



Welcome to TheFourthC WFG's Monthly Compliance Newsletter

During the past six months, the real estate industry has been consumed by everything "TRID". In this publication we have provided monthly updates on WFG's progress for employee training, workflow modifications and systems integrations - all necessitated by CFPB's initiative commonly referred to as "Know Before You Owe" and the new TRID forms. Our plan for this month's issue of *TheFourthC* was to provide an update to WFG's TRID readiness plan as we counted down the remaining days to the August 1 effective date. On June 17 in an unexpected announcement CFPB Director Richard Cordray proposed extending the effective date to October 1, 2015. Although not yet official, many believe the Director's proposed extension will be approved making October 1 the new effective date.

The two-month delay will help as we continue to educate WFG employees, title agents and vendors and migrate to one operating system. While the extension will help all industry participants be better-prepared, everyone should stay focused and maintain the momentum of being prepared. Mickey Vandenberg addresses this in her article, "*TILA-RESPA Integrated Disclosures aka TRID – Are you ready?*" Stay in touch with WFG's TRID Readiness Team as we continue our journey towards the implementation of the new forms and processes. How is your team preparing for the new Integrated Mortgage Disclosures and the changes in the closing process? Reach out and let us know if you have any innovative ideas that we can share with others.

Also in this month's issue, you will read about new and revised corporate-wide policies and procedures that were approved in May.

This month's publication also updates you on "*What's New in*

WFG Scholar? WFG continues to find ways to utilize their Learning Management System in delivering training, policies and procedures and updates to the WFG Employee Handbook in a manner that we can track and record acknowledgements from the staff.

Interested in a particular compliance or audit topic? Or, writing an article for *TheFourthC*? We are always looking for ideas for new articles and new contributors. If you have an idea for a future article or want to write an article, please contact us at compliance@wfgnationaltitle.com.

*Donald A. O'Neill
Executive Vice President & Chief Compliance Officer
WFG National Title Insurance Company*



TILA-RESPA Integrated Disclosures aka TRID – Are you ready?

Here we are in June, time flies doesn't it? We are now starting our countdown to August 1 and the implementation of TRID in weeks. Next month we will start counting down in days. Although CFPB has proposed an amendment delaying the TRID Rule implementation to October 1, 2015, we should continue on our current path until that is finalized and adopted.

This year, August brings more than the usual summer vacations and opportunities for adventure sports at the shore. For the real estate industry, the biggest wave this year is the new TILA-RESPA Integrated Disclosure aka TRID Rule taking effect which will change

how we do business. So are you ready to meet the demands and requirements?

CFPB has indicated it will aggressively enforce the new regulations, through its enforcement powers and penalties of up to \$1 million per day for any known violation of any law, rule or final order imposed by the CFPB. Since the new disclosures cannot be used prior to the effective date of the TRID Rule, lenders, real estate agents, and settlement service providers will have to rely on dual processes during the transition period beginning on the effective date of the Rule. One process for transactions in which the loan originated prior to the effective date of the Rule, and a different process for transactions in which the loan originated on or after the effective date of the Rule. The new form requirements, along with the new deadlines and disclosure obligations, will complicate the transition process.

The TRID Rule has properly been called an industry game changer and is much more than new documents to replace the GFE, TIL, and HUD-1. We created the WFG TRID Train the Trainer program to bring you awareness and tools on how to navigate waves of the new world. Our theme for our Train the Trainer Program is a tsunami, a big wave that can be devastating if you are unprepared. As the saying goes, "You can't stop the waves, but you can learn to surf."

We started making the rounds with our training program in June and I'm happy to announce that the training has been well received. The first training was on June 4th in Irvine, and then we went on to Portland for another day on June 8th. We have two more training days scheduled; one in Dallas on June 17th and the final one in Seattle on June 22nd. Our objective is to inspire engagement and ownership in the new daily business processes needed to successfully transition, and to meet the requirements of the TILA-RESPA Integrated Disclosure Rule. If you have not or will not attend, make sure you talk to your peers that did or will attend.

Our greatest advantage is being proactive and engaging in the awareness process so we can anticipate our challenges. This also provides lots of opportunities for us to educate and partner with our clients to make the transition as smooth as possible. WFG is an industry leader in all matters compliance, of which TRID is a big part.

TRID will be an industry game-changer, with rough surf and riptides for the unwary but smooth sailing for those who take the time to prepare and learn how to navigate the new currents. So I ask you, are you ready?

*Mickey Vandenberg
National Escrow Manager/Senior Vice President
Williston Financial Group*



GAIN TWO MONTHS IN WFG'S TRID (TILA-RESPA Integrated Disclosures) Readiness

WFG created the TRID Readiness Team in early 2015, which consists of team members from different internal departments. Their goal is to assist all departments in their efforts to implement the changes required to ensure compliance of the new TRID Rule.

As WFG's TRID readiness efforts move into June, we remain focused on ongoing communications with all of our employees and customers. Your participation in this effort is strongly encouraged by becoming engaged in the TRID awareness and starting the dialogue with your customers and co-workers, if you haven't done so already.

