the locked interest rate． |
|  | 4．You must lock the interest rate at least N／A days before settlement． |

Summary of
your loan

| Your initial loan amount is |
| :--- |
| Your loan term is |
| Your initial interest rate is |
| Your initial monthly amount owed for principal， <br> interest，and any mortgage insurance is |
| Can your interest rate rise？ |
| Even if you make payments on time，can your <br> loan balance rise？ |
| Even if you make payments on time，can your <br> monthly amount owed for principal，interest， <br> and any mortgage insurance rise？ |
| Does your loan have a prepayment penalty？ |
| Does your loan have a balloon payment？ |


| \＄162，000．00 |  |  |
| :---: | :---: | :---: |
| 30 | years |  |
| 3.875 | \％ |  |
| \＄ 844.13 | 3 per month |  |
| 区 No | Yes，it can rise to a maximum of The first change will be in | \％． |
| 区 No | $\square \mathrm{Yes}$ ，it can rise to a maximum of \＄ |  |
| 区 No | Yes，the first increase can be in and the monthly amount owed can rise to $\$$ ．The maximum it can ever rise to is \＄ |  |
| $\square \mathrm{No}$ | 区 Yes，your maximum prepayment penalty is $\$ 3,240.00$ |  |
| 囚 No | Yes，you have a balloon payment of \＄due in years． |  |

Escrow account information

Some lenders require an escrow account to hold funds for paying property taxes or other property－related charges in addition to your monthly amount owed of \＄844．13
Do we require you to have an escrow account for your loan？
$\square$ No，you do not have an escrow account．You must pay these charges directly when due．
$\sqrt{\bar{x}}$ Yes，you have an escrow account．It may or may not cover all of these charges．Ask us．
Summary of your settlement charges

| Your Adjusted Origination Charges（See page 2．） <br> Your Charges for All Other Settlement Services（See page 2．） |  |  | \＄1，802．00 |
| :---: | :---: | :---: | :---: |
|  |  |  | \＄6，250．84 |
| A |  | Total Estimated Settlement Charges | \＄8，052．84 |

Understanding
your estimated
settlement
charges

Some of these
charges can change at settlement See the top of page 3 for more information.


## Instructions

Understanding This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)

| These charges cannot increase at settlement: | The total of these charges can increase up to 10\% at settlement: | These charges can change at settlement: |
| :---: | :---: | :---: |
| - Our origination charge <br> - Your credit or charge (points) for the specific interest rate chosen (after you lock in your interest rate) <br> - Your adjusted origination charges (after you lock in your interest rate) <br> - Transfer taxes | - Required services that we select <br> - Title services and lender's title insurance (if we select them or you use companies we identify) <br> - Owner's title insurance (if you use companies we identify) <br> - Required services that you can shop for (if you use companies we identify) <br> - Government recording charges | - Required services that you can shop for (if you do not use companies we identify) <br> - Title services and lender's title insurance (if you do not use companies we identify) <br> - Owner's title insurance (if you do not use companies we identify) <br> - Initial deposit for your escrow account <br> - Daily interest charges <br> - Homeowner's insurance |

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate.
- If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower <br> settlement charges | The same loan with a <br> lower interest rate |
| :--- | :--- | :--- | :--- |
| Your initial loan amount | $\$ 162,000.00$ | $\$$ | $\%$ |
| Your initial interest rate ${ }^{1}$ | 3.875 | $\$ 844.13$ | $\$$ |
| Your initial monthly amount owed | No change | You will pay \$ <br> more every month | You will pay \$ <br> less every month |
| Change in the monthly amount owed from <br> this GFE | No change | Your settlement charges <br> will be reduced by <br> $\$$ | Your settlement charges <br> will increase by <br> $\$$ |
| Change in the amount you will pay at <br> settlement with this interest rate | $\$$ | $\$$ |  |
| How much your total estimated settlement <br> charges will be | $\$ 8,052.84$ | $\$$ |  |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| This loan |  | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Loan originator name |  |  |  |  |
| Initial loan amount |  |  |  |  |
| Loan term |  |  |  |  |
| Initial interest rate |  |  |  |  |
| Initial monthly amount owed |  |  |  |  |
| Rate lock period |  |  |  |  |
| Can interest rate rise? |  |  |  |  |
| Can loan balance rise? |  |  |  |  |
| Can monthly amount owed rise? |  |  |  |  |
| Prepayment penalty? |  |  |  |  |
| Balloon payment? |  |  |  |  |
| Total Estimated Settlement Charges |  |  |  |  | is sold in the future

# Truth-In-Lending Disclosure Statement 

| Lender: Maple Bank | Loan No. 123456789 | Date: $4 / 15 / 2013$ |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345  <br>  $\square$ Preliminary |  |
|  | 区 Final |  |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. <br> $\mathbf{4 . 1 7 4 \%}$ |
| :---: | :--- | :--- | :--- |
| $\$ \mathbf{\$ 1 1 8 , 8 3 0 . 2 7}$ | $\$ 162,000.00$ | $\$ 355,037.07$ |  |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

| Interest Rate | Rate \& Monthly Payment |
| :--- | :---: |
| Principal and Interest | $3.875 \%$ |
| Est. Taxes + Insurance (Escrow) <br> $\bullet$ Includes Private Mortgage Insurance | $\$ 761.78$ |
| Total Est. Monthly Payment | $\$ 288.48$ |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | d feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rate | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 85.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, Easier, Fixed, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { S want credit life and disability insurance. }}$ |


| Prepayment: | If you pay off your loan early, you |  |
| :---: | :---: | :---: |
| 囚 may | $\square$ will not | have to pay a penalty. |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$


Current HUD-1, Easier, Fixed, A, Name Set 1, page 2

| L. Settiement Charges |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 700. Total Real Estate Broker Fees \$11,400.00 |  |  | Paid From Borrower's Funds at Settlement | Paid From Seller's Funds at Settlement |
| Division of commission (line 700) as follows : |  |  |  |  |
| 701. \$5,700.00 to Alpha Real Estate Broker |  |  |  |  |
| 702. \$ 5,700.00 to Omega Real Estate Broker |  |  |  |  |
| 703. Commission paid at settlement |  |  |  | \$1,400.00 |
| 704. Deposit retained by Alpha Real Estate Broker \$10,000.00 |  |  |  |  |
| 800. Items Payable in Connection with Loan |  |  |  |  |
| 801. Our origination charge | \$ 1,397.00 | (from GFE \#1) |  |  |
| 802. Your credit or charge (points) for the specific interest rate chosen | \$ 405.00 | (from GFE \#2) |  |  |
| 803. Your adjusted origination charges |  | (from GFE \#A) | \$1,802.00 |  |
| 804. Appraisal fee to John Smith Appraisers, Inc. |  | (from GFE \#3) | \$405.00 |  |
| 805. Credit report to Information Inc. (POC \$29.80 Borrower) |  | (from GFE \#3) |  |  |
| 806. Tax service to Info Co. |  | (from GFE \#3) | \$80.00 |  |
| 807. Flood certification to Info Co. |  | (from GFE \#3) | \$20.00 |  |
| 808. Flood Monitoring Fee to Info Co. |  |  | \$31.75 |  |
| 809. Tax Monitoring Fee to Info Co. |  |  | \$75.00 |  |
| 810. |  |  |  |  |
| 811. |  |  |  |  |
| 900. Items Required by Lender to be Paid in Advance |  |  |  |  |
| 901. Daily interest charges from 4/15/2013 to 5/01/2013 @ \$ 17.44 /day |  | (from GFE \#10) | \$279.04 |  |
| 902. Mortgage insurance premium for months to |  | (from GFE \#3) |  |  |
| 903. Homeowner's insurance for 1 years to Insurance Co. |  | (from GFE \#11) | \$1,209.96 |  |
| 904. Property Taxes 6 months to Any County USA |  |  | \$631.80 |  |
| 1000. Reserves Deposited with Lender |  |  |  |  |
| 1001. Initial deposit for your escrow account |  | (from GFE \#9) | \$412.25 |  |
| 1002. Homeowner's insurance 2 months @ \$ 100.83 per month | \$ 201.66 |  |  |  |
| 1003. Mortgage insurance months @ \$ per month | \$ |  |  |  |
| 1004. Property Taxes 2 months @ \$ 105.30 per month | \$ 210.60 |  |  |  |
| 1005.0 months @ \$ per month | \$ |  |  |  |
| 1006. months @ \$ per month | \$ |  |  |  |
| 1007. Aggregate Adjustment | -\$ 0.01 |  |  |  |
| 1100. Title Charges |  |  |  |  |
| 1101. Title services and lender's title insurance |  | (from GFE \#4) | \$2,450.00 |  |
| 1102. Settlement or closing fee | \$ |  |  |  |
| 1103. Owner's title insurance |  | (from GFE \#5) | \$1,000.00 |  |
| 1104. Lender's title insurance | \$ 500.00 |  |  |  |
| 1105. Lender's title policy limit \$ 162,000.00 |  |  |  |  |
| 1106. Owner's title policy limit \$ 180,000.00 |  |  |  |  |
| 1107. Agent's portion of the total title insurance premium to Epsilon Title Co. | \$ 1,200.00 |  |  |  |
| 1108. Underwriter's portion of the total title insurance premium to Underwriter Inc. | \$ 300.00 |  |  |  |
| 1109. |  |  |  |  |
| 1110. |  |  |  |  |
| 1111. |  |  |  |  |
| 1200. Government Recording and Transfer Charges |  |  |  |  |
| 1201. Government recording charges |  | (from GFE \#7) | \$85.00 |  |
| 1202. Deed \$ 40.00 Mortgage \$ 45.00 Release \$ |  |  |  |  |
| 1203. Transfer taxes |  | (from GFE \#8) |  |  |
| 1204. City/County tax/stamps Deed \$ Mortgage \$ |  |  |  | \$950.00 |
| 1205. State tax/stamps Deed \$ Mortgage \$ |  |  |  |  |
| 1206. |  |  |  |  |
| 1300. Additional Settlement Charges |  |  |  |  |
| 1301. Required services that you can shop for |  | (from GFE \#6) | \$205.50 |  |
| 1302. Pest Inspection Fee to Pests Co. \$ 120.50 |  |  |  |  |
| 1303. Survey Fee to Surveys Co. \$85.00 |  |  |  |  |
| 1304. Home Inspection Fee to Engineers Inc. (POC $\$ 750.00$ Seller) |  |  | \$750.00 |  |
| 1305. Home Warranty Fee to XYZ Warranty Inc. |  |  |  | \$450.00 |
| 1400. Total Settlement Charges (enter on lines 103, Section J and 502, Section K) |  |  | \$9,437.30 | \$2,800.00 |

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$1,397.00 \& \$1,397.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& \$405.00 \& \$405.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$1,802.00 \& \$1,802.00 \\
\hline Transfer taxes \& \# 1203 \& \$0.00 \& \$0.00 \\
\hline \multicolumn{2}{|l|}{Charges That In Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline \multicolumn{2}{|l|}{Government recording charges \#1201} \& \$85.00 \& \$85.00 \\
\hline \multicolumn{2}{|l|}{Appraisal Fee \#802} \& \$405.00 \& \$405.00 \\
\hline \multicolumn{2}{|l|}{Credit Report Fee \#805} \& \$30.00 \& \$29.80 \\
\hline \multicolumn{2}{|l|}{Flood certification/Monitoring \# 807/808} \& \$52.00 \& \$51.75 \\
\hline \multicolumn{2}{|l|}{Tax service/Monitoring \# 806/809} \& \$185.00 \& \$155.00 \\
\hline \multicolumn{2}{|r|}{\#} \& \& \\
\hline \multicolumn{2}{|r|}{\#} \& \& \\
\hline \multicolumn{2}{|r|}{\#} \& \& \\
\hline \& Total \& \$757.00 \& \$726.55 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \& \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$412.26 \& \$412.25 \\
\hline Daily interest charges \$ 17.44 /day \& \# 901 \& \$261.60 \& \$279.04 \\
\hline Homeowner's insurance \& \# 903 \& \$604.98 \& \$1,209.96 \\
\hline Pest Inspection Fee \& \# 1302 \& \$135.00 \& \$120.50 \\
\hline Survey Fee \& \# 1303 \& \$65.00 \& \$85.00 \\
\hline Title services/Owner's Title Insurance \& \# 1101/1103 \& \$4,015.00 \& \$3,450.00 \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 162,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{3.875 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ 844.13 includes
Principal
Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\)
\(\square\) Yes, it can rise to a maximum of \\
\(\%\). The first change will be on and can change again every
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{\(\pm\) No Yes, it can rise to a maximum of \$} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\(x\) No \(\square\) Yes, the first increase can be on and the monthly amount owed can rise to \$ . The maximum it can ever rise to is \(\$\)} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(\square\) No X Yes, your maximum prepayment penalty is \$ 3,240.00} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{\(\square\) No \(\square\) Yes, you have a balloon payment of \$} \& due in years \\
\hline Total monthly amount owed including escrow account payments \& \multicolumn{3}{|l|}{\begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself. \\
X You have an additional monthly escrow payment of \(\$ 206.13\) \\
that results in a total initial monthly amount owed of \$ \\
principal, interest, any mortagage insurance and any items checked below:
Property taxes Homeowner's insurance
Flood insurance 

\end{tabular}} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



## Current Easier Fixed B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Nandina Bank and Name Set 2 used Balsam Bank.

## Truth-In-Lending Disclosure Statement

| Lender: Nandina Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | ख Preliminary | $\square$ Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :--- | :--- | :--- | :--- |
| $\mathbf{4 . 5 8 1 \%}$ | $\mathbf{\$ 1 3 2 , 1 0 3 . 6 4}$ | $\$ 161,713.05$ | $\$ 372,043.80$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

| Interest Rate | Rate \& Monthly Payment |
| :--- | :---: |
| Principal and Interest | $4.25 \%$ |
| Est. Taxes + Insurance (Escrow) <br> $\bullet$ Includes Private Mortgage Insurance | $\$ 796.94$ |
| Total Est. Monthly Payment | $\$ 299.65$ |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a demand | d feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | e-rate feature. Disclosures about the variable-rate feature you earlier. |
| $\square$ Required Deposit: The annual percentage rate | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 97.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, Easier, Fixed, B, Name Set 1, page 2

## You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such

 carrier meets the requirements of the Lender.If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | Signature |

Prepayment: If you pay off your loan early, you

| $\square$ may | ® will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

Understanding
your estimated
settlement
charges

Some of these
charges can change at settlement See the top of page 3 for more information.


## Instructions

Understanding which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan is sold in the future

This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)

| These charges cannot increase at settlement: | The total of these charges can increase up to $10 \%$ at settlement: | These charges can change at settlement: |
| :---: | :---: | :---: |
| - Our origination charge <br> - Your credit or charge (points) for the specific interest rate chosen (after you lock in your interest rate) <br> - Your adjusted origination charges (after you lock in your interest rate) <br> - Transfer taxes | - Required services that we select <br> - Title services and lender's title insurance (if we select them or you use companies we identify) <br> - Owner's title insurance (if you use companies we identify) <br> - Required services that you can shop for (if you use companies we identify) <br> - Government recording charges | - Required services that you can shop for (if you do not use companies we identify) <br> - Title services and lender's title insurance (if you do not use companies we identify) <br> - Owner's title insurance (if you do not use companies we identify) <br> - Initial deposit for your escrow account <br> - Daily interest charges <br> - Homeowner's insurance |

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate.
- If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower settlement charges | The same loan with a lower interest rate |
| :---: | :---: | :---: | :---: |
| Your initial loan amount | \$ 162,000.00 | \$ | \$ |
| Your initial interest rate ${ }^{1}$ | 4.25 \% | \% | \% |
| Your initial monthly amount owed | \$ 879.29 | \$ | \$ |
| Change in the monthly amount owed from this GFE | No change | You will pay \$ more every month | You will pay \$ less every month |
| Change in the amount you will pay at settlement with this interest rate | No change | Your settlement charges will be reduced by \$ | Your settlement charges will increase by \$ |
| How much your total estimated settlement charges will be | $\$_{4,735.55}$ | \$ | \$ |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| This loan |  | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Loan originator name |  |  |  |  |
| Initial loan amount |  |  |  |  |
| Loan term |  |  |  |  |
| Initial interest rate |  |  |  |  |
| Initial monthly amount owed |  |  |  |  |
| Rate lock period |  |  |  |  |
| Can interest rate rise? |  |  |  |  |
| Can loan balance rise? |  |  |  |  |
| Can monthly amount owed rise? |  |  |  |  |
| Prepayment penalty? |  |  |  |  |
| Balloon payment? |  |  |  |  |
| Total Estimated Settlement Charges |  |  |  |  |

Some lenders may sell your loan after settlement. Any fees lenders receive in the future cannot change the loan you receive or the charges you paid at settlement.

## Current Final TIL, Easier, Fixed, B, Name Set 1, page 1

## Truth-In-Lending Disclosure Statement

| Lender: Nandina Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a yearly rate. 4.835\% | Finance Charge <br> The dollar amount the credit will cost you assuming the annual percentage rate does not change. \$140,740.27 | Amount Financed <br> The amount of credit provided to you or on your behalf as of loan closing. $\$ 161,676.00$ | Total of Payments <br> The amount you will have paid after you have made all payments as scheduled assuming the annual percentage rate does not change. <br> $\$ 434,644.27$ |
| :---: | :---: | :---: | :---: |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square \quad$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

| Interest Rate | Rate \& Monthly Payment |
| :--- | :---: |
| Principal and Interest | $4.50 \%$ |
| Est. Taxes + Insurance (Escrow) <br> $\bullet$ Includes Private Mortgage Insurance | $\$ 820.83$ |
| Total Est. Monthly Payment | $\$ 449.65$ |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dem | d feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rate | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 85.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | $\square$ may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, Easier, Fixed, B, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
| Credit Disability |  |  |  |
|  |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { Signature }}$ |

Prepayment: If you pay off your loan early, you

| $\square$ may | ख will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. | Date |
| :--- | :--- |
| Borrower: Mary B. | Date |



Current HUD-1, Easier, Fixed, B, Name Set 1, page 2


| Previous edition are obsolete | Page 2 of 3 | HUD-1 |
| :--- | :---: | :---: |


| Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges |  |
| :--- | :--- |
| Charges That Cannot Increase | HUD-1 Line Number |
| Our origination charge | $\# 801$ |
| Your credit or charge (points) for the specific interest rate chosen | $\# 802$ |
| Your adjusted origination charges | $\# 803$ |
| Transfer taxes | $\# 1203$ |


| Good Faith Estimate | HUD-1 |
| :---: | :---: |
|  |  |
| $\$ 500.00$ | $\$ 500.00$ |
| $-\$ 500.00$ | $\$ 0.00$ |
| $\$ 0.00$ | $\$ 500.00$ |
| $\$ 0.00$ | $\$ 0.00$ |


| Charges That In Total Cannot Increase More Than 10\% |  |
| :--- | :--- |
| Government recording charges | $\#$ 1201 |
| Appraisal Fee | $\# 802$ |
| Credit report | $\# 805$ |
| Flood certification | $\# 807$ |
| Tax service | $\# 806$ |
| Title services | $\# 1101$ |
| Owner's Title Insurance | $\# 1103$ |
| Survey Fee | $\# 1302$ |
|  |  |
|  | Increase between GFE and HUD-1 Charges |


| Good Faith Estimate | HUD-1 |
| :---: | :---: |
| $\$ 97.00$ | $\$ 85.00$ |
| $\$ 325.00$ | $\$ 325.00$ |
| $\$ 24.00$ | $\$ 24.00$ |
| $\$ 36.00$ | $\$ 36.00$ |
| $\$ 150.00$ | $\$ 150.00$ |
| $\$ 1,680.00$ | $\$ 1,680.00$ |
| $\$ 800.00$ | $\$ 824.00$ |
| $\$ 120.00$ | $\$ 120.00$ |
| $\$ 3,232.00$ | $\$ 3,244.00$ |
| $\$ 12$ | or |


| Charges That Can Change |  |
| :--- | :--- |
| Initial deposit for your escrow account | \# 1001 |
| Daily interest charges | $\$ 20.25$ |
| Homeowner's insurance | Iday |
| Pest Inspection Fee to Pests Co. | $\#$ 901 |
|  | $\# 903$ |
|  | $\# 1302$ |
|  | $\#$ |


| Good Faith Estimate | HUD-1 |
| :---: | :---: |
| $\$ 434.60$ | $\$ 734.59$ |
| $\$ 286.95$ | $\$ 324.00$ |
| $\$ 672.00$ | $\$ 1,344.00$ |
| $\$ 110.00$ | $\$ 94.00$ |
|  |  |
|  |  |

\begin{tabular}{|c|c|}
\hline \multicolumn{2}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \$ 162,000.00 \\
\hline Your loan term is \& 30 years \\
\hline Your initial interest rate is \& 4.50 \% \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \$ 903.18 includes
Principal
Interest
Mortgage Insurance \\
\hline Can your interest rate rise? \& \(\boxed{X}\) No Yes, it can rise to a maximum of
\begin{tabular}{l} 
and can change again every
\end{tabular}\(\quad\) \%. The first change will be on
interest rate can increase or decrease by
guaranteed to never be lower than \(\quad\)\begin{tabular}{l} 
\%. Over the life of the loan, your interest rate is \\
\% or higher than
\end{tabular} \\
\hline Even if you make payments on time, can your loan balance rise? \& \(\square\) No \(\square\) Yes, it can rise to a maximum of \$ \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \begin{tabular}{l}
\(\square\) No \(\square\) Yes, the first increase can be on \\
and the monthly amount owed can rise to \$ . The maximum it can ever rise to is \$
\end{tabular} \\
\hline Does your loan have a prepayment penalty? \& \(\triangle\) No \(\square\) Yes, your maximum prepayment penalty is \$ \\
\hline Does your loan have a balloon payment? \& \(\boldsymbol{X}\) No Yes, you have a balloon payment of \(\$\) due in years \\
\hline Total monthly amount owed including escrow account payments \& \begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself.
You have an additional monthly escrow payment of \(\$ 367.30\) \\
that results in a total initial monthly amount owed of \$ principal, interest, any mortagage insurance and any items checked below:
Property taxes Homeowner's insurance
Flood insurance \(\square\) Homeowner's Association

\end{tabular} <br>

\hline
\end{tabular}

Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.

| Previous edition are obsolete Page 3 of 3 | HUD-1 |
| :--- | :--- | :--- |



Current More Challenging Fixed A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Oak Bank and Name Set 2 used Cottonwood Bank.

