

CREFC Watchlist

Configuring Strategy to Monitor for CREFC Watchlist Reasons

Release Level 20



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Revisions:

Date	Pg	Change Summary
11/2021		Updated for Release 20
	<u>4</u>	Added Watchlist Rule Summary
	Various	Updated logic for Rules 202-205, 235 and 236 related to Most Recent Operation Statement. Now also checks for most recent statement with a status of Completed (CO) or Approved (AP). Will select the next most recent periodic statement if the Status is not CO or AP
	<u>71</u>	Updated rule 227 with Reason Code 5A.
	Various	Added rules 257-262, 264 with applicable CREFC Watchlist Code.
	Various	Each Watchlist Reason Code now has its own section.
	<u>34</u>	Watchlist Reason Code 2A – Updated replacing Rule 128, with Rule 249.



CREFC Watchlist Rule Summary

Watchlist Code Rule Short Description Rule No. **Financial Conditions Delinquent P&I Payment 1A** 101 P&I Payments Delinquent **1B Delinquent Taxes Taxes Delinquent** 108 Taxes Delinquent -Monitor 144 **1C Delinquent or Forced Place Insurance** Insurance Policy Renewal Past Due (Non-Monitoring) 109 118 Insurance Policy Forced Placed 149 Insurance Policy Renewal Past Due (Monitoring) **1D Outstanding Servicing Advances** 201 Servicing Advances Outstanding **1E Fixed Rate Loan DSCR** 202 DSCR Fixed Rate Loan HC/LO 203 DSCR Fixed Rate Loan not HC/LO 257 DSCR Float Rate Loan HC/LO:Rate Change Compare> 258 DSCR Float Rate Loan not HC/LO:Rate Chge Compare> **1F Fixed Rate Loan DSCR** DSCR Fixed Rate & DSCR @ UWS 204 259 DSCR Float Rate & DSCR @ UWS:Rate Change Compare> **Floating Rate Loan DSCR 1G** 205 DSCR Floating Rate & NOI @ UWS 260 DSCR Float Rate & NOI @ UWS:Rate Change Compare<= Defaulted or Matured Senior Lien and/or Mechanics Lien in Excess of 5% of UPB or Defaulted, Matured or Discovery of Previously Undisclosed, Subordinate Lien Including Mezzanine Debt 1H 206 Lien GT 5% UPB -Mechanics Lien Defaulted/Matured/Subord 207



Watchlist C	
Rule No.	Rule Short Description
208	Lien Previously Undisclosed
41	
<u>11</u>	Failure to Submit Financial Statements
209	Fin Stmt Failure to Submit
Borrower Is	ssues
<u>2A</u>	Required Repair, Remediation or O&M Plan Deficiency but not Completed by Due Date
249	Repair Past Due/Bal>500000or5%
2B	No Longer in Use by CREFC
	Occurrence of Servicing Trigger Event in the Mortgage Loan Documents (for example: Springing
<u>2C</u>	Lockbox, Establishment of LOC, Trap Excess (Cash).
	Watchlist Reason Code to be manually added to Watch List
<u>2D</u>	Expiration of Ground Lease within 6 months or Ground Lease Default
210	Ground Lease Expiring
2E	No Longer in Use by CREFC
<u>2F</u>	Operating License or Franchise Agreement Default
211	Franchise Agreement Default
212	Operating License Default
	Bankruptcy of Borrower/Owner or Guarantor that comes to the Knowledge of Lender/Servicer (unless
<u>2G</u>	bankruptcy is a minority guarantor/borrower similar to a TIC relationship).
213	Borrower/Guarantor Bankruptcy
<u>2H</u>	Federal/State Survey for Nursing Homes that Require the Report per the Loan Documents
214	Nursing Home Survey Overdue
215	Nursing Home Survey Deficient
Property Co	ondition Issues
	Inspection reveals Poor or Not accessible condition as defined by the MBA Property Inspection Form
<u>3A</u>	adopted by the CREFC
132	Inspection Rating
<u>3B</u>	Property Affected by Life Safety Issue or Potentially Harmful Environmental Issue
216	Prop Life Safety/Harmful Env



Watchlist Code Rule No. **Rule Short Description** Property Affected by Major Casualty or Condemnation Proceeding Affecting Future Cash Flows **3C** 217 Casualty or Condemnation 3D No Longer in Use by CREFC Lease Rollover, Tenant Issues and Vacancy **Occupancy Decrease (Excludes Lodging)** <u>4A</u> 218 Occupancy Decrease Fixed Rate Occupancy Decrease Float Rate 235 236 Occupancy Decrease Multifamily 261 Occupancy Decrease Float Rate: Rate Change Compare> 262 Occupancy Decrease Float Rate: Rate Chge Compare<= **4B** No Longer in Use by CREFC Single Tenant, or any Tenant with a Lease >30% NRA, (i) Expiring within the next 12 months, for Loans ≥ \$30 million, (ii) Expiring within 6 months, for loans < \$30 million, or (iii) anytime the Servicer Receives **4C** Notice that the Tenant will not Renew 219 Tenant > 30% NRA/UPB >= 30 Mil 220 Tenant > 30% NRA/UPB < 30 Mil A combination of top 3 tenants with lease expirations within the next 6 months 4D 221 Top 3 Tenants Lease Exp 6 mnth Bankruptcy of Licensee, Franchisor, or any Combination of Top 3 Tenants that Individually Occupy at least 5% of the NRA and Cumulatively Occupy Greater than 30% of the NRA. For Healthcare Property, the Bankruptcy of Tenant Under Master Lease or of the Management Company. For Multifamily and 4E MH Park with Master Lease >30 NRA 222 Tenant Bankruptcy - Healthcare 223 Top 3 Tenants Bnkrptcy - MF,MH Top 3 Tenants Bnkrpt not MF,MH 224 4F Major Tenant Lease is in Default, Terminated or is Dark 225 Major Tenant Lease in Default Maturity



Watchlist C	ode
Rule No	Rule Short Description
<u>5A</u>	
116	Loan Maturity Pending
226	Loan Internal Maturity Pending
227	Loan has Matured
264	Loan has matured - Internal
Other	
	Any Other Situation that Indicates an Increased Level of Default Risk that may Create Potential Material
6A	Losses to Investors (Lesser of 10% of UPB or \$500,000)
	Watchlist Reason Code to be manually added to Watch List
Loans Retu	rned from Special Servicer
<u>7A</u>	Loan has been Returned from the Special Servicer
228	Returned from Spec Servicer
<u>7B</u>	Loan Modifications, Interest Shortfalls and WODRA Repayment Periods
229	Loan Modifications with B Note



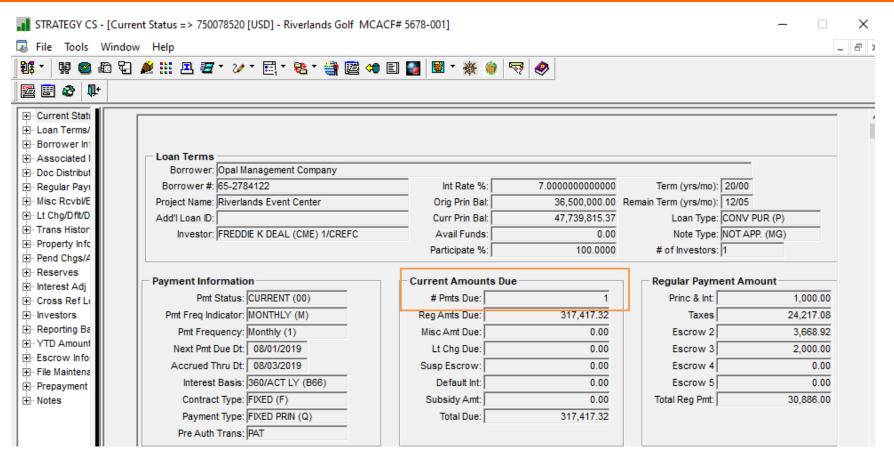
CREFC Watchlist Reason 1A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1A	Delinquent P&I Payment	> 2 payments due	Current

Rule 101 monitors for Reason Code 1A using the Loan Master Information. # of Delinquent Payments is calculated by the system and updated in the Loan Master information, and displayed in Current Status.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
101	Delinquent P&I Pmnt CREFC Watchlist Reason 1A	Specify the minimum number of delinquent payments that should trigger the performance of the requested action or actions.	Compares the number of delinquent payments shown in Current Status with the value entered in Rules Maintenance. When the value shown in the Master record is greater than or equal to the value entered into Rules Maintenance, perform the requested action or actions.	# of Delinquent Payments – PMASTR.CM#PDQ	P&I is delinquent; XX payment(s) overdue [XX is the number of payments overdue]





1-TOOLS>CURRENT STATUS>CURRENT STATUS (PMASTR.CM#PDQ)



CREFC Watchlist Reason 1B

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1B	Delinquent Taxes	Servicer has verified that non- escrowed taxes are > 60 days past due	Taxes are brought current including all interest and penalties

Rules 108 & 144 monitors for Reason Code 1B using the Tax Description records in Strategy.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
108	Delinquent Taxes CREFC Watchlist Reason 1B	Specify the number of days past the tax due date that should trigger the performance of the requested action or actions.	Ignoring "Tax Status = 0" use the System Control Process Through Date as the current date, calculate the number of days between the current date and Tax Next Disbursement Date. If the result is positive and the value is greater than the number entered, perform the requested action or actions.	Tax Status PTXDSC.ADSTAT <>0 System Process Through Date PSYSCPER.S2PDT Tax Next Disbursement Date PTXDSC.ADNEXT	Taxes are delinquent; XX day(s), non- monitoring [XX is the number of days that the Taxes are past due].



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
144	Taxes Delinquent - Monitor	Enter the number of days past the Tax Next Disbursement Date to perform the designated action or actions	The system will retrieve all tax records that are monitoring and compare the Process Through Date to the Next Disbursement Date. If the number of days between the Process Through Date and the Next Disbursement Date is equal to or greater than the number of days entered, perform the designated action or actions.	System Process Through Date is used as the Current Date PSYSCPER.S2PDT PTXDSC.ADNEXT – Next Disbursement Date PTXDSC.ADSTAT = 0 – Tax Bill Status being monitored.	Taxes are delinquent XX days, monitoring [XX is the number of days past the Next Disbursement Date]



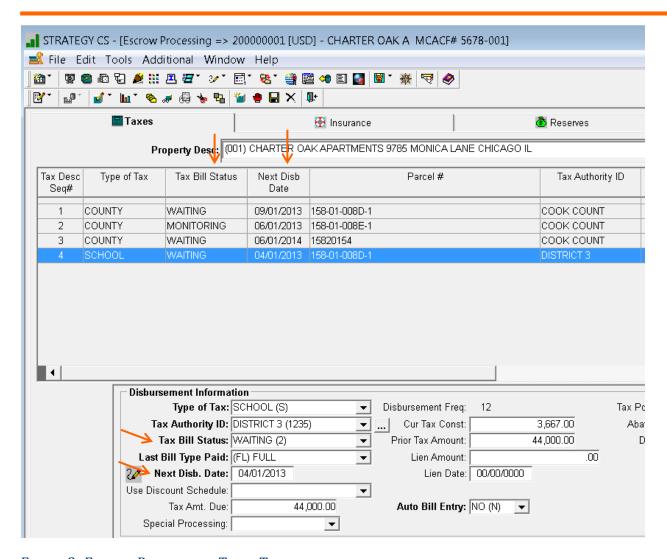


FIGURE 2- ESCROW PROCESSING>TAXES TAB



CREFC Watchlist Reason 1C

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	1C	Delinquent or Forced Placed Insurance	Property (excluding terrorism) or liability (general and excess) coverage is more > 60 days delinquent or forced placed	Receipt of proof of satisfactory property (excluding terrorism) or liability (general and excess) insurance in force

