



Request for Public Comments **Proposed Mortgage Call Report Changes**

October 1, 2014

On behalf of the state regulatory agencies participating in NMLS,¹ the State Regulatory Registry LLC² (SRR) invites public comments on proposed changes to the Mortgage Call Report.

Goals of the NMLS Mortgage Call Report

The NMLS Mortgage Call Report (MCR) provides timely, comprehensive, and uniform information concerning the financial condition of licensed mortgage companies, their mortgage loan activities, and the production information of their mortgage loan originators. This information enhances a state regulator's ability to effectively supervise licensees, determine examination schedules, monitor compliance with state law and requirements of Title V of P.L. 110-289, the *Secure and Fair Enforcement for Mortgage Licensing Act of 2008* ("SAFE Act")³, and accurately calculate assessments when applicable.

Another goal of the MCR is that it is modified as necessary to include information required by state regulators such that these regulators do not need to collect information from licensees outside NMLS.

Background

NMLS Mortgage Call Report

The MCR is a quarterly report of condition a company mortgage licensee submits through NMLS. These quarterly reports are comprised of two parts: the state-level "Residential Mortgage Loan Activity Report" (RMLA) and the entity level "Financial Condition Report." In addition, most companies file the "Standard" version of the MCR. Companies that are Fannie Mae or Freddie Mac Seller/Servicers or Ginnie Mae Issuers file the "Expanded" version of the MCR.

The SAFE Act, which became effective July 30, 2008, requires NMLS to develop a mortgage call report that mortgage licensees must submit to the system:

"MORTGAGE CALL REPORTS-Each mortgage licensee shall submit to the Nationwide Mortgage Licensing System and Registry reports of condition, which

¹ Information about NMLS can be found at <http://mortgage.nationwidelicensingsystem.org/Pages/default.aspx>

² Information about the State Regulatory Registry LLC can be found at <http://www.csbs.org/srr/Pages/default.aspx>

³ The full text of the SAFE Act can be found at <http://mortgage.nationwidelicensingsystem.org/SAFE/NMLS%20Document%20Library/SAFE-Act.pdf>

shall be in such form and shall contain such information as the Nationwide Mortgage Licensing System and Registry may require [12 USCA §5104(e)].”

State regulators held conference calls with state and national trade associations in December 2008 to brief the associations on the proposed SAFE Act Implementation Plan, including the Mortgage Call Report provisions.

A working group of state regulators commenced in June 2009 to develop the Mortgage Call Report and accompanying policies. In March 2010, SRR invited [public comment](#)⁴ on the proposed Mortgage Call Report. SRR received 88 comments during this comment period and published a final version of the Mortgage Call Report in November 2010. The Mortgage Call Report was implemented in NMLS in May 2011. In October 2012, the Mortgage Call Report was modified based on initial input and experiences from industry and state regulators.

In April 2013, SRR invited [public comment](#)⁵ for 60 days on the Mortgage Call Report and invited [public comment](#)⁶ for 30 days on initial changes arising from the 60 day comment period to the Mortgage Call Report in October 2013. The changes identified in this document are a result of the 2013 comment periods. State regulators are likely to make additional changes based on the 2013 comment periods over the next year or two, as they continue to review the NMLS Mortgage Call Report and greater clarity is received concerning changes that the Consumer Financial Protection Bureau (CFPB) is making to the reporting requirements under the Home Mortgage Disclosure Act (HMDA).

Request for Public Comments

On behalf of the state regulatory agencies using NMLS, SRR is seeking comment on the following four proposed changes to the NMLS Mortgage Call Report:

- the definition of “application”
- required reporting on the amount and count of closed loans that qualify as “Qualified Mortgages” (QM)
- required nationwide servicing reporting and additional state specific servicing reporting
- additional fields to capture changes in loan application amount .

SRR believes that the new information being requested as part of the MCR is substantially readily available to licensees.