# Truth-In-Lending Disclosure Statement 

| Lender: Oak Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :---: |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | ख Preliminary | $\square$ Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. <br> $\$ 731,910.60$ |
| :---: | :--- | :--- | :--- |
| $\mathbf{4 . 7 1 3 \%}$ | $\mathbf{\$ 2 6 1 , 5 7 0 . 9 5}$ | $\$ 309,959.65$ |  |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square \quad$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

| Interest Rate | Rate \& Monthly Payment |
| :--- | :---: |
| Principal and Interest | $4.250 \%$ |
| Est. Taxes + Insurance (Escrow) <br> $\bullet$ Includes Private Mortgage Insurance | $\$ 1,549.61$ |
| Total Est. Monthly Payment | $\$ 608.25$ |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dem | feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rate | ces not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 150.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, More Challenging, Fixed, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | $\boxed{\text { Signature }}$ |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\boxed{\text { Signature }}$ |
|  |  |  |  |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| ख may | $\square$ will not | have to pay a penalty. |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

| Name of Originator Oak Bank |  |
| :--- | :--- |
| Originator <br> Address | 4321 Random Boulevard <br> Somecity, ST 12340 |
| Originator Phone Number 123-456-7890 |  |
| Originator Email joesmith@oakbank.com |  |


| Borrower John A. and Mary B. |
| :--- | :--- |
| Property 456 Somewhere Avenue <br> Address Anytown, ST 12345 <br> Date of GFE 2/15/2013  |

This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan. For more information, see HUD's Special Information Booklet on settlement charges, your Truth-in-Lending Disclosures, and other consumer information at www.hud.gov/respa. If you decide you would like to proceed with this loan, contact us.

Shopping for Only you can shop for the best loan for you. Compare this GFE with other loan offers, so you can find the best your loan Important dates loan. Use the shopping chart on page 3 to compare all the offers you receive.

| Purpose | This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan. <br> For more information, see HUD's Special Information Booklet on settlement charges, your Truth-in-Lending <br> Disclosures, and other consumer information at www.hud.gov/respa. If you decide you would like to proceed <br> with this loan, contact us. |
| :--- | :--- |
| Shopping for | Only you can shop for the best loan for you. Compare this GFE with other loan offers, so you can find the best <br> loan. Use the shopping chart on page 3 to compare all the offers you receive. |
|  | 1. The interest rate for this GFE is available through 4/16/2013 5:00PM EDT <br> rate, some of your loan Origination Charges, and the monthly payment shown below can change until you <br> lock your interest rate. |
| 2. This estimate for all other settlement charges is available through $3 / 22 / 2013$ 5:00PM EDT |  |
| 3. After you lock your interest rate, you must go to settlement within 60 |  |
| period) to receive the locked interest rate. |  |

Summary of
your loan

| Your initial loan amount is |
| :--- |
| Your loan term is |
| Your initial interest rate is |
| Your initial monthly amount owed for principal, <br> interest, and any mortgage insurance is <br> Can your interest rate rise? <br> Even if you make payments on time, can your <br> loan balance rise? <br> Even if you make payments on time, can your <br> monthly amount owed for principal, interest, <br> and any mortgage insurance rise? <br> Does your loan have a prepayment penalty? <br> Does your loan have a balloon payment? |



Escrow account information

Some lenders require an escrow account to hold funds for paying property taxes or other property-related charges in addition to your monthly amount owed of \$ 1,712.36
Do we require you to have an escrow account for your loan?
$\square$ No, you do not have an escrow account. You must pay these charges directly when due.
$\boxed{\boxed{X}}$ Yes, you have an escrow account. It may or may not cover all of these charges. Ask us.
Summary of your settlement charges
Understanding
your estimated
settlement

Some of these
charges can change at settlement. See the top of page 3 for more information.


## Instructions

Understanding This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)

| These charges cannot increase at settlement: | The total of these charges can increase up to 10\% at settlement: | These charges can change at settlement: |
| :---: | :---: | :---: |
| - Our origination charge <br> - Your credit or charge (points) for the specific interest rate chosen (after you lock in your interest rate) <br> - Your adjusted origination charges (after you lock in your interest rate) <br> - Transfer taxes | - Required services that we select <br> - Title services and lender's title insurance (if we select them or you use companies we identify) <br> - Owner's title insurance (if you use companies we identify) <br> - Required services that you can shop for (if you use companies we identify) <br> - Government recording charges | - Required services that you can shop for (if you do not use companies we identify) <br> - Title services and lender's title insurance (if you do not use companies we identify) <br> - Owner's title insurance (if you do not use companies we identify) <br> - Initial deposit for your escrow account <br> - Daily interest charges <br> - Homeowner's insurance |

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate.
- If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower <br> settlement charges | The same loan with a <br> lower interest rate |
| :--- | :--- | :--- | :--- |
| Your initial loan amount | $\$ 315,000.00$ | $\$$ | $\%$ |
| Your initial interest rate ${ }^{1}$ | 4.25 | $\%$ |  |
| Your initial monthly amount owed | $\$ 1,712.36$ | \% change | You will pay \$ <br> more every month |
| Change in the monthly amount owed from <br> this GFE | No | Your settlement charges <br> will be reduced by <br> $\$$ | Your settlement charges <br> less every month <br> will increase by <br> $\$$ |
| Change in the amount you will pay at <br> settlement with this interest rate | No change | $\$$ | $\$$ |
| How much your total estimated settlement <br> charges will be | $\$ 14,055.35$ | $\$$ |  |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| Loan originator name | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Initial loan amount | Oak Bank |  |  |  |
| Loan term | $\$ 315,000.00$ |  |  |  |
| Initial interest rate | 30 years |  |  |  |
| Initial monthly amount owed | $4.25 \%$ |  |  |  |
| Rate lock period | $\$ 1,712.36$ |  |  |  |
| Can interest rate rise? | 60 days |  |  |  |
| Can loan balance rise? | No |  |  |  |
| Can monthly amount owed rise? | No |  |  |  |
| Prepayment penalty? | No |  |  |  |
| Balloon payment? | Yes |  |  |  |
| Total Estimated Settlement Charges | No |  |  |  | is sold in the future

## Current Final TIL, More Challenging, Fixed, A, Name Set 1, page 1

# Truth-In-Lending Disclosure Statement 

| Lender: Oak Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{4 . 8 4 7 \%}$ | $\mathbf{\$ 3 1 8 , 9 4 7 . 5 4}$ | $\$ 310,247.96$ | $\$ 843,575.50$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | First Increase <br> $(6 / 1 / 2023)$ |  |
| :--- | :---: | :---: |
| Interest Rate | Rate \& Monthly Payment |  |


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | d feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rat | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 150.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | $\square$ may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, More Challenging, Fixed, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | $\boxed{\text { Signature }}$ |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  |  |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| $\square$ may | 区 will not | have to pay a penalty. |
| $\square$ may | x will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

Current HUD-1, More Challenging, Fixed, A, Name Set 1, page 1



| Previous edition are obsolete | Page 2 of 3 | HUD-1 |
| :--- | :---: | :---: |

Current HUD-1, More Challenging, Fixed, A, Name Set 1, page 3

| Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges |  | Good Faith Estimate | HUD-1 |
| :---: | :---: | :---: | :---: |
| Charges That Cannot Increase | HUD-1 Line Number |  |  |
| Our origination charge | \#801 | \$1,200.00 | \$1,200.00 |
| Your credit or charge (points) for the specific interest rate chosen | \#802 | \$3,150.00 | \$3,150.00 |
| Your adjusted origination charges | \#803 | \$4,350.00 | \$4,350.00 |
| Transfer taxes | \# 1203 | \$1,960.00 | \$1,960.00 |
| Charges That In Total Cannot Increase More Than 10\% |  | Good Faith Estimate | HUD-1 |
| Government recording charges | \# 1201 | \$150.00 | \$150.00 |
| Appraisal Fee | \# 802 | \$400.00 | \$400.00 |
| Credit Report Fee | \# 805 | \$30.00 | \$29.50 |
| Flood certification/Monitoring | \# 807/808 | \$52.00 | \$52.00 |
| Tax service/Monitoring | \# 806/809 | \$185.00 | \$185.00 |
| Title services | \# 1101 | \$3,462.00 | \$3,462.00 |
| Owner's Title Insurance | \# 1103 | \$965.00 | \$965.00 |
| $\square$ \# |  |  |  |
| Total |  | \$5,244.00 | \$5,243.50 |
| Increase between GFE and HUD-1 Charges |  |  | \% |
| Charges That Can Change |  | Good Faith Estimate | HUD-1 |
| Initial deposit for your escrow account | \# 1001 | \$1,216.50 | \$1,190.99 |
| Daily interest charges $\$ 37.19$ /day | \# 901 | \$557.85 | \$595.04 |
| Homeowner's insurance | \# 903 | \$537.00 | \$537.00 |
| Pest Inspection Fee | \# 1302 | \$125.00 | \$94.00 |
| \# |  |  |  |
|  | \# |  |  |
| Loan Terms |  |  |  |
| Your initial loan amount is | \$ 315,000.00 |  |  |
| Your loan term is | 30 years |  |  |
| Your initial interest rate is | 4.25 \% |  |  |
| Your initial monthly amount owed for principal, interest, and any mortgage insurance is | \$ 1,278.37 includesPrincipalInterestMortgage Insurance |  |  |
| Can your interest rate rise? | $\boxed{X}$ No Yes, it can rise to a maximum of \%. The first change will be on <br> and can change again every after . Every change date, your <br> interest rate can incease or decrease by \%. Over the life of the loan, your interest rate is  <br> guaranteed to never be lower than $\%$ or higher than  |  |  |
| Even if you make payments on time, can your loan balance rise? | $\square$ Yes, it can rise to a maximum of \$ |  |  |
| Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? | $\square$ No $\square$ Yes, the first increase can be on $6 / 1 / 2023$ and the monthly amount owed can rise to $\$ 2,113.33$. The maximum it can ever rise to is $\$ 2,113.33$ |  |  |
| Does your loan have a prepayment penalty? | $\triangle$ No $\square$ Yes, your maximum prepayment penalty is \$ |  |  |
| Does your loan have a balloon payment? | $\square$ |  | due in years |
| Total monthly amount owed including escrow account payments | You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself. <br> X You have an additional monthly escrow payment of \$ 595.50 that results in a total initial monthly amount owed of \$ 1,873.87 principal, interest, any mortagage insurance and any items checked below: Property taxes Flood insurance |  |  |
| Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender. |  |  |  |
| Previous edition are obsolete | Page 3 of 3 |  | HUD-1 |



Current More Challenging Fixed B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Pine Bank and Name Set 2 used Dogwood Bank.

# Truth-In-Lending Disclosure Statement 

| Lender: Pine Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 <br>  <br>  <br>  <br> 区 Preliminary <br> $\square$ |  |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{5 . 3 2 1 \%}$ | $\mathbf{\$ 3 2 8 , 9 2 9 . 7 0}$ | $\$ 314,260.10$ | $\$ 803,749.80$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | $\begin{array}{c}\text { First Increase } \\ (6 / 1 / 2018)\end{array}$ |  |
| :--- | :---: | :---: |
| Interest Rate | Rate Monthly Payment |  |$]$


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dem | feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rat | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 110.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, More Challenging, Fixed, B, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  | I want credit life and disability insurance. |  |

Prepayment: If you pay off your loan early, you

| $\square$ may | 区 will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |


| Name of Originator Pine Bank |  |
| :--- | :--- |
| Originator <br> Address | 4321 Random Boulevard <br> Somecity, ST 12340 |
| Originator Phone Number | 123-456-7890 |
| Originator Email joesmith@pinebank.com |  |


| Borrower John A. and Mary B. |
| :--- | :--- |
| Property 456 Somewhere Avenue <br> Address Anytown, ST 12345 <br> Date of GFE $2 / 15 / 2013$  |


| Purpose | This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan. <br> For more information, see HUD's Special Information Booklet on settlement charges, your Truth-in-Lending <br> Disclosures, and other consumer information at www.hud.gov/respa. If you decide you would like to proceed <br> with this loan, contact us. |
| :--- | :--- |
| Shopping for  <br> your loan Only you can shop for the best loan for you. Compare this GFE with other loan offers, so you can find the best <br> loan. Use the shopping chart on page 3 to compare all the offers you receive. <br> Important dates 1. The interest rate for this GFE is available through $4 / 16 / 2013$ 5:00PM EDT <br> rate, some of your loan Origination Charges, and the monthly payment shown below can change until you <br> lock your interest rate. <br> 2. This estimate for all other settlement charges is available through $3 / 22 / 2013$ 5:00PM EDT  <br> 3. After you lock your interest rate, you must go to settlement within 60 <br> period) to receive the locked interest rate.  <br> 4. You must lock the interest rate at least N/A  days before settlement. |  |

## Summary of your loan

Escrow
account information

| Your initial loan amount is |
| :--- |
| Your loan term is |
| Your initial interest rate is |
| Your initial monthly amount owed for principal, <br> interest, and any mortgage insurance is |
| Can your interest rate rise? |
| Even if you make payments on time, can your <br> loan balance rise? |
| Even if you make payments on time, can your <br> monthly amount owed for principal, interest, <br> and any mortgage insurance rise? |
| Does your loan have a prepayment penalty? |
| Does your loan have a balloon payment? |



Some lenders require an escrow account to hold funds for paying property taxes or other property-related charges in addition to your monthly amount owed of \$ 1,442.43
Do we require you to have an escrow account for your loan?
$\square$ No, you do not have an escrow account. You must pay these charges directly when due.
$\sqrt{\mathbf{x}}$ Yes, you have an escrow account. It may or may not cover all of these charges. Ask us.
Summary of your settlement charges

| A | Your Adjusted Origination Charges (See page 2 .) | $\$ 600.00$ |  |
| :--- | :--- | :--- | :--- |
| B | Your Charges for All Other Settlement Services (see page 2.) | $\$ 10,598.90$ |  |
| A + | B | Total Estimated Settlement Charges | $\$ 11,198.90$ |

Understanding
your estimated
settlement
charges

Some of these
charges can change at settlement See the top of page 3 for more information.


## Instructions

Understanding which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan is sold in the future

This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)


In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate. - If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower settlement charges | The same loan with a lower interest rate |
| :---: | :---: | :---: | :---: |
| Your initial loan amount | \$315,000.00 | \$ | \$ |
| Your initial interest rate ${ }^{1}$ | 4.875 \% | \% | \% |
| Your initial monthly amount owed | \$ 1,442.43 | \$ | \$ |
| Change in the monthly amount owed from this GFE | No change | You will pay \$ more every month | You will pay \$ less every month |
| Change in the amount you will pay at settlement with this interest rate | No change | Your settlement charges will be reduced by \$ | Your settlement charges will increase by \$ |
| How much your total estimated settlement charges will be | $\$_{11,198.90}$ | \$ | \$ |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| Loan originator name | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Initial loan amount | Pine Bank |  |  |  |
| Loan term | $\$ 315,000.00$ |  |  |  |
| Initial interest rate | 30 years |  |  |  |
| Initial monthly amount owed | $4.875 \%$ |  |  |  |
| Rate lock period | $\$ 1,442.43$ |  |  |  |
| Can interest rate rise? | 60 days |  |  |  |
| Can loan balance rise? | No |  |  |  |
| Can monthly amount owed rise? | No |  |  |  |
| Prepayment penalty? | Yes |  |  |  |
| Balloon payment? | No |  |  |  |
| Total Estimated Settlement Charges | No |  |  |  |

Some lenders may sell your loan after settlement. Any fees lenders receive in the future cannot change the loan you receive or the charges you paid at settlement.

## Current Final TIL, More Challenging, Fixed, B, Name Set 1, page 1

## Truth-In-Lending Disclosure Statement

| Lender: Pine Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{5 . 6 0 2 \%}$ | $\mathbf{\$ 3 4 4 , 1 2 3 . 3 4}$ | $\$ 314,716.48$ | $\$ 819,220.52$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square \quad$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | $\begin{array}{c}\text { First Increase } \\ (6 / 1 / 2018)\end{array}$ |
| :--- | :---: | :---: |
| Interest Rate | Rate \& Monthly Payment |$)$


| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | d feature as follows: |
| $\square$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | e-rate feature. Disclosures about the variable-rate feature you earlier. |
| $\square$ Required Deposit: The annual percentage rate | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 120.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | $\square$ may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, More Challenging, Fixed, B, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
| Credit Disability |  |  |  |
|  |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { Signature }}$ |

Prepayment: If you pay off your loan early, you
$\square$ may

| $\square$ may | ख will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. | Date |
| :--- | :--- |
| Borrower: Mary B. | Date |

Current HUD-1, More Challenging, Fixed, B, Name Set 1, page 1


Current HUD-1, More Challenging, Fixed, B, Name Set 1, page 2


| Previous edition are obsolete | Page 2 of 3 | HUD-1 |
| :--- | :---: | :---: |

Current HUD-1, More Challenging, Fixed, B, Name Set 1, page 3

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$1,600.00 \& \$1,600.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& -\$1,000.00 \& \$0.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$600.00 \& \$1,600.00 \\
\hline Transfer taxes \& \# 1203 \& \$1,960.00 \& \$1,960.00 \\
\hline \multicolumn{2}{|l|}{Charges That in Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline Government recording charges \& \# 1201 \& \$110.00 \& \$120.00 \\
\hline Appraisal Fee \& \# 802 \& \$400.00 \& \$400.00 \\
\hline Credit Report Fee \& \# 805 \& \$25.00 \& \$29.50 \\
\hline Flood certification \& \# 807 \& \$60.00 \& \$60.00 \\
\hline Tax service \& \# 806 \& \$120.00 \& \$120.00 \\
\hline Title services \& \# 1101 \& \$4,551.00 \& \$4,928.00 \\
\hline Owner's Title Insurance \& \# 1103 \& \$1,050.00 \& \$1,098.00 \\
\hline Survey Fee \& \# 1303 \& \$120.00 \& \$127.50 \\
\hline \& Total \& \$6,436.00 \& \$6,883.00 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \$ 447 \& 6.95 \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$891.00 \& \$1,387.63 \\
\hline Daily interest charges \(\quad \$ 42.93\) /day \& \# 901 \& \$639.90 \& \$686.88 \\
\hline Homeowner's insurance \& \# 903 \& \$537.00 \& \$1,074.00 \\
\hline Pest Inspection Fee \& \# 1302 \& \$135.00 \& \$94.00 \\
\hline \& \# \& \& \\
\hline \& \# \& \& \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 317,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{4.875 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ \(1,536.13\) includes
Principal
Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) Yes, it can rise to a maximum of \\
\(\%\). The first change will be on and can change again every
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{X No \(\square\) Yes, it can rise to a maximum of \$} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No \(\square\) Yes, the first increase can be on \\
6/1/2018 and the monthly amount owed can rise to \(\$ 2,078.46\). The maximum it can ever rise to is \(\$ 2,078.46\)
\end{tabular}} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(\triangle \mathrm{No} \square\) Yes, your maximum prepayment penalty is \$} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{\(\square\) No \(\square\) Yes, you have a balloon payment of \$} \& due in \\
\hline Total monthly amount owed including escrow account payments \& \multicolumn{3}{|l|}{\begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself. \\
You have an additional monthly escrow payment of \$ 445.50 \\
that results in a total initial monthly amount owed of \$ 1,981.63 \\
principal, interest, any mortagage insurance and any items checked below:
Property taxes Homeowner's insurance
Flood insurance 

\end{tabular}} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



## Current Easier ARM A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Quince Bank and Name Set 2 used Elm Bank.

# Truth-In-Lending Disclosure Statement 

| Lender: Quince Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :---: |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | 区 Preliminary | $\square$ Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{4 . 5 9 1 \%}$ | $\mathbf{\$ 1 0 1 , 6 3 1 . 5 2}$ | $\$ 120,611.00$ | $\$ 222,242.52$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | INTRODUCTORY <br> Rate \& Monthly Payment (for first seven years) | [MAXIMUM during FIRST FIVE YEARS (4/15/2013)] | MAXIMUM EVER (as early as 5/1/2022) |
| :---: | :---: | :---: | :---: |
| Interest Rate | 3.750\% | 3.750\% | 9.000\% |
| Principal and Interest | \$560.36 | \$560.36 | \$884.44 |
| Total Est. Monthly Payment | \$560.36 | \$560.36 | \$884.44 |

Introductory Rate Notice
You have a discounted introductory rate of $3.750 \%$ that ends after the first seven years. In the eighth year, even if market rates do not change, this rate will increase to $4.750 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | feature as follows: |
| V Variable Rate Feature: This loan has a variab <br> have been provided | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rater | ees not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 250.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, Easier, ARM, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | $\boxed{\text { Signature }}$ |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\boxed{\text { Signature }}$ |
|  |  |  |  |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| $\square$ may | 区 will not | have to pay a penalty. |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

| Name of Originator Quince Bank |  |
| :--- | :--- |
| Originator 4321 Random Boulevard <br> Address Somecity, ST 12340 |  |
| Originator Phone Number 123-456-7890 |  |
| Originator Email joesmith@quincebank.com |  |


| Borrower John A. and Mary B. |
| :---: |
| Property 456 Somewhere Avenue |
| Address Anytown, ST 12345 |
| Date of GFE 2/15/2013 |



Summary of your settlement charges

| A | Your Adjusted Origination Charges (See page 2.) | $\$ 700.00$ |
| :--- | :--- | :--- |
| B | Your Charges for All Other Settlement Services (See page 2.) | $\$ 4,103.00$ |
| A | $+B$ | Total Estimated Settlement Charges |

Good Faith Estimate (HUD-GFE) 1

Understanding your estimated settlement charges

Some of these
charges can change at settlement. See the top of page 3 for more information.