Rules 109, 118, and 149 monitors for Reason Code 1C using the Other Escrow information found on the Insurance tab in Escrow Processing in Strategy.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
109	Insurance Renewal CREFC Watchlist Reason 1C	Specify the number of days past the insurance expiration date that should trigger the performance of the requested action or actions.	Using the System Control Process Through Date as the current date, calculate the number of days between the current date and the Escrow Policy Expiration Date. If that number is positive and greater than or equal to the number entered in Rules Maintenance, perform the requested action or actions.	System Process Through Date is used as the Current Date PSYSCPER.S2PDT Billing Status <> 0 POESC.SOBSCD Policy Expiration Date POESC.SOEXDT cannot be blank	Insurance renewal is XX days past due, non-monitoring [XX is the number of days between the System Process Through Date and the Expiration Date]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
118	InsPol Forced Placed CREFC Watchlist Reason 1C	None	If the Forced Placed Insurance flag is set to 'Y', perform the requested action or actions.	Forced Place Insurance Flag POESC.SOFPYN = 'Y' Note: Flag is set by entering a Forced Place Start Date. POESC.SOFPSC, SOFPSY, SOFPSM, SOFPSD	Insurance policy is forced placed
149	Ins Policy Renewal Past Due – Mon CREFC Watchlist Reason 1C	Enter the number of days past the Insurance Expiration Date to perform the designated action or actions.	The system will retrieve the insurance records that are monitoring and compare the Process Through Date to the Insurance Expiration Date. If the number of days between the Process Through Date and Insurance Expiration Date is greater than or equal to the number of days entered, perform the designated action or actions.	System Process Through Date is used as the Current Date PSYSCPER.S2PDT POESC.SOSES = 2 – Escrow Type equal to Insurance records. POESC.SOEXDT– Insurance Expiration Date - cannot be blank POESC.SOBSDC = 0 – Insurance records that are being monitored.	Insurance renewal is XX days past due, monitoring [XX is the number of days between the System Process Through Date and the Insurance Expiration Date]



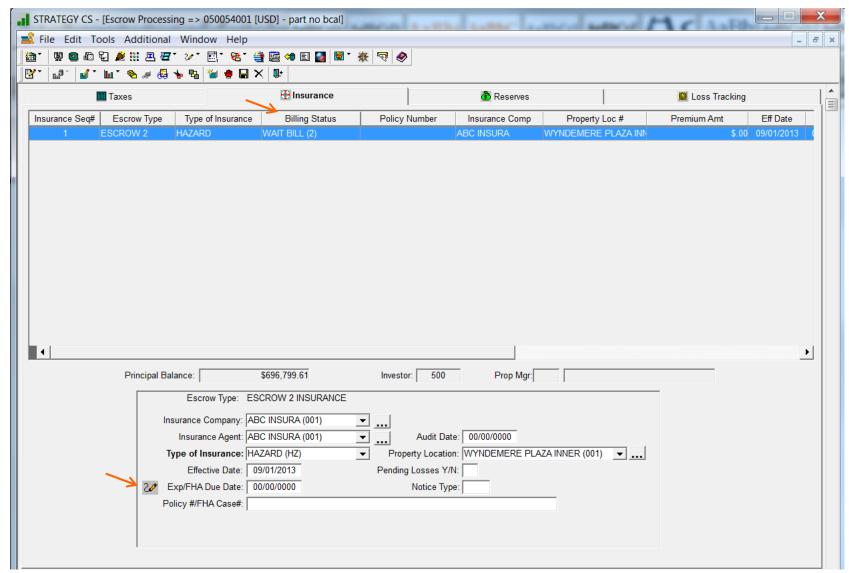


FIGURE 3 - ESCROW PROCESSING> INSURANCE TAB



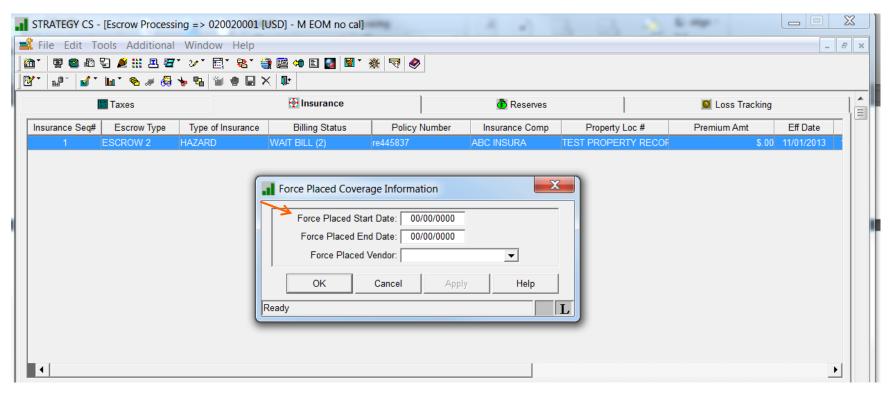


FIGURE 4- ESCROW PROCESSING>INSURANCE TAB>INSURANCE>FORCED PLACE COVERAGE - ENTERING THE FORCE PLACED START DATE FLIPS THE FORCE PLACED FLAG TO YES.



CREFC Watchlist Reason 1D

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1D	Outstanding Servicing Advances (Taxes, Insurance, PPA, Other) (L38 and/or L39)	> 30 days delinquent & > \$10,000 in aggregate	Servicing Advances have been paid down to < \$10,000 in aggregate

Rule 201 monitors for Reason Code 1D using the Servicing Advance fields in the Investor Master Information.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
201	Servicing Advances Outstanding CREFC Watchlist Reason 1D	Enter the number of days after the servicing advance date to take the designated action or actions. Note: Action will only be taken if the aggregate advances for Taxes, PPA, Insurance and other are greater than \$10,000.) Note: # of days set to 30 in CREFC Watchlist Rule Set.	The system will compare Process Through Date to the Servicing Advance Date and return records where the Process Through Date is greater than nn days from the Servicing Advance Date. The system then reviews the returned records and will take the designated action or actions on any records where the aggregate total of Advances for Taxes, Insurance, PPAs and Fees exceed \$10,000.	System Process Through Date is used as the Current Date PSYSCPER.S2PDT Servicing Advance Date PPSAADVV.KFADVDATE Outstanding Advances defined as the sum of PPSAIM.KGTAXADVO PPSAIM.KGINSADVO PPSAIM.KGPEADVO PPSAIM.KGPPAADVO	Outstanding Servicing Advances (Taxes, Insurance, PPA, Other) is GT 10,000 and outstanding for XX Days [XX is the number of days past the Servicing Advance Date]



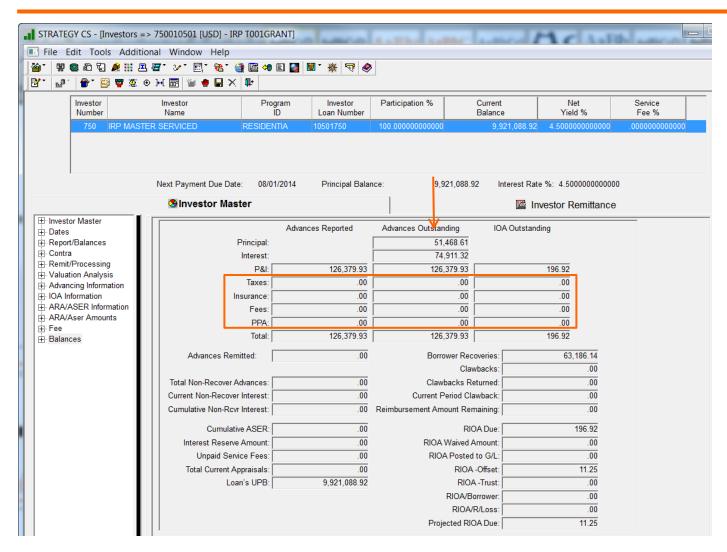


FIGURE 5- ON CREFC INVESTORS (F1-IRP-Y) INVESTOR PROCESSING>INVESTOR MASTER>BALANCES



CREFC Watchlist Reason 1E

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1E	Fixed Rate Loan DSCR (refer to implementation guidelines on how to apply)	(NCF) DSCR < 1.10; ≤ 1.20 for healthcare & lodging; exclude CTL, co-ops, ground leases and single tenant NNN	(NCF) DSCR above threshold

CREFC Watchlist Reason Codes 1E-1G use rules 202-205, 257-260 evaluating DSCR They use information from the Collateral record, Master record and Financial Statement Analysis. Rules 203-205 also use the <u>Lease information</u> viewed in the Rent Roll widget to select loans for evaluation. When completing the information related to the Financial Statements, each statement referenced should be properly entered with revenues, expenses and debt service to properly calculate the DSCR.



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
202	DSCR Fixed Rate Loan HC/LO CREFC Watchlist Reason 1E	Enter the minimum DSCR acceptable for a Fixed Rate Loan (not Health Care or Lodging) Note: Default value is 1.2%	System selects Fixed Rate loans that are Health Care or Lodging. Using the latest Completed or Approved Periodic Operation Statement and compare the DSCR to the entered value. If the calculated DSCR is less than or equal to the rule variable value perform the designated action or actions.	PMASTR.CMCOT = 'F' Fixed rate loan PCCOLLCRE.PROPTYPE = 'HC' or 'LO' POPMST.MSPURP = PER Operating Statement Purpose codes of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSSTAT = 'CO' or 'AP' DSCR = Sum of Net Cash flow divided by the total of all debt service obligations (POPMST.MSNTCF/SUM(POPMSTMSDSAO,	Fixed rate loan DSCR XX% below threshold for healthcare & lodging [XX indicates DSCR from the latest Periodic Operating Statement]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
203	DSCR Fixed Rate Loan not HC/LO CREFC Watchlist Reason 1E	Enter the minimum DSCR acceptable for a Fixed Rate Loan (for Health Care or Lodging) Note: Default value is 1.1%	System selects Fixed Rate loans that are not Health Care, Lodging or Coop Housing, are not single tenant or credit tenant, and do not have ground rent. Using the latest Periodic Operation Statement and compare the DSCR to the entered value. If the calculated DSCR is less than to the rule variable value perform the designated action or actions.	PMASTR.CMCOT = 'F' Fixed rate loan PCCOLLCRE.PROPTYPE not 'HC' 'LO' or 'CH' PCCOLLCRE.PQGRL not 'Y' No Ground Lease. PLEASEA.LSSTENTNNN<>'Y' Not Single Tenant PLEASEA.LSCT not 'Y' Not a Credit Tenant POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSSTAT = 'CO' or 'AP' DSCR = Sum of Net Cash flow divided by the total of all debt service obligations (POPMST.MSNTCF/SUM(POPMSTMSDSAO, POPMSTMSDSBO, POPMSTMSDSCO)	Fixed rate loan DSCR XX % below threshold, excludes healthcare & lodging [XX indicates DSCR from the latest Periodic Operating Statement]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
257	DSCR Float Rate Loan HC/LO; Rate Change Compare > CREFC Watchlist Reason 1E	Enter the minimum DSCR acceptable for a Fixed Rate Loan (for Health Care or Lodging) Note: Default value is 1.2%	System selects Float Rate loans that are Health Care or Lodging. Using the latest Periodic Operation Statement and compare the DSCR to the entered value. If the calculated DSCR is less than or equal to the rule variable value perform the designated action or actions.	PMASTR.CMCOT <> 'F' Float Rate Loan PARMH.ARECDT First Rate Change date greater than process through date. PSYSCPER.S2PTDT PCCOLLCRE.PROPTYPE = 'HC' 'LO' or 'CH' POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date DSCR = Sum of Net Cash flow divided by the total of all debt service obligations (POPMST.MSDSAO, POPMSTMSDSBO, POPMSTMSDSCO)	Float rate loan DSCR XX % below threshold, for healthcare & lodging, Rate Change>Process Thru Date [XX indicates DSCR from the latest Periodic Operating Statement]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
258	DSCR Float Rate Loan not HC/LO: Rate Chge Compare> CREFC Watchlist Reason 1E	Enter the minimum DSCR acceptable for a Fixed Rate Loan (for Health Care or Lodging) Note: Default value is 1.2%	System selects Float Rate loans that are not Health Care, Lodging or Coop Housing, are not ground lease, single tenant or credit tenant. Using the latest Periodic Operation Statement and compare the DSCR to the entered value. If the calculated DSCR is less than the rule variable value perform the designated action or actions.	PMASTR.CMCOT <> 'F' Float Rate Loan PARMH.ARECDT First Rate Change date greater than process through date. PCCOLLCRE.PROPTYPE not 'HC' 'LO' or 'CH' PCCOLLCRE.PQGRL not 'Y' No Ground Lease. PLEASEA.LSSTENTNNN<>'Y' Not Single Tenant PLEASEA.LSCT not 'Y' Not a Credit Tenant POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date DSCR = Sum of Net Cash flow divided by the total of all debt service obligations (POPMST.MSNTCF/SUM(POPMSTMSDSAO, POPMSTMSDSBO, POPMSTMSDSCO)	Float rate loan DSCR XX % below threshold, excludes healthcare & lodging, rate change > process thru date [XX indicates DSCR from the latest approved or completed Periodic Operating Statement]