⁴ The 2010 MCR public comment document can be found at <http://mortgage.nationwidelicencingsystem.org/news/ProposalsForComment/Public%20Comment%20Request%20for%20NMLS%20Call%20Report.pdf>

⁵ The April 2013 MCR Public comment document can be found at <http://mortgage.nationwidelicencingsystem.org/news/ProposalsForComment/Licensing%20Forms%20and%20MCR%20Request%20for%20Comments%20April%202013%20FINAL.pdf>

⁶ The October 2013 MCR public comment document can be found at <http://mortgage.nationwidelicencingsystem.org/news/ProposalsForComment/2013-3%20Licensing%20Forms%20and%20MCR%20Changes.pdf>

I. Definition of “application”

State regulators recognize that various definitions of “application” exist in state and federal law. These various definitions may present challenges when collecting loan origination information and comparing the different reporting requirements and interpretations of what constitutes an “application” for purposes of state, federal, and MCR purposes. This definition will be applicable to all MCR filers – Expanded and Standard. To address these issues, the MCR Working Group (Addendum A) has been working on a new, more encompassing definition summarized below:

What is an Application?

An application is an oral or written request for an extension of credit encumbering a 1-4 family residential property. Exclude any commercial/business/investment purpose encumbrances from reporting. Include inquiries or Pre-Qualification requests that result in denial of credit.

What Application date is to be used for reporting?

- The date on the initial 1003 with the borrower’s signature
- The date of an oral request for extension of credit, with deference to the initial 1003
- Inquiries and Pre-Qualification requests, if declined, should use the denial date

What is a residential property?

A 1-4 family structure to be used as a dwelling. This includes:

- House
- Manufactured House
- Condominium Unit
- Co-Op Unit
- Mobile Home
- Trailer
- Houseboat

What loans fall under the definition?

- Purchase of owner occupied 1-4 family residential properties including 2nd homes and vacation homes
- Construction of 1-4 family residential properties (as described above) made directly to the consumer
- Non-commercial liens on residential properties. Lines of Credit should be reported at maximum approved credit line
- Pre-Approvals on item #1 even if a residential property has not been identified
- Reverse Mortgages – regardless of purpose
- Refinance loans on all of the above
- All requests for extensions of credit to purchase residential property that result in the issuance of an ECOA notice

II. Addition of Qualified Mortgage (QM) fields

SRR is proposing the addition of Qualified Mortgage (QM) fields to the State-specific RMLA. All companies completing the MCR will be required to submit information in this area. Under Regulation Z (12 CFR 1026), a loan that meets the product feature requirements can be a QM under any of three main categories:

- (1) the general definition
- (2) the “GSE-eligible” provision
- (3) the small creditor provision.

Mandatory product feature requirements for all QMs are as follows:

- Points and fees are less than or equal to 3% of the loan amount (for loan amounts less than \$100k, higher percentage thresholds are allowed);
- No risky features like negative amortization, interest-only, or balloon loans (NOTE: balloon loans originated until January 10, 2016 that meet the other product features are QMs if originated and held in portfolio by small creditors);
- Maximum loan term is less than or equal to 30 years.

Three main categories for QMs:

1. **General definition category of QMs**

Any loan that meets the product feature requirements with a debt-to-income ratio of 43% or less is a QM.

2. **“GSE-eligible” category of QMs**

Any loan that meets the product feature requirements and is eligible for purchase, guarantee, or insurance by a GSE, FHA, VA, or USDA is QM regardless of the debt-to-income ratio (this QM category applies for GSE loans as long as the GSEs are in FHFA conservatorship and for federal agency loans until an agency issues its own QM rules, or January 10, 2021, whichever occurs first).

3. **Small creditor category of QMs**

If you have less than \$2B in assets and originate 500 or fewer first mortgages per year, loans you make and hold in portfolio are QMs as long as you have considered and verified a borrower’s debt-to-income ratio (though no specific DTI limit applies).

Proposed Field Additions for capturing QM loans in the RMLA section of the MCR can be found in Addendum B and for the Financial Condition Report in Addendum F.