## Instructions

Understanding which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan is sold in the future

This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)


The total of these charges can increase up to 10\% at settlement:

- Required services that we select
- Title services and lender's title insurance (if we select them or you use companies we identify)
- Owner's title insurance (if you use companies we identify)
- Required services that you can shop for (if you use companies we identify)
- Government recording charges

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate. If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower <br> settlement charges | The same loan with a <br> lower interest rate |
| :--- | :--- | :--- | :--- |
| Your initial loan amount | $\$ 121,000.00$ | $\$$ | $\%$ |
| Your initial interest rate ${ }^{1}$ | 3.75 | $\$ 622.88$ | $\$$ |
| Your initial monthly amount owed | No change | You will pay $\$$ <br> more every month | You will pay $\$$ <br> less every month |
| Change in the monthly amount owed from <br> this GFE | No change | Your settlement charges <br> will be reduced by <br> $\$$ | Your settlement charges <br> will increase by <br> $\$$ |
| Change in the amount you will pay at <br> settlement with this interest rate | $\$$ | $\$$ |  |
| How much your total estimated settlement <br> charges will be | $\$ 4,803.00$ | $\$$ |  |

For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| Loan originator name | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Initial loan amount | Quince Bank |  |  |  |
| Loan term | $\$ 121,000.00$ |  |  |  |
| Initial interest rate | 30 years |  |  |  |
| Initial monthly amount owed | 3.75 |  |  |  |
| Rate lock period | $\$ 622.88$ |  |  |  |
| Can interest rate rise? | 60 days |  |  |  |
| Can loan balance rise? | Yes |  |  |  |
| Can monthly amount owed rise? | No |  |  |  |
| Prepayment penalty? | Yes | No |  |  |
| Balloon payment? | No |  |  |  |
| Total Estimated Settlement Charges | $\$ 4,803.00$ |  |  |  |

Some lenders may sell your loan after settlement. Any fees lenders receive in the future cannot change the loan you receive or the charges you paid at settlement.
$\left.\begin{array}{l}\text { These charges } \\ \text { can change } \\ \text { at settlement: } \\ \text { - Required services that you can } \\ \text { shop for (if you do not use companies } \\ \text { we identify) } \\ \text { - Title services and lender's title } \\ \text { insurance (if you do not use } \\ \text { companies we identify) } \\ \text { - Owner's title insurance (if you do not } \\ \text { use companies we identify) } \\ \text { - Initial deposit for your escrow account } \\ \text { - Daily interest charges } \\ \text { - Homeowner's insurance }\end{array}\right\} \begin{aligned} & \text { ettlement charges. However: } \\ & \text { have higher settlement charges. } \\ & \text { wation if the table is not completed. }\end{aligned}$
anies


# Truth-In-Lending Disclosure Statement 

| Lender: Quince Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. <br> $\$ 310,089.72$ |
| :---: | :--- | :--- | :--- |
| $\mathbf{4 . 5 9 2 \%}$ | $\mathbf{\$ 1 0 1 , 6 4 4 . 1 2}$ | $\$ 120,598.40$ | $\$ \$ 2$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
INTEREST RATE AND PAYMENT SUMMARY

|  | INTRODUCTORY <br> Rate \& Monthly Payment (for first seven years) | [MAXIMUM during FIRST FIVE YEARS (4/15/2013)] | MAXIMUM EVER (as early as 5/1/2022) |
| :---: | :---: | :---: | :---: |
| Interest Rate | 3.750\% | 3.750\% | 9.000\% |
| Principal and Interest | \$560.36 | \$560.36 | \$884.44 |
| Est. Taxes + Insurance (Escrow) <br> - Includes Private Mortgage Insurance | \$306.54 | \$306.54 | \$244.02 |
| Total Est. Monthly Payment | \$866.90 | \$866.90 | \$1,128.46 |

Introductory Rate Notice
You have a discounted introductory rate of $3.750 \%$ that ends after the first seven years. In the eighth year, even if market rates do not change, this rate will increase to $4.750 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a demand | nd feature as follows: |
| $\begin{array}{ll}\nabla \text { Variable Rate Feature: } & \begin{array}{l}\text { This loan has a variab } \\ \text { have been provided }\end{array}\end{array}$ | le-rate feature. Disclosures about the variable-rate feature o you earlier. |
| $\square$ Required Deposit: The annual percentage rat | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 250.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, Easier, ARM, A, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { S want credit life and disability insurance. }}$ |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| $\square$ may | 区 will not | have to pay a penalty. |
| $\square$ may | $\boxed{x}$ will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  |  |
| Borrower: Mary B. |  | Date |

Current HUD-1, Easier, ARM, A, Name Set 1, page 1


Current HUD-1, Easier, ARM, A, Name Set 1, page 2

| L. Settlement Charges |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 700. Total Real Estate Broker Fees $\quad \$ 6,750.00$ |  |  |  | Paid From Borrower's Funds at Settlement | Paid From Seller's Funds at Settlement |
| Division of commission (line 700) as follows : |  |  |  |  |  |
| 701. \$ 3,375.00 to Alpha Real Estate Broker |  |  |  |  |  |
| 702. \$ 3,375.00 to Omega Real Estate Broker |  |  |  |  |  |
| 703. Commission paid at settlement |  |  |  |  | \$1,750.00 |
| 704. Deposit retained by Alpha Real Estate Broker \$5,000 |  |  |  |  |  |
| 800. Items Payable in Connection with Loan |  |  |  |  |  |
| 801. Our origination charge |  | \$ 700.00 | (from GFE \#1) |  |  |
| 802. Your credit or charge (points) for the specific interest rate chosen |  | \$ 0.00 | (from GFE \#2) |  |  |
| 803. Your adjusted origination charges |  |  | (from GFE \#A) | \$700.00 |  |
| 804. Appraisal fee to John Smith Appraisers, Inc.(POC $\$ 425.00$ Borrower) |  |  | (from GFE \#3) |  |  |
| 805. Credit report to Information Inc. (POC \$27.00 Borrower) |  |  | (from GFE \#3) |  |  |
| 806. Tax service to Info Co. |  |  | (from GFE \#3) | \$120.00 |  |
| 807. Flood certification to Info Co. |  |  | (from GFE \#3) | \$20.00 |  |
| 808. |  |  |  |  |  |
| 809. |  |  |  |  |  |
| 810. |  |  |  |  |  |
| 811. |  |  |  |  |  |
| 900. Items Required by Lender to be Paid in Advance |  |  |  |  |  |
| 901. Daily interest charges from 4/15/2013 to 5/01/2013 @ \$ 12.60 | /day |  | (from GFE \#10) | \$201.60 |  |
| 902. Mortgage insurance premium for months to |  |  | (from GFE \#3) |  |  |
| 903. Homeowner's insurance for 1 years to Insurance Co. |  |  | (from GFE \#11) | \$570.00 |  |
| 904. Property Taxes 6 months to Any County USA |  |  |  | \$1,179.12 |  |
| 1000. Reserves Deposited with Lender |  |  |  |  |  |
| 1001. Initial deposit for your escrow account |  |  | (from GFE \#9) | \$488.03 |  |
| 1002. Homeowner's insurance 2 months @ \$ 47.50 | per month | \$ 95.00 |  |  |  |
| 1003. Mortgage insurance months @ \$ | per month | \$ |  |  |  |
| 1004. Property Taxes 2 months @ \$ 196.52 | per month | \$ 393.04 |  |  |  |
| 1005. months @ \$ | per month | \$ |  |  |  |
| 1006.10 months @ \$ | per month | \$ |  |  |  |
| 1007. Aggregate Adjustment |  | -\$ 0.01 |  |  |  |


| 1100. Title Charges |  |  |  |
| :---: | :---: | :---: | :---: |
| 1101. Title services and lender's title insurance | (from GFE \#4) | \$1,530.00 |  |
| 1102. Settlement or closing fee | \$ |  |  |
| 1103. Owner's title insurance | (from GFE \#5) | \$844.00 |  |
| 1104. Lender's title insurance | \$ 876.00 |  |  |
| 1105. Lender's title policy limit \$ 121,000.00 |  |  |  |
| 1106. Owner's title policy limit \$ 135,000.00 |  |  |  |
| 1107. Agent's portion of the total title insurance premium to Epsilon Title Co. | \$ 1,376.00 |  |  |
| 1108. Underwriter's portion of the total title insurance premium to Underwriter Inc. | \$ 344.00 |  |  |
| 1109. |  |  |  |
| 1110. |  |  |  |
| 1111. |  |  |  |


| 1200. Government Recording and Transfer Charges |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1201. Government recording charges |  |  | (from GFE \#7) | \$250.00 |  |
| 1202. Deed \$ 125.00 | Mortgage \$ 125.00 | Release \$ |  |  |  |
| 1203. Transfer taxes |  |  | (from GFE \#8) |  |  |
| 1204. City/County tax/stamps | Deed \$ | Mortgage \$ |  |  |  |
| 1205. State tax/stamps | Deed \$ 1,350.00 | Mortgage \$ |  |  | \$1,350.00 |
| 1206. |  |  |  |  |  |


| 1300. Additional Settlement Charges |  |  |  |
| :--- | :---: | :---: | :---: |
| 1301. Required services that you can shop for | $\$ 110.00$ |  |  |
| 1302. Pest Inspection Fee to Pests Co. |  |  |  |
| (from | \#6) |  |  |
| 1303. Survey Fee to Surveyors Co. |  |  |  |
| 1304. Home Inspection Fee to Engineers Inc. (POC $\$ 750.00$ |  |  |  |
| 1305. Structural Inspection Fee to Structural Engineers Inc. (POC $\$ 1,100.00$ Seller) |  |  |  |