CREFC Watchlist Reason 1F

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	1F	Fixed Rate Loan DSCR (refer to implementation guidelines on how to apply)	(NCF) DSCR <1.40 and ≤75% UW DSCR; Excludes CTL, co-ops, ground leases and single tenant NNN	(NCF) DSCR above threshold

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
204	DSCR Fixed Rate & DSCR at UWS CREFC Watchlist Reason 1F	Enter the minimum DSCR acceptable for a Fixed Rate Loan Note: Default DSCR set to 1.4 for CREFC Watchlist Rule Set.	System selects Fixed Rate loans that are not a COOP, not Ground Rent and the latest Completed or Approved Periodic (PER) Operating Statement Ending Period and compares the DSCR to the entered value and to the DSCR stated in the Underwriting at Securitization (UWS) Operating Statement. If the DSCR stated in the most recent operating statement is less than or equal to both the target and 75% of the UWS DSCR take the specified action or actions.	PMASTR.CMCOT = 'F' Fixed rate loan PCCOLLCRE.PQGRL no 'Y' Not Ground Lease PCCOLLCRE.PROPTYPE not 'CH' Not Coop POPMST.MSPURP = PER AND UWS Operating Statement Purpose codes of Periodic and Underwriting at Securitization POPMST.MSSTAT = 'CO' or 'AP' Completed or approved Operating Statement Status POPMST.MSENDT Selects the Periodic operating statement with the most recent end date	Fixed Rate Loan DSCR is LE target LE 75% of the Underwriting Sheet DSCR [XX is the DSCR for the most recent PER statement]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
				POPMST.MSNCFABCN DSCR/NOI Debt Service	
259	DSCR Fixed Rate & DSCR at UWS: Rate Change Compare > CREFC Watchlist Reason 1F	Enter the minimum DSCR acceptable for a Fixed Rate Loan Note: Default DSCR set to 1.4 for CREFC Watchlist Rule Set.	System selects Float Rate loans where the First Rate Change is greater than the system date and the collateral is not a COOP, not Ground Rent or Credit Tenant (latest Rent Roll) taking the latest Periodic (PER) Operating Statement, if the DSCR is less than or equal to the entered value and is less than or equal to 75% of the DSCR stated in the Underwriting at Securitization (UWS) Operating Statement. take the specified action or actions.	PMASTR.CMCOT <> 'F' Float rate loan PCCOLLCRE.PROPTYPE not 'CH' Not Coop PCCOLLCRE.PQGRL no 'Y' Not Ground Lease PLEASEA.LSCT<> 'Y' Not Credit Tenant POPMST.MSPURP = PER AND UWS Operating Statement Purpose codes of Periodic and Underwriting at Securitization POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSNCFABCN DSCR/NOI Debt Service	Fixed Rate Loan DSCR is LE target LE 75% of the Underwriting Sheet DSCR



CREFC Watchlist Reason 1G

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1G	Floating Rate Loan DSCR (refer to implementation guidelines on how to apply)	DSCR < 1.0 and < 90% of NOI "in place" as of U/W. Excludes CTL, ground leases and single tenant NNN	DSCR or NOI above threshold

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
205	DSCR Floating Rate & UWS @ NOI CREFC Watchlist Reason 1G	Enter the minimum DSCR that should trigger the specified action or actions Note: Default DSCR is set to 1.1 in the CREFC Watchlist Rule Set.	System selects Floating Rate loans that are not a COOP, or Ground Rent and the latest Completed or Approved Periodic (PER) Operating Statement Ending Period and compares the DSCR in the periodic statement to the entered value and to the NOI DSCR stated in the Underwriting at Securitization (UWS) Operating Statement. If the DSCR stated in the most recent operating statement is less than both the target and 90% UWS NOI DSCR	PMASTR.CMCOT <> 'F' Floating Rate loan PCCOLLCRE.PQGRL no 'Y' Not Ground Lease PCCOLLCRE.PROPTYPE not 'CH' Not Coop POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSSTAT = 'CO' or 'AP Completed or Approved Statement.' POPMST.MSNCFABCN (Used with latest PER Statement) DSCR/NOI Debt Service ABC Note	floating rate DSCR XX LT target and LT 90% of NOI @ UWS [XX is the DSCR recorded in the latest Periodic Statement]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
			take the specified action or actions.	POPMST.MSNOIAN (Used with UWS Statement) DSCR – POPMST.MSNTCF/(MSDSAO+MSDSBO+MSDSCO)	
260	DSCR Float Rate & NOI @ UWS: Rate Change Compare<=	Specify the DSCR % that should trigger actions	For each Float Rate loan with the 1st Rate Change Date is less than or equal to the System Date and the property type is not Coop, not ground lease, use the most recent periodic operating statement to calculate the DSCR. Compare the DSCR in the periodic statement to the entered value and to the NOI DSCR stated in the Underwriting at Securitization (UWS) Operating Statement. If the DSCR stated in the most recent operating statement is less than both the value entered and 90% UWS NOI DSCR take the specified action or actions.	PMASTR.CMCOT <> 'F' Floating Rate loan PCCOLLCRE.PQGRL no 'Y' Not Ground Lease PCCOLLCRE.PROPTYPE not 'CH' Not Coop POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date DSCR — POPMST.MSNTCF/(MSDSAO+MSDSBO+MSDSCO)	Float rate DSCR XX LT target and LT 90% of NOI at UWS; rate change<=process thru date [XX is the DSCR identified]



CREFC Watchlist Reason 1H

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	1H	Defaulted or Matured Senior Lien and/or Mechanics Lien in Excess of 5% of UPB or Defaulted, Matured, or Discovery of Previously Undisclosed, Subordinate Lien Including Mezzanine Debt	When notice received by Servicer	Default cured or lien paid off. Loan assumed by subordinate lienholder or mezzanine debt is approved by the Servicer

Reason Code 1H is broken down to 3 rules: 206, 207, and 208. Information is gathered from the Collateral Management module, Liens file and Loan Master Info.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
206	Lien GT 5% UPB –	None:	Find loan PCLIEN records	PCLIEN.LNTYPE = 14	Defaulted or
	Mechanics		designated as Mechanics Lien	Specifies there is a Mechanics	Matured or
	CREFC Watchlist Reason 1H		on a property with a total lien	Lien	Mechanics Lien in
	CREI'C Watchinst Reason III		balance greater than 5% of the Unpaid Principal Balance perform the specified action or	PCLIEN.SATISFIED= 'N' Lien has not been satisfied	Excess of 5% of UPB
			actions.	PCLIEN.LNBAL	
				Lien Balance	
				PMASTR.CMPBAL	
				Unpaid Principal Balance	



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
207	Lien Defaulted/Matured/Subord CREFC Watchlist Reason 1H	None	Returns all loans that have unsatisfied, defaulted, or matured Lien records with a lien balance greater than zero.	PCLIEN/SATISFIED = 'N' Lien has not been satisfied PCLIEN/LNDFLTD = 'Y' Lien has defaulted PCLIEN/LNBAL > 0 There is a lien balance PCLIEN/LNMATDATE < System date. Lien has matured. PSYSCPER.S2PDT System Process Through Date is used as the Current Date	Lien defaulted or matured. Senior or Subordinate serviced by outside servicer.
208	Lien Previously Undisclosed CREFC Watchlist Reason 1H	None	Returns all loans that have unsatisfied or undisclosed debt.	PCLIEN/SATISFIED = 'N' Lien has not been satisfied PCLIEN/LNDBTSEC = 'Y'	Discovery of Previously Undisclosed, Subordinate Lien including Mezzanine Debt



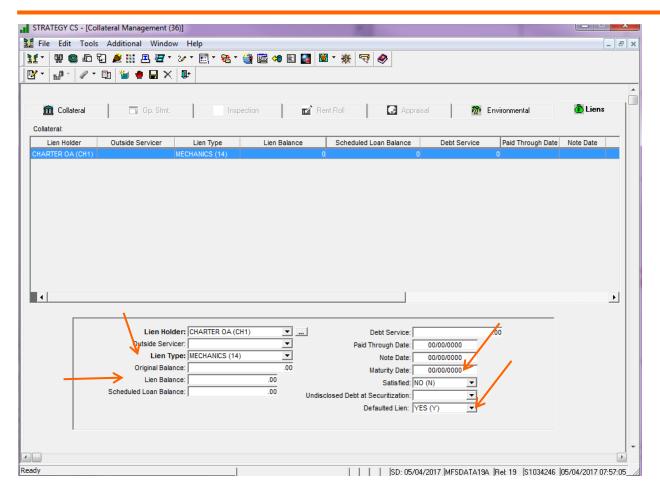


FIGURE 6 - COLLATERAL MANAGEMENT>LIENS



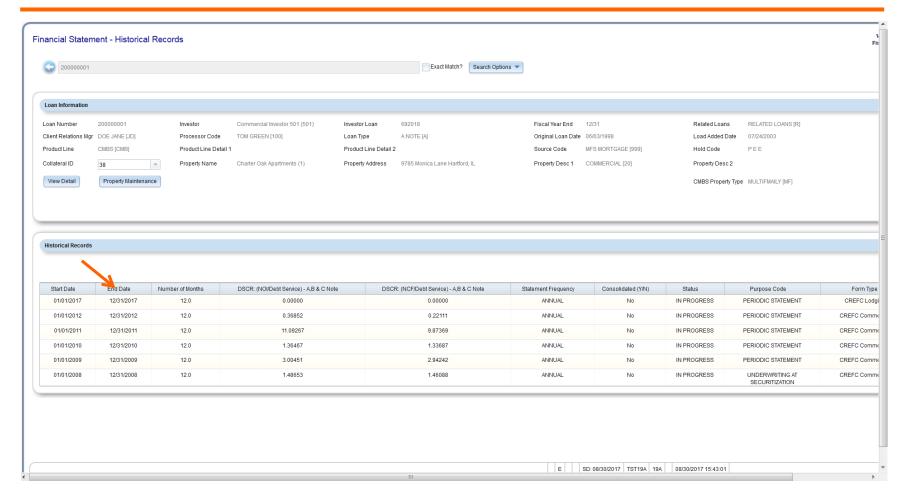
CREFC Watchlist Reason 1

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	1I	Failure to Submit Financial Statements	As required by loan documents, 4 consecutive quarters without submitted financial statements	Submission of complete financial statements resulting in a reported OSAR

Rule 209 monitors for CREFC Watchlist Reason 1I using the most recent Periodic Financial Statement and the System Date.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
209	Fin Stmt Failure to Submit CREFC Watchlist Reason 11	Enter the number of days past the Operating Statement Period End Date that will trigger the specified action or actions Note: Default # of days is 365 in the CREFC Watchlist Rule Set.	Select the Periodic Operating Statement with the most recent Period End Date. Calculate the number of days between the latest periodic statement end date and the System Process Through Date. If the resulting number of days is greater than the number of days entered in the rule, perform the specified action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date POPMST.MSENDT Statement Period End Date POPMST.MSPURP = 'PER' Statement Purpose Code - Periodic	Failure to submit Financial Statements







CREFC Watchlist Reasons 2A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	2A	Required Repair, Remediation or O&M Plan Deficiency but not Completed by Due Date	If required repair is not completed within 60 days following the due date (extended for extensions approved by Servicer) and repair is the lesser of 5% of the UPB or \$500,000	Satisfactory verification that repairs have been completed or deficiency has been cured

Rule 249 monitors for Watchlist Reason codes for 2A. Information is maintained in the Inspection application, Repairs component.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
249	Repair Past Due/ Balance >500000 or 5% CREFC Watchlist Reason 2A	Specify the minimum number of days after the scheduled due date for repair that should trigger the performance of the requested action or actions.	Using the System Control Process Through Date as the current date, calculate the number of days between the current date and the Repair Scheduled Due Date for Repair records with a Reserve Type of "RE" and no completion date entered. If the result is positive and the value is greater than or equal to the value entered and the repair is greater than \$500,000 or 5% of the unpaid principal balance take the specified actions.	System Process Through Date PSYSCPER.S2PDT Reserve Type PINREPAIR.ITRTYPE = 'RE' Repair Completion Date PINREPAIR.ITACTCMPDT is Blank Repair Scheduled Due Date PINREPAIR.ITSCHDT Repair PRBL.RBBAL Unpaid Principal Balance PMASTR.CMPBAL	Repair past due XX days and repair > \$500,000 or 5% of the UPB [XX number of days repair past due]



Loan Number:	200000001											
Property Name:	Charter Oak Apartments (1)											
Туре:	REPAIRS [RE]	v										
Funding Escrow:	Reserves	▼										
Reserve #	Reserve Type	Reserve Type		Bank		D.D.A #						
1	REPAIRS	Repair Reserve	MFS C	ustodial Bank	<	1133		<u> </u>				
2	RR TENANT IMPROVEMENT	Tenant Reserve	MFS C	ustodial Bank	<	1133						
3	ADA RESERVE	Ada Reserve	MFS F	teserve Bank		986621177	77	•				
Associated Rese	erve Record: Repair Reserve	Reserve Balance:	2,462,950.95									
	коран козотто		2,402,730.73									_
Repairs/Capita	al Improvements											
	Description of			Total	Estimated	Excess	Original			Scheduled		Ī
	air/Capital Improvement	Category		Escrowed	Cost	Escrow	Due Date		Rev?	Due Date		
roof		OTHER [OTH]		0.00	0.00	0.00	6/26/2009	~		6/26/2009	~	
				0.00	0.00	0.00	6 (07 (004 0			6 /07 /004 0		
pool rehab			▼	0.00	0.00	0.00	6/27/2010	*		6/27/2010	~	
	Total			0.00	0.00	0.00						
4												
epair Setup Comp	plete?					Run	Letter Sa	ve				

FIGURE 7- PORTAL>INSPECTIONS>HISTORICAL INSPECTION RECORDS>REPAIRS BUTTON (ACTUAL COMPLETION DATE IS TO THE RIGHT)



CREFC Watchlist Reasons 2C

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	2C	Occurrence of Servicing Trigger Event in the Mortgage Loan Documents (for example: Springing Lockbox, Establishment of LOC, Trap Excess Cash)	Any Occurrence	Cure of the event that required action under the mortgage documents, or satisfying relevant mortgage loan provisions or the establishment of LOC or lockbox

This CREFC Watchlist Reason must be added to the Watchlist manually.