While the above is provided to help respondents assess the impact of this change on their reporting requirements under the NMLS Mortgage Call report in order to respond to this Request for Comments, it should be noted that licensees will be expected to report loans in accordance with direction provided by the CFPB as to which loans qualify as QM loans. Nothing in the NMLS Mortgage Call Report should be construed as interpreting the CFPB’s QM rule.

III. Addition of Nationwide Servicing and New State Specific Servicing Fields

SRR is proposing the addition of nationwide servicing information fields to the Company-level RMLA to account for the fact that the current NMLS Mortgage Call Report does not provide the ability for all companies to report nationwide servicing data. All companies completing the MCR will be required to submit information in this area if they service loans in accordance with the definitions provided in the NMLS Mortgage Call Report. In addition, state specific fields will be added to the Closed Loan section to capture the quarter end servicing status of any loans closed during the period. These fields will capture the amount and count of loans serviced by the lender itself, as well as loans serviced by others.

The addition of other servicing fields in the State-level RMLA is also included in Addendum D and applies only to Expanded filers of the MCR.

Proposed Field Additions found in Addendum C (applicable to all MCR filers) and Addendum D (applicable only to Expanded filers).

IV. Addition of Change in Application Amount Fields

SRR is proposing the addition of fields to capture changes in application amount to the Application Data section of the State-specific RMLA. Filers will be able to indicate the overall increase or decrease in the loan amounts from an application to the closed loan, if applicable.

Proposed Field Additions for changes in application amounts for the RMLA section can be found in Addendum E

Request for Public Comments

Comments are requested to be limited to the proposed changes to the Mortgage Call Report presented in this document.

For those without access to NMLS and the Mortgage Call Report, including existing policies and requirements, can be found here:

[Mortgage Call Report Fields and Definitions](#)⁷

Persons submitting comments must include their contact information. Comments received, as well as the submitter's name and company or organization (if applicable), will be posted on the NMLS Resource Center for public view. Comments submitted without contact information will not be considered.

All comments will be reviewed by the Mortgage Call Report Working Group comprised of state regulators and will be reviewed with all state regulators. The MCR Working Group will consult

⁷ The Mortgage Call Report Fields and Definitions can be found at <http://mortgage.nationwidelicencingsystem.org/slr/common/mcr/Pages/default.aspx>

with industry representatives during the comment evaluation period. The recommendations for proposed changes from the regulator groups will be sent to the NMLS Policy Committee for evaluation and approval or rejection.

Persons submitting comments are encouraged to provide these comments electronically via email to: comments@csbs.org

Comments may also be submitted in physical form to:

State Regulatory Registry
Conference of State Bank Supervisors
Attn: Tim Doyle, Senior Vice President
1129 20th St NW, 9th Floor
Washington, DC 20036

Comment submission deadline: October 30, 2014

SRR will provide 30 days for public comments on the proposed changes to the Mortgage Call Report.

SRR expects to publish the final changes to the Mortgage Call Report in November 2014. SRR expects to integrate these changes into NMLS in time for companies to report this information starting in Q1 2015, with the first deadline of May 15, 2015.

Addendum A

Mortgage Call Report Working Group

REPRESENTATIVE	AGENCY
Richard Cortes	Connecticut Department of Banking
Eric Davies	California Department of Business Oversight
Kara Grove	Michigan Department of Insurance and Financial Services
James Keiser	Pennsylvania Department of Banking and Securities
Timothy Knopp	Pennsylvania Department of Banking and Securities
Rick St. Onge	Washington Department of Financial Institutions
Scott Peter	Nebraska Department of Banking and Finance
Tracy Hudson	West Virginia Division of Financial Institutions
Ryan Walsh	Pennsylvania Department of Banking and Securities

ADDENDUM B

QM fields AC410 and AC420 must be completed by all MCR filers and must equal AC070

Servicing fields must be completed by all MCR filers and must equal AC070. Report the quarter end servicing status of loans closed and funded during the quarter.