Current HUD-1, Easier, ARM, A, Name Set 1, page 3

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$700.00 \& \$700.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& \$0.00 \& \$0.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$700.00 \& \$700.00 \\
\hline Transfer taxes \& \# 1203 \& \$0.00 \& \$0.00 \\
\hline \multicolumn{2}{|l|}{Charges That In Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline Government recording charges \& \# 1201 \& \$250.00 \& \$250.00 \\
\hline Appraisal Fee \& \# 802 \& \$425.00 \& \$425.00 \\
\hline Credit Report Fee \& \# 805 \& \$27.00 \& \$27.00 \\
\hline Flood certification fee \& \# 807 \& \$20.00 \& \$20.00 \\
\hline Tax service fee \& \# 806 \& \$120.00 \& \$120.00 \\
\hline Title services \& \# 1101 \& \$1,513.00 \& \$1,530.00 \\
\hline Owner's Title Insurance \& \# 1103 \& \$844.00 \& \$844.00 \\
\hline Survey Fee \& \# 1302 \& \$175.00 \& \$175.00 \\
\hline \multicolumn{2}{|l|}{- Total} \& \$3,374.00 \& \$3,391.00 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \$ 17 \& . 5 \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$0.00 \& \$488.03 \\
\hline Daily interest charges \(\$ 12.60\) /day \& \# 901 \& \$189.00 \& \$201.60 \\
\hline Homeowner's insurance \& \# 903 \& \$415.00 \& \$570.00 \\
\hline Pest Inspection Fee \& \# 1302 \& \$125.00 \& \$110.00 \\
\hline \multicolumn{2}{|l|}{\(\square\)} \& \& \\
\hline \& \# \& \& \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 121,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{3.75 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ 622.88 includes
Principal
Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No \(\square\) Yes, it can rise to a maximum of \\
\(9.0 \%\). The first change will be on \(5 / 1 / 2020\)
\(\square\) and can change again every year after \(5 / 1 / 2020\) \(\qquad\) Every change date, your interest rate can increase or decrease by \(2-3 \%\). Over the life of the loan, your interest rate is guaranteed to never be lower than \\
4.25 \(\%\) or higher than 9.0 \%.
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{\(\square\) Yes, it can rise to a maximum of \$} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\(\square\) No \(\square\) Yes, the first increase can be on 6/1/2020 and the monthly amount owed can rise to \$ 739.59 . The maximum it can ever rise to is \(\$ 884.44\)} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(\triangle\) No \(\square\) Yes, your maximum prepayment penalty is \$} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{```
\(\square\)
\(\square\) Yes, you have a balloon payment of \$ on
```} \& due in years \\
\hline Total monthly amount owed including escrow account payments \& \begin{tabular}{l}
You do not have a monthly escrow homeowner's insurance. You mu \\
X You have an additional monthly e that results in a total initial month principal, interest, any mortagage
Property taxes
Flood insurance

 \& 

payment for items, such as pay these items directly you row payment of \$ 244.02 amount owed of \$ 866.90 surance and any items che <br>
$X$ Homeowner's

 \& 

xes and <br>
his includes <br>
w:
\end{tabular} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



## Current Easier ARM B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Redbud Bank and Name Set 2 used Fir Bank.

## Current Initial TIL, Easier, ARM, B, Name Set 1, page 1

## Truth-In-Lending Disclosure Statement

| Lender: Redbud Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 <br>  <br>  <br> 区 Preliminary <br> $\square$ |  |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{5 . 2 9 4 \%}$ | $\mathbf{\$ 1 1 9 , 5 9 6 . 2 6}$ | $\$ 119,494.86$ | $\$ 322,438.32$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | INTRODUCTORY <br> Rate \& Monthly Payment (for first three years) | [MAXIMUM during FIRST FIVE YEARS (5/1/2016)] | MAXIMUM EVER (as early as 5/1/2022) |
| :---: | :---: | :---: | :---: |
| Interest Rate | 3.375\% | 5.375\% | 9.000\% |
| Principal and Interest | \$534.93 | \$665.39 | \$902.78 |
| Est. Taxes + Insurance (Escrow) <br> - Includes Private Mortgage Insurance | \$294.04 | \$294.04 | \$231.52 |
| Total Est. Monthly Payment | \$828.97 | \$959.43 | \$1,134.30 |

Introductory Rate Notice
You have a discounted introductory rate of $3.375 \%$ that ends after the first three years. In the fourth year, even if market rates do not change, this rate will increase to $5.33 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | feature as follows: |
| V Variable Rate Feature: This loan has a varia <br> have been provided | le-rate feature. Disclosures about the variable-rate feature you earlier. |
| $\square$ Required Deposit: The annual percentage rate | ees not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 225.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

Page $\mathbf{1}$ of $\mathbf{2}$

## Current Initial TIL, Easier, ARM, B, Name Set 1, page 2

## You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such

 carrier meets the requirements of the Lender.If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | Signature |

Prepayment: If you pay off your loan early, you

| $\square$ may | ® will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  | Date |
| :--- | :--- | :--- |
|  |  | Date |

Page $\mathbf{2}$ of $\mathbf{2}$

| Name of Originator Redbud Bank |
| :---: |
| Originator 4321 Random Boulevard |
| Address Somecity, ST 12340 |
| Originator Phone Number 123-456-7890 |
| Originator Email joesmith@redbudbank.com |


| Borrower John A. and Mary B. |
| :--- | :--- |
| Property 456 Somewhere Avenue <br> Address Anytown, ST 12345 |
| Date of GFE 2/15/2013 |



Summary of your settlement charges

| A | Your Adjusted Origination Charges (See page 2.) | $\$ 1,460.00$ |
| :--- | :--- | :--- |
| B | Your Charges for All Other Settlement Services (See page 2.) | $\$ 4,208.18$ |
| A | B | Total Estimated Settlement Charges |

Good Faith Estimate (HUD-GFE) 1

Understanding your estimated settlement charges

Some of these
charges can change at settlement. See the top of page 3 for more information.


## Instructions

Understanding which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan is sold in the future

This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)


The total of these charges
can increase up to $10 \%$ at settlement:

- Required services that we select
- Title services and lender's title insurance (if we select them or you use companies we identify)
- Owner's title insurance (if you use companies we identify)
- Required services that you can shop for (if you use companies we identify)
- Government recording charges

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate. If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed

|  | The loan in this GFE | The same loan with lower settlement charges | The same loan with a lower interest rate |
| :---: | :---: | :---: | :---: |
| Your initial loan amount | \$ 121,000.00 | \$ | \$ |
| Your initial interest rate ${ }^{1}$ | 3.375 \% | \% | \% |
| Your initial monthly amount owed | \$ 597.45 | \$ | \$ |
| Change in the monthly amount owed from this GFE | No change | You will pay \$ more every month | You will pay \$ less every month |
| Change in the amount you will pay at settlement with this interest rate | No change | Your settlement charges will be reduced by \$ | Your settlement charges will increase by \$ |
| How much your total estimated settlement charges will be | $\$_{5,668.18}$ | \$ | \$ |

'For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| Loan originator name | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Initial loan amount |  |  |  |  |
| Loan term |  |  |  |  |
| Initial interest rate |  |  |  |  |
| Initial monthly amount owed |  |  |  |  |
| Rate lock period |  |  |  |  |
| Can interest rate rise? |  |  |  |  |
| Can loan balance rise? |  |  |  |  |
| Can monthly amount owed rise? |  |  |  |  |
| Prepayment penalty? |  |  |  |  |
| Balloon payment? |  |  |  |  |
| Total Estimated Settlement Charges |  |  |  |  |

Some lenders may sell your loan after settlement. Any fees lenders receive in the future cannot change the loan you receive or the charges you paid at settlement.

# Truth-In-Lending Disclosure Statement 

| Lender: Redbud Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{5 . 4 0 1 \%}$ | $\mathbf{\$ 1 2 2 , 9 5 6 . 5 6}$ | $\$ 119,483.525,786.20$ |  |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square \quad$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY

|  | $\begin{array}{c}\text { INTRODUCTORY } \\ \text { Rate \& Monthly Payment } \\ \text { (for first three years) }\end{array}$ | $\begin{array}{c}\text { [MAXIMUM during } \\ \text { FIRST FIVE YEARS } \\ (5 / 1 / 2016)]\end{array}$ |  |
| :--- | :---: | :---: | :---: | \(\left.\begin{array}{c}MAXIMUM EVER <br>

(as early as <br>
5 / 1 / 2022)\end{array}\right]\)

Introductory Rate Notice
You have a discounted introductory rate of $3.375 \%$ that ends after the first three years. In the fourth year, even if market rates do not change, this rate will increase to $5.500 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a deman | d feature as follows: |
| $\checkmark$ Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a varia } \\ \text { have been provided }\end{array}$ | le-rate feature. Disclosures about the variable-rate feature to you earlier. |
| $\square$ Required Deposit: The annual percentage rate | oes not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 240.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than 15 days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Final TIL, Easier, ARM, B, Name Set 1, page 2

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

Insurance:
Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
| Credit Disability |  |  |  |
|  |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { Signature }}$ |

Prepayment: If you pay off your loan early, you
$\square$ may

| $\square$ may | ख will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. | Date |
| :--- | :--- |
| Borrower: Mary B. | Date |

Current HUD-1, Easier, ARM, B, Name Set 1, page 1


Current HUD-1, Easier, ARM, B, Name Set 1, page 2

| L. Settlement Charges |  |  |
| :---: | :---: | :---: |
| 700. Total Real Estate Broker Fees $\quad \$ 6,750.00$ | Paid From Borrower's Funds at Settlement | Paid From Seller's Funds at Settlement |
| Division of commission (line 700) as follows : |  |  |
| 701. \$ 3,375.00 to Alpha Real Estate Broker |  |  |
| 702. \$ 3,375.00 to Omega Real Estate Broker |  |  |
| 703. Commission paid at settlement |  | \$1,750.00 |
| 704. Deposit retained by Alpha Real Estate Broker \$5,000 |  |  |


| 800. Items Payable in Connection with Loan |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 801. Our origination charge | $\$ 250.00$ | (from GFE \#1) |  |  |
| 802. Your credit or charge (points) for the specific interest rate chosen | $\$ 1,210.00$ | (from GFE \#2) |  |  |
| 803. Your adjusted origination charges | (from GFE \#A) | $\$ 1,460.00$ |  |  |
| 804. Appraisal fee to John Smith Appraisers, Inc.(POC $\$ 500.00$ Borrower) | (from GFE \#3) |  |  |  |
| 805. Credit report to Information Inc. (POC $\$ 30.00$ Borrower) | (from GFE \#3) |  |  |  |
| 806. Tax service to Info Co. | (from GFE \#3) | $\$ 110.00$ |  |  |
| 807. Flood certification to Info Co. | (from GFE \#3) | $\$ 50.00$ |  |  |
| 808. |  |  |  |  |
| 809. |  |  |  |  |
| 810. |  |  |  |  |
| 811. |  |  |  |  |


| 900. Items Required by Lender to be Paid in Advance |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 901. Daily interest charges from 4/15/2013 to 5/01/2013 @ \$ 11.34 | /day | (from GFE \#10) | \$181.44 |  |
| 902. Mortgage insurance premium for months to |  | (from GFE \#3) |  |  |
| 903. Homeowner's insurance for 1 years to Insurance Co. |  | (from GFE \#11) | \$420.00 |  |
| 904. Property Taxes 6 months to Any County USA |  |  | \$1,179.12 |  |
| 1000. Reserves Deposited with Lender |  |  |  |  |
| 1001. Initial deposit for your escrow account |  | (from GFE \#9) | \$588.07 |  |
| 1002. Homeowner's insurance 2 months @ \$ 35.00 | per month | \$ 70.00 |  |  |
| 1003. Mortgage insurance 2 months @ \$ 62.52 | per month | \$ 125.04 |  |  |
| 1004. Property Taxes 20 months @ \$ 196.52 | per month | \$ 393.04 |  |  |
| 1005. months @ \$ | per month | \$ |  |  |
| 1006.10 months @ \$ | per month | \$ |  |  |
| 1007. Aggregate Adjustment |  | -\$ 0.01 |  |  |


| 1100. Title Charges |  |  |  |
| :---: | :---: | :---: | :---: |
| 1101. Title services and lender's title insurance | (from GFE \#4) | \$1,385.00 |  |
| 1102. Settlement or closing fee | \$ |  |  |
| 1103. Owner's title insurance | (from GFE \#5) | \$710.00 |  |
| 1104. Lender's title insurance | \$ 735.00 |  |  |
| 1105. Lender's title policy limit \$ 121,000.00 |  |  |  |
| 1106. Owner's title policy limit \$ 135,000.00 |  |  |  |
| 1107. Agent's portion of the total title insurance premium to Epsilon Title Co. | \$ 1,156.00 |  |  |
| 1108. Underwriter's portion of the total title insurance premium to Underwriter Inc. | \$ 289.00 |  |  |
| 1109. |  |  |  |
| 1110. |  |  |  |
| 1111. |  |  |  |


| 1200. Government Recording and Transfer Charges |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1201. Government recording charges |  |  | (from GFE \#7) | \$240.00 |  |
| 1202. Deed \$ 120.00 | Mortgage \$ 120.00 | Release \$ |  |  |  |
| 1203. Transfer taxes |  |  | (from GFE \#8) |  |  |
| 1204. City/County tax/stamps | Deed \$ | Mortgage \$ |  |  |  |
| 1205. State tax/stamps | Deed \$ 1,350.00 | Mortgage \$ |  |  | \$1,350.00 |
| 1206. |  |  |  |  |  |


| 1300. Additional Settlement Charges |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 1301. Required services that you can shop for |  | (from GFE \#6) | \$224.00 |  |
| 1302. Pest Inspection Fee to Pests Co. | \$ 99.00 |  |  |  |
| 1303. Survey Fee to Surveyors Co. | \$ 125.00 |  |  |  |
| 1304. Home Inspection Fee to Engineers Inc. (POC $\$ 750.00$ Seller) |  |  |  |  |
| 1305. Structural Inspection Fee to Structural Engineers Inc. (POC \$1,100.00 Seller) |  |  |  |  |


| Previous edition are obsolete | Page 2 of 3 | HUD-1 |
| :--- | :--- | :--- |

Current HUD-1, Easier, ARM, B, Name Set 1, page 3

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$250.00 \& \$250.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& \$1,210.00 \& \$1,210.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$1,460.00 \& \$1,460.00 \\
\hline Transfer taxes \& \# 1203 \& \$0.00 \& \$0.00 \\
\hline \multicolumn{2}{|l|}{Charges That In Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline Government recording charges \& \# 1201 \& \$225.00 \& \$240.00 \\
\hline Appraisal Fee \& \# 802 \& \$500.00 \& \$500.00 \\
\hline Credit Report Fee \& \# 805 \& \$30.00 \& \$30.00 \\
\hline Flood certification fee \& \# 807 \& \$50.00 \& \$50.00 \\
\hline Tax service fee \& \# 806 \& \$110.00 \& \$110.00 \\
\hline Title services \& \# 1101 \& \$1,385.00 \& \$1,385.00 \\
\hline Owner's Title Insurance \& \# 1103 \& \$710.00 \& \$710.00 \\
\hline Survey Fee \& \# 1302 \& \$125.00 \& \$125.00 \\
\hline \& Total \& \$3,135.00 \& \$3,150.00 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \$ 15 \& . 48 \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$588.08 \& \$588.07 \\
\hline Daily interest charges \$ 11.34 /day \& \# 901 \& \$170.10 \& \$181.44 \\
\hline Homeowner's insurance \& \# 903 \& \$210.00 \& \$420.00 \\
\hline Pest Inspection Fee \& \# 1302 \& \$105.00 \& \$99.00 \\
\hline \& \# \& \& \\
\hline \& \# \& \& \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 121,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{3.375 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ 597.45 includes
Principal
Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No \(\square\) Yes, it can rise to a maximum of \\
\(9.0 \%\). The first change will be on \(5 / 1 / 2016\) and can change again every three years after 5/1/2016 \\
Every change date, your interest rate can increase or decrease by \(2.0 \%\). Over the life of the loan, your interest rate is guaranteed to never be lower than \\
5.0 \\
\(\%\) or higher than \\
\(9.0 \%\).
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{\(\pm\) No \(\square\) Yes, it can rise to a maximum of \$} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\(\square\) No \(\boldsymbol{X}\) Yes, the first increase can be on 6/1/2016 and the monthly amount owed can rise to \(\$ 727.91\). The maximum it can ever rise to is \(\$ 902.78\)} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(x\) No \(\square\) Yes, your maximum prepayment penalty is \$} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{\[
\underset{\text { on }}{\boldsymbol{X}} \text { No Yes, you have a balloon payment of \$ }
\]} \& \begin{tabular}{l}
due in \\
years
\end{tabular} \\
\hline Total monthly amount owed including escrow account payments \& \multicolumn{3}{|l|}{\begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself.
You have an additional monthly escrow payment of \$ 231.52 \\
that results in a total initial monthly amount owed of \(\$ 828.97\) \\
principal, interest, any mortagage insurance and any items checked below:
Property taxes Homeowner's insurance
Flood insurance 

\end{tabular}} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



Current More Challenging ARM A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Spruce Bank and Name Set 2 used Gingko Bank.

# Truth-In-Lending Disclosure Statement 

| Lender: Spruce Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\boxed{\bigotimes}$ Preliminary | $\square$ Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| 4.617\% | $\mathbf{\$ 1 8 6 , 8 3 6 . 7 0}$ | $\$ 207,638.40$ | $\$ 394,475.10$ |

You have the right to receive at this time an itemization of the Amount Financed.

| $\square$ I want an itemization. |  |  | I do not want an itemization. |  |
| :---: | :---: | :---: | :---: | :---: |
| INTEREST RATE AND PAYMENT SUMMARY |  |  |  |  |
|  | INTRODUCTORY Rate \& Monthly Payment (for first five years) |  | $\begin{gathered} 6 / 1 / 18 \\ 1^{\text {st }} \text { adjustment } \end{gathered}$ | MAXIMUM during FIRST FIVE YEARS 5/1/18 | MAXIMUM EVER (as early as 5/1/27) |
| Interest Rate | 4.0\% | 6.0\% | 6.0\% | 12.0\% |
| Principal Payment | -None- | \$304.48 | \$304.48 | \$306.04 |
| Interest Payment | \$703.33 | \$1,054.99 | \$1,054.99 | \$1,761.62 |
| Total Est. Monthly Payment | \$703.33 | \$1,359.47 | \$1,359.47 | \$2,067.66 |

Introductory Rate Notice
You have a discounted introductory rate of 4.0\% that ends after the first five years. In the sixth year, even if market rates do not change, this rate will increase to $4.16 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |  |
| :---: | :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |  |
| $\square$ Demand Feature: This obligation has a dema | feature as follows: |
| ® Variable Rate Feature: $\quad \begin{array}{ll}\text { This loan has a variab } \\ \text { have been provided }\end{array}$ | e-rate feature. Disclosures about the variable-rate feature you earlier. |
| $\square$ Required Deposit: The annual percentage rate | ees not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |  |
| Filing/Recording Fees \$ 152.00 | Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |  |
| Assumption: Someone buying your house: <br> cannot assume the remainder of the mortgage on the original terms. | may, subject to conditions, be allowed to assume the remainder of the mortgage on the original terms. |

## Current Initial TIL, More Challenging, ARM, A, Name Set 1, page 2



I/We hereby acknowledge reading and receiving a copy of this disclosure.

## Good Faith Estimate (GFE)

| Name of Originator Spruce Bank |  |  |
| :--- | :--- | :---: |
| Originator <br> Address | 4321 Random Boulevard <br> Somecity, ST 12340 |  |
| Originator Phone Number 123-456-7890 |  |  |
| Originator Email joesmith@sprucebank.com |  |  |


| Borrower John A. and Mary B. |
| :--- | :--- |
| Property 456 Somewhere Avenue <br> Address Anytown, ST 12345 <br> Date of GFE 2/15/2013 ${ }^{2}$ |


| Purpose | This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan. <br> For more information, see HUD's Special Information Booklet on settlement charges, your Truth-in-Lending <br> Disclosures, and other consumer information at www.hud.gov/respa. If you decide you would like to proceed <br> with this loan, contact us. |
| :--- | :--- |
| Shopping for  <br> your loan Only you can shop for the best loan for you. Compare this GFE with other loan offers, so you can find the best <br> loan. Use the shopping chart on page 3 to compare all the offers you receive. <br> Important dates 1. The interest rate for this GFE is available through $4 / 16 / 2013$ 5:00PM EDT <br> rate, some of your loan Origination Charges, and the monthly payment shown below can change until you <br> lock your interest rate. <br> 2. This estimate for all other settlement charges is available through $3 / 22 / 2013$ 5:00PM EDT  <br> 3. After you lock your interest rate, you must go to settlement within 60 <br> period) to receive the locked interest rate.  <br> 4. You must lock the interest rate at least N/A  days before settlement. |  |

Summary of
your loan

| Your initial loan amount is |
| :--- |
| Your loan term is |
| Your initial interest rate is |
| Your initial monthly amount owed for principal, <br> interest, and any mortgage insurance is |
| Can your interest rate rise? |
| Even if you make payments on time, can your <br> loan balance rise? |
| Even if you make payments on time, can your <br> monthly amount owed for principal, interest, <br> and any mortgage insurance rise? |
| Does your loan have a prepayment penalty? |
| Does your loan have a balloon payment? |



Escrow account information

Some lenders require an escrow account to hold funds for paying property taxes or other property-related charges in addition to your monthly amount owed of \$812.35
Do we require you to have an escrow account for your loan?
$\boxed{\boxed{X}}$ No, you do not have an escrow account. You must pay these charges directly when due.
$\square$ Yes, you have an escrow account. It may or may not cover all of these charges. Ask us.
Summary of your settlement charges

| A | Your Adjusted Origination Charges (See page 2.) | $\$ 3,510.00$ |
| :--- | :--- | :--- |
| B | Your Charges for All Other Settlement Services (See page 2.) | $\$ 5,280.60$ |
| A | B $\quad$ Total Estimated Settlement Charges | $\$ 8,790.60$ |

Understanding
your estimated
settlement
charges

Some of these
charges can change at settlement. See the top of page 3 for more information.


## Instructions

Understanding This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)

| These charges cannot increase at settlement: | The total of these charges can increase up to 10\% at settlement: | These charges can change at settlement: |
| :---: | :---: | :---: |
| - Our origination charge <br> - Your credit or charge (points) for the specific interest rate chosen (after you lock in your interest rate) <br> - Your adjusted origination charges (after you lock in your interest rate) <br> - Transfer taxes | - Required services that we select <br> - Title services and lender's title insurance (if we select them or you use companies we identify) <br> - Owner's title insurance (if you use companies we identify) <br> - Required services that you can shop for (if you use companies we identify) <br> - Government recording charges | - Required services that you can shop for (if you do not use companies we identify) <br> - Title services and lender's title insurance (if you do not use companies we identify) <br> - Owner's title insurance (if you do not use companies we identify) <br> - Initial deposit for your escrow account <br> - Daily interest charges <br> - Homeowner's insurance |

In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate.
- If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower <br> settlement charges | The same loan with a <br> lower interest rate |
| :--- | :--- | :--- | :--- |
| Your initial loan amount | $\$ 211,000.00$ | $\$$ | $\%$ |
| Your initial interest rate ${ }^{1}$ | 4.0 | $\%$ |  |
| Your initial monthly amount owed | $\$ 812.35$ | \% change | You will pay \$ <br> more every month |
| Change in the monthly amount owed from <br> this GFE | No change | Your settlement charges <br> will be reduced by <br> $\$$ | Your settlement charges <br> will increase by <br> less every month |
| Change in the amount you will pay at <br> settlement with this interest rate | \$ | $\$$ |  |
| How much your total estimated settlement <br> charges will be | $\$ 8,790.60$ | $\$$ |  |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

| Loan originator name | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Initial loan amount | Spruce Bank |  |  |  |
| Loan term | $\$ 211,000.00$ |  |  |  |
| Initial interest rate | 30 years |  |  |  |
| Initial monthly amount owed | $4.0 \%$ |  |  |  |
| Rate lock period | $\$ 812.35$ |  |  |  |
| Can interest rate rise? | 60 days |  |  |  |
| Can loan balance rise? | Yes |  |  |  |
| Can monthly amount owed rise? | No |  |  |  |
| Prepayment penalty? | Yes |  |  |  |
| Balloon payment? | No |  |  |  |
| Total Estimated Settlement Charges | No |  |  |  | is sold in the future

## Current Final TIL, More Challenging, ARM, A, Name Set 1, page 1

# Truth-In-Lending Disclosure Statement 

| Lender: Spruce Bank | Loan No. 123456789 | Date: $4 / 15 / 2013$ |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | $\left.\begin{array}{l}\text { Property Address: } 456 \text { Somewhere Avenue, Anytown, ST } 12345 \\ \\ \\ \\ \\ \hline\end{array}\right]$ Preliminary | Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :--- | :--- | :--- | :--- |
| $\mathbf{4 . 8 7 2 \%}$ | $\mathbf{\$ 1 9 2 , 9 9 1 . 7 2}$ | $\$ 207,614.96$ | $\$ 383.47$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

## INTEREST RATE AND PAYMENT SUMMARY

This loan offers you several monthly payment options. The table below shows you what your payments would be under two of these options if the interest rate reached its maximum of $\mathbf{1 2 \%}$ in the $15^{\text {th }}$ year of this loan.