CREFC Watchlist Reasons 2D

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	2D	Expiration of Ground Lease within 6 Months or Ground Lease Default	When notice received by Servicer	Informational

The Watchlist Reason codes for 2D and 2F are broken down into three rules: 210, 211, 212. Information is gathered from the Rent Roll component, <u>Lease</u> <u>Detail.</u>

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
210	Ground Lease Expiring CREFC Watchlist Reason 2D	Enter the number of months prior to the Ground Lease Expiration date that will trigger the designated action or actions. Note: Default value is 6	Select the most recent Rent Roll where Ground Lease is noted and compare to the Lease Expiration Date to the Process Through Date. If the number of months between the Lease Expiration Date and Process Through Date is equal or less than to the number of months entered, perform the designated action or actions	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PRROLL.RRDATE Rent Roll Date PLEASEA.LSGROUNDYN = Y Ground Lease expiring within XX months.	
		months for the CREFC Watchlist Rule Set.		PLEASEA.LSEXDT Lease Expiration Date is less than the System Process Through Date	

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CREFC Watchlist Reasons 2F

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	2F	Operating License or Franchise Agreement Default	When notice received by Servicer	New franchise or license in place, or default under franchise or license has been cured

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
211	Franchise Agreement Default CREFC Watchlist Reason 2F	None	For the most recent Rent Roll note any lease records indicating that the franchise agreement is in default. If found take the designated action or actions	PRROLL.RRDATE Rent Roll Date PLEASEA.LSGRAGRDFT = 'Y' Franchise Agreement in Default	Franchise Agreement is in default



Rule Rule ID	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
212 Operation License I CREFC W Reason 2	efault tchlist	Using either the most recent Rent Roll or the most recent Financial Statement note any lease records indicating that the Operating License has expired or the most recent Operating Statement State License field indicates it has expired. If either date is less than or equal to the Process Through Date take the designated action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PRROLL.RRDATE Rent Roll Date PLEASEA.LSOPEXDTE Operating License Expiration Date not blank and is less than the System Process Through Date OR POPMST.MSSTLICEXP State License Expiration Date not blank and is less than the System Process	Operating License Default

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Lease Information Required for monitoring CREFC Watchlist Reasons associated with Lease/Tenant Information

included in your CREFC Lease Forms and populated in the Lease Detail sections. **Lease Form Type Maintenance** - Edit New Note: As you are building the Lease Form, the order that the fields appear in Selected Fields panel is the order that they appear in the screen, left to right, top to bottom. Use the Up Selected Fields and Down Arrow icons to order the fields as you wish. Your form may differ from the one TENANT NAME LESSEE NAME shown below. SOUARE FEET LEASED LEASE EXPIRATION DATE ANNUAL BASE RENT AMT ANNUAL PASS THRU AMT The fields highlighted in blue in Figure 8 are the fields monitored for the CREFC Watchlist. TENANT RANK EVER GREEN LEASE Y/N RENT FREQ These involve Reason Codes 1E, 1G, 2D, 2F, 4C, 4D, 4E & 4F GOING DARK CLAUSE GUARANTOR NAME GUARANTOR TAX ID Strategy Rules: 203, 205, 210-212, 219-225. LEASE GUARANTEE Y/N NEXT INCREASE DATE IN OVERAGES Y/N FIGURE 8 - PORTAL>RENT ROLLS>TOOLS>FORM MAINTENANCE LEASE APPROVAL REQUIRED SUBORDINATE TO MTGE LEASE TYPE MKT RENT PER SQ FT MONTH TO MONTH LEASE Y/N V NON-COMPETE CLAUSE FIGURE 8 - PORTAL>RENT ROLLS>LEASE TERMS NEXT INCREASE AMOUNT NEXT RENT INCREASE % NAT REGION LOCAL OCCUPIED Y/N OWNER OCCUPIED Y/N RENT PER SQUARE FOOT Square Feet Leased Expiration Date GROUND LEASE Y/N RANCHISE AGREEMENT DFT Y/N Total Annual Rent Amount Units Year % Rent Due Concession Description OF RENTABLE SQ FEET ASE EXP ROLLING MONTHS Credit Tenant ption Doc Notice Code Going Dark Clause Guarantor Name Remove Lease Guarantee Y/N Next Increase Date In Overages Y/N Lease Approval Required Subordinate to Mtge Lease Type Market Rent Per Sq Ft Month to Month Lease Y/N Non-Compete Clause Next Increase Amount Next Increase % National/Regional/Local Owner Occupied Y/N Occupied Y/N Rent Per Sa Foot Subleased Tenant Subleased Tenant Name Tenant Pay Cam Dark Tenant Y/N Ten or Par in Bank Franchise Agreement Dft Y/N Operating Lic Exp Date Default Under Lease Y/N % of Rentable Sq Feet Lease Exp Rolling Months Major Lease

To monitor the Watchlist Rules dealing with specific lease terms, certain fields must be



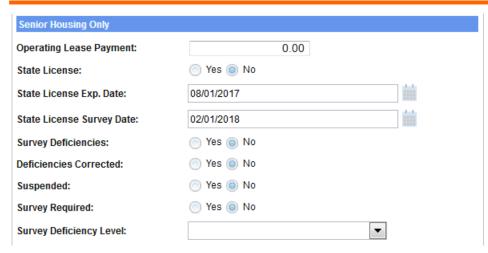


Figure 9 - Portal>Financial Statement>Financial Statement Detail Entry - Edit

Licensing information can be noted in the Operating Statement on the New Entry screen. The License Expiration date can be entered here or in the Rent Roll Lease Information.

The Financial Statement – New Entry screen also stores information related to the State License Survey including whether the Survey is required, the Survey Date, are there Survey Deficiencies, what is the Survey Deficiency Level and have they been corrected. These values are associated with the CREFC Watchlist reason 2H and are monitored by Strategy Rules 214 & 215.



CREFC Watchlist Reason 2G

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	2G	Bankruptcy of Borrower/Owner or Guarantor that comes to the Knowledge of Lender/Servicer (unless bankruptcy is a minority guarantor/borrower similar to a TIC relationship)	Upon receipt of notice by Servicer	Bankruptcy resolved or loan is transferred to the Special Servicer, whichever occurs first

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
213	Borrower/Guarantor Bankruptcy	None	For any loan where the Bankruptcy Threat Indicator is set to 'Y', take the designated action or actions.	PMASTR3.CMINBNKTCY = 'Y' Bankruptcy Threat Indicator found on Loan Administration> Analysis &	Borrower/Owner or Guarantor in Bankruptcy.
	CREFC Watchlist Reason 2G			Reporting>Analysis & Reporting (1)	



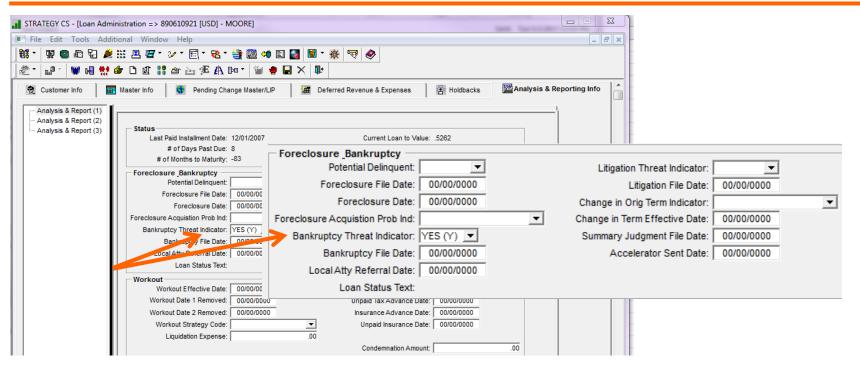


FIGURE 10-LOAN ADMINISTRATION>ANALYSIS & REPORTING>ANALYSIS & REPORT (1)>FORECLOSURE_BANKRUPTCY



CREFC Watchlist Reasons 2H

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	2Н	Federal/State Survey for Nursing Homes that Require the Report per the Loan Documents	Servicer has not received a new survey within 18 months of the last survey received by the Servicer or the latest survey indicates a deficiency level of F or higher	Annual survey submitted or deficiency cured

Reason Code 2H is evaluated by Rules 214 and 215.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
214	Nursing Home Survey Overdue CREFC Watchlist Reason 2H	Enter the number of months since the last survey that should trigger the specified action or actions. Note: Default value is 18 for CREFC Watchlist Rule Set.	Select the Periodic Operating Statement records where the License Survey is required and which has the latest License Survey Date. Calculate the number of months between the License Survey Date and the System Process Through Date. If the calculated number of months is greater than or equal to the value entered into the rule, perform the designated action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date POPMST.MSPURP = 'PER' Periodic Statement type POPMST.MSSURVEYR = 'Y' indicates that a survey is required. (Survey data found on New Statement Entry Screen in Financial Statement application). POPMST.MSSTLICSUR	Federal/State survey for nursing homes is overdue.
				State License Survey Date	



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
215	Nursing Home Survey Deficient CREFC Watchlist	Enter the deficiency level code that should trigger the specified action or actions. Values are selected from PINFO	Select the Periodic Operating Statement record with the Latest License Survey Date where the License Survey is required and the deficiency has not been corrected. If the Survey Deficiency Level is greater than or	POPMST.MSSTLICSUR State License Survey Date POPMST.MSSURVEYR = 'Y' indicates that a survey is required.	Federal/State survey for nursing homes has a deficiency rating of XX
	Reason 2H	D9. Note: Default value is 'F' for CREFC Watchlist Rule Set	equal to the value entered into the rule, perform the designated action or actions.	POPMST.MSSERVEYD indicates the deficiency level. Deficiencies are labeled A-L with a hierarchy of deficiency severity with A being the least severe and L being most severe. Will trigger for anything with a value of greater than the value entered. Default Value F will trigger with G,H,I,J,K or L.	XX indicates the deficiency rating found
					POPMST.INDMSDERCORIN not 'Y' indicates that the deficiency has not been corrected.

<u>Licensing fields</u> are found on the New Entry screen of the Financial Statement.



CREFC Watchlist Reason 3A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	3A	Inspection reveals Poor or Not Accessible condition as defined by the MBA Property Inspection Form adopted by CREFC	Place on Watchlist if the property received a 4 or 5 rating from the most recent inspection	Determination by Servicer in its discretion that property deficiencies have been cured, or access allowed and inspection completed

Reason Code 3A is supported by Rule 132. Critical data is located in the Inspection application.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
132	Inspection Rating CREFC Watchlist Reason 3A°	Select the Inspection Rating values from the drop down for which the designated action or actions should be taken	Retrieve the most recent inspection due date and compare the Inspection Rating to the values entered, if the Inspection Rating is equal to any of the values entered perform the designated action or actions.	Last Inspection Due Date - PINSPA.INLIDD Inspection Rating Code — PINSPA.INPCC (4 or 5 values trip rule) Values are found for Inspection Rating in PINFO	Inspection Rating is XX. [XX is the value found in PINSPA.INPCC]
				Table 45.	