CLOSED LOAN DATA										
		BROKERED			CLOSED-RETAIL APPLICATION			CLOSED-WHOLESALE APPLICATION		
Forward Mortgages		Amount(\$)	Count(#)	Average Size(\$)	Amount(\$)	Count(#)	Average Size(\$)	Amount(\$)	Count(#)	Average Size(\$)
AC100	Conventional			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC110	FHA-Insured			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC120	VA-guaranteed			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC130	FSA/RHS-guaranteed			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC190	Total Loan Type - Forward Mortgages	Equals the sum of rows AC100 to AC130 in the above column	Equals the sum of rows AC100 to AC130 in the above column	=(Amount / Count)	Equals the sum of rows AC100 to AC130 in the above column	Equals the sum of rows AC100 to AC130 in the above column	=(Amount / Count)	Equals the sum of rows AC100 to AC130 in the above column	Equals the sum of rows AC100 to AC130 in the above column	=(Amount / Count)
Property Type										
AC200	One to Four Family Dwelling			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC210	Manufactured housing			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC220	Multifamily Dwelling			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC290	Total Property Type	Equals the sum of rows AC200 to AC220 in the above column	Equals the sum of rows AC200 to AC220 in the above column	=(Amount / Count)	Equals the sum of rows AC200 to AC220 in the above column	Equals the sum of rows AC200 to AC220 in the above column	=(Amount / Count)	Equals the sum of rows AC200 to AC220 in the above column	Equals the sum of rows AC200 to AC220 in the above column	=(Amount / Count)
Purpose of Loan or Application										
AC300	Home Purchase			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC310	Home Improvement			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC320	Refinancing			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC390	Total Purpose of Loan or Application	Equals the sum of rows AC300 to AC320 in the above column	Equals the sum of rows AC300 to AC320 in the above column	=(Amount / Count)	Equals the sum of rows AC300 to AC320 in the above column	Equals the sum of rows AC300 to AC320 in the above column	=(Amount / Count)	Equals the sum of rows AC300 to AC320 in the above column	Equals the sum of rows AC300 to AC320 in the above column	=(Amount / Count)
AC400	HOEPA			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC410	QM			=(Amount / Count)						
AC420	Non-QM			=(Amount / Count)						
AC490	Total QM and Non-QM	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	=(Amount / Count)	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	=(Amount / Count)	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	Equals the sum of rows AC410 to AC420 in the above column and must equal AC070	=(Amount / Count)
Servicing Status on Loans Closed During the Quarter										
AC1200	Loans with servicing retained			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC1210	Loans with servicing released			=(Amount / Count)			=(Amount / Count)			=(Amount / Count)
AC1290	Total Loans	sum of rows AC1200 to AC1210 in the above column and must equal AC070	sum of rows AC1200 to AC1210 in the above column and must equal AC070	=(Amount / Count)	sum of rows AC1200 to AC1210 in the above column and must equal AC070	sum of rows AC1200 to AC1210 in the above column and must equal AC070	=(Amount / Count)	sum of rows AC1200 to AC1210 in the above column and must equal AC070	sum of rows AC1200 to AC1210 in the above column and must equal AC070	=(Amount / Count)

ADDENDUM C

Loans serviced information will be required for all MCR filers and will be reported on a nationwide total basis.

Loans Serviced - Nationwide Totals

		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Servicing Activity				
LS010	Wholly Owned Loans Serviced			=(Amount / Count)
LS020	Loans Serviced under MSRs			=(Amount / Count)
LS030	Subservicing by Others			=(Amount / Count)
LS040	Subservicing for Others			=(Amount / Count)
LS090	Total Servicing Activity	Equals the sum of rows LS010 to LS040	Equals the sum of rows LS010 to LS040	=(Amount / Count)

ADDENDUM D

Servicing additions in this section (fields in red) are required for Expanded filers on a state specific basis.