All payments shown in the table include $\$ 718.88$ for estimated taxes and insurance (escrow).

| Maximum Interest Rate |  | 5 years intro |
| :--- | :---: | :---: |
| Full Payment Option <br> Monthly payments cover all principal and <br> interest. | $4.0 \%$ (intro rate) | $6.0 \%$ |
| Minimum Payment Option <br> Initial monthly payments cover no principal <br> and only some interest and increase your <br> loan amount. | $\$ 1,726.33$ | $\$ 2,165.21$ |

You will borrow an additional \$13,480.79 by 6/1/18 if you make only minimum payments on this loan.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |
| :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |
| $\square$ Demand Feature: This obligation has a demand feature as follows: |
| $\boxed{\chi}$ Variable Rate Feature: This loan has a variable-rate feature. Disclosures about the variable-rate feature <br> have been provided to you earlier. |
| $\square$ Required Deposit: The annual percentage rate does not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |
| Filing/Recording Fees \$ 156.00 Non-filing insurance \$ |
| Late Charge: If a payment is more than 15 days late, you will be charged $5 \%$ of the monthly principal and interest payment. |

Page 1 of $\mathbf{2}$

## Current Final TIL, More Challenging, ARM, A, Name Set 1, page 2

| Assumption: $\quad$ Someone buying your house: |  |
| :--- | :--- |
| 区 cannot assume the remainder of the mortgage on | $\square$ may, subject to conditions, be allowed to assume the |
| the original terms. |  |

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided
unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
| Credit Disability |  |  | Signature |
|  |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  | $\overline{\text { Signature }}$ |


| Prepayment: <br> $\square$ may <br> $\square$ may <br>  <br> $\quad$If you pay off your loan early, you <br> See your contract documents for any additional information about nonpayment, default, any required <br> repayment in full before the scheduled date, and prepayment refunds and penalties. |
| :--- | :---: | :--- |

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |  |
| :--- | :--- |
| Borrower: Mary B. | Date |
|  |  |

Current HUD-1, More Challenging, ARM, A, Name Set 1, page 1


Current HUD-1, More Challenging, ARM, A, Name Set 1, page 2

| L. Settlement Charges |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 700. Total Real Estate Broker Fees \$10,550 |  |  | Paid From Borrower's Funds at Settlement | Paid From Seller's Funds at Settlement |
| Division of commission (line 700) as follows : |  |  |  |  |
| 701. \$5,275.00 to Alpha Real Estate Broker |  |  |  |  |
| 702. \$ 5,275.00 to Omega Real Estate Broker |  |  |  |  |
| 703. Commission paid at settlement |  |  |  | \$550.00 |
| 704. Deposit retained by Alpha Real Estate Broker \$10,000.00 |  |  |  |  |
| 800. Items Payable in Connection with Loan |  |  |  |  |
| 801. Our origination charge | \$ 1,400.00 | (from GFE \#1) |  |  |
| 802. Your credit or charge (points) for the specific interest rate chosen | \$ 2,110.00 | (from GFE \#2) |  |  |
| 803. Your adjusted origination charges |  | (from GFE \#A) | \$3,510.00 |  |
| 804. Appraisal fee to John Smith Appraisers, Inc. (POC \$305.00 Borrower) |  | (from GFE \#3) |  |  |
| 805. Credit report to Information Inc. (POC \$30.00 Borrower) |  | (from GFE \#3) |  |  |
| 806. Tax service to Info Co. |  | (from GFE \#3) | \$50.00 |  |
| 807. Flood certification to Info Co. |  | (from GFE \#3) | \$35.00 |  |
| 808. |  |  |  |  |
| 809. |  |  |  |  |
| 810. |  |  |  |  |
| 811. |  |  |  |  |
| 900. Items Required by Lender to be Paid in Advance |  |  |  |  |
| 901. Daily interest charges from 4/15/2013 to 5/1/2013 @ \$ 23.44 /day |  | (from GFE\#10) | \$375.04 |  |
| 902. Mortgage insurance premium for months to |  | (from GFE \#3) |  |  |
| 903. Homeowner's insurance for 1 years to Insurance Co. |  | (from GFE \#11) | \$1,243.20 |  |
| 904. Property Taxes 6 months to Any County USA |  |  | \$2,700.00 |  |
| 1000. Reserves Deposited with Lender |  |  |  |  |
| 1001. Initial deposit for your escrow account |  | (from GFE \#9) | \$1,107.19 |  |
| 1002. Homeowner's insurance 2 months @ \$ 103.60 per month | \$ 207.20 |  |  |  |
| 1003. Mortgage insurance months @ \$ permonth | \$ |  |  |  |
| 1004. Property Taxes 2 months @ \$ 450.00 per month | \$ 900.00 |  |  |  |
| 1005.0 months @ \$ per month | \$ |  |  |  |
| 1006. months @ \$ per month | \$ |  |  |  |
| 1007. Aggregate Adjustment | -\$ 0.01 |  |  |  |
| 1100. Title Charges |  |  |  |  |
| 1101. Title services and lender's title insurance |  | (from GFE \#4) | \$1,682.00 |  |
| 1102. Settlement or closing fee | \$ |  |  |  |
| 1103. Owner's title insurance |  | (from GFE \#5) | \$1,436.00 |  |
| 1104. Lender's title insurance | \$ 665.00 |  |  |  |
| 1105. Lender's title policy limit \$ 211,000.00 |  |  |  |  |
| 1106. Owner's title policy limit \$ $240,000.00$ |  |  |  |  |
| 1107. Agent's portion of the total title insurance premium to Epsilon Title Co. | \$ 1,680.80 |  |  |  |
| 1108. Underwriter's portion of the total title insurance premium to Underwriter Inc. | \$ 420.20 |  |  |  |
| 1109. |  |  |  |  |
| 1110. |  |  |  |  |
| 1111. |  |  |  |  |
| 1200. Government Recording and Transfer Charges |  |  |  |  |
| 1201. Government recording charges |  | (from GFE \#7) | \$156.00 |  |
| 1202. Deed \$ 78.00 Mortgage \$ 78.00 Release \$ |  |  |  |  |
| 1203. Transfer taxes |  | (from GFE \#8) |  |  |
| 1204. City/County tax/stamps Deed \$ Mortgage \$ |  |  |  |  |
| 1205. State tax/stamps $\quad$ Deed \$ 2,110.00 Mortgage \$ |  |  |  | \$2,110.00 |
| 1206. |  |  |  |  |
| 1300. Additional Settlement Charges |  |  |  |  |
| 1301. Required services that you can shop for |  | (from GFE \#6) | \$265.00 |  |
| 1302. Pest Inspection Fee to Pests Co. \$ 115.00 |  |  |  |  |
| 1303. Survey Fee to Surveyors Co. \$ 150.00 |  |  |  |  |
| 1304. Home Inspection Fee to Engineers Inc. (POC $\$ 750.00$ Seller) |  |  |  |  |
| 1305. Structural Inspection Fee to Structural Engineers Inc. (POC \$1,110.00 Seller) |  |  |  |  |
| 1400. Total Settlement Charges (enter on lines 103, Section J and 502, Section K) |  |  | \$12,559.43 | \$2,660.00 |


| Previous edition are obsolete | Page 2 of 3 | HUD-1 |
| :--- | :---: | :---: |

Current HUD-1, More Challenging, ARM, A, Name Set 1, page 3

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$1,400.00 \& \$1,400.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& \$2,110.00 \& \$2,110.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$3,510.00 \& \$3,510.00 \\
\hline Transfer taxes \& \# 1203 \& \$0.00 \& \$0.00 \\
\hline \multicolumn{2}{|l|}{Charges That In Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline Government recording charges \& \# 1201 \& \$152.00 \& \$156.00 \\
\hline Appraisal Fee \& \# 802 \& \$305.00 \& \$305.00 \\
\hline Credit Report Fee \& \# 805 \& \$30.00 \& \$30.00 \\
\hline Flood certification \& \# 807 \& \$35.00 \& \$35.00 \\
\hline Tax service \& \# 806 \& \$50.00 \& \$50.00 \\
\hline Title services \& \# 1101 \& \$1,646.00 \& \$1,682.00 \\
\hline Owner's Title Insurance \& \# 1103 \& \$1,436.00 \& \$1,436.00 \\
\hline \multirow[t]{2}{*}{Survey Fee to Surveys Co.} \& \# 1303 \& \$150.00 \& \$150.00 \\
\hline \& Total \& \$3,804.00 \& \$3,844.00 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \$ 40 \& 1.05 \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$0.00 \& \$1,107.19 \\
\hline Daily interest charges \(\$ 23.44\) /day \& \# 901 \& \$351.60 \& \$375.04 \\
\hline Homeowner's insurance \& \# 903 \& \$1,000.00 \& \$1,243.20 \\
\hline Pest Inspection Fee \& \# 1302 \& \$125.00 \& \$115.00 \\
\hline \multicolumn{2}{|l|}{\#} \& \& \\
\hline \& \# \& \& \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 211,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{4.00 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ 665.28 includes
Principal
Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No Yes, it can rise to a maximum of \\
\(12 \%\). The first change will be on \(5 / 01 / 2018\) and can change again every 3 years \\
after 5/01/2018 \\
. Every change date, your interest rate can increase or decrease by \\
\(2 \%\). Over the life of the loan, your interest rate is guaranteed to never be lower than \\
3.25 \(\%\) or higher than \(12 \%\).
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No \\
Yes, it can rise to a maximum of \$ 224,480.79
\end{tabular}} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\(\square\) No \(\square\) Yes, the first increase can be on 06/01/2018 and the monthly amount owed can rise to \(\$ 1,611.61\). The maximum it can ever rise to is \(\$ 2,365.05\)} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(\triangle\) No \(\square\) Yes, your maximum prepayment penalty is \$} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{\begin{tabular}{l}
\(\square\) No \(\square\) Yes, you have a balloon payment of \$ \\
on
\end{tabular}} \& \begin{tabular}{l}
due in \\
years
\end{tabular} \\
\hline Total monthly amount owed including escrow account payments \& \multicolumn{3}{|l|}{\begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself. \\
You have an additional monthly escrow payment of \$ 553.60 \\
that results in a total initial monthly amount owed of \$ 1,218.88 \\
principal, interest, any mortagage insurance and any items checked below:
Property taxes Homeowner's insurance
Flood insurance 

\end{tabular}} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



Current More Challenging ARM B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Tulip Bank and Name Set 2 used Hornbeam Bank.

## Current Initial TIL, More Challenging, ARM, B, Name Set 1, page 1

## Truth-In-Lending Disclosure Statement

| Lender: Tulip Bank | Loan No. 123456789 | Date: 2/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 <br>  <br>  <br>  <br> 区 Preliminary |  |


| Annual Percentage Rate <br> The cost of your credit as a yearly rate. 5.067\% | Finance Charge <br> The dollar amount the credit will cost you assuming the annual percentage rate does not change. <br> \$219,153.17 | Amount Financed <br> The amount of credit provided to you or on your behalf as of loan closing. $\$ 209,283.31$ | Total of Payments <br> The amount you will have paid after you have made all payments as scheduled assuming the annual percentage rate does not change. <br> \$588,816.48 |
| :---: | :---: | :---: | :---: |

You have the right to receive at this time an itemization of the Amount Financed.

| $\square$ I want an itemization. |  | - | I do not want an itemization. |  |
| :---: | :---: | :---: | :---: | :---: |
| INTEREST RATE AND PAYMENT SUMMARY |  |  |  |  |
|  | INTRODUCTORY Rate \& Monthly Payment (for first seven years) | MAXIMUM during FIRST FIVE YEARS 4/15/2013 | $\begin{gathered} \text { 6/1/20 } \\ 1^{\text {st }} \text { adjustment } \end{gathered}$ | MAXIMUM EVER (as early as 5/1/23) |
| Interest Rate | 4.25\% | 4.25\% | 5.25\% | 8.0\% |
| Principal Payment | -None- | -None- | \$395.12 | \$335.12 |
| Interest Payment | \$747.29 | \$747.29 | \$923.12 | \$1,315.94 |
| Est. Taxes + Insurance (Escrow) <br> - Includes Private Mortgage Insurance | \$554.52 | \$554.52 | \$554.52 | \$554.52 |
| Total Est. Monthly Payment | \$1,301.81 | \$1,301.81 | \$1,872.76 | \$2,205.58 |

Introductory Rate Notice
You have a discounted introductory rate of $4.25 \%$ that ends after the first seven years. In the eighth year, even if market rates do not change, this rate will increase to $4.86 \%$.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |
| :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |
| $\square$ Demand Feature: This obligation has a demand feature as follows: |
| ® Variable Rate Feature: This loan has a variable-rate feature. Disclosures about the variable-rate feature <br> have been provided to you earlier. |
| $\square$ Required Deposit: The annual percentage rate does not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |
| Filing/Recording Fees \$ 225.00 Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |

## Current Initial TIL, More Challenging, ARM, B, Name Set 1, page 2

| Assumption: <br> 区 cannot assume the remainder of the mortgage on <br> the original terms. | $\square$ may, subject to conditions, be allowed to assume the <br> remainder of the mortgage on the original terms. |
| :--- | :--- |

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
|  |  |  | Signature |
| Credit Disability |  | I want credit disability insurance. |  |
| Credit Life and Disability |  |  | $\overline{\text { I want credit life and disability insurance. }}$ |
|  |  |  |  |

Prepayment: If you pay off your loan early, you

| $\square$ may | $\boxed{x}$ will not | have to pay a penalty. |
| :--- | :--- | :--- |
| $\square$ may | 区 will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.

| Borrower: John A. |
| :--- |
| Borrower: Mary B. |


| Date |
| :--- |
| Date |

Page $\mathbf{2}$ of $\mathbf{2}$

## Good Faith Estimate（GFE）

| Name of Originator Tulip Bank |  |
| :--- | :--- |
| Originator 4321 Random Boulevard <br> Address Somecity，ST 12340 |  |
| Originator Phone Number 123－456－7890 |  |
| Originator Email joesmith＠tulipbank．com |  |


| Borrower John A．and Mary B． |
| :--- | :--- |
| Property 456 Somewhere Avenue <br> Address Anytown，ST 12345 <br> Date of GFE 2／15／2013 ${ }^{2}$ |

This GFE gives you an estimate of your settlement charges and loan terms if you are approved for this loan． For more information，see HUD＇s Special Information Booklet on settlement charges，your Truth－in－Lending Disclosures，and other consumer information at www．hud．gov／respa．If you decide you would like to proceed with this loan，contact us．

Shopping for Only you can shop for the best loan for you．Compare this GFE with other loan offers，so you can find the best your loan Important dates loan．Use the shopping chart on page 3 to compare all the offers you receive．

1．The interest rate for this GFE is available through $4 / 16 / 20135: 00$ PM EDT ．After this time，the interest rate，some of your loan Origination Charges，and the monthly payment shown below can change until you lock your interest rate．
2．This estimate for all other settlement charges is available through 3／22／2013 5：00PM EDT
3．After you lock your interest rate，you must go to settlement within 60 days（your rate lock period）to receive the locked interest rate．
4．You must lock the interest rate at least N／A days before settlement．

## Summary of your loan

Escrow
account information

| Your initial loan amount is |
| :--- |
| Your loan term is |
| Your initial interest rate is |
| Your initial monthly amount owed for principal， <br> interest，and any mortgage insurance is |
| Can your interest rate rise？ |
| Even if you make payments on time，can your <br> loan balance rise？ |
| Even if you make payments on time，can your <br> monthly amount owed for principal，interest， <br> and any mortgage insurance rise？ |
| Does your loan have a prepayment penalty？ |
| Does your loan have a balloon payment？ |


| \＄211，000．00 |  |  |
| :---: | :---: | :---: |
| 30 | years |  |
| 4.25 | \％ |  |
| \＄ 856.31 | per month |  |
| $\square \mathrm{No}$ | 区 Yes，it can rise to a maximum of 8.0 The first change will be in 7 years． | \％． |
| 区 No | $\square$ Yes，it can rise to a maximum of \＄ |  |
|  | Yes，the first increase can be in 7 years． and the monthly amount owed can rise to $\$ 1,427.26$ ．The maximum it can ever rise to is \＄1，760．08 |  |
| 区 No | Yes，your maximum prepayment penalty is \＄ |  |
| ＊No | Yes，you have a balloon payment of \＄ due in years． |  |

Some lenders require an escrow account to hold funds for paying property taxes or other property－related charges in addition to your monthly amount owed of \＄856．31
Do we require you to have an escrow account for your loan？
$\square$ No，you do not have an escrow account．You must pay these charges directly when due．
$\sqrt{\mathbf{x}}$ Yes，you have an escrow account．It may or may not cover all of these charges．Ask us．
Summary of your settlement charges

| A | Your Adiusted Oirignation Charges（Sse pese 2 ） | \＄1，300．00 |
| :---: | :---: | :---: |
| B | Your Charges for Al Other Settement Sevices（seopeges 2） | \＄5，995．69 |
| A | B Total Estimated Settlement Charges | \＄7，295．69 |

Understanding
your estimated
settlement
charges

Some of these
charges can change at settlement See the top of page 3 for more information.


## Instructions

Understanding which charges can change at settlement

Using the tradeoff table

Using the shopping chart

If your loan is sold in the future

This GFE estimates your settlement charges. At your settlement, you will receive a HUD-1, a form that lists your actual costs. Compare the charges on the HUD-1 with the charges on this GFE. Charges can change if you select your own provider and do not use the companies we identify. (See below for details.)


In this GFE, we offered you this loan with a particular interest rate and estimated settlement charges. However:

- If you want to choose this same loan with lower settlement charges, then you will have a higher interest rate. - If you want to choose this same loan with a lower interest rate, then you will have higher settlement charges.

If you would like to choose an available option, you must ask us for a new GFE.
Loan originators have the option to complete this table. Please ask for additional information if the table is not completed.

|  | The loan in this GFE | The same loan with lower settlement charges | The same loan with a lower interest rate |
| :---: | :---: | :---: | :---: |
| Your initial loan amount | \$ 211,000.00 | \$ | \$ |
| Your initial interest rate ${ }^{1}$ | 4.25 \% | \% | \% |
| Your initial monthly amount owed | \$ 856.31 | \$ | \$ |
| Change in the monthly amount owed from this GFE | No change | You will pay \$ more every month | You will pay \$ less every month |
| Change in the amount you will pay at settlement with this interest rate | No change | Your settlement charges will be reduced by \$ | Your settlement charges will increase by \$ |
| How much your total estimated settlement charges will be | $\$_{7,295.69}$ | \$ | \$ |

${ }^{1}$ For an adjustable rate loan, the comparisons above are for the initial interest rate before adjustments are made.
Use this chart to compare GFEs from different loan originators. Fill in the information by using a different column for each GFE you receive. By comparing loan offers, you can shop for the best loan.

|  | This loan | Loan 2 | Loan 3 | Loan 4 |
| :--- | :--- | :--- | :--- | :--- |
| Loan originator name | Tulip Bank |  |  |  |
| Loan term | $\$ 211,000.00$ |  |  |  |
| Initial interest rate | 30 years |  |  |  |
| Initial monthly amount owed | $4.25 \%$ |  |  |  |
| Rate lock period | $\$ 856.31$ |  |  |  |
| Can interest rate rise? | 60 days |  |  |  |
| Can loan balance rise? | Yes |  |  |  |
| Can monthly amount owed rise? | No |  |  |  |
| Prepayment penalty? | Yes |  |  |  |
| Balloon payment? | No |  |  |  |
| Total Estimated Settlement Charges | No |  |  |  |

Some lenders may sell your loan after settlement. Any fees lenders receive in the future cannot change the loan you receive or the charges you paid at settlement.

## Current Final TIL, More Challenging, ARM, B, Name Set 1, page 1

# Truth-In-Lending Disclosure Statement 

| Lender: Tulip Bank | Loan No. 123456789 | Date: 4/15/2013 |
| :--- | :--- | :--- |
| Borrowers: John A. and Mary B. | Property Address: 456 Somewhere Avenue, Anytown, ST 12345 |  |
|  | $\square$ Preliminary | 区 Final |


| Annual Percentage Rate <br> The cost of your credit as a <br> yearly rate. | Finance Charge <br> The dollar amount the credit will <br> cost you assuming the annual <br> percentage rate does not <br> change. | Amount Financed <br> The amount of credit provided to <br> you or on your behalf as of loan <br> closing. | Total of Payments <br> The amount you will have paid <br> after you have made all <br> payments as scheduled assuming <br> the annual percentage rate does <br> not change. |
| :---: | :--- | :--- | :--- |
| $\mathbf{5 . 3 3 5 \%}$ | $\mathbf{\$ 2 2 2 , 3 0 9 . 2 3}$ | $\$ 210,012.12$ | $\$ 651,743.54$ |

You have the right to receive at this time an itemization of the Amount Financed.
$\square$ I want an itemization.
$\square$ I do not want an itemization.

INTEREST RATE AND PAYMENT SUMMARY
This loan offers you several monthly payment options. The table below shows you what your payments would be under two of these options if the interest rate reached its maximum of $\mathbf{8 \%}$ in the $10^{\text {th }}$ year of this loan.

All payments shown in the table include $\$ 712.78$ for estimated taxes and insurance (escrow).

|  |  | 7 years intro |
| :--- | :---: | :---: |
| Maximum Interest Rate | $4.125 \%$ (intro rate) | + every year after |
| Full Payment Option | $\$ 1,749.93$ | $\$ 125 \%$ |
| Monthly payments cover all principal and <br> interest. |  |  |
| Minimum Payment Option <br> Initial monthly payments cover no principal <br> and only some interest and increase your <br> loan amount. | $\$ 1,112.78$ |  |

You will borrow an additional \$22,322.19 by 6/1/18 if you make only minimum payments on this loan.

| THERE IS NO GUARANTEE THAT YOU WILL BE ABLE TO REFINANCE TO LOWER YOUR RATE AND PAYMENTS. |
| :---: |
| You are not required to complete this agreement merely because you have received these disclosures or have signed a loan application. |
| $\square$ Demand Feature: This obligation has a demand feature as follows: |
| $\boxed{\otimes}$ Variable Rate Feature: This loan has a variable-rate feature. Disclosures about the variable-rate feature <br> have been provided to you earlier. |
| $\square$ Required Deposit: The annual percentage rate does not take into account your required deposit. |
| You are giving a security interest in: 456 Somewhere Avenue, Anytown, ST 12345 |
| Filing/Recording Fees \$ 224.00 Non-filing insurance \$ |
| Late Charge: If a payment is more than $\mathbf{1 5}$ days late, you will be charged $\mathbf{5 \%}$ of the monthly principal and interest payment. |

## Current Final TIL, More Challenging, ARM, B, Name Set 1, page 2

| Assumption: Someone buying your house: |  |
| :--- | :--- |
| 区 cannot assume the remainder of the mortgage on | $\square$ may, subject to conditions, be allowed to assume the |
| the original terms. |  |

You may obtain property insurance from anyone you want that is acceptable to the Lender, provided such carrier meets the requirements of the Lender.

If you get the insurance from the Lender, you will pay the cost set forth in a separate insurance statement furnished by the Lender.

## Insurance:

Credit life insurance and credit disability insurance are not required to obtain credit, and will not be provided unless you sign and agree to pay the additional cost.

| Type | Premium | Signature |  |
| :--- | :--- | :--- | :--- |
| Credit Life |  | I want credit life insurance. |  |
| Credit Disability |  |  | $\overline{\text { Signature }}$ |
|  |  |  |  |
| Credit Life and Disability credit disability insurance. |  |  |  |
|  |  |  |  |


| Prepayment: | If you pay off your loan early, you |  |
| :--- | :---: | :--- |
| $\square$ may | $\boxed{\otimes}$ will not | have to pay a penalty. |
| $\square$ may | $\boxed{x}$ will not | be entitled to a refund of part of the finance charge. |

See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds and penalties.

I/We hereby acknowledge reading and receiving a copy of this disclosure.
Borrower: John A.

| Date |
| :--- |
| Date |

Page $\mathbf{2}$ of $\mathbf{2}$


Current HUD-1, More Challenging, ARM, B, Name Set 1, page 2

| L. Settlement Charges |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 700. Total Real Estate Broker Fees \$10,550 |  |  | Paid From Borrower's Funds at Settlement | Paid From Seller's Funds at Settlement |
| Division of commission (line 700) as follows : |  |  |  |  |
| 701. \$5,275.00 to Alpha Real Estate Broker |  |  |  |  |
| 702. \$ 5,275.00 to Omega Real Estate Broker |  |  |  |  |
| 703. Commission paid at settlement |  |  |  | \$550.00 |
| 704. Deposit retained by Alpha Real Estate Broker \$10,000.00 |  |  |  |  |
| 800. Items Payable in Connection with Loan |  |  |  |  |
| 801. Our origination charge | \$ 1,300.00 | (from GFE \#1) |  |  |
| 802. Your credit or charge (points) for the specific interest rate chosen | \$ 2,140.00 | (from GFE \#2) |  |  |
| 803. Your adjusted origination charges |  | (from GFE \#A) | \$3,440.00 |  |
| 804. Appraisal fee to John Smith Appraisers, Inc. (POC \$450.00 Borrower) |  | (from GFE \#3) |  |  |
| 805. Credit report to Information Inc. (POC \$25.00 Borrower) |  | (from GFE \#3) |  |  |
| 806. Tax service to Info Co. |  | (from GFE \#3) | \$40.00 |  |
| 807. Flood certification to Info Co. |  | (from GFE \#3) | \$50.00 |  |
| 808. Tax Monitoring Fee to Info Co. |  |  | \$115.00 |  |
| 809. Flood Monitoring Fee to Info Co. |  |  | \$110.00 |  |
| 810. |  |  |  |  |
| 811. |  |  |  |  |
| 900. Items Required by Lender to be Paid in Advance |  |  |  |  |
| 901. Daily interest charges from 4/15/2013 to 5/1/2013 @ \$ 24.52 /day |  | (from GFE \#10) | \$392.32 |  |
| 902. Mortgage insurance premium for months to |  | (from GFE \#3) |  |  |
| 903. Homeowner's insurance for 1 years to Insurance Co. |  | (from GFE \#11) | \$1,170.00 |  |
| 904. Property Taxes 6 months to Any County USA |  |  | \$2,700.00 |  |
| 1000. Reserves Deposited with Lender |  |  |  |  |
| 1001. Initial deposit for your escrow account |  | (from GFE \#9) | \$1,425.55 |  |
| 1002. Homeowner's insurance 2 months @ \$ 97.50 per month | \$ 195.00 |  |  |  |
| 1003. Mortgage insurance 2 months @ \$ 165.28 per month | \$ 330.56 |  |  |  |
| 1004. Property Taxes 2 months @ \$ 450.00 per month | \$ 900.00 |  |  |  |
| 1005. months @ \$ per month | \$ |  |  |  |
| 1006.10 months @ \$ per month | \$ |  |  |  |
| 1007. Aggregate Adjustment | -\$ 0.01 |  |  |  |
| 1100. Title Charges |  |  |  |  |
| 1101. Title services and lender's title insurance |  | (from GFE \#4) | \$1,921.00 |  |
| 1102. Settlement or closing fee | \$ |  |  |  |
| 1103. Owner's title insurance |  | (from GFE \#5) | \$810.00 |  |