Progress on our comprehensive project plan, which includes operational, systems and compliance readiness tasks, remains on schedule. *WFG Scholar* employee training, together with Operational Manager and Sales TRID awareness training, has been rolled out to all divisions. Through our internal communication, we continue to encourage you to focus on TRID awareness and education.

In addition, the TRID Team has actively reached out to customers with the following objectives;

- communicating periodic WFG TRID awareness updates,
- asking for proactive collaboration, and
- introducing our Lender Outreach Program.

Our sales and escrow teams will be actively participating in assisting the TRID Team with obtaining the contact information and providing the Lender Outreach documentation to our customers. This is another great opportunity for WFG to create a WOW factor for our customers and allows us to continue being a leader in the industry for both compliance and TRID.

We will continue to provide you with updates as we get closer to October 1st, which is the expected extended date to implement the new TRID forms for certain loans initiated on or after October 1. We encourage all WFG employees to utilize the WFG on-line tools such as, WFG Scholar and TRID training material located on our WFG Home website, so you are ready for all the upcoming changes. This valuable information can be used in collaboration with our creditors and real estate agents whose lives will be significantly impacted by the new forms, delivery of the forms and new processes. Our customers will likely take a cautious approach in managing their transactions to avoid delays and compliance violations. It is up to each one of us to be prepared and aware of the new rule, new forms, and manage the expectations of our clients. Please reach out to me (WFGTRIDReadiness@wfgnationaltitle.com) for any additional questions or comments that you have as it relates to TRID.

*Dan Gaudreau
TRID Readiness Manager
Williston Financial Group*



Policies & Procedures

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A summary of new and revised WFG Policies and Procedures that were issued in May, 2015 are:

New

→ [WFG Agency Pre-Sign Escrow Review v1.0](#)

Revised

→ [WFG Internal and External Notary Public and Signing Services v5.0](#)

The revised notary P&P includes a new California WFG Agreement for the Provision of Signing/Notary Services, which is now different from the Agreement for the remaining states.



What's New in WFG Scholar?

Employee Handbook Modification Acknowledgements are now in Scholar

The new updated modifications to the Employee Handbooks from 2014 have been uploaded in WFG Scholar for your review and acknowledgement. They are:

- WFG Drug-Free Workplace Policy
- WFG Communications Systems Policy
- WFG Travel and Expense Reimbursement Policy
- WFG Holiday Policy
- WFG California Paid Sick Leave Policy

Employees have seven days in which to review and acknowledge the new policies. They receive a three-day warning through WFG Scholar before their deadline. WFG has additional corporate-wide Policies and Procedures that must be followed, in addition to certain topics contained in the WFG Employee Handbooks.

If you have any questions or concerns regarding your account, please contact training@wfgnationaltitle.com, or if you have questions containing the employee handbook modifications please contact your WFG HR Representative.

A green speech bubble-shaped banner with the text 'FAST FACTS' in a large, white, cursive font in the center. On the left side, there is a circular icon containing the text 'CFPB Final Rule click'. On the right side, there is another circular icon containing the text 'Closing Disclosure Form click'. Below the main text, there is a paragraph of text: 'Turn to The FourthC Fast Facts each month for continued information from The Dodd-Frank Wall Street Reform and Consumer Protection Act, the final CFPB rule on the Integrated Mortgage Disclosures, and updated information from CFPB.'

We've heard that the August 1st date for the new Closing Disclosure and Loan Estimate is now extended?

CFPB plans to delay the new *Know Before You Owe Rule* until October 1, 2015, due to an administrative error, and for consumers and their families rushing to get kids settled into a new school year. Read more here:

<http://www.consumerfinance.gov/newsroom/statement-by-cfpb-director-richard-cordray-on-know-before-you-owe-mortgage-disclosure-rule/>.

Do you know how you can find recent Lender TRID Communication postings?

Our TRID Readiness Team is starting to post Lender TRID bulletins, memos and letters that we receive to our WFG Home Page. As you start to work on lender's transactions you can go to this site to see if we have their communications on how they plan on implementing TRID after October 1st. The communications we receive often have "Frequently Asked Questions" that may be beneficial to your office.

<http://home.williston.local/trid-training/2015/06/lender-trid-communications-received-in-2015-watch-for-updates-as-we-learn-more/>

Did you know that WFG acquired another great guide on TRID for your use?

You will find posted on the internal WFG Home website, the MBA Resource Guide for TILA-RESPA Integrated Disclosures (TRID), for yet another training guide to assist you. This manual provides a great overview for all WFG personnel who want to understand what the changes will be after October 1, 2015. You can find the link here:

<http://home.williston.local/compliance/2015/03/tila-respa-integrated-disclosure-trid-resource-guide/>



WFG Compliance Program

The WFG Compliance Program incorporates the latest industry best practices, as well as CFPB's most recent guidance for third party settlement services providers.

[Check out all the new information on our website](#)