Modifications		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S100	Loan Modification Applications in process at beginning of period			=(Amount / Count)
S110	Loan Modifications completed			=(Amount / Count)
S120	Loan Modification applications terminated by borrower			=(Amount / Count)
S130	Loan Modification applications denied by lender/servicer			=(Amount / Count)
S140	Loan Modification applications terminated by other			=(Amount / Count)
S150	Loan Modification applications received during period			=(Amount / Count)
S160	Loan Modification applications in process at end of period			=(Amount / Count)
Contracted for by Lienholder/Servicer		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S200	Loans to be modified at beginning of period			=(Amount / Count)
S210	Loan Modifications completed			=(Amount / Count)
S220	Loan modification attempts terminated for whatever reason			=(Amount / Count)
S230	New loans received for modification			=(Amount / Count)
S240	Loans to be modified at the end of period.			=(Amount / Count)
DELINQUENCY STATUS AS OF END DATE (All Loans)		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S300	Less than 30 Days Delinquent			=(Amount / Count)
S305	30 to 60 Days Delinquent			=(Amount / Count)
S310	61 to 90 Days Delinquent			=(Amount / Count)
S315	More Than 90 Days Delinquent			=(Amount / Count)
DELINQUENCY STATUS AS OF END DATE (Loans Modified within one (1) year)		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S320	Less than 30 Days Delinquent			=(Amount / Count)
S325	30 to 60 Days Delinquent			=(Amount / Count)
S330	61 to 90 Days Delinquent			=(Amount / Count)
S335	More Than 90 Days Delinquent			=(Amount / Count)
DELINQUENCY STATUS AS OF END DATE (Loans Modified over one (1) year ago)		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S340	Less than 30 Days Delinquent			=(Amount / Count)
S345	30 to 60 Days Delinquent			=(Amount / Count)
S350	61 to 90 Days Delinquent			=(Amount / Count)
S355	More Than 90 Days Delinquent			=(Amount / Count)
FORECLOSURE STATUS AS OF END DATE		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S400	In foreclosure status as of <u>last period end date</u>			=(Amount / Count)
S410	Moved into foreclosure status in Period			=(Amount / Count)
S420	Foreclosure resolved other than Sheriff sale in Period			=(Amount / Count)
S430	Foreclosure resulting in Sheriff sale in Period			=(Amount / Count)
S440	In foreclosure status as of End Date			=(Amount / Count)
S450	REOs as of End Date			=(Amount / Count)

PROPOSED ADDITIONS TO RMLA III

LOANS SERVICED UNDER MSRS

OWNER NAME		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
	Owner Pool#1			=(Amount / Count)
	Owner Pool#2			=(Amount / Count)
	Owner Pool#3			=(Amount / Count)
S590	Total Loans Serviced Under MSRs			Sum in this Category

LOANS SERVICED FOR OTHERS (SUBSERVICING)

OWNER NAME		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
	Owner Pool#1			=(Amount / Count)
	Owner Pool#2			=(Amount / Count)
S690	Total Loans Serviced Under Contract			Sum in this Category

LOANS SERVICED BY OTHERS

SERVICER NAME		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
	Servicer Name #1			=(Amount / Count)
	Servicer Name #2			=(Amount / Count)
S700	Total Loans Serviced By Others			Sum in this Category

RATE TYPE ON LOANS SERVICED

TYPE		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S800	Fixed			=(Amount / Count)
S810	ARM			=(Amount / Count)
S890	Total Rate Type			Sum in this Category

LOAN TYPE ON LOANS SERVICED

		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Residential First Mortgages (1-4 Family Only)				
S1000	Government (FHA/VA/RHS)			=(Amount / Count)
S1010	Prime Conforming			=(Amount / Count)
S1020	Prime Non-Conforming			=(Amount / Count)
S1030	Other			=(Amount / Count)
S1090	Total Loan Type			Sum in this Category