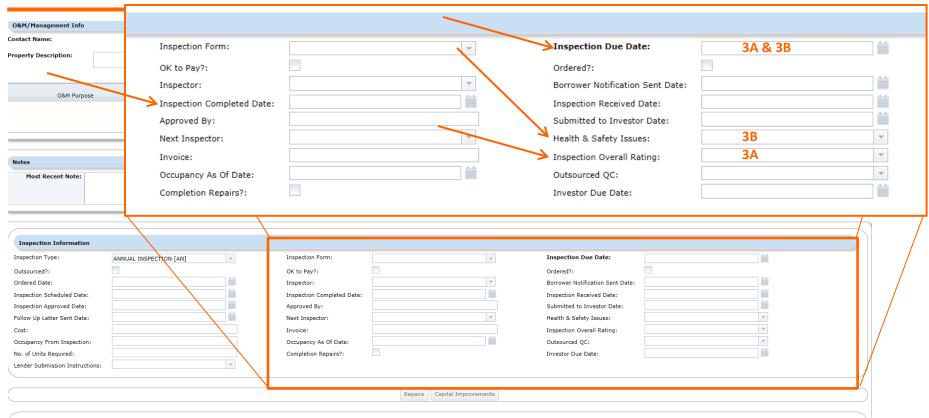


FIGURE 11- PORTAL>INSPECTIONS> HISTORICAL INSPECTION RECORDS>INSPECTION INFORMATION



CREFC Watchlist Reason 3B

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	3B	Property Affected by Life Safety Issue or Potentially Harmful Environmental Issue	The Servicer becomes aware in ordinary course of an inspection. May be listed as (or changed to) "Information" at Service's discretion	Determination by Servicer in its discretion that property deficiencies have been cured

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
216	Prop Life Safety/Harmful Env CREFC Watchlist Reason 3B	Specify the Health & Safety Issue code for 'No Issues'	Select the most recent inspection records. If the Health & Safety issue code is not blank and not equal to the Variable Value entered, or the Variable Value is blank, take the specified action or actions.	PINSPA.INLIDD Indicates the inspection date PINSPA.INHSIS –indicates health & safety issues were noted or 'No Issues' value was selected. (value not blank)	Property affected by life safety issue or potentially harmful environmental issue



CREFC Watchlist Reason 4A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	4A	Occupancy Decrease (Excludes Lodging)	< 80% of UW for fixed rate loans; <90% of in place tenants as of UW for floating rate loans; or if Multifamily: occupancy falls below 80%	When condition no longer exists

Rule 218, 235, 236, 261 and 262 are used to identify Watchlist Reason Code 4A by evaluating Occupancy changes.

For Strategy to evaluate this rule,

- there must be a Financial Statement entered with the Purpose Code of Underwriting (UWS) and a second Financial Statement with a Purpose Code of Periodic (PER).
- Occupancy must be entered or each statement must be linked to a Rent Roll record.
- Strategy calculates the "Average Occupancy" for the subject loan/properties by adding together the occupancy for all properties on the loan, and dividing by the # of properties. The Average Occupancy may be calculated for the Underwriting Statement (UWS) and/or the most recent (PER) statement depending on the rule logic. When calculating the minimum occupancy for Multifamily properties, only the periodic statement is used. When calculating the percentage change in occupancy, Average Occupancy is calculated for both the Underwriting and Periodic Statement.
- Then determines the "Percentage Change in Occupancy" from Underwriting to the most current Periodic statement by dividing the occupancy for the periodic statement by the occupancy for the underwriting statement, subtracting from 1 and multiplying the result by 100.



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
218	Occupancy Decrease Fixed Rate CREFC Watchlist 4A	Enter the maximum % Occupancy Decrease allowed Note: Default value is 20%	For each Fixed Rate loan, that is secured by non-lodging property types, using the most recent periodic operating statement and the underwriting statement, calculate the Average Occupancy for each statement purpose and determining the Percentage Change in Occupancy. If the change is negative, compare to the variable value entered and if it is greater than variable perform the actions.	PMASTR.CMCOT = 'F' Fixed Rate Loan PCCOLLCRE.PQPTYP <> 'MF' OR 'LO' POPMST.MSPURP = PER AND UWS Operating Statement Purpose codes of Periodic and Underwriting at Securitization POPMST.MSENDT Selects the Periodic operating statement with the most recent end date	Occupancy decreased XX% from the UWS for fixed rate loan, excludes lodging. [XX represents the % decrease in occupancy]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
235	Occupancy Decrease Float Rate CREFC Watchlist 4A	Enter the maximum % Occupancy Decrease allowed Note: Default value is 10%	For all Floating Rate loans, that are secured by non-lodging property types, using the most recent approved or completed periodic operating statement and the underwriting statement, calculate the Average Occupancy for each statement purpose and determining the Percentage Change in Occupancy. If the change is negative, compare to the variable value entered and if it is greater than variable, perform the actions.	PMASTR.CMCOT <> 'F' Float Rate Loan PCCOLLCRE.PQPTYP <> 'MF' OR 'LO' POPMST.MSPURP = PER AND UWS Operating Statement Purpose codes of Periodic and Underwriting at Securitization POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSSTAT = 'CO' or 'AP' Completed or Approved Status POCCUPA.OCO Occupancy %	Occupancy decreased XX% from the UWS for floating rate loan, excludes lodging. [XX represents the % decrease in occupancy]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
236	Occupancy Decrease Multifamily CREFC Watchlist 4A	Enter the minimum % Occupancy allowable for Multifamily properties	For all loans secured by multifamily properties, using the most recent completed or approved periodic operating statement, determine the Average Occupancy and compare to the variable value. If the occupancy is less than the variable value, perform the action or actions.	PCCOLLCRE.PQPTYP = 'MF' Multifamily Property POPMST.MSPURP = PER Operating Statement Purpose code of Periodic POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POPMST.MSSTAT = 'CO' or 'AP' Completed or Approved Status POCCUPA.OCO Occupancy %	Occupancy falls below XX % for Multi-Family property type [XX is the occupancy %]



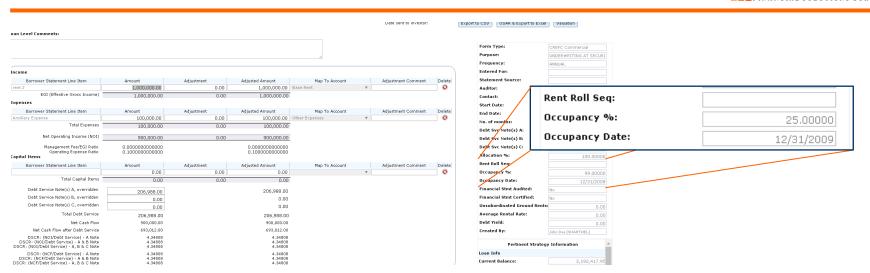
Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text	
261	Occupancy Decrease Float Rate: Rate Change Compare> Process Thru Date Excludes Lodging	Enter the maximum allowable % occupancy decrease. Default value is 20%.	For each non-fixed rate loan secured with commercial properties excluding multifamily and lodging, where the First Rate Change is greater than the Process Through Date, using the most recent periodic operating statement, determine the Average Occupancy for loan and determine the Percentage Change in Occupancy. Compare the difference to the variable value. If the change in occupancy is greater than the variable value, perform the action or actions.	PMASTR.CMCOT <> 'F' Float Rate Loan PARMH.ARECDT First Rate Change date greater than process through date. PCCOLLCRE.PQPTYP <> 'MF' OR 'LO' POPMST.MSPURP = 'PER' and 'UWS' Operating Statement Purpose code of Periodic or Underwriting POPMST.MSENDT Selects the Periodic operating statement with the most recent end date	Occupancy decreased XX % from UWS for float rate loan, excludes lodging; rate chng >process thru date	
				POCCUPA.OCO Occupancy %		



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
262	Occupancy Decrease for Float Rate Loan: Rate Chge Compare <= Process thru Date Excludes Lodging.	Enter maximum allowable Occupancy Decrease for Float Rate loans Default Value is 10%	For each non-fixed rate loan secured with commercial properties excluding multifamily and lodging, where the First Rate Change is less than or equal to the Process Through Date, using the most recent periodic operating statement, determine the Average Occupancy for loan and determine the Percentage Change in Occupancy. Compare the difference to the variable value. If the change in occupancy is greater than the variable value, perform the action or actions.	PMASTR.CMCOT <> 'F' Float Rate Loan PARMH.ARECDT First Rate Change less than or equal to the process through date. PCCOLLCRE.PQPTYP <> 'MF' OR 'LO' POPMST.MSPURP = 'PER' and 'UWS' Operating Statement Purpose code of Periodic or Underwriting POPMST.MSENDT Selects the Periodic operating statement with the most recent end date POCCUPA.OCO	Occupancy decreased XX % from UWS for float rate loan, excludes lodging; rate chng <=process thru date
				Occupancy %	

Occupancy is displayed on the Financial Statement – Detail Entry screen to the right of the detail entry





12- OCCUPANCY % AND OCCUPANCY DATE WITH AN OCCUPANCY TYPE OF OS, CAN BE VIEWED ON THE FINANCIAL STATEMENT IN THE RIGHT HAND PANEL.

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CREFC Watchlist Reason 4C

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	4C	Bankruptcy of Licensee, Franchisor, or any Combination of Top 3 Tenants that Individually Occupy at least 5% of the NRA and Cumulatively Occupy Greater than 30% of the NRA. For Healthcare Property, the Bankruptcy of Tenant Under Master Lease or of the Management Company. For Multifamily and MH Park with Master Lease >30 NRA	> 30% NRA; Excludes Lodging Park & Self Storage; For Healthcare bankruptcy of tenant under master lease or of management company. For Multifamily and MH Park with master lease >30 NRA	When condition no longer exists

Rule 219 and 220 are used to identify Watchlist Reason Code 4C.

For Strategy to properly rank tenants and evaluate the % of Net Rentable Area,

- Fields must be completed in both the Collateral and Lease records.
- Square Feet Leased cannot be blank. Found in the Lease record (PLEASEA.LSSFLD)
- Gross Square Feet cannot be blank. Found in the Collateral Record (PCCOLLCRE.PQTOTS)
- Comm NRA or Resd NRA must have a value. Found in the Collateral Record (PCCOLLCRE.PQCNRA OR PQRNRA)



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
219	Tenant > 30% NRA and UPB >= \$30 Million CREFC Watchlist 4C	% NRA Threshold Note: Default value is 30%	For loans with unpaid principal balances greater than or equal to \$30 million, select from the most recent rent rolls where the expiration date is not null and the expiration rolling months is 1-12 months and notice not to renew has not been received. Compare the % of rentable square feet to the value entered and if it is greater perform the requested action.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PMASTR.CMPBAL Unpaid Principal Balance >= \$30 Million PLEASEA.LSEXDT Lease Expiration Date PLEASEA.LSPCRT % of Square Feet Leased >30% (default) PLEASEA.LSLEASEXPM Lease Expiration Rolling Months = L0112 PLEASEA.LSRWNOTICE = Blank or 'N'	Tenant GT XX % NRA and expiring in 1-12 months with UPB GE 30 million [XX represents the % sq ft leased]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
220	Tenant > 30% NRA and UPB < \$30 Million CREFC Watchlist 4C	% NRA Threshold Note: Default value is 30%	For loans with unpaid principal balances less than \$30 million, select from the most recent rent rolls where the expiration date is not null and the expiration rolling months is 1-12 months and no notice not to renew has been received and the number of months from the Lease Expiration Date and the System Date is 1-6. Compare the % of rentable square feet to the value entered and if it is greater perform the requested action.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PMASTR.CMPBAL Unpaid Principal Balance >= \$30 Million PLEASEA.LSEXDT Lease Expiration Date PLEASEA.LSPCRT % of Square Feet Leased >5% PLEASEA.LSLEASEXPM Lease Expiration Rolling Months = L0112 PLEASEA.LSRWNOTICE = Blank or 'N'	Tenant greater than XX % NRA and expiring in 6 months or expired, with UPB less than 30 million [XX represents the % sq ft leased]