| 1104. Lender's title insurance | \$ 892.00 |  |  |  |
| 1105. Lender's title policy limit \$ 214,000.00 |  |  |  |  |
| 1106. Owner's title policy limit \$ $240,000.00$ |  |  |  |  |
| 1107. Agent's portion of the total title insurance premium to Epsilon Title Co. | \$ 1,361.60 |  |  |  |
| 1108. Underwriter's portion of the total title insurance premium to Underwriter Inc. | \$ 340.40 |  |  |  |
| 1109. |  |  |  |  |
| 1110. |  |  |  |  |
| 1111. |  |  |  |  |
| 1200. Government Recording and Transfer Charges |  |  |  |  |
| 1201. Government recording charges |  | (from GFE \#7) | \$224.00 |  |
| 1202. Deed \$ $112.00 \quad$ Mortgage \$ 112.00 Release \$ |  |  |  |  |
| 1203. Transfer taxes |  | (from GFE \#8) |  |  |
| 1204. City/County tax/stamps Deed \$ Mortgage \$ |  |  |  |  |
| 1205. State tax/stamps $\quad$ Deed \$ 2,110.00 Mortgage \$ |  |  |  | \$2,110.00 |
| 1206. |  |  |  |  |
| 1300. Additional Settlement Charges |  |  |  |  |
| 1301. Required services that you can shop for |  | (from GFE \#6) | \$245.00 |  |
| 1302. Pest Inspection Fee to Pests Co. \$ 115.00 |  |  |  |  |
| 1303. Survey Fee to Surveyors Co. \$ 130.00 |  |  |  |  |
| 1304. Home Inspection Fee to Engineers Inc. (POC $\$ 750.00$ Seller) |  |  |  |  |
| 1305. Structural Inspection Fee to Structural Engineers Inc. (POC \$1,100.00 Seller) |  |  |  |  |
| 1400. Total Settlement Charges (enter on lines 103, Section J and 502, Section K) |  |  | \$12,642.87 | \$2,660.00 |

Previous edition are obsolete $\quad$ Page 2 of $3 \ldots$ HUD-1

Current HUD-1, More Challenging, ARM, B, Name Set 1, page 3

\begin{tabular}{|c|c|c|c|}
\hline \multicolumn{2}{|l|}{Comparison of Good Faith Estimate (GFE) and HUD-1 Charrges} \& Good Faith Estimate \& HUD-1 \\
\hline Charges That Cannot Increase \& HUD-1 Line Number \& \& \\
\hline Our origination charge \& \# 801 \& \$1,300.00 \& \$1,300.00 \\
\hline Your credit or charge (points) for the specific interest rate chosen \& \# 802 \& \$0.00 \& \$2,140.00 \\
\hline Your adjusted origination charges \& \# 803 \& \$1,300.00 \& \$3,440.00 \\
\hline Transfer taxes \& \# 1203 \& \$0.00 \& \$0.00 \\
\hline \multicolumn{2}{|l|}{Charges That In Total Cannot Increase More Than 10\%} \& Good Faith Estimate \& HUD-1 \\
\hline Government recording charges \& \# 1201 \& \$225.00 \& \$224.00 \\
\hline Appraisal Fee \& \# 802 \& \$450.00 \& \$450.00 \\
\hline Credit report \& \# 805 \& \$25.00 \& \$25.00 \\
\hline Flood certification/Monitoring \& \# 807/809 \& \$160.00 \& \$160.00 \\
\hline Tax service/Monitoring \& \# 806/808 \& \$155.00 \& \$155.00 \\
\hline Title services/Owner's Title Insurance \& \# 1101/1103 \& \$2,731.00 \& \$2,731.00 \\
\hline Pest Inspection Fee \& \# 1301 \& \$105.00 \& \$115.00 \\
\hline Survey Fee \& \# 1302 \& \$125.00 \& \$130.00 \\
\hline \& Total \& \$3,976.00 \& \$3,990.00 \\
\hline \multicolumn{2}{|r|}{Increase between GFE and HUD-1 Charges} \& \$ 14 \& 0.35 \% \\
\hline \multicolumn{2}{|l|}{Charges That Can Change} \& Good Faith Estimate \& HUD-1 \\
\hline Initial deposit for your escrow account \& \# 1001 \& \$1,109.04 \& \$1,425.55 \\
\hline Daily interest charges \(\$ 24.52\) /day \& \# 901 \& \$373.65 \& \$392.32 \\
\hline Homeowner's insurance \& \# 903 \& \$537.00 \& \$1,170.00 \\
\hline \& \# \& \& \\
\hline \& \# \& \& \\
\hline \& \# \& \& \\
\hline \multicolumn{4}{|l|}{Loan Terms} \\
\hline Your initial loan amount is \& \multicolumn{3}{|l|}{\$ 214,000.00} \\
\hline Your loan term is \& \multicolumn{3}{|l|}{30 years} \\
\hline Your initial interest rate is \& \multicolumn{3}{|l|}{4.125 \%} \\
\hline Your initial monthly amount owed for principal, interest, and any mortgage insurance is \& \multicolumn{3}{|l|}{\$ 565.28 includes
Principal
\(\square\) Interest
Mortgage Insurance} \\
\hline Can your interest rate rise? \& \multicolumn{3}{|l|}{\begin{tabular}{l}
\(\square\) No Xes, it can rise to a maximum of \\
\(8.0 \%\). The first change will be on \(5 / 1 / 2020\) and can change again every year
\(\square\) after \(5 / 1 / 2020\). Every change date, your interest rate can increase or decrease by guaranteed to never be lower than
\end{tabular}} \\
\hline Even if you make payments on time, can your loan balance rise? \& \multicolumn{3}{|l|}{\(\square\) No Yes, it can rise to a maximum of \$ 236,322.19} \\
\hline Even if you make payments on time, can your monthly amount owed for principal, interest, and mortgage insurance rise? \& \multicolumn{3}{|l|}{\(\square\) No Xes, the first increase can be on 6/1/2018 and the monthly amount owed can rise to \(\$ 1,429.04\). The maximum it can ever rise to is \(\$ 1,924.36\)} \\
\hline Does your loan have a prepayment penalty? \& \multicolumn{3}{|l|}{\(\square\) No \(\square\) Yes, your maximum prepayment penalty is \$} \\
\hline Does your loan have a balloon payment? \& \multicolumn{2}{|l|}{\(\square\) Yes, you have a balloon payment of \$} \& \begin{tabular}{l}
due in \\
years
\end{tabular} \\
\hline Total monthly amount owed including escrow account payments \& \multicolumn{3}{|l|}{\begin{tabular}{l}
You do not have a monthly escrow payment for items, such as property taxes and homeowner's insurance. You must pay these items directly yourself. \\
\(X\) You have an additional monthly escrow payment of \$ 547.50 \\
that results in a total initial monthly amount owed of \$ 1,112.78 principal, interest, any mortagage insurance and any items checked below:
Property taxes \\
Homeowner's insurance
Flood insurance 

\end{tabular}} <br>

\hline \multicolumn{4}{|l|}{Note: If you have any questions about the Settlement Charges and Loan Terms listed on this form, please contact your lender.} <br>
\hline Previous edition are obsolete \& \multicolumn{2}{|l|}{Page 3 of 3} \& HUD-1 <br>
\hline
\end{tabular}



## Proposed Easier Fixed A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Aspen Bank and Name Set 2 used Maple Bank.

Proposed Loan Estimate, Easier, Fixed, A, Name Set 1, page 1


## Proposed Loan Estimate, Easier, Fixed, A, Name Set 1, page 2

## Closing Cost Details



Proposed Loan Estimate, Easier, Fixed, A, Name Set 1, page 3

## Additional Information About This Loan

| LENDER | Aspen Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLS ID | 12345 | NMLS ID |
| EMAIL | joesmith@aspenbank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In 5 Years | $\$ 56,582$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. |
| $\$ 15,773$ | Principal you will have paid off. |  |

Other Considerations

## Appraisal

Assumption

## Homeowner's

## Insurance

Late Payment

Refinance

## Servicing

We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. You can pay for an additional appraisal for your own use at your own cost.

If you sell or transfer this property to another person, we will allow, under certain conditions, this person to assume this loan on the original terms. $\mathbf{X}$ will not allow assumption of this loan on the original terms.

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

If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## We intend

$\square$ to service your loan. If so, you will make your payments to us.
$\mathbf{X}$ to transfer servicing of your loan.

## 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.
$\overline{\text { Applicant Signature }} \overline{ } \quad \overline{\text { Co-Applicant Signature }}$

## Proposed Closing Disclosure, Easier, Fixed, A, Name Set 1, page 1

| Closing Disclosure |  |  | This form is a statement of final loan terms and closing costs. Compare this document with your Loan Estimate. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Closing Information |  | Transaction Information |  | Loan Information |  |
| Date Issued | 4/15/2013 | Borrower | John A. and Mary B. 123 Anywhere Street | Loan Term Purpose | 30 years Purchase |
| Closing Date | 4/15/2013 |  |  |  |  |
| Disbursement Date | 4/15/2013 |  | Anytown, ST 12345 | Product | Fixed Rate |
| Settlement Agent | Epsilon Title Co. | Seller | Steve C. and Amy D.321 Somewhere Drive |  |  |
| File \# | 12-3456 |  |  | Loan Type | 区 Conventional $\square$ FHA |
| Property | 456 Somewhere | Lender | Anytown, ST 12345Aspen Bank |  | $\square \mathrm{VA}$ ■ |
|  | Anytown, ST 1234 |  |  | Loan ID \# MIC\# | 123456789 |
| Sale Price | \$180,000 |  |  |  | 000654321 |
| Loan Terms |  |  | Can this amount increase after closing? |  |  |
| Loan Amount |  | \$162,000 | NO |  |  |
| Interest Rate |  | 3.875\% | NO |  |  |
| Monthly Principal \& Interest <br> See Projected Payments below for your Estimated Total Monthly Payment |  | \$761.78 | NO |  |  |
|  |  |  |  |  |  |
| Prepayment Penalty |  |  | Does the loan have these features? |  |  |  |
|  |  |  | YES - Ashigh | you pay o | the loan during the |
| Balloon Payment |  | NO |  |  |  |



## Proposed Closing Disclosure, Easier, Fixed, A, Name Set 1, page 2

## Closing Cost Details



## Other Costs



## Proposed Closing Disclosure, Easier, Fixed, A, Name Set 1, page 3



## Proposed Closing Disclosure, Easier, Fixed, A, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\boldsymbol{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your Ioan amount lower the equity you have in this property
$\mathbf{X}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:

## $\mathbf{X}$ not accept partial payments.

If this loan is sold, your new lender may have a different policy

## Security Interest

You are granting a security interest in
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  | $\$ 2,473.56$ |
| :--- | :---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |  |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> Homeowner's Association Dues |
| Initial Escrow <br> Payment | $\$ 412.25$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 206.13$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Proposed Closing Disclosure, Easier, Fixed, A, Name Set 1, page 5




## Proposed Easier Fixed B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Balsam Bank and Name Set 2 used Nandina Bank.

Proposed Loan Estimate, Easier, Fixed, B, Name Set 1, page 1


## Proposed Loan Estimate, Easier, Fixed, B, Name Set 1, page 2

## Closing Cost Details



## Additional Information About This Loan

| LENDER | Balsam Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLSID | 12345 | NMLS ID |
| EMAIL | joesmith@balsambank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :---: | :--- |
| In 5 Years | $\$ 55,989$ <br> $\$ 14,892$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> Prin will have paid off. |
| Annual Percentage Rate (APR) | $4.581 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |
| Total Interest Percentage (TIP) | $77.28 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |

Other Considerations

## Appraisal

Assumption

## Homeowner's

## Insurance

Late Payment

Refinance

## Servicing

We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. You can pay for an additional appraisal for your own use at your own cost.

If you sell or transfer this property to another person, we will allow, under certain conditions, this person to assume this loan on the original terms. $\mathbf{X}$ will not allow assumption of this loan on the original terms.

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

If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## We intend

$\square$ to service your loan. If so, you will make your payments to us.
$\mathbf{X}$ to transfer servicing of your loan.

## 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.
$\overline{\text { Applicant Signature }} \overline{ } \quad \overline{\text { Co-Applicant Signature }}$

## Proposed Closing Disclosure, Easier, Fixed, B, Name Set 1, page 1

| Closing Disclosure |  |  | This form is a statement of final loan terms and closing costs. Compare this document with your Loan Estimate. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Closing Information |  | Transaction Information |  | Loan Information |  |
| Date Issued | 4/15/2013 | Borrower | John A. and Mary B. | Loan Term | 30 years |
| Closing Date | 4/15/2013 |  | 123 Anywhere Street | Purpose | Purchase |
| Disbursement Date | 4/15/2013 |  | Anytown, ST 12345 | Product | Fixed Rate |
| Settlement Agent | Epsilon Title Co. | Seller | Steve C. and Amy D. |  |  |
| File \# | 12-3456 |  | 321 Somewhere Drive | Loan Type | 区 Conventional $\square$ FHA |
| Property | 456 Somewhere Ave | Lender | Anytown, ${ }^{\text {Balsam Bank }} 12345$ |  | $\square \mathrm{VA} \square$ |
|  | Anytown, ST 12345 |  |  | Loan ID\# | 123456789 |
| Sale Price | \$180,000 |  |  | mic\# | 000654321 |
| Loan Terms |  | Can this amount increase after closing? |  |  |  |
| Loan Amount |  | \$162,000 | NO |  |  |
| Interest Rate |  | 4.50\% | NO |  |  |
| Monthly Principal \& Interest <br> See Projected Payments below for your Estimated Total Monthly Payment |  | \$820.83 | NO |  |  |
|  |  |  |  |  |
| Prepayment Penalty |  |  | Does the loan have these features? |  |  |  |
|  |  |  | NO |  |  |
| Balloon Payment |  | NO |  |  |  |



| Cash to Close |  |  |
| :--- | :--- | :--- |
| Cash to Close | $\$ 14,574.35$ | Includes $\$ 8,722.39$ in Closing Costs $(\$ 2,929.00$ in Loan Costs + <br> $\$ 5,793.39$ in Other Costs $-\$ 0$ in Lender Credits). See details on page 2. |
| CLOSING DISCLOSURE |  |  |

## Proposed Closing Disclosure, Easier, Fixed, B, Name Set 1, page 2

## Closing Cost Details



## Other Costs



| J. TOTAL CLOSING COSTS (Borrower-Paid) | $\mathbf{\$ 8 , 7 2 2 . 3 9}$ |  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | :---: | :---: |
| Closing Costs Subtotals (D+I) | $\$ 7,409.39$ | $\$ 1,313.00$ | $\$ 9,950.00$ | $\$ 750.00$ |  |  |
| Lender Credits |  |  |  |  |  |  |

CLOSING DISCLOSURE PAGE 2 OF $5 \cdot$ LOAN ID \# 123456789

## Proposed Closing Disclosure, Easier, Fixed, B, Name Set 1, page 3



## Proposed Closing Disclosure, Easier, Fixed, B, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
X will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
【 does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{x}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:

区 not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in 456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  | $\$ 4,407.60$ |
| :--- | :---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes, HOA Dues |  |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 734.59$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. <br> Estimated total amount over year 1 for <br> your non-escrowed property costs: |
| Initial Escrow <br> Payment | $\$ 367.30$ | The amount included in your total <br> monthly payment. |
| Monthly Escrow <br> Payment |  |  |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1. You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Proposed Closing Disclosure, Easier, Fixed, B, Name Set 1, page 5

| Loan Calculations |  |
| :--- | ---: |
| Total of Payments. Total you will have paid after <br> you make all payments of principal, interest, <br> mortgage insurance, and loan costs, as scheduled. | $\$ 305,669.27$ |
| Finance Charge. The dollar amount the loan will <br> cost you. | $\$ 140,740.27$ |
| Amount Financed. The loan amount available after <br> paying your upfront finance charge. | $\$ 161,676.00$ |
| Annual Percentage Rate (APR). Your costs over <br> the loan term expressed as a rate. This is not your <br> interest rate. | $4.835 \%$ |
| Total Interest Percentage (TIP). The total amount <br> of interest that you will pay over the loan term as a <br> percentage of your loan amount. | $82.61 \%$ |
| Approximate Cost of Funds (ACF). The approximate <br> cost of the funds used to make this loan. This is not <br> a direct cost to you. | $1.63 \%$ |
|  |  |
| Questions? If you have questions about the loan <br> terms and costs on this form, contact your lender. <br> To get more information or make a complaint, <br> contact the Consumer Financial Protection Bureau <br> at www.consumerfinance.gov/learnmore. |  |

## Other Disclosures

## Appraisal

If the property was appraised for your loan, your lender is required to give you a copy at no additional cost at least 3 days before closing If you have not yet received it, please contact your lender at the information listed below.

## Contract Details

See your note and security instrument for information about

- what happens if you fail to make your payments,
- what is a default on the loan,
- situations in which your lender can require early repayment of the loan, and
- the rules for making payments before they are due.


## Liability after Foreclosure

If your lender forecloses on this property and the foreclosure does not cover the amount of unpaid balance on this loan,
$\mathbf{X}$ state law may protect you from liability for the unpaid balance. If you refinance or take on any additional debt on this property, you may lose this protection and be liable for debt remaining after the foreclosure. You may want to consult a lawyer for more information.
state law does not protect you from liability for the unpaid balance.

## Refinance

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## Tax Deductions

If you borrow more than this property is worth, the interest on the loan amount above this property's fair market value is not deductible from your federal income taxes. You should consult a tax advisor for more information.

| Contact Information |  | Mortgage Broker | Real Estate Broker (B) | Real Estate Broker (S) <br> Omega Real Estate <br> Broker Inc. | Alpha Real Estate <br> Broker Co. |
| :--- | :--- | :--- | :--- | :--- | :--- |
| Name | Lender | Balsam Bank |  | 789 Local Lane <br> Sometown, ST 12345 | 987 Suburb Ct. <br> Someplace, ST 12340 |
| Address | 4321 Random Blvd. <br> Somecity, ST 12340 Co. | 123 Commerce Pl. <br> Somecity, ST 12344 |  |  |  |
| NMLS/ <br> License ID |  | Z765416 | Z61456 | Z61616 |  |
| Contact | Joe S. |  | Samuel G. | Joseph C. | Sarah A. |
| Contact NMLS/ <br> License ID | 12345 | P16415 | P51461 | PT1234 |  |
| Email | joesmith@ <br> balsambank.com |  | sam@omegare.biz | joe@alphare.biz | sarah@ <br> epsilontitle.com |
| Phone | $123-456-7890$ |  | $123-555-1717$ | 321-555-7171 | 987-555-4321 |

## 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.

## Proposed More Challenging Fixed A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Cottonwood Bank and Name Set 2 used Oak Bank.

Proposed Loan Estimate, More Challenging, Fixed, A, Name Set 1, page 1


## Proposed Loan Estimate, More Challenging, Fixed, A, Name Set 1, page 2

## Closing Cost Details



## Additional Information About This Loan

| LENDER | Cottonwood Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLSID | 12345 | NMLSID |
| EMAIL | joesmith@cottonwoodbank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In $\mathbf{5}$ Years | $\$ 112,294$ <br> Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> $\$ 28,956$ | Principal you will have paid off. |

Other Considerations

Appraisal

Assumption If you sell or transfer this property to another person, we
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{x}$ will not allow assumption of this loan on the original terms.
This loan requires homeowner's insurance on the property, which you may obtain from a company of your choice that we find acceptable.

## Insurance

Homeowner's

Late Payment If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Refinance Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## Servicing

We intend
$\square$ to service your loan. If so, you will make your payments to us.
$\boldsymbol{x}$ to transfer servicing of your loan.

## 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.
$\overline{\text { Applicant Signature }} \overline{\text { Co-Applicant Signature }} \quad$ Date

LOAN ESTIMATE

## Proposed Closing Disclosure, More Challenging, Fixed, A, Name Set 1, page 1



## Proposed Closing Disclosure, More Challenging, Fixed, A, Name Set 1, page 2

## Closing Cost Details

| Loan Costs | Borrower-Paid |  | Seller-Paid |  | Paid by Others |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | At Closing | Before Closing | At Closing | Before Closing |  |
| A. Origination Charges | \$4,350.00 |  |  |  |  |
| $011 \%$ of Loan Amount (Points) | \$3,150.00 |  |  |  |  |
| 02 Application Fee | \$300.00 |  |  |  |  |
| 03 Underwriting Fee | \$900.00 |  |  |  |  |
| 04 |  |  |  |  |  |
| 05 |  |  |  |  |  |
| 06 |  |  |  |  |  |
| 07 |  |  |  |  |  |
| 08 |  |  |  |  |  |
| B. Services Borrower Did Not Shop For | \$4,128.50 |  |  |  |  |
| 01 Appraisal Fee to John Smith Appraisers Inc. | \$400.00 |  |  |  |  |
| 02 Credit Report Fee to Information Inc. | \$20.00 \$29.50 |  |  |  |  |
| 03 Flood Determination Fee to Info Co. |  |  |  |  |  |
| 04 Flood Monitoring Fee to Info Co. |  | \$32.00 |  |  |  |
| 05 Tax Monitoring Fee to Info Co. | \$75.00 |  |  |  |  |
| 06 Tax Status Research Fee to Epsilon Title Co. | \$110.00 |  |  |  |  |
| 07 Title - Commitment Letter to Epsilon Title Co. | \$525.00 |  |  |  |  |
| 08 Title - Lender's Title Policy to Epsilon Title Co. | \$475.00 |  |  |  |  |
| 09 Title - Settlement Agent Fee to Epsilon Title Co. | \$550.00 |  |  |  |  |
| 10 Title - Title Search to Epsilon Title Co. | \$1,912.00 |  |  |  |  |
| C. Services Borrower Did Shop For | \$94.00 |  |  |  |  |
| 01 Pest Inspection Fee to Pests Co. | \$94.00 |  |  |  |  |
| 02 (o Pests Co. |  |  |  |  |  |
| 03 |  |  |  |  |  |
| 04 |  |  |  |  |  |
| 05 |  |  |  |  |  |
| 06 |  |  |  |  |  |
| 07 |  |  |  |  |  |
| 08 |  |  |  |  |  |
| D. TOTAL LOAN COSTS (Borrower-Paid) | \$8,572.50 |  |  |  |  |  |
| Loan Costs Subtotals ( $\mathrm{A}+\mathrm{B}+\mathrm{C}$ ) | \$8,017.00 | \$555.50 |  |  |  |

## Other Costs



## Proposed Closing Disclosure, More Challenging, Fixed, A, Name Set 1, page 3



## Proposed Closing Disclosure, More Challenging, Fixed, A, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

Assumption
If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{X}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:
$\mathbf{X}$ not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in $\qquad$
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Adjustable Payment (AP) Table

| Interest Only Payments? | YES for your first 120 payments |  |
| :--- | :--- | :---: |
| Optional Payments? | NO |  |
| Step Payments? | NO |  |
| Seasonal Payments? | NO |  |
| Monthly Principal and Interest Payments |  |  |
| First Change/Amount $\$ 1,951$ at 121st payment |  |  |
| No subsequent changes |  |  |
| Subsequent Changes $\$ 1,951$ starting at 121st payment |  |  |

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  | $\$ 7,146.00$ |
| :--- | :---: | :--- |
| $\begin{array}{l}\text { Escrowed } \\ \text { Property Costs } \\ \text { over Year 1 }\end{array}$ | $\begin{array}{l}\text { Estimated total amount over year 1 for } \\ \text { your escrowed property costs: } \\ \text { Homeowner's Insurance } \\ \text { Property Taxes, HOA Dues }\end{array}$ |  |
| $\begin{array}{l}\text { Non-Escrowed } \\ \text { Property Costs } \\ \text { over Year 1 }\end{array}$ | $\$ 1,190.99$ | $\begin{array}{l}\text { A cushion for the escrow account you } \\ \text { pay at closing. See Section G on page 2. }\end{array}$ |
| $\begin{array}{l}\text { Initial Escrow } \\ \text { Payment }\end{array}$ | your non-escrowed property costs: |  |$\}$

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Proposed Closing Disclosure, More Challenging, Fixed, A, Name Set 1, page 5




Proposed More Challenging Fixed B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Dogwood Bank and Name Set 2 used Pine Bank.

Proposed Loan Estimate, More Challenging, Fixed, B, Name Set 1, page 1


## Proposed Loan Estimate, More Challenging, Fixed, B, Name Set 1, page 2

## Closing Cost Details



| Adjustable Payment (AP) Table |  |
| :---: | :---: |
| Interest Only Payments? | YES for your first 60 payments |
| Optional Payments? | NO |
| Step Payments? | NO |
| Seasonal Payments? | NO |
| Monthly Principal and Interest Payments |  |
| First Change/Amount | \$1,819 at 61st payment |
| Subsequent Changes | No subsequent changes |
| Maximum Payment | \$1,819 starting at 61st payment |

## Additional Information About This Loan

| LENDER | Dogwood Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLSID | 12345 | NMLS ID |
| EMAIL | joesmith@dogwoodbank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In 5 Years | $\$ 94,197$ <br> $\$ 0$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> Principal you will have paid off. |
| Annual Percentage Rate (APR) | $5.321 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |
| Total Interest Percentage (TIP) | $97.78 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |

Other Considerations

## Appraisal

Assumption

## Homeowner's

## Insurance

## Late Payment

Refinance

## Servicing

We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. You can pay for an additional appraisal for your own use at your own cost.

If you sell or transfer this property to another person, we will allow, under certain conditions, this person to assume this loan on the original terms. $\mathbf{X}$ will not allow assumption of this loan on the original terms.

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

If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## We intend

$\square$ to service your loan. If so, you will make your payments to us.
$\mathbf{X}$ to transfer servicing of your loan.

## 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.
$\overline{\text { Applicant Signature }} \overline{ } \quad \overline{\text { Co-Applicant Signature }}$

## Proposed Closing Disclosure, More Challenging, Fixed, B, Name Set 1, page 1



## Proposed Closing Disclosure, More Challenging, Fixed, B, Name Set 1, page 2

## Closing Cost Details



## Other Costs



## Proposed Closing Disclosure, More Challenging, Fixed, B, Name Set 1, page 3



## Proposed Closing Disclosure, More Challenging, Fixed, B, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
X will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{x}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{x}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:

区 not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in $\qquad$