		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
Other Mortgages				
S1100	Closed-End Second Mortgages			=(Amount / Count)
S1110	Funded Helocs			=(Amount / Count)
S1120	Reverse Mortgages			=(Amount / Count)
S1130	Commercial Mortgage Loans			=(Amount / Count)
S1140	Other			=(Amount / Count)
S1190	Total Loan Type			Sum in this Category

S1200	TOTAL MORTGAGES SERVICED			Sum in this Category
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		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S1300	Mortgage Loans Modified under HAMP			=(Amount / Count)

		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S1400	Loans Paid Through Short Sale			=(Amount / Count)

SERVICED LOANS LTV DISTRIBUTION

		UPB (\$)	Loan Count (#)	Average Loan Size (\$)
S1500	Equals 60% or less			=(Amount / Count)
S1510	Greater than 60% but less than or equal to 70%			=(Amount / Count)
S1520	Greater than 70% but less than or equal to 80%			=(Amount / Count)
S1530	Greater than 80% but less than or equal to 90%			=(Amount / Count)
S1540	Greater than 90% but less than or equal to 100%			=(Amount / Count)
S1550	Greater than 100%			=(Amount / Count)
S1590	Total Mortgages Serviced			Sum in this Category

EXPLANATORY NOTES

ACNOTE

EXPLANATORY NOTES-FREE TEXT

ADDENDUM E

Field AC065 is available for all filers to capture either positive or negative changes in application amounts								
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State-specific RMLA

RMLA SECTION I

APPLICATION DATA		DIRECTLY RECEIVED FROM BORROWER			RECEIVED FROM 3RD PARTY		
		Amount (\$)	Count (#)	Average Size (\$)	Amount (\$)	Count (#)	Average Size (\$)
<i>Type of Action Taken</i>				= (Amount / Count)			= (Amount / Count)
AC010 Applications In Process at the Beginning of the Period				= (Amount / Count)			= (Amount / Count)
AC020 Applications Received				= (Amount / Count)			= (Amount / Count)
AC030 Applications Approved but not Accepted				= (Amount / Count)			= (Amount / Count)
AC040 Applications Denied				= (Amount / Count)			= (Amount / Count)
AC050 Applications Withdrawn				= (Amount / Count)			= (Amount / Count)
AC060 File Closed for Incompleteness				= (Amount / Count)			= (Amount / Count)
AC062 Pre-Approval Requests Denied				= (Amount / Count)			= (Amount / Count)
AC064 Pre-Approval Requests Approved but not Accepted				= (Amount / Count)			= (Amount / Count)
AC065 Changes in Application Amount (Positive or Negative)				= (Amount / Count)			= (Amount / Count)
AC066 Total (Field Label TBD)		Equals the sum of rows AC010 to AC065 in the above column	Equals the sum of rows AC010 to AC065 in the above column	= (Amount / Count)	Equals the sum of rows AC010 to AC065 in the above column	Equals the sum of rows AC010 to AC065 in the above column	= (Amount / Count)
AC070 Loans Closed and Funded				= (Amount / Count)			= (Amount / Count)
AC080 Applications in Process at the End of the Period				= (Amount / Count)			= (Amount / Count)
AC090 Total (Field Label TBD)		Equals the sum of rows AC070 to AC080 in the above column	Equals the sum of rows AC070 to AC080 in the above column	= (Amount / Count)	Equals the sum of rows AC070 to AC080 in the above column	Equals the sum of rows AC070 to AC080 in the above column	= (Amount / Count)

ADDENDUM F

Fields A-061A and A-061B are reported on an annual basis for Standard filers and on a quarterly basis for Expanded filers

Schedule A-061 Qualified Mortgages

		HFI, at Amortized Cost (\$)	HFI, at Fair Value (\$)
A-061A	Qualified Mortgages		
A-061B	Non-Qualified Mortgages		
A-061T	Total Loans	Equals sum of A-061A to A-061B and Total Loans in A-060W	Equals sum of A-061A to A-061B and Total Loans in A-060W