CREFC Watchlist Reason 4D

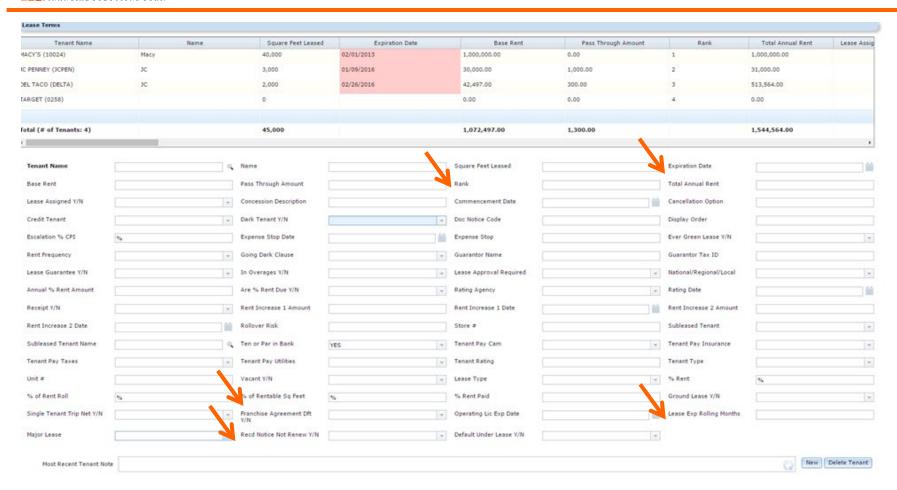
Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	4D	A combination of top 3 tenants with lease expirations within the next 6 months	The combination of any top 3 tenants with lease expirations within the next 6 months that individually occupy at least 5% of the NRA and cumulatively occupy greater than 30% of the NRA	When condition no longer exists

For Strategy to properly rank tenants and evaluate the % of Net Rentable Area,

- Fields must be completed in both the Collateral and Lease records.
- Square Feet Leased cannot be blank. Found in the Lease record (PLEASEA.LSSFLD)
- Gross Square Feet cannot be blank. Found in the Collateral Record (PCCOLLCRE.PQTOTS)
- Comm NRA or Resd NRA must have a value. Found in the Collateral Record (PCCOLLCRE.PQCNRA OR PQRNRA)

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
221	Top 3 Tenants Lease Exp 6 months CREFC Watchlist Reason 4D	None.	Using the System Processed Through Date as the current date select Lease records from the most recent rent roll where the Rank of the Tenant < 4 and % of SQ Ft leased is Greater than 5% or the combined total > 30% and the number of months between the lease expiration date and the system date is less than or equal to 6.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PLEASEA.LSEXDT Lease Expiration Date PLEASEA.LSPCRT % of Square Feet Leased >5% PLEASEA.LSRANK Tenant Rank in Rent Roll	A combination of top three tenants with lease expirations in the next 6 months





13-MAKE SURE FIELDS ARE DEFINED IN YOU LEASE FORM TO CAPTURE NOTICE NOT TO RENEW, TENANT RANKING, TOTAL ANNUAL RENT AND LEASE EXP ROLLING MONTHS.



CREFC Watchlist Reason 4E

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	4E	Bankruptcy of Licensee, Franchisor, or any Combination of Top 3 Tenants that Individually Occupy at least 5% of the NRA and Cumulatively Occupy Greater than 30% of the NRA. For Healthcare Property, the Bankruptcy of Tenant Under Master Lease or of the Management Company. For Multifamily and MH Park with Master Lease >30 NRA	> 30% NRA; Excludes Lodging Park & Self Storage; For Healthcare bankruptcy of tenant under master lease or of management company. For Multifamily and MH Park with master lease >30 NRA	When condition no longer exists

Strategy Rules 222, 223, & 224 alert to CREFC Watchlist Reason 4E.

For Strategy to properly rank tenants and evaluate the % of Net Rentable Area,

- Fields must be completed in both the Collateral and Lease records.
- Square Feet Leased cannot be blank. Found in the Lease record (PLEASEA.LSSFLD)
- Gross Square Feet cannot be blank. Found in the Collateral Record (PCCOLLCRE.PQTOTS)
- Comm NRA or Resd NRA must have a value. Found in the Collateral Record (PCCOLLCRE.PQCNRA OR PQRNRA)



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
222	Tenant Bankruptcy – Healthcare CREFC Watchlist Reason Code 4E	None	For each property with a property type of Health Care select the most recent rent roll and if any lease records indicate a Tenant or Parent is in Bankruptcy take the designated action or actions.	PCCOLLCRE.PPROPTYPE = HC Indicates that a property is Health Care.	
				PLEASEA.LSTPB is 'Y' indicates that Tenant or Parent is in bankruptcy.	

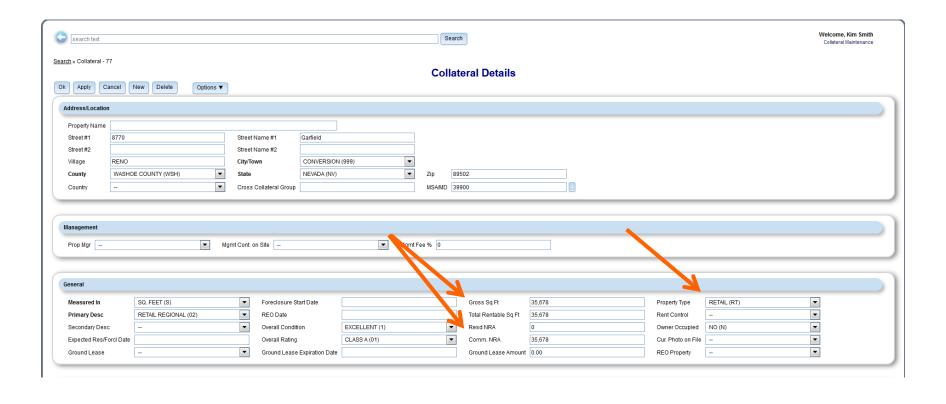


Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
223	Top 3 Tenants Bankruptcy – Multifamily, Mental Health CREFC Watchlist Reason 4E	Enter the maximum threshold for % of Net Rentable Area Note: Default value is 30 for CREFC Watchlist Rule Set.	Selects the most recent rent roll where the property type is Multifamily or Mobile Home selecting tenants ranked in the top three and flagged as tenant or parent in bankruptcy. Total the % of rentable sq feet by loan/collateral and compare to rule variable entered. If the percentage calculated is greater than the variable value entered, take the specified action or actions.	PRROLL.RRDATE indicates date of rent roll. PLEASEA.LSRANK < 4 is used to indicate the top 3 tenants on the property. PLEASEA.LSTPB – 'Y' indicates tenant or parent is in bankruptcy. PCCOLLCRE.PROPTYPE = 'MF' or 'MH' – Multifamily or Mobile Home PLEASEA. LSPCTSQFT indicates Percent Leased Sq Ft. PCCOLLCRE.PQTOTS Can't be blank PCCOLLCRE.PQCNRA & PCCOLLCRE.PQRNRA Can't both be zero or blank	Top 3 tenants in bankruptcy for MF or MH property type and combined NRA > XX %. [XX is the NRA% entered as the rule variable value]

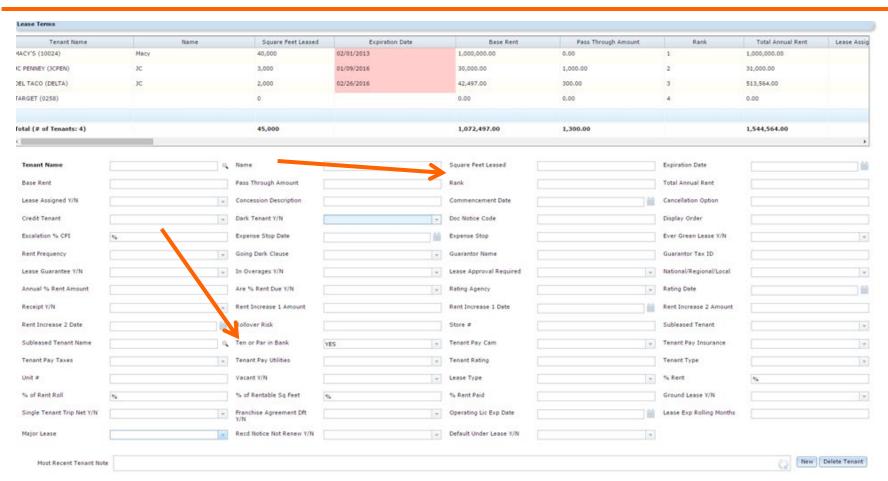


Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
224	Top 3 Tenants Bankruptcy – Not Multifamily, Mental Health CREFC Watchlist Reason 4E	Enter the maximum threshold for % of Net Rentable Area Note: Default value is 30 for CREFC Watchlist Rule Set.	Selects the most recent rent roll where the property type is not Health Care, Multifamily or Mobile Home selecting tenants ranked in the top three are flagged as tenant or parent in bankruptcy and with the rentable sq feet is greater than 5%. Total the % of rentable sq feet by loan/collateral and compare to the rule variable entered. If the percentage calculated is greater than the variable value entered, take the specified action or actions.	PRROLL.RRDATE indicates date of rent roll. PLEASEA.LSTPB — 'Y' indicates tenant or parent in bankruptcy. PLEASEA.LSRANK < 4 is used to indicate the top 3 tenants on the property. PCCOLLCRE.PROPTYPE <> 'HC' 'MF' or 'MH' — Not Healthcare, Multifamily or Mobile Home PLEASEA. LSPCTSQFT indicates Percent Leased Sq Ft. PLEASEA.LSPCRT Indicates percent of rentable sq. feet. PCCOLLCRE.PQTOTS Can't be blank PCCOLLCRE.PQCNRA & PCCOLLCRE.PQRNRA Can't both be zero or blank	Top 3 tenants in bankruptcy with property type not MF, MH or HC, indiv NRA>.05% and cumm NRA> XX %. [XX is the NRA% entered as the rule variable]











CREFC Watchlist Reason 4F

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	4F	Major Tenant Lease is in Default, Terminated or is Dark	> 30% NRA; Excludes Multifamily, Lodging, MH Park & Self Storage; For Healthcare failure to comply with Regulatory Requirements	When condition no longer exists

Rule 225 alerts for CREFC Watchlist Reason code 4F.

For Strategy to properly rank tenants and evaluate the % of Net Rentable Area,

- Fields must be completed in both the Collateral and <u>Lease records</u>.
- Square Feet Leased cannot be blank. Found in the Lease record (PLEASEA.LSSFLD)
- Gross Square Feet cannot be blank. Found in the Collateral Record (PCCOLLCRE.PQTOTS)
- Comm NRA or Resd NRA must have a value. Found in the Collateral Record (PCCOLLCRE.PQCNRA OR PQRNRA)

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Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
225	Major Tenant Lease is in Default CREFC Watchlist Reason 4F	Enter the maximum threshold for % of Net Rentable Area Note: Default value is 30 for CREFC Watchlist Rule	Reviews the most recent rent roll where the property type is not Health Care, Multifamily, Mobile Home, or Self Storage, where a major lease at least one of the following is true: Default Under Lease is 'Y', Vacant is 'Y', Received Not Renewing is 'Y' or Dark Tenant is 'Y' Compare the % of rentable square feet to the value entered in the rule and if it is greater than the value entered, take the designated action or actions.	PCCOLLCRE.PROPTYPE <> 'HC' 'MF' 'MH' 'SS' PCCOLLCRE.PQTOTS Can't be blank PCCOLLCRE.PQCNRA & PCCOLLCRE.PQRNRA Can't both be zero or blank PRROLL.RRDATE indicates date of rent roll. PLEASEA.LSMAJOR = 'Y' Indicates a major lease PLEASEA.LSDFLTLEASE = 'Y' Indicates Default under lease PLEASEA.LSVACANT= 'Y' Indicates Vacant PLEASEA.LSRWNOTICE = 'Y' Indicates Not Renewing PLEASEA.LSDARK = 'Y' Indicates Dark PLEASEA.LSPCRT Indicates percent of rentable sq. feet	Major tenant lease in default, terminated or not renewing and NRA > XX %. [XX is the NRA % entered as the rule variable value]