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  | $\$ 5,346.00$ |
| :--- | :---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |  |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> HOA Dues |
| Initial Escrow <br> Payment | $\$ 1,387.63$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 445.50$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

Adjustable Payment (AP) Table

| Interest Only Payments? | YES for your first 60 payments |  |
| :--- | :--- | :---: |
| Optional Payments? | NO |  |
| Step Payments? | NO |  |
| Seasonal Payments? | NO |  |
| Monthly Principal and Interest Payments |  |  |
| $\$ 1,830$ at 61st payment |  |  |
| First Change/Amount | No subsequent changes |  |
| Subsequent Changes | 1,830 starting at 61st payment |  |
| Maximum Payment |  |  |

## Proposed Closing Disclosure, More Challenging, Fixed, B, Name Set 1, page 5

| Loan Calculations |  |
| :--- | ---: |
| Total of Payments. Total you will have paid after <br> you make all payments of principal, interest, <br> mortgage insurance, and loan costs, as scheduled. | $\$ 667,383.04$ |
| Finance Charge. The dollar amount the loan will <br> cost you. | $\$ 344,123.34$ |
| Amount Financed. The loan amount available after <br> paying your upfront finance charge. | $\$ 314,716.48$ |
| Annual Percentage Rate (APR). Your costs over <br> the loan term expressed as a rate. This is not your <br> interest rate. | $5.602 \%$ |
| Total Interest Percentage (TIP). The total amount <br> of interest that you will pay over the loan term as a <br> percentage of your loan amount. | $97.79 \%$ |
| Approximate Cost of Funds (ACF). The approximate <br> cost of the funds used to make this loan. This is not <br> a direct cost to you. | $1.63 \%$ |

Questions? If you have questions about the loan terms and costs on this form, contact your lender. To get more information or make a complaint, contact the Consumer Financial Protection Bureau at www.consumerfinance.gov/learnmore.

## Other Disclosures

## Appraisal

If the property was appraised for your loan, your lender is required to give you a copy at no additional cost at least 3 days before closing. If you have not yet received it, please contact your lender at the information listed below.

## Contract Details

See your note and security instrument for information about

- what happens if you fail to make your payments,
- what is a default on the loan,
- situations in which your lender can require early repayment of the
loan, and
- the rules for making payments before they are due.


## Liability after Foreclosure

If your lender forecloses on this property and the foreclosure does not cover the amount of unpaid balance on this loan,
$\mathbf{X}$ state law may protect you from liability for the unpaid balance. If you refinance or take on any additional debt on this property, you may lose this protection and be liable for debt remaining after the foreclosure. You may want to consult a lawyer for more information. state law does not protect you from liability for the unpaid balance.

## Refinance

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## Tax Deductions

If you borrow more than this property is worth, the interest on the loan amount above this property's fair market value is not deductible from your federal income taxes. You should consult a tax advisor for more information.

| Contact Information |  | Mortgage Broker | Real Estate Broker (B) | Real Estate Broker (S) | Settlement Agent |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Lender |  |  |  |  |
| Name | Dogwood Bank |  | Omega Real Estate Broker Inc. | Alpha Real Estate Broker Co. | Epsilon Title Co. |
| Address | 4321 Random Blvd. Somecity, ST 12340 |  | 789 Local Lane <br> Sometown, ST 12345 | 987 Suburb Ct. <br> Someplace, ST 12340 | 123 Commerce PI. Somecity, ST 12344 |
| NMLS/ License ID |  |  | Z765416 | Z61456 | Z61616 |
| Contact | Joe S. |  | Samuel G. | Joseph C. | Sarah A. |
| Contact NMLS/ License ID | 12345 |  | P16415 | P51461 | PT1234 |
| Email | joesmith@ dogwoodbank.com |  | sam@omegare.biz | joe@alphare.biz | sarah@ epsilontitle.com |
| Phone | 123-456-7890 |  | 123-555-1717 | 321-555-7171 | 987-555-4321 |

## 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 |  |
| :--- | :---: | :---: |
| CLO-Applicant Signature | Date |  |
| CLOSING DISCLOSURE |  | PAGE 5 OF 5•LOAN ID \# 123456789 |



Proposed Easier ARM A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Elm Bank and Name Set 2 used Quince Bank.

Proposed Loan Estimate, Easier, ARM, A, Name Set 1, page 1
4321 Random Boulevard • Somecity, ST 12340 Save this Loan Estimate to compare with your Closing Disclosure.


| Projected Payments |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Payment Calculation | Years 1-7 | Year 8 | Year 9 | Years 10-30 |
| Principal \& Interest | \$560.36 | $\begin{aligned} & \$ 588 \min \\ & \$ 740 \max \end{aligned}$ | $\begin{aligned} & \$ 588 \min ^{2} \\ & \$ 868 \max \end{aligned}$ | $\$ 588 \mathrm{~min}$ \$884 max |
| Mortgage Insurance | + 63 | + | + | + - |
| Estimated Escrow Amount can increase over time | + 0 | + 0 | + 0 | 0 |
| Estimated Total Monthly Payment | \$623 | \$588-\$740 | \$588-\$868 | \$588-\$884 |
| Estimated Taxes, Insurance \& Assessments <br> Amount can increase over time | $\$ 244$ <br> a month | This estimate inclu <br> x Property Taxes <br> $\mathbf{x}$ Homeowner's Ins Other: <br> See Section G on page property costs separat | escrowed property cos | In escrow? <br> NO <br> NO <br> You must pay for other |


| Cash to Close |  |  |
| :--- | :--- | :--- |
| Estimated Cash to Close | $\$ 13,803$ | Includes $\$ 4,803$ in Closing Costs ( $\$ 3,105$ in Loan Costs $+\$ 1,698$ in <br> Other Costs $-\$ 0$ in Lender Credits). See details on page 2. |

Visit www.consumerfinance.gov/learnmore for general information and tools.

## Proposed Loan Estimate, Easier, ARM, A, Name Set 1, page 2

## Closing Cost Details



## Additional Information About This Loan

| LENDER | Elm Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLS ID | 12345 | NMLS ID |
| EMAIL | joesmith@elmbank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In 5 Years | $\$ 40,667$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. |
|  | $\$ 12,006$ | Principal you will have paid off. |

## Other Considerations

| Appraisal | We may order an appraisal to determine the property's value and charge you for this <br> appraisal. We will promply give you a copy of any appraisal, even if your loan does not close. <br> You can pay for an additional appraisal for your own use at your own cost. |
| :--- | :--- |
| Assumption | If you sell or transfer this property to another person, we <br> will allow, under certain conditions, this person to assume this loan on the original terms. <br> will not allow assumption of this loan on the original terms. |
| Homeowner's | This loan requires homeowner's insurance on the property, which you may obtain from a <br> company of your choice that we find acceptable. |
| Insurance | If your payment is more than 15 days late, we will charge a late fee of 5\% of the monthly <br> principal and interest payment. |
| Late Payment | Refinancing this loan will depend on your future financial situation, the property value, and <br> market conditions. You may not be able to refinance this loan. |
| Refinance | We intend <br> Servicing <br> to service your loan. If so, you will make your payments to us. <br> to transfer servicing of your loan. |

## 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.
$\overline{\text { Applicant Signature }} \overline{\text { Co-Applicant Signature }}$

## Proposed Closing Disclosure, Easier, ARM, A, Name Set 1, page 1



Proposed Closing Disclosure, Easier, ARM, A, Name Set 1, page 2

## Closing Cost Details

|  | Borrower-Paid |  | Seller-Paid |  | Paid by Others |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Loan Costs | At Closing | Before Closing | At Closing | Before Closing |  |
| A. Origination Charges | \$700.00 |  |  |  |  |
| 01 \% of Loan Amount (Points) |  |  |  |  |  |
| 02 Application Fee | \$500.00 |  |  |  |  |
| 03 Underwriting Fee | \$200.00 |  |  |  |  |
| 04 |  |  |  |  |  |
| 05 |  |  |  |  |  |
| 06 |  |  |  |  |  |
| 07 |  |  |  |  |  |
| 08 |  |  |  |  |  |
| B. Services Borrower Did Not Shop For | \$2,297 | 97.00 |  |  |  |
| 01 Appraisal Fee to John Smith Appraisers Inc. |  | \$425.00 |  |  |  |
| 02 Credit Report Fee to Information Inc. |  | \$27.00 |  |  |  |
| 03 Flood Determination Fee to Info Co. | \$20.00 |  |  |  |  |
| 04 Survey Fee to Surveyors Co. | \$175.00 |  |  |  |  |
| 05 Tax Status Research Fee to Info Co. | \$120.00 |  |  |  |  |
| 06 Title - Lender's Title Policy to Epsilon Title Co. | \$876.00 |  |  |  |  |
| 07 Title - Settlement Agent Fee to Epsilon Title Co. | \$350.00 |  |  |  |  |
| 08 Title - Title Search Fee to Epsilon Title Co. | \$304.00 |  |  |  |  |
| 09 |  |  |  |  |  |
| 10 |  |  |  |  |  |
| C. Services Borrower Did Shop For | \$11 | 0.00 |  |  |  |
| 01 Pest Inspection Fee to Pests Co. |  | \$110.00 |  |  |  |
| 02 |  |  |  |  |  |
| 03 |  |  |  |  |  |
| 04 |  |  |  |  |  |
| 05 |  |  |  |  |  |
| 06 |  |  |  |  |  |
| 07 |  |  |  |  |  |
| 08 |  |  |  |  |  |
| D. TOTAL LOAN COSTS (Borrower-Paid) | \$3,107 | 07.00 |  |  |  |
| Loan Costs Subtotals ( $\mathrm{A}+\mathrm{B}+\mathrm{C}$ ) | \$2,545.00 | \$562.00 |  |  |  |



## Proposed Closing Disclosure, Easier, ARM, A, Name Set 1, page 3

|  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

## Proposed Closing Disclosure, Easier, ARM, A, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{X}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:

## $\underline{\mathbf{X}}$ not accept partial payments.

If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Escrow Account

For now, your loan
区 will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  |  |
| :--- | ---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | $\$ 2,928.24$ | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> HOA Dues |
| You may have other property costs. |  |  |
| Initial Escrow <br> Payment | $\$ 488.03$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 244.02$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 |  | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

Adjustable Interest Rate (AIR) Table

| Index + Margin | LIBOR +4\% |
| :--- | ---: |
| Initial Interest Rate | $3.75 \%$ |
| Minimum/Maximum Interest Rate | $4.25 \% / 9 \%$ |

## Change Frequency

First Change Beginning of 85th month
Subsequent Changes Every 12th month after first change

Limits on Interest Rate Changes

| First Change | $3 \%$ |
| :--- | :--- |
| Subsequent Changes | $2 \%$ |

## Proposed Closing Disclosure, Easier, ARM, A, Name Set 1, page 5




Proposed Easier ARM B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Fir Bank and Name Set 2 used Redbud Bank.

## Proposed Loan Estimate, Easier, ARM, B, Name Set 1, page 1



## Closing Cost Details

| Loan Costs |  |
| :--- | ---: |
| A. Origination Charges | $\$ 1,460$ |
| 1 \% of Loan Amount (Points) | $\$ 1,210$ |
| Application Fee | $\$ 250$ |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  | $\$ 690$ |
| B. Services You Cannot Shop For | $\$ 500$ |
| Appraisal Fee | $\$ 30$ |
| Credit Report Fee | $\$ 50$ |
| Flood Determination Fee | $\$ 110$ |
| Tax Status Research Fee |  |
|  |  |

Tax Status Research Fee
\$110

| G. Initial Escrow Payment at Closing |  | \$588 |
| :---: | :---: | :---: |
| Homeowner's Insurance | \$35.00 per month for 2 mo . | \$70 |
| Mortgage Insurance | \$62.52 per month for 2 mo . | \$125 |
| Property Taxes | \$196.52 per month for 2 mo . | \$393 |
| H. Other |  | \$710 |
| Title - Owner's Title Policy | (optional) | \$710 |


| I. TOTAL OTHER COSTS $\mathbf{( E + F + \mathbf { G } + \mathbf { H } )}$ | $\mathbf{\$ 1 , 9 0 3}$ |
| :--- | ---: |
|  |  |
| J. TOTAL CLOSING COSTS | $\$ 5,668$ |
| D + I | $\$ 5,668$ |
| Lender Credits |  |
| Calculating Cash to Close | $\$ 5,668$ |
| Total Closing Costs (J) | $\$ 0$ |
| Closing Costs Financed (Included in Loan Amount) | $\$ 14,000$ |
| Down Payment/Funds from Borrower | $-\$ 5,000$ |
| Deposit | $\$ 0$ |
| Funds for Borrower | $\$ 0$ |
| Seller Credits | $\$ 0$ |
| Adjustments and Other Credits | $\$ 14,668$ |
| Estimated Cash to Close |  |


| Adjustable Interest Rate (AIR) Table |  |
| :--- | ---: |
| Index + Margin | COFI + 4\% |
| Initial Interest Rate | $3.375 \%$ |
| Minimum/Maximum Interest Rate | $5 \% / 9 \%$ |
| Change Frequency |  |
| First Change | Beginning of 37th month |
| Subsequent Changes | Every 36th month after first change |
| Limits on Interest Rate Changes |  |
| First Change | $2 \%$ |
| Subsequent Changes | $2 \%$ |


| Other Costs |  |
| :--- | :---: |
| E. Taxes and Other Government Fees | $\mathbf{\$ 2 2 5}$ |
| Recording Fees and Other Taxes $\$ 225$ <br> Transfer Taxes  | $\mathbf{\$ 3 8 0}$ |
| F. Prepaids | $\$ 210$ |
| Homeowner's Insurance Premium ( $\quad 6$ months) <br> Mortgage Insurance Premium ( $\quad$ months) <br> Prepaid Interest ( $\$ 11.34$ per day for 15 days @ 3.375\%) <br> Property Taxes (__ months) | $\$ 170$ |

## Additional Information About This Loan

| LENDER | Fir Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLS ID | 12345 | NMLS ID |
| EMAIL | joesmith@firbank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons |  | Use these measures to compare this loan with other loans. |
| :--- | :--- | :--- |
| In 5 Years | $\$ 42,964$ <br> Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> $\$ 11,344$ | Principal you will have paid off. |
| Annual Percentage Rate (APR) | $5.294 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |
| Total Interest Percentage (TIP) | $93.40 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |

Other Considerations

| Appraisal | We may order an appraisal to determine the property's value and charge you for this <br> appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. <br> You can pay for an additional appraisal for your own use at your own cost. |
| :--- | :--- |
| Assumption | If you sell or transfer this property to another person, we <br> $\square$ will allow, under certain conditions, this person to assume this loan on the original terms. <br> $\mathbf{x}$ will not allow assumption of this loan on the original terms. |
| Homeowner's <br> Insurance | This loan requires homeowner's insurance on the property, which you may obtain from a <br> company of your choice that we find acceptable. |
| Late Payment | If your payment is more than 15 days late, we will charge a late fee of 5\% of the monthly <br> principal and interest payment. |
| Refinance | Refinancing this loan will depend on your future financial situation, the property value, and <br> market conditions. You may not be able to refinance this loan. |
| Servicing | We intend <br> $\square$ to service your loan. If so, you will make your payments to us. <br> $\boldsymbol{X}$ to transfer servicing of your loan. |

## 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.
$\overline{\text { Applicant Signature }} \overline{\text { Co-Applicant Signature }} \quad$ Date
LOAN ESTIMATE PAGE 3 OF 3 • LOAN ID \#123456789

## Proposed Closing Disclosure, Easier, ARM, B, Name Set 1, page 1



## Proposed Closing Disclosure, Easier, ARM, B, Name Set 1, page 2

## Closing Cost Details



| E. Taxes and Other Government Fees | \$240.00 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 01 Recording Fees Deed: \$120.00 Mortgage: \$120.00 | \$240.00 |  |  |  |  |
| 02 State Transfer Tax |  |  | \$1,350.00 |  |  |
| F. Prepaids | \$1,780.56 |  |  |  |  |
| 01 Homeowner's Insurance Premium ( 12 mo .) to Insurance Co. | \$420.00 |  |  |  |  |
| 02 Mortgage Insurance Premium ( mo.) |  |  |  |  |  |
| 03 Prepaid Interest \$11.34 per day from 4/15/13 to 5/1/13 | \$181.44 |  |  |  |  |
| 04 Property Taxes ( 6 mo.) to Any County USA | \$1,179.12 |  |  |  |  |
| 05 |  |  |  |  |  |
| G. Initial Escrow Payment at Closing | \$588.07 |  |  |  |  |
| 01 Homeowner's Insurance \$35.00 per month for 2 mo . | \$70.00 |  |  |  |  |
| 02 Mortgage Insurance $\$ 62.52$ per month for 2 mo . | \$125.04 |  |  |  |  |
| 03 Property Taxes \$196.52 per month for 2 mo . | \$393.04 |  |  |  |  |
| 04 |  |  |  |  |  |
| 05 |  |  |  |  |  |
| 06 |  |  |  |  |  |
| 07 |  |  |  |  |  |
| 08 Aggregate Adjustment | -0.01 |  |  |  |  |
| H. Other Costs | \$1,335.00 |  |  |  |  |
| 01 HOA Capital Contribution to HOA Acre Inc. | \$500.00 |  |  |  |  |
| 02 HOA Processing Fee to HOA Acre Inc. | \$125.00 |  |  |  |  |
| 03 Home Inspection Fee to Engineers Inc. |  |  |  | \$750.00 |  |
| 04 Real Estate Commission to Alpha Real Estate Broker |  |  | \$3,375.00 |  |  |
| 05 Real Estate Commission to Omega Real Estate Broker |  |  | \$3,375.00 |  |  |
| 06 Structural Inspection Fee to Structural Engineers Inc. |  |  |  | \$1,100.00 |  |
| 07 Title - Owner's Title Policy (optional) to Epsilon Title Co. | \$710.00 |  |  |  |  |
| 08 |  |  |  |  |  |
| I. TOTAL OTHER COSTS (Borrower-Paid) | \$3,9 | 43.63 |  |  |  |
| Other Costs Subtotals ( $\mathrm{E}+\mathrm{F}+\mathrm{G}+\mathrm{H}$ ) | \$3,943.63 |  |  |  |  |


| J. TOTAL CLOSING COSTS (Borrower-Paid) | $\mathbf{\$ 7 , 7 0 2 . 6 3}$ |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | :---: |
| Closing Costs Subtotals (D +I$)$ | $\$ 7,073.63$ | $\$ 629.00$ | $\$ 8,100.00$ | $\$ 1,850.00$ |  |
| Lender Credits |  |  |  |  |  |

## Proposed Closing Disclosure, Easier, ARM, B, Name Set 1, page 3



## Proposed Closing Disclosure, Easier, ARM, B, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

## Your loan

$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\square$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\mathbf{X}$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:
$\boldsymbol{X}$ not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in $\qquad$ 456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  |  |
| :--- | ---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | $\$ 2,778.24$ | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> HOA Dues <br> You may have other property costs. |
| Initial Escrow <br> Payment | $\$ 588.07$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 231.52$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 |  | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Adjustable Interest Rate (AIR) Table

| Index + Margin | COFI + 4\% |
| :--- | ---: |
| Initial Interest Rate | $3.375 \%$ |
| Minimum/Maximum Interest Rate | $5 \% / 9 \%$ |

## Change Frequency

| First Change | Beginning of 37th month |
| :--- | ---: |
| Subsequent Changes | Every 36th month after first change |
| Limits on Interest Rate Changes |  |
| First Change | $2 \%$ |
| Subsequent Changes | $2 \%$ |

## Proposed Closing Disclosure, Easier, ARM, B, Name Set 1, page 5

| Loan Calculations |  |
| :--- | ---: |
| Total of Payments. Total you will have paid after <br> you make all payments of principal, interest, <br> mortgage insurance, and loan costs, as scheduled. | $\$ 246,504.48$ |
| Finance Charge. The dollar amount the loan will <br> cost you. | $\$ 122,956.56$ |
| Amount Financed. The loan amount available after <br> paying your upfront finance charge. | $\$ 119,483.52$ |
| Annual Percentage Rate (APR). Your costs over <br> the loan term expressed as a rate. This is not your <br> interest rate. | $5.401 \%$ |
| Total Interest Percentage (TIP). The total amount <br> of interest that you will pay over the loan term as a <br> percentage of your loan amount. | $96.12 \%$ |
| Approximate Cost of Funds (ACF). The approximate <br> cost of the funds used to make this loan. This is not <br> a direct cost to you. | $1.63 \%$ |

Questions? If you have questions about the loan terms and costs on this form, contact your lender. To get more information or make a complaint, contact the Consumer Financial Protection Bureau at www.consumerfinance.gov/learnmore.

## Other Disclosures

## Appraisal

If the property was appraised for your loan, your lender is required to give you a copy at no additional cost at least 3 days before closing. If you have not yet received it, please contact your lender at the information listed below.

## Contract Details

See your note and security instrument for information about

- what happens if you fail to make your payments,
- what is a default on the loan,
- situations in which your lender can require early repayment of the
loan, and
- the rules for making payments before they are due.


## Liability after Foreclosure

If your lender forecloses on this property and the foreclosure does not cover the amount of unpaid balance on this loan,
$\mathbf{X}$ state law may protect you from liability for the unpaid balance. If you refinance or take on any additional debt on this property, you may lose this protection and be liable for debt remaining after the foreclosure. You may want to consult a lawyer for more information. state law does not protect you from liability for the unpaid balance.

## Refinance

Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## Tax Deductions

If you borrow more than this property is worth, the interest on the loan amount above this property's fair market value is not deductible from your federal income taxes. You should consult a tax advisor for more information.

| Contact Information |  | Mortgage Broker | Real Estate Broker (B) | Real Estate Broker (S) | Settlement Agent |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Lender |  |  |  |  |
| Name | Fir Bank |  | Omega Real Estate Broker Inc. | Alpha Real Estate Broker Co. | Epsilon Title Co. |
| Address | 4321 Random Blvd. Somecity, ST 12340 |  | 789 Local Lane <br> Sometown, ST 12345 | 987 Suburb Ct. <br> Someplace, ST 12340 | 123 Commerce PI. <br> Somecity, ST 12344 |
| NMLS/ License ID |  |  | Z765416 | Z61456 | Z61616 |
| Contact | Joe S. |  | Samuel G. | Joseph C. | Sarah A. |
| Contact NMLS/ License ID | 12345 |  | P16415 | P51461 | PT1234 |
| Email | joesmith@ firbank.com |  | sam@omegare.biz | joe@alphare.biz | sarah@ epsilontitle.com |
| Phone | 123-456-7890 |  | 123-555-1717 | 321-555-7171 | 987-555-4321 |

## 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.


Proposed More Challenging ARM A Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Gingko Bank and Name Set 2 used Spruce Bank.

Proposed Loan Estimate, More Challenging, ARM, A, Name Set 1, page 1


Proposed Loan Estimate, More Challenging, ARM, A, Name Set 1, page 2

## Closing Cost Details

|  |  |
| :--- | ---: |
| Loan Costs |  |
| A. Origination Charges | $\mathbf{\$ 3 , 1 1 0}$ |
| $1 \%$ of Loan Amount (Points) | $\$ 2,110$ |
| Application Fee | $\$ 500$ |
| Processing Fee | $\$ 500$ |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  | $\$ 820$ |
| B. Services You Cannot Shop For | $\$ 305$ |
| Appraisal Fee | $\$ 30$ |
| Credit Report Fee | $\$ 35$ |
| Flood Determination Fee | $\$ 400$ |
| Lender's Attorney Fee | $\$ 50$ |
| Tax Status Research Fee |  |


| C. Services You Can Shop For | $\mathbf{\$ 1 , 9 2 1}$ |
| :--- | ---: |
| Pest Inspection Fee | $\$ 125$ |
| Survey Fee | $\$ 150$ |
| Title - Courier Fee | $\$ 32$ |
| Title - Lender's Title Policy | $\$ 665$ |
| Title - Settlement Agent Fee | $\$ 325$ |
| Title - Title Search | $\$ 624$ |
|  |  |
|  |  |
|  |  |
|  | $\mathbf{\$ 5 , 8 5 1}$ |
| D. TOTAL LOAN COSTS (A + B + C) |  |


| Adjustable Payment (AP) Table |  |
| :--- | :--- |
| Interest Only Payments? | YES for your first 60 payments |
| Optional Payments? | NO |
| Step Payments? | NO |
| Seasonal Payments? | NO |
| Monthly Principal and Interest Payments |  |
| First Change/Amount $\$ 1,028-\$ 1,359$ at 61 st payment |  |
| Subsequent Changes |  |
| Maximum Payment | Every three years |


| Adjustable Interest Rate (AIR) Table |  |
| :--- | ---: |
| Index + Margin | MTA + 4\% |
| Initial Interest Rate | $4 \%$ |
| Minimum/Maximum Interest Rate |  |
| Change Frequency |  |
| First Change | Beginning of 61st month |
| Subsequent Changes | Every 36th month after first change |
| Limits on Interest Rate Changes |  |
| First Change | $2 \%$ |
| Subsequent Changes | $2 \%$ |

## Additional Information About This Loan

| LENDER | Gingko Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLS ID | 12345 | NMLS ID |
| EMAIL | joesmith@gingkobank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In $\mathbf{5}$ Years | $\$ 54,944$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> Principal you will have paid off. |
| Annual Percentage Rate (APR) | $4.617 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |
| Total Interest Percentage (TIP) | $81.18 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |

Other Considerations

| Appraisal | We may order an appraisal to determine the property's value and charge you for this <br> appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. <br> You can pay for an additional appraisal for your own use at your own cost. |
| :--- | :--- |
| Assumption | If you sell or transfer this property to another person, we <br> $\square$ will allow, under certain conditions, this person to assume this loan on the original terms. <br> $\mathbf{x}$ will not allow assumption of this loan on the original terms. |
| Homeowner's <br> Insurance | This loan requires homeowner's insurance on the property, which you may obtain from a <br> company of your choice that we find acceptable. |
| Late Payment | If your payment is more than 15 days late, we will charge a late fee of 5\% of the monthly <br> principal and interest payment. |
| Refinance | Refinancing this loan will depend on your future financial situation, the property value, and <br> market conditions. You may not be able to refinance this loan. |
| Servicing | We intend <br> $\square$ to service your loan. If so, you will make your payments to us. <br> $\boldsymbol{X}$ to transfer servicing of your loan. |

## 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.
$\overline{\text { Applicant Signature }} \quad$ Date $\quad$ Co-Applicant Signature $\quad$ Date
LOAN ESTIMATE PAGE 3 OF 3 • LOAN ID \#123456789

