

TO: Our Valued Clients / **WHOLESALE**

Date: July 17, 2018

**SUBJECT: REGULATION B - EQUAL CREDIT OPPORTUNITY ACT
POLICY AND PROCEDURE UPDATE**

******* IMPORTANT NOTICE *******

Effective Date of Change Effective 7/23/2018 Towne will begin applying consistent policy and procedures to manage when a complete application is considered received, in order to comply with all requirements of **Regulation B - Equal Credit Opportunity Act**.

Purpose Regulation B provides specific requirements for creditors regarding notification of action taken, ECOA notices, and statement of specific reasons to applicants.
When notification is required under 12 CFR § 1002.9(a)(1), creditors must notify applicants of action taken on the applicant’s request for credit, whether favorable or adverse, within 30 days after receiving a **complete** application.

Overview of Change Towne considers a **complete** application received when the six pieces of information under the TILA-RESPA Integrated Disclosure rule are recorded within TPO Connect, as detailed in **BULLETIN 18JUN11 TRID Application Reminder**.

On the effective date of this change, Towne will apply the following policy and procedures.

Complete application received by Towne	Calendar Day 15	After 20 calendar days	Calendar Day 30
Initial submission has not been completed	System notice will be sent to the LO that loan will be submitted to UW in 5 calendar days for a credit decision. “Loan number xxxxxx will be automatically submitted to underwriting in five calendar days in order to meet the Equal Credit Opportunity Act requirement for a credit decision within 30 calendar days from application. If you have documentation to support this loan application, please submit within five calendar days for underwriting consideration.”	Loan will be submitted for underwriting review, if no request for withdrawal has been submitted.	Credit decision notice issued no later than 30 calendar days after receipt of the application.
Initial UW decision has been issued by Towne	File will remain active through the approval expiration date. Upon expiration of the loan approval, the loan application will be cancelled.		

**Application
Withdrawal
Procedures** To request withdrawal of an application, please refer to TPO Connect Resources,
under Training Material > How-To Job Aids.

If you have questions regarding Towne's policies and procedures, please contact your Account Executive or Client Relations Representative.

**Thank you,
Towne Family of Companies**