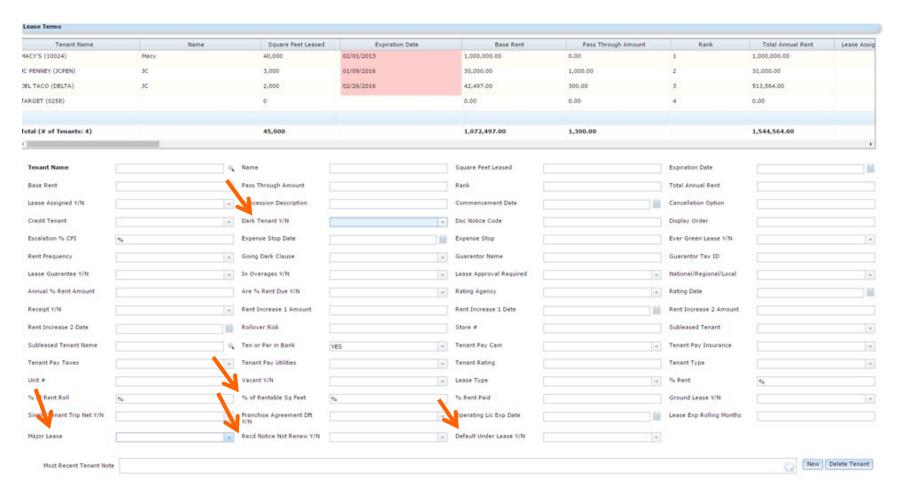


FIGURE 14 - PORTAL>RENT ROLL>HISTORICAL RENT ROLLS>LEASE TERMS



CREFC Watchlist Reason 5A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	5A	Pending Loan Maturity or Anticipated Repayment Date (ARD) with Balloon Balance Due; Excludes Fully Amortizing Loans	< 90 days	Until loans is extended or paid off, or for ARD loans, three payment are made after the ARD Date and no other WL trigger or events have occurred

To monitor for pending maturity or anticipated repayment dates, Strategy uses rules 226 and 116 to evaluate both the Internal Maturity Date (ARP) and the Legal Maturity Date fields.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
226	Loan Internal Maturity Pending CREFC Watchlist Reason 5A	Specify the number of days prior to the internal loan maturity date to take the specified action or action. Note: 90 days is the default value.	Using the System Processed Through Date as the current date determine the number of days between it and the Loan Internal Maturity Date. If the number of days found is less than or equal to the rule variable value entered, take the designated action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PMASTR.CMCMAT Internal Maturity Date	Loan Internal Maturity Date pending in XX days. (ARP - Anticipated Repayment Date) [XX is the number of days prior to the internal maturity date]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
116	Pending Maturity CREFC Watchlist Reason 5A	Specify the number of days prior to the maturity date to take the specified actions. Note: 90 days is the default value.	Using the System Control Process Through Date as the current date, calculate the number of days between the current date and the Loan Maturity Date. If the result is less than or equal to the number entered in Maintenance, perform the requested action or actions.	System Process Through Date PSYSCPER.S2PDT Legal Maturity Date PMASTR.CMMATD No. of days prior to maturity entered into Rules Maintenance PRURULED.RDVALUEN	Loan maturity/ARD pending in XX days [XX is the number of dates prior to the maturity date]
227	Loan Has Matured CREFC Watchlist Reason 5A	Specify the number of days after the Loan Maturity Date to take the designated action or actions	Retrieve the loan maturity date and calculate the number of dates between it and the System Process Through Date and if the number of dates calculated is greater than or equal to the value entered perform the designated action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date. PMASTR.CMMATD Loan Maturity Date not blank and less than the System Process Through Date	Loan matured XX days ago [XX is the number of days since the loan maturity date.]



Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
264	Loan Has Matured- Internal CREFC Watchlist Reason 5A	specify the number of days past internal maturity date to take the designated actions.	Retrieve loan internal maturity date that is not zero, and find the number of days between it and System Process Through Date. Test to see if that number is greater than or equal to the rule detail numeric value entered.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PMASTR.CMCMAT Internal Maturity Date	Loan Matured XX days ago-Internal (ARP - Anticipated Repayment Date) [XX is the number of days since the Internal loan maturity date.]



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	■ Master Info Pending Change Master/LIP	o
Payment/Billing Balances/Processing Contract Esc/LateChg/Default D.I.A.L. Reporting Tiered Service Fee Period to Date(1) Period to Date(2) Commercial/Balloon Interest Reserve Valuation Analysis	Payment Information Payment Frequency Indicator: MONTHLY (M) Bill/Payment Frequency: 1	
Fee Information	Pmt App String: LIKE STRAT (V98) ▼	
	Accrual Follows Bus Cal Due Date: ✓ Allow Partial Payments: YES (Y) ✓	
	Next Pmt Due Date w/o Bus Cal: 09/01/2014 Principal & Interest Pmt: 48,886.53	
	Next Payment Due Date: 9/1/2014 Escrow 2 Payment: .00 Due Date for Delinquency: 09/01/2014 Escrow 3 Payment: .00	
	% of Principal (Pmt Type R): .000000000000	
	Simple Interest: NO (N) ▼ Escrow 5 Payment: .00	
	Billing Information	
	Next Billing Date: 05/01/2014 Legal Maturity Date: 04/01/2044 Rule 116, 227 Billing Cycle Method: 1ST THRU 1 (1) Internal Maturity Date: 00/00/0000 Review Date: 00/00/00000 Call Date: 00/00/00000 Print Notices: YES (Y) Internal Mat/Call: NO (N) Internal Mat/Call: NO (N) Interest Compounding Frequency: N/A (N)	

FIGURE 15 - LOAN ADMINISTRATION>MASTER INFO>PAYMENT/BILLING>BILLING INFORMATION



CREFC Watchlist Reason 6A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Credit	6A	Any Other Situation that Indicates an Increased Level of Default Risk that may Create Potential Material Losses to Investors (Lesser of 10% of UPB or \$500,000)	Is added to Watchlist based on Servicer's discretion. Also add for (but not limited to) any unplanned draw on a LOC or reserve to pay debt service or three or more delinquencies in a trailing 12 month period	When condition no longer exists

This CREFC Watchlist Reason must be added to the Watchlist manually.



CREFC Watchlist Reason 7A

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	7A	Loan has been Returned from the Special Servicer	Date returned from the Special Servicer. Other Watchlist triggers aren't applicable if based on outdated information (from prior to the date loan was returned)	3 months after return to Master barring any other trigger

Strategy looks to the Investor Reporting module and the Special Servicer tracking to determine if the loan has returned from Special Servicing and has been back for more than the number of days entered in the value (typically 90 for CREFC). For this purpose the Return from Special Servicing field cannot be blank.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
228	Returned from the Special Servicer. CREFC Watchlist Reason 7A	Specify the number of days past the transfer date to take the designated action or actions	Retrieve a loan's most recent transfer from Special Servicing date and determine the number of days between it and the System Process Through date. If the number of days after return is less than or equal to the number of days entered in the rule, take the designated action or actions.	PSYSCPER.S2PDT System Process Through Date is used as the Current Date PPSATFR.TRFRDT Date transferred from Special Servicing	Loan returned from special servicer XX days ago. [XX is the number of days after the return from Special Servicing]



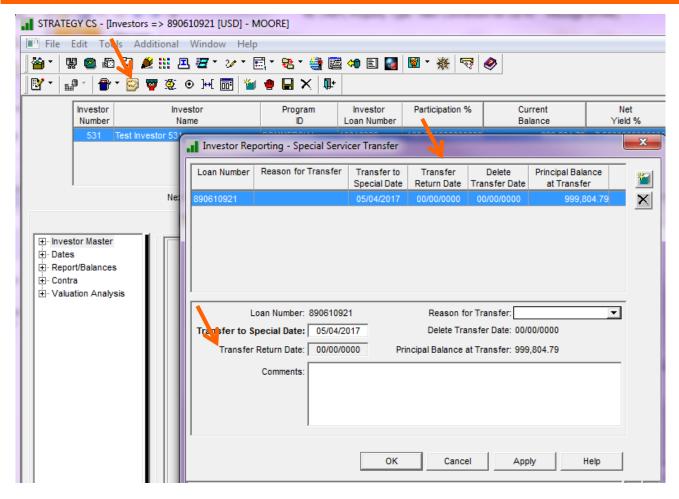


FIGURE 16-INVESTOR PROCESSING>TOOLS>SPECIAL SERVICER TRANSFER



CREFC Watchlist Reason 7B

Credit (default)	Code	Guideline	Review Threshold	Release Threshold
Informational	7B	Loan Modifications, Interest Shortfalls and WODRA Repayment Periods	Any of the following three conditions: 1) Loan modifications where a B note was created 2) Cumulative interest shortfalls 3) WODRA repayment periods	When loan pays off

Strategy Rule 229 monitors for the creation of a B note which is noted in the Loan Administration module, Analysis and Reporting tab. Loans experiencing Cumulative Interest Shortfalls or noted for WODRA repayment periods must be added to the Watchlist manually at this time.

Rule ID	Rule	Customer defined Variable Value	Logic	Fields Used	Rule Alert Text
229	Loan Modifications with B Note CREFC Watchlist Reason 7B	None	Select loans where the is a loan modification and the system indicates that a B Note was created.	PMASTR5.CMBNTECRT = 'Y' Indicates that a B Note was created.	Loan modifications where a B note was created.



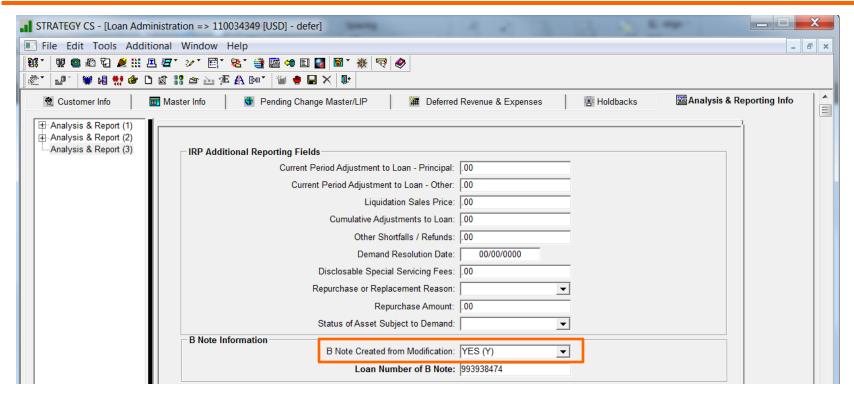


FIGURE 17- LOAN ADMINISTRATION>ANALYSIS & REPORTING INFO>ANALYSIS & REPORT (3)>B NOTE INFORMATION



Manually Adding Items to the Watchlist



The Watchlist Component populates automatically from the Rules Maintenance program, or by manual entry by the user. CREFC Watchlist Reasons Codes have associated Rules to monitor for the associated risk indicators, with the exception of Reason Codes 2C, 6A and 7B. Creating a Rule Set to monitor for the reasons and setting the Rule Action to Watchlist, populates the Watchlist.

Items can be manually entered on the Watchlist using the Watchlist component in the Portal.

Enter the Loan number or Borrower Name in the Search box.

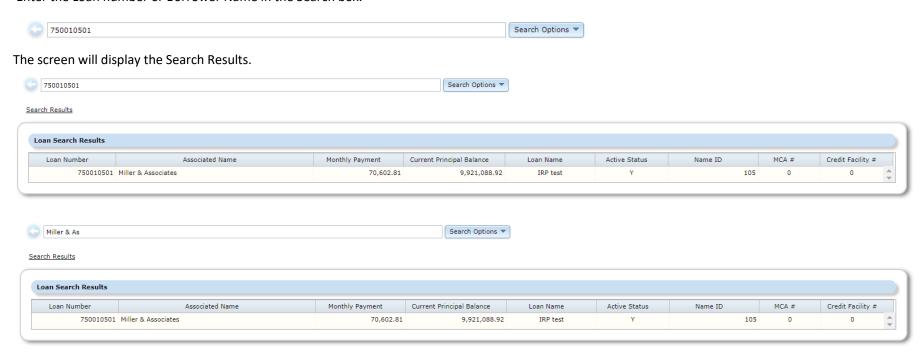


FIGURE 18 - PORTAL>WATCHLIST>SEARCH RESULTS



Double clicking the appropriate record in the search results opens the Watchlist Summary Information for the selected Loan.