## Proposed Closing Disclosure, More Challenging, ARM, A, Name Set 1, page 1

| Closing Disclosure |  |  | This form is a statement of final loan terms and closing costs. Compare this document with your Loan Estimate. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Closing Information |  | Transaction Information |  | Loan Information |  |
| Date Issued | 4/15/2013 | Borrower | John A. and Mary B. 123 Anywhere Street | Loan TermPurpose | 30 years |
| Closing Date | 4/15/2013 |  |  |  | Purchase |
| Disbursement Date | 4/15/2013 |  | Anytown, ST 12345 | Product | 5 Year Negative Amortization, |
| Settlement Agent | Epsilon Title Co. | Seller | Steve C. and Amy D. | Loan Type | 5/3 Adjustable Rate |
| File \# | 12-3456 |  | 321 Somewhere Drive |  | 区 Conventional $\square$ FHA |
| Property | 456 Somewhere | Lender | Anytown, ST 12345 | Loan ID \# | $\square \mathrm{VA} \square$ |
|  | Anytown, ST 123 |  | Gingko Bank |  | 123456789 |
| Sale Price | \$240,000 |  |  | MIC \# | 000654321 |
| Loan Terms |  | Can this amount increase after closing? |  |  |  |
| Loan Amount |  | \$211,000 | YES •Goes as <br> - Increase | gh as $\mathbf{\$ 2 2 4 , 4 8 1}$ until year 6 |  |
| Interest Rate |  | 4\% | YES •Adjusts <br> - Can go <br> - See AIR | ery 3 years starting in year 6 high as $12 \%$ in year 15 ble on page 4 for details |  |
| Monthly Principal \& Interest <br> See Projected Payments below for your Estimated Total Monthly Payment |  | \$500.00 | YES • Adjusts <br> - Can go a <br> - Includes | ery 3 years starting in year 6 <br> high as $\mathbf{\$ 2 , 2 0 0}$ in year 15 <br> nly interest and no principal until year 6 <br> le on page 4 for details |  |
| Prepayment Penalty |  | Does the loan have these features? |  |  |  |
|  |  | NO |  |  |  |
| Balloon Payment |  | NO |  |  |  |
| Projected Payments |  |  |  |  |  |
| Payment Calculation |  | Years 1-5 | Years 6-8 | Years 9-11 | Years 12-30 |
| Principal \& Interest |  | $\begin{array}{r} \$ 500.00 \\ \text { only interest } \end{array}$ | $\begin{aligned} & \$ 1,094 \min \\ & \$ 1,446 \max \end{aligned}$ | $\begin{aligned} & \$ 1,094 \text { min } \\ & \$ 1,707 \text { max } \end{aligned}$ | $\begin{aligned} & \$ 1,094 \text { min } \\ & \$ 2,200 \text { max } \end{aligned}$ |
| Mortgage Insurance |  | + 165.28 | + 165.28 | + 165.28 | + 165.28 |
| Estimated Escrow <br> Amount can increase over time |  | + 553.60 | + 553.60 | + 553.60 | + 553.60 |
| Estimated Total Monthly Payment |  | \$1,218.88 | \$1,813-\$2,165 | \$1,813-\$2,426 | \$1,813-\$2,919 |
| Estimated Taxes, Insurance \& Assessments <br> Amount can increase over time See details on page 4 |  | $\begin{aligned} & \$ 703.60 \\ & \text { a month } \end{aligned}$ | This estimate includes |  | In escrow? |
|  |  | X Property Taxes | YES |  |
|  |  | X Homeowner's Insurance |  |  |
|  |  | See page 4 for escrowed property costs. You must pay for other property costs separately. |  |  |
| Cash to Close |  |  |  |  |  |
| Cash to Close |  |  | \$30,589.43 | Includes $\$ 13,519.43$ in Closing Costs ( $\$ 5,877.00$ in Loan Costs + $\$ 7,642.43$ in Other Costs - $\$ 0$ in Lender Credits). See details on page 2. |  |  |
| CLOSING DISCLOSURE |  |  | PAGE 1 OF 5-LOAN ID \# 123456789 |  |  |

## Proposed Closing Disclosure, More Challenging, ARM, A, Name Set 1, page 2

## Closing Cost Details



## Other Costs



## Proposed Closing Disclosure, More Challenging, ARM, A, Name Set 1, page 3



## Proposed Closing Disclosure, More Challenging, ARM, A, Name Set 1, page 4

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
X will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\mathbf{X}$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:

区 not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in $\qquad$
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Adjustable Payment (AP) Table

| Interest Only Payments? | YES for your first 60 payments |
| :--- | :--- |
| Optional Payments? | NO |
| Step Payments? | YES for your first 60 payments |
| Seasonal Payments? | NO |

Monthly Principal and Interest Payments

| First Change/Amount | $\$ 1,094-\$ 1,446$ at 61 st payment |
| :--- | ---: |
| Subsequent Changes | Every three years |
| Maximum Payment | $\$ 2,200$ starting at 169th payment |

CLOSING DISCLOSURE

## Escrow Account

For now, your loan
X will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  |  |
| :--- | :---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | $\$ 6,643.20$ | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> Homeowner's Association Dues |
| Initial Escrow <br> Payment | $\$ 1,107.19$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 553.60$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 | Estimated total amount over year 1. You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |  |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Adjustable Interest Rate (AIR) Table

| Index + Margin | MTA +4\% |
| :--- | ---: |
| nitial Interest Rate | $4 \%$ |
| Minimum/Maximum Interest Rate |  |
| Change Frequency |  |
| First Change | Beginning of 61st month |
| Subsequent Changes | Every |
| 36th month after first change |  |
| Limits on Interest Rate Changes |  |
| First Change | $2 \%$ |
| Subsequent Changes | $2 \%$ |

PAGE 4 OF $5 \cdot$ LOAN ID \# 123456789

## Proposed Closing Disclosure, More Challenging, ARM, A, Name Set 1, page 5




Proposed More Challenging ARM B Disclosures

The study used two different sets of lender names for the loan disclosures. All other information was identical. Name Set 1 used Hornbeam Bank and Name Set 2 used Tulip Bank.

Proposed Loan Estimate, More Challenging, ARM, B, Name Set 1, page 1


## Proposed Loan Estimate, More Challenging, ARM, B, Name Set 1, page 1

## Closing Cost Details

|  |  |
| :--- | ---: |
| Loan Costs |  |
| A. Origination Charges | $\mathbf{\$ 1 , 3 0 0}$ |
| \% of Loan Amount (Points) |  |
| Application Fee | $\$ 400$ |
| Underwriting Fee | $\$ 900$ |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
| B. Services You Cannot Shop For | $\$ 790$ |
| Appraisal Fee | $\$ 450$ |
| Credit Report Fee | $\$ 25$ |
| Flood Determination Fee | $\$ 50$ |
| Flood Monitoring Fee | $\$ 110$ |
| Tax Monitoring Fee | $\$ 15$ |
| Tax Status Research Fee |  |


| C. Services You Can Shop For | $\mathbf{\$ 2 , 1 5 1}$ |
| :--- | ---: |
| Pest Inspection Fee | $\$ 105$ |
| Survey Fee | $\$ 125$ |
| Title - Lender's Title Policy | $\$ 892$ |
| Title - Search Fee | $\$ 644$ |
| Title - Settlement Agent Fee | $\$ 385$ |

D. TOTAL LOAN COSTS $(A+B+C) \quad \$ 4,241$

| Adjustable Payment (AP) Table |  |
| :--- | :---: |
| Interest Only Payments? |  |
| Optional Payments? |  |
| YES for your first 84 payments |  |
| Step Payments? |  |
| Seasonal Payments? |  |
| Monthly Principal and Interest Payments |  |
| First Change/Amount |  |
| Subsequent Changes |  |
| Maximum Payment |  |


| Adjustable Interest Rate (AIR) Table |  |
| :--- | ---: |
| Index + Margin | LIBOR + 4\% |
| Initial Interest Rate | $4.25 \%$ |
| Minimum/Maximum Interest Rate | $4.5 \% / 8 \%$ |
| Change Frequency |  |
| First Change | Beginning of 85th month |
| Subsequent Changes | Every 12th month after first change |
| Limits on Interest Rate Changes |  |
| First Change |  |
| Subsequent Changes |  |

## Additional Information About This Loan

| LENDER | Hornbeam Bank | MORTGAGE BROKER |
| :--- | :--- | :--- |
| NMLS/LICENSE ID |  | NMLS/LICENSE ID |
| LOAN OFFICER | Joe Smith | LOAN OFFICER |
| NMLS ID | 12345 | NMLS ID |
| EMAIL | joesmith@hornbeambank.com | EMAIL |
| PHONE | $123-456-7890$ | PHONE |


| Comparisons | Use these measures to compare this loan with other loans. |  |
| :--- | :--- | :--- |
| In $\mathbf{5}$ Years | $\$ 56,212$ | Total you will have paid in principal, interest, mortgage insurance, and loan costs. <br> Principal you will have paid off. |
| Annual Percentage Rate (APR) | $5.067 \%$ | Your costs over the loan term expressed as a rate. This is not your interest rate. |
| Total Interest Percentage (TIP) | $96.20 \%$ | The total amount of interest that you will pay over the loan term as a <br> percentage of your loan amount. |

Other Considerations

## Appraisal

Assumption If you sell or transfer this property to another person, we
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.
This loan requires homeowner's insurance on the property, which you may obtain from a company of your choice that we find acceptable.

If your payment is more than 15 days late, we will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Refinance Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan.

## Servicing

$\square$ to service your loan. If so, you will make your payments to us.
$\mathbf{x}$ to transfer servicing of your loan.

## 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.
$\overline{\text { Applicant Signature }} \overline{\text { Co-Applicant Signature }} \quad$ Date

LOAN ESTIMATE
PAGE 3 OF $3 \cdot$ LOAN ID \#123456789

## Proposed Closing Disclosure, More Challenging, ARM, B, Name Set 1, page 1



Proposed Closing Disclosure, More Challenging, ARM, B, Name Set 1, page 2

## Closing Cost Details




## Proposed Closing Disclosure, More Challenging, ARM, B, Name Set 1, page 3

|  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

## Additional Information About This Loan

## Loan Disclosures

## Assumption

If you sell or transfer this property to another person, your lender
$\square$ will allow, under certain conditions, this person to assume this loan on the original terms.
$\mathbf{X}$ will not allow assumption of this loan on the original terms.

## Demand Feature

Your loan
$\square$ has a demand feature, which permits your lender to require early repayment of the loan. You should review your note for details.
$\mathbf{X}$ does not have a demand feature.

## Late Payment

If your payment is more than 15 days late, your lender will charge a late fee of $5 \%$ of the monthly principal and interest payment.

Negative Amortization (Increase in Loan Amount)
Under your loan terms, you
$\mathbf{X}$ are scheduled to make monthly payments that do not pay all of the interest due that month. As a result, your loan amount will increase (negatively amortize), and your loan amount will likely become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.may have monthly payments that do not pay all of the interest due that month. If you do, your loan amount will increase (negatively amortize), and, as a result, your loan amount may become larger than your original loan amount. Increases in your loan amount lower the equity you have in this property.
$\square$ do not have a negative amortization feature.

## Partial Payment

Your lender will
$\square$ accept payments that are less than the full amount due (partial payments). Partial payments will be applied:
$\mathbf{X}$ not accept partial payments.
If this loan is sold, your new lender may have a different policy.

## Security Interest

You are granting a security interest in
456 Somewhere Ave., Anytown, ST 12345

You may lose this property if you do not make your payments or satisfy other obligations for this loan.

## Adjustable Payment (AP) Table

| Interest Only Payments? | YES for your first 60 payments |
| :--- | :--- |
| Optional Payments? | YES for your first 60 payments |
| Step Payments? | YES for your first 60 payments |
| Seasonal Payments? | NO |
| Monthly Principal and Interest Payments |  |
| First Change/Amount $\$ 1,310-\$ 1,390$ at 61st payment |  |
| Subsequent Changes |  |
| Maximum Payment |  |

CLOSING DISCLOSURE

## Escrow Account

For now, your loan
区 will have an escrow account (also called an "impound" or "trust" account) to pay the property costs listed below. Without an escrow account, you would pay them directly, possibly in one or two large payments a year. Your lender may be liable for penalties and interest for failing to make a payment.

| Escrow |  |  |
| :--- | ---: | :--- |
| Escrowed <br> Property Costs <br> over Year 1 | $\$ 6,570.00$ | Estimated total amount over year 1 for <br> your escrowed property costs: <br> Homeowner's Insurance <br> Property Taxes |
| Non-Escrowed <br> Property Costs <br> over Year 1 | $\$ 1,800.00$ | Estimated total amount over year 1 for <br> your non-escrowed property costs: <br> HOA Dues <br> You may have other property costs. |
| Initial Escrow <br> Payment | $\$ 1,425.55$ | A cushion for the escrow account you <br> pay at closing. See Section G on page 2. |
| Monthly Escrow <br> Payment | $\$ 547.50$ | The amount included in your total <br> monthly payment. |

$\square$ will not have an escrow account because $\square$ you declined it $\square$ your lender does not offer one. You must directly pay your property costs, such as taxes and homeowner's insurance. Contact your lender to ask if your loan can have an escrow account.

| No Escrow |  |  |
| :--- | :--- | :--- |
| Estimated <br> Property Costs <br> over Year 1 |  | Estimated total amount over year 1.You <br> must pay these costs directly, possibly <br> in one or two large payments a year. |
| Escrow Waiver Fee |  |  |

## In the future,

Your property costs may change and, as a result, your escrow payment may change. You may be able to cancel your escrow account, but if you do, you must pay your property costs directly. If you fail to pay your property taxes, your state or local government may (1) impose fines and penalties or (2) place a tax lien on this property. If you fail to pay any of your property costs, your lender may (1) add the amounts to your loan balance, (2) add an escrow account to your loan, or (3) require you to pay for property insurance that the lender buys on your behalf, which likely would cost more and provide fewer benefits than what you could buy on your own.

## Adjustable Interest Rate (AIR) Table

| Index + Margin | LIBOR $+4 \%$ |
| :--- | ---: |
| Initial Interest Rate | $4.125 \%$ |
| Minimum/Maximum Interest Rate | $4.5 \% / 8 \%$ |

## Change Frequency

| First Change | Beginning of 85th month |
| :--- | ---: |
| Subsequent Changes | Every 12th month after first change |

## Limits on Interest Rate Changes

| First Change | $1 \%$ |
| :--- | :--- |
| Subsequent Changes | $1 \%$ |

## Proposed Closing Disclosure, More Challenging, ARM, B, Name Set 1, page 5

| Loan Calculations |  |  |  | Other Disclosures |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Total of Payments. Total you will have paid after you make all payments of principal, interest, mortgage insurance, and loan costs, as scheduled. |  |  | \$461,762.42 | Appraisal <br> If the property was appraised for your loan, your lender is required to give you a copy at no additional cost at least 3 days before closing. If you have not yet received it, please contact your lender at the information listed below. |  |  |
| Finance Charge. The dollar amount the loan will cost you. |  |  | \$222,309.23 |  |  |  |
| Amount Financed. The loan amount available after paying your upfront finance charge. |  |  | \$210,012.12 | See your note and security instrument for information about <br> - what happens if you fail to make your payments, <br> - what is a default on the loan, <br> - situations in which your lender can require early repayment of the loan, and <br> - the rules for making payments before they are due. |  |  |
| Annual Percentage Rate (APR). Your costs over the loan term expressed as a rate. This is not your interest rate. |  |  | 5.335\% |  |  |  |
| Total Interest Percentage (TIP). The total amount of interest that you will pay over the loan term as a percentage of your loan amount. |  |  | 90\% | Liability after Foreclosure <br> If your lender forecloses on this property and the foreclosure does not cover the amount of unpaid balance on this loan, |  |  |
| Approximate Cost of Funds (ACF). The approximate cost of the funds used to make this loan. This is not a direct cost to you. |  |  | 1.63\% | X state law may protect you from liability for the unpaid balance. If you refinance or take on any additional debt on this property, you may lose this protection and be liable for debt remaining after the foreclosure. You may want to consult a lawyer for more information. state law does not protect you from liability for the unpaid balance. |  |  |
| Questions? If you have questions about the loan terms and costs on this form, contact your lender. To get more information or make a complaint, contact the Consumer Financial Protection Bureau at www.consumerfinance.gov/learnmore. |  |  |  | Refinance <br> Refinancing this loan will depend on your future financial situation, the property value, and market conditions. You may not be able to refinance this loan. <br> Tax Deductions <br> If you borrow more than this property is worth, the interest on the loan amount above this property's fair market value is not deductible from your federal income taxes. You should consult a tax advisor for more information. |  |  |
|  |  |  |  |  |  |  |
| Contact Information |  |  |  |  |  |  |
|  | Lender | Mortga | e Broker | Real Estate Broker (B) | Real Estate Broker (S) | Settlement Agent |
| Name | Hornbeam Bank |  |  | Omega Real Estate Broker Inc. | Alpha Real Estate Broker Co. | Epsilon Title Co. |
| Address | 4321 Random Blvd. Somecity, ST 12340 |  |  | 789 Local Lane <br> Sometown, ST 12345 | 987 Suburb Ct. <br> Someplace, ST 12340 | 123 Commerce PI. Somecity, ST 12344 |
| NMLS/ <br> License ID |  |  |  | Z765416 | Z61456 | Z61616 |
| Contact | Joe S. |  |  | Samuel G. | Joseph C. | Sarah A. |
| Contact NMLS/ License ID | 12345 |  |  | P16415 | P51461 | PT1234 |
| Email | joesmith@ hornbeambank.com |  |  | sam@omegare.biz | joe@alphare.biz | sarah@ epsilontitle.com |
| Phone | 123-456-7890 |  |  | 123-555-1717 | 321-555-7171 | 987-555-4321 |

## 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 |
| :--- | :--- | :---: | :---: |
| CLOSING DISCLOSURE |  |  | PAGE 5 OF 5•LOAN ID \# 123456789 |



References

Blumberg, Stephen J. and Julian V. Luke. December 2010. Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2010. National Center for Health Statistics. Available at http://www.cdc.gov/nchs/nhis.htm

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Schriesheim, C. A., \& Hill, K. D. (1981). Controlling acquiescence response bias by item reversals and the effect on questionnaire validity. Educational and Psychological Measurement, 41, 1101-1114.


[^0]:    1 See Dodd-Frank Act Section 1032 (f).
    2 See Kleimann Communication Group. July 2012. Know Before You Owe: Evolution of the Integrated TILA-RESPA Disclosures. Available at www.consumerfinance.gov/knowbeforeyouowe. 377 FR 51116 (Aug. 23, 2012).

[^1]:    4 The Proposed Rule provided for a bifurcated comment process. Comments regarding the proposed amendments to 12 CFR 1026.1(c) were required to be received on or before September 7, 2012. For all other proposed amendments and comments pursuant to the Paperwork Reduction Act, comments were required to be received on or before November 6, 2012.
    5 We used these revised disclosures in the Quantitative Study, but because the modifications were relatively minor and for ease of reference, we refer to them as the Proposed Disclosures throughout this report.
    6 See Kleimann Communication Group. November 20, 2013. Post-Proposal Consumer Testing of Spanish and Refinance TILA-RESPA Disclosures. Available at www.consumerfinance.gov/knowbeforeyouowe.

[^2]:    7 Lacko, James and Janis, K. Pappalardo. June 2007. Improving Consumer Mortgage Disclosures: An Empirical Assessment of Current and Prototype Disclosure Forms, Federal Trade Commission, Bureau of Economics Staff Report, Table 6.1, p. 70.
    8 Ibid., Table 6.8, p. 112.
    9 Here and throughout this report, by "statistically significant," we mean at the five percent level based on a two-tailed test.

[^3]:    10 The Parts and Tasks were as follows: Part 2-Task 2; Part 3-Task 3; Part 4-Task 4; and Part 4-Task 5. Task 1 is analyzed separately.

[^4]:    11 Rural populations may be under-represented in the sample due to the on-site, in-person data collection method, as these sites may have been too far for respondents to want to drive to participate at the incentive level offered.

[^5]:    12 Question 16 asked respondents with the current disclosures to identify the settlement charges and asked respondents working with the proposed disclosures to identify the closing costs, based on the language used on each disclosure. The design of the current GFE places the heading Summary of your settlement charges in a prominent position to emphasize it. However, the design of the proposed Loan Estimate places the phrase Cash to Close in a prominent position to emphasize it; the closing costs are present, but are embedded in text, not in a heading. The CFPB team expected some difference in performance, but not at the level that occurred. In fact, $51.6 \%$ of respondents with the proposed disclosures provided the cash to close amount and $46.3 \%$ provided the closing cost amount. Only $2.1 \%$ of respondents provided an answer other than these two.
    13 Kleimann Communication Group, November 20, 2013, Post-Proposal Consumer Testing.
    14 Lacko and Pappalardo, 2007, p. 128.

[^6]:    1 Title X of the Dodd-Frank Act, the "Consumer Financial Protection Act of 2010," Public Law 111-203.
    2 See Dodd-Frank Act Sections 1032(f), 1098, and 1100A.

[^7]:    377 FR 51116 (Aug. 23, 2012).
    4 The Qualitative Study included the Context Setting, Formative Development, and Iterative Usability Testing stages. The Quantitative Study included the Validation Testing stage.
    5 We used these revised disclosures in the Quantitative Study, but because the modifications were relatively minor and for ease of reference, we refer to them as the Proposed Disclosures throughout this report.

[^8]:    6 Kleimann Communication Group. July 2012. Know Before You Owe: Evolution of the Integrated TILA-RESPA Disclosures. Available at www.consumerfinance.gov/knowbeforeyouowe.
    7 The Proposed Rule provided for a bifurcated comment process. Comments regarding the proposed amendments to 12 CFR 1026.1 (c) were required to be received on or before September 7, 2012. For all other proposed amendments and comments pursuant to the Paperwork Reduction Act, comments were required to be received on or before November 6, 2012.

[^9]:    8 See Kleimann Communication Group. November 20, 2013. Post-Proposal Consumer Testing of the Spanish and Refinance Integrated TILA-RESPA Disclosures. Available at www.consumerfinance.gov/knowbeforeyouowe.

[^10]:    9 The CFPB awarded the contract to Kleimann Communication Group under CFP-12-Z-00004 with an award date of 9/28/12. The Kleimann team was led by Dr. Manoj Hastak with data collection by GfK Custom Research.
    10 Lacko, James and Janis, K. Pappalardo. June 2007. Improving Consumer Mortgage Disclosures: An Empirical Assessment of Current and Prototype Disclosure Forms, Federal Trade Commission, Bureau of Economics Staff Report.

[^11]:    12 Note that this corresponds to 16 distinct groups.

[^12]:    Each respondent worked individually to complete the structured questionnaire for either a set of current or proposed disclosures. The disclosure type and loan type were randomized so each

[^13]:    15 Lacko and Pappalardo, 2007, pp. 42-43.
    16 These market facilities are regular partners with GfK Custom Research.

[^14]:    17 This $2 \times 2 \times 2 \times 2$ design created 16 sets of mortgage disclosures, each set containing both initial and final disclosures.

[^15]:    Midwest/East North Central

    - Northeast/Middle AtlanticNortheast/New England

[^16]:    18 Knowledge Networks, now owned by GfK Custom Research, is a part of the contractor team led by Kleimann Communication Group.
    19 Blumberg, S.J. and J.V. Luke. December 2010. Wireless substitution: Early release of estimates from the National Health Interview Survey, January-June 2010. National Center for Health Statistics. Available from: http://www.cdc.gov/nchs/nhis.htm.

[^17]:    20 Respondents skew somewhat toward higher education.

[^18]:    21 We have excluded an analysis of Question 42 and Questions 43 through 48 from this report. For Question 42—"Do you have any comments about the final loan terms and costs?"—respondents provided relatively few useful responses; $45.6 \%$ left the question blank; 12.5\% gave "nothing" (or a variation of such) as their response. For the scale rating questions (Questions 43 through 48), responses were inconsistent. We included reverse wording in these questions following conservative psychometric practice. Four items used an agreement scale to rate whether a task was "easy" to perform and two other items used the same agreement scale to rate whether a task was "hard" to perform. Initial results showed that the scale and item wording may have confused respondents. Schriesheim and Hill (1981) observe that these "confused" responses are often not caused by true, underlying constructs, but are an artifact of the way in which people respond to those items. Respondents can respond inaccurately because they are confused by the negative wording, or because they are careless and read negative items similarly to positive ones. As a result, we excluded these questions from the analysis as well.

[^19]:    22 Lacko and Pappalardo, 2007, Table 6.1, p. 70.
    23 Ibid., Table 6.8, p. 112.

[^20]:    24 Here and throughout this report, by "statistically significant" we mean at the five percent level based on a two-tailed test.

[^21]:    26 For this section, we have divided Table 9 into nine smaller tables relevant to the concept discussion.

[^22]:    27 Lacko and Pappalardo, 2007, p. 128.

[^23]:    28 The results for Questions 16 prompted some modification in the proposed disclosures. These modifications are detailed in Chapter 6 of this report and in Kleimann Communication Group, November 20, 2013, Post-Proposal Consumer Testing.
    29 Lacko and Pappalardo, 2007, p. 128

[^24]:    30 See Kleimann Communication Group, July 2012.

[^25]:    31 See Kleimann Communication Group, November 20, 2013, Post-Proposal Consumer Testing.

[^26]:    46 Blumberg, S.J. and J.V. Luke. December 2010. Wireless substitution: Early release of estimates from the National Health Interview Survey, January-June 2010. National Center for Health Statistics. Available from: http://www.cdc.gov/nchs/ nhis.htm.

