

Announcement 15-42

Date: August 13, 2015

Topic: TILA RESPA Integrated Disclosures

The TRID related amendments to TILA were originally scheduled to have an effective date of August 1, 2015, but that effective date has been delayed by the CFPB. Now, consumer loans with applications received by the lender (or mortgage broker, if applicable) on or after October 3, 2015 must comply with the TRID requirements, as codified in the amendments to sections 1026.19, 1026.37 and 1026.38 of TILA. PennyMac will require that all applicable loans comply with the TILA RESPA Integrated Disclosure Rule (TRID).

PennyMac also recognizes that some TRID topics have been interpreted in more than one way. In order to aid correspondents by defining PennyMac purchase requirements, we are providing the following resources:

- For PennyMac TRID-related purchase requirements, please see the "PCG TRID FAQ" document posted on: gopennymac.com → Tools & Resources → Reference Guides.
- Other TRID implementation resources, such as examples of the Loan Estimate and Closing Disclosure, are available at the CFPB's Website.
- <u>CFPB Webinars</u> provide helpful but unofficial guidance on numerous TRID implementation topics.

We also feel it is important to remind clients to consult with legal counsel regarding compliance with regulatory and statutory requirements, as PennyMac's purchase requirements do not constitute legal advice.

Please note that while this communication is based on the most recent CFPB published rule and guidance, it is possible that further clarifications or other amendments may be issued that impact our policies and procedures. We will notify and publish any significant changes made to this policy.

If you have any questions or need clarification on PennyMac's purchase requirements related to TRID compliance, please email your inquiry to pcgcompliancepolicy@pnmac.com.