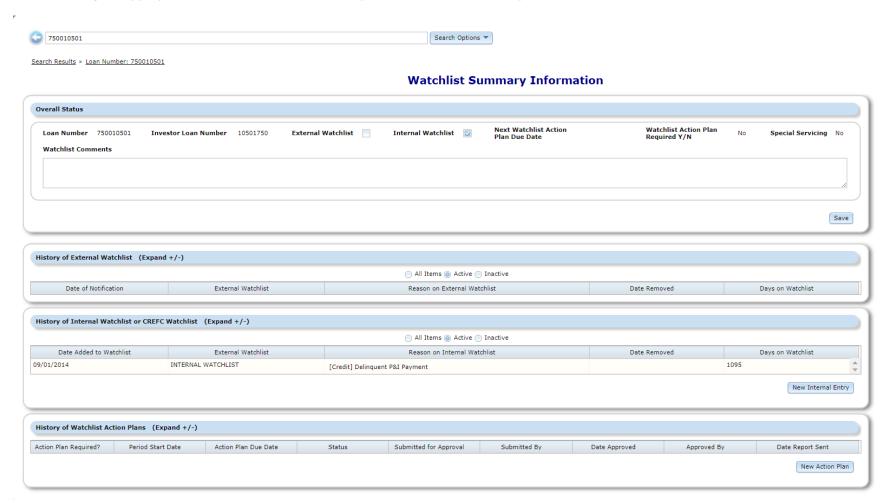
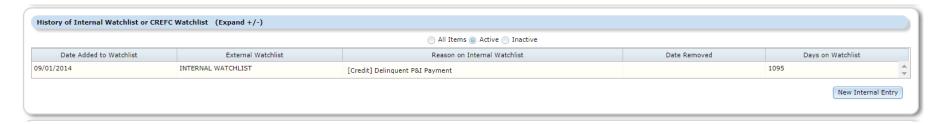


FIGURE 19- PORTAL>WATCHLIST>SEARCH & SELECT>WATCHLIST SUMMARY

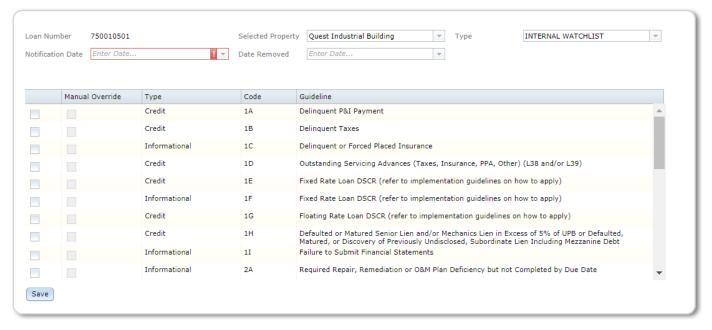
The Summary consists of the Overall Status, History of External Watchlist, History of Internal Watchlist or CREFC Watchlist, and History of Watchlist Action Plans. Comments entered into the Watchlist Comments field (Overall Status section) appear in the Servicer's Watchlist Report – PIRPXWL.

Users can manually add a loan to the Watchlist by using the New Internal Entry below the History of Internal Watchlist summary grid.





New Watchlist Entry



The New Watchlist Entry screen allows you to enter the Notification Date, select the correct Property with the Selected Property dropdown, and select a User defined Watchlist for reporting. Using the check box and Manual Override to the left of the Watchlist reason allows a specific Watchlist Reason code to be identified. Hitting Save closes the window and displays the new item in the History of Internal Watchlist or CREFC Watchlist summary.



History of Internal Watchlist or CREFC	Watchlist (Expand +/-)				
		○ All Items Active Inactive			
Date Added to Watchlist	External Watchlist	Reason on Internal Watchlist	Date Removed	Days on Watchlist	
09/01/2014	INTERNAL WATCHLIST	[Credit] Delinquent P&I Payment		1095	_
08/31/2014	INTERNAL WATCHLIST	[Credit] Any Other Situation that Indicates an Increased Level of Default Risk that may Create Potential Material Losses to Investors (Lesser of 10% of UPB or \$500,000)		1096	~
				New Internal Entry	

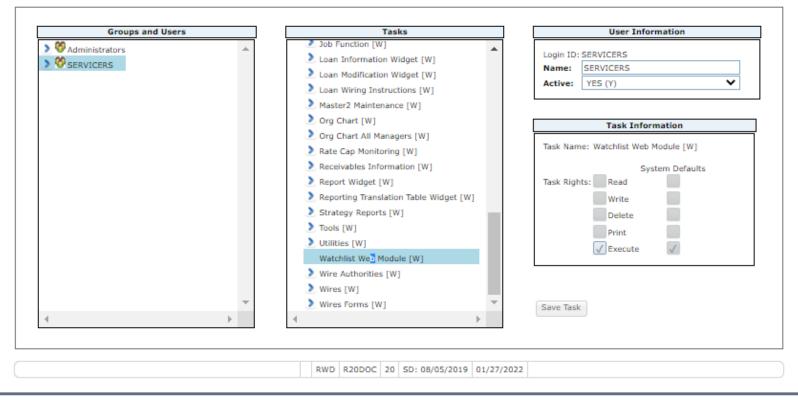


Watchlist Widget Administration

Security

Users must have Execute access to use the Watchlist widget.

Security Maintenance



20-PORTAL>SECURITY>WEB PORTAL[W]>WATCHLIST WEB MODULE [W]

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Watchlist Module Files

PWATCHCODE

Master file for Watchlist Reason Codes. Defines the CREFC Reason Type (Credit or Informational) and the Reason Text that displays in the History of Internal Watchlist or CREFC Watchlist in the Watchlist widget.

PWATCHCODE		
WCCODE	WCTYPE	WCTEXT
CHAR	CHAR	CHAR
2	30	500
REASON CODE	REASON TYPE	REASON TEXT
1A	Credit	Delinquent P&I Payment
1B	Credit	Delinquent Taxes
1C	Informational	Delinquent or Forced Placed Insurance
1D	Credit	Outstanding Servicing Advances (Taxes, Insurance, PPA, Other) (L38 and/or L39)
1E	Credit	Fixed Rate Loan DSCR (refer to implementation guidelines on how to apply)
1F	Informational	Fixed Rate Loan DSCR (refer to implementation guidelines on how to apply)
1G	Credit	Floating Rate Loan DSCR (refer to implementation guidelines on how to apply)
1H	Credit	Defaulted or Matured Senior Lien and/or Mechanics Lien in Excess of 5% of UPB or Defaulted,
		Matured, or Discovery of Previously Undisclosed, Subordinate Lien Including Mezzanine Debt
11	Informational	Failure to Submit Financial Statements
2A	Informational	Required Repair, Remediation or O&M Plan Deficiency but not Completed by Due Date
2В	Credit	Occurrence of Servicing Trigger Event in the Mortgage Loan Documents (for example: Springing Lockbox, Establishment of LOC, Trap Excess Cash)



PWATCHCODE		
WCCODE	WCTYPE	WCTEXT
CHAR	CHAR	CHAR
2	30	500
REASON CODE	REASON TYPE	REASON TEXT
2C	Credit	Expiration of Ground Lease within 6 Months or Ground Lease Default
2D	Informational	Operating License or Franchise Agreement Default
2F	Credit	Bankruptcy of Borrower/Owner or Guarantor that comes to the Knowledge of Lender/Servicer
		(unless bankruptcy is a minority guarantor/borrower similar to a TIC relationship)
2G	Credit	Federal/State Survey for Nursing Homes that Require the Report per the Loan Documents
2H	Informational	Inspection reveals Poor or Not Accessible condition as defined by the MBA Property Inspection Form adopted by CREFC
3A	Credit	Property Affected by Life Safety Issue or Potentially Harmful Environmental Issue
3B	Credit	Property Affected by Major Casualty or Condemnation Proceeding Affecting Future Cash Flows
3C	Credit	Occupancy Decrease (Excludes Lodging)
4A	Credit	Single Tenant, or any Tenant with a Lease >30% NRA, (i) Expiring within the next 12 months, for Loans ? \$30 million, (ii) Expiring within 6 months, for loans < \$30 million, or (iii) anytime the Servicer Receives Notice that the Tenant will not Renew
4C	Credit	A combination of top 3 tenants with lease expirations within the next 6 months
4D	Credit	Bankruptcy of Licensee, Franchisor, or any Combination of Top 3 Tenants that Individually Occupy at least 5% of the NRA and Cumulatively Occupy Greater than 30% of the NRA. For Healthcare



PWATCHCODE		
WCCODE	WCTYPE	WCTEXT
CHAR	CHAR	CHAR
2	30	500
REASON CODE	REASON TYPE	REASON TEXT
		Property, the Bankruptcy of Tenant Under Master Lease or of the Management Company. For
		Multifamily and MH Park with Master Lease >30 NRA
4E	Credit	Major Tenant Lease is in Default, Terminated or is Dark
4F	Credit	Pending Loan Maturity or Anticipated Repayment Date (ARD) with Balloon Balance Due; Excludes Fully Amortizing Loans
5A	Credit	Any Other Situation that Indicates an Increased Level of Default Risk that may Create Potential Material Losses to Investors (Lesser of 10% of UPB or \$500,000)
6A	Credit	Loan has been Returned from the Special Servicer
7A	Informational	Loan Modifications, Interest Shortfalls and WODRA Repayment Periods
7B	Informational	Delinquent P&I Payment

PWATCHLOAD

Populated manually or by the Rules Engine – this file stores the loans assigned to the Watchlist. This includes the Reason Code.

PWATCHLOAD				
Field Description	Field Name/Alias	Field Type	Length	Comments
LOAN NUMBER	W1LN	PACKED	9,00	



PWATCHLOAD				
Field Description	Field Name/Alias	Field Type	Length	Comments
SEQUENCE NUMBER	W1SEQ	PACKED	9,00	
PROCESS ID	W1TKNO	PACKED	9,00	
ACTION PLAN REQ	W1TYPE	CHAR	2	
REASON CODE	W1REASON	CHAR	2	
NOTIFICATION DATE	W1NOTIFY	DATE	10,00	
ACTION PLAN DUE DATE	W1DUE	DATE	10,00	
DATE REMOVED	W1REMOVED	DATE	10,00	
DATE REPORT SENT	W1RPSENT	DATE	10,00	
COLLATERAL ID	W1FKEY1	PACKED	9,00	
LENDER RATING	W1LRATING	CHAR	25	
LENDER STATUS	W1LSTATUS	CHAR	25	
DESC. AND CONDITION	W1DESCON	CHAR	2500	
FINANCIAL ANALYSIS	W1FSANA	CHAR	2500	
BORROWER COMMITMENT	W1BORRCOM	CHAR	2500	
OUTSTANDING ISSUES	W10UTISS	CHAR	2500	
OVERALL STRNGTH/WEAK	W1STRWEAK	CHAR	2500	
ACTION PLAN COMMENTS	W1ACTNPLN	CHAR	2500	

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PWATCHLOAD						
Field Description	Field Name/Alias	Field Type	Length	Comments		
ACTIVE Y/N	W1ACTIVE	CHAR	1			
DATE/TIME CREATED	SYSCRT	DATETIM	26,00			
DATE/TIME UPDATED	SYSUPD	Date/Time	26,00			
CREATED BY USER	SYSCRTBY	Char	10			
UPDATED BY USER	SYSUPDBY	Char	10			
CREATED BY PROGRAM	PGMCRTBY	Char	10			
UPDATED BY PROGRAM	PGMUPDBY	Char	10			

PWATCHRSN

Populated by the Rules Engine action or added by Manual Override, the file stores the Reason Code that was applied to a loan on the Watchlist. Information from this file is displayed in the Watchlist Detail Information page. The Watchlist Detail Information page displays the Guideline description of the Reason Code in PWATCHRSN using the Reason Text in PWATCHCODE. Users use the Manual Override checkbox to manually apply the date removed, or to add a new internal Watchlist reason.

PWATCHRSN							
Field Description	Field Name/Alias	Field Type	Length	Comments			
LOAN NUMBER	W2LN	Numeric (Packed)	9,0				
SEQUENCE NUMBER	W2SEQ	Numeric (Packed)	9,0				
REASON SEQ NUM	W2RSEQ	Numeric (Packed)	3,0				



PWATCHRSN					
Field Description	Field Name/Alias	Field Type	Length	Comments	
REASON CODE	W2REASON	Char	2		
REASON TYPE	W2TYPE	Char	30		
DATE REMOVED	W2REMOVED	Date (Null Capable)	10,00		
ACTIVE Y/N	W2ACTIVE	Char	1		
MANUAL OVERRIDE Y/N	W2MANOVR	Char	1		
DATE/TIME CREATED	SYSCRT	Date/Time	26,00		
DATE/TIME UPDATED	SYSUPD	Date/Time	26,00		
CREATED BY USER	SYSCRTBY	Char	10		
UPDATED BY USER	SYSUPDBY	Char	10		
CREATED BY PROGRAM	PGMCRTBY	Char	10		
UPDATED BY PROGRAM	PGMUPDBY	Char	10		

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