

Lender Letter LL-2015-06

October 6, 2015

To: All Fannie Mae Single-Family Sellers

Information Related to Know Before You Owe TILA-RESPA Integrated Disclosures

At the direction of the Federal Housing Finance Agency, Fannie Mae is issuing this Lender Letter.

Fannie Mae recognizes that many lenders and their partners in the mortgage industry have undertaken considerable technological and operational changes in order to meet the requirements created by the Consumer Financial Protection Bureau's Know Before You Owe TILA-RESPA Integrated Disclosure (TRID) rule, which went into effect October 3, 2015. Fannie Mae recognizes and appreciates the enormous efforts that its lenders have made to date.

Fannie Mae is aware that some lenders continue to address the implementation of TRID's technical requirements. In recognition of this, until further notice, Fannie Mae will not conduct routine post-purchase loan file reviews for technical compliance with TRID; however, consistent with current practices, Fannie Mae will evaluate whether the correct forms were used in connection with the origination of a mortgage loan. After a transitional period, Fannie Mae will consider whether to begin such reviews for technical compliance; any such measures will be announced before being implemented.

Fannie Mae expects lenders to make good faith efforts to comply with TRID; failure to use a TRID-required form will be deemed a violation of the good faith efforts standard and will render the mortgage loan subject to all contractual remedies, including repurchase.

Fannie Mae reminds lenders that under the generally applicable provisions of the *Selling Guide*, A3-2-01, Compliance with Laws, Fannie Mae retains the right to require a repurchase for a lender's violation of applicable law if the lender's failure to comply could be expected to impair Fannie Mae's ability to enforce the note or mortgage, or to impose assignee liability on Fannie Mae. However, Fannie Mae does not intend to exercise contractual remedies, including repurchase, for noncompliance with the newly applicable provisions of TRID except in two limited circumstances: if the required form is not used; or if a particular practice would impair enforcement of the note or mortgage or would result in assignee liability, and a court of law, regulator or other authoritative body has determined that such practice violates TRID.

We understand the significant effort the industry has put into TRID implementation and hope this Lender Letter provides you with reassurance that we will work with you during this transition period. Lenders who have questions about this should contact their Account Team. Please check Fannie Mae's [website](#) later this week for some frequently asked questions that will answer additional questions about TRID.

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Chief Credit Officer for Single-Family