

Lender Name	Date of Statement	BP Statement	Documents
American Bank & Trust	July 17, 2015	American Bank & Trust letter to closing attorneys: "On or before October 2, 2015, all approved attorneys will be required to provide a letter of intent to comply with the CFPB's TRID rules, including proof of certification of compliance from an independent party of ALTA Best Practices (proof of annual renewal will be required) and a list of all parishes that you will conduct closings."	<ul style="list-style-type: none"> • July 17, 2015: American Bank & Trust letter to closing attorneys
Arvest Mortgage Vendor Management Office	September 1, 2015	Arvest letter to active closing agents/attorneys: "In order to comply with these regulations, Arvest Bank – Mortgage Division will require the following: (1) A review of the third party's Business Licenses, State Regulatory Depart or Agency Licenses, Insurance Requirements, American Land Title Association (ALTA) Policy Forms Licensing Requirements, and Policies/Procedures/Controls and/or ALTA Best Practice Adherence Assessment, and (2) Registration of Ellie Mae's Encompass (Loan Origination System) Title/Closing Portal." To complete the first requirement, "Arvest Bank – Mortgage Division will be supplying a three-part (3) Third Party Title Questionnaire. Part A – Company Information/ALTA Certification Information Part B – Policies/Procedures/Controls for companies not ALTA Certified Part C – License/Insurance Information"	<ul style="list-style-type: none"> • September 1, 2015: Arvest letter to active closing agents/attorneys
Atlantic Pacific Mortgage Company	January 12, 2016	Atlantic Pacific Mortgage Company letter to title companies: "In order for us to move forward in the vetting process of your company we will need the following documents within five (5) business days from today: 1. Best Practices Policies and Procedures"	<ul style="list-style-type: none"> • January 12, 2016: Atlantic Pacific Mortgage Company letter to title companies
Bancorp South	March 2, 2015	Bancorp South letter to settlement providers: "After careful deliberation, BancorpSouth now requires all of our approved closing agents to adhere to the ALTA Best Practices 2.0.... Your adherence to the ALTA Best Practices must be verified by an independent third party vendor acceptable to us, and self-certification is not acceptable." Requested that all certifications be completed no later than July 31, 2015.	<ul style="list-style-type: none"> • March 2, 2015: BancorpSouth Letter
	May 29, 2015	Bancorp South letter to settlement providers: Further guidance from Bancorp about the type of third party engagements that would be acceptable. "BancorpSouth has determined that both an examination review and a procedural engagement [set forth by AICPA standards] will be an acceptable form of certification." Requested that all certifications be completed no later than July 31, 2015.	<ul style="list-style-type: none"> • May 29, 2015: BancorpSouth Letter
BankFirst	August 14, 2015	BankFirst letter to approved closing attorneys, closing agents, and title companies: "BankFirst now requires all of our approved Closing Attorneys, Closing Agents, and Title Companies to adhere to ALTA Best Practices 2.0. . . Your adherence to ALTA Best Practices must be verified by an independent third party. <i>BankFirst will not accept self-certifications</i> . . . ALTA Best Practices Certifications must be completed by October 1, 2015."	<ul style="list-style-type: none"> • August 14, 2015: BankFirst letter to approved closing attorneys, closing agents, and title companies
BankPlus	September 22, 2015	BankPlus letter to current closing agents/attorneys: "[W]e ask that you self-certify your adherence to the American Land Title Association's (ALTA) "Best Practices" framework. This framework will constitute compliance with federal rules and regulations pertaining to consumer mortgage lending practices." Provides checklist with letter allowing closing agent/attorney to attest that they meet the ALTA Best Practices and to include a copy of a third-party certification that the firm is compliant with the Best Practices.	<ul style="list-style-type: none"> • September 22, 2015: BankPlus letter to current closing agents/attorneys
Community Bank	Unknown	Community Bank letter to current closing agents/attorneys: "[W]e ask that you self-certify your adherence to the American Land Title Association's (ALTA) "Best Practices" framework. Abidance to this framework will constitute compliance with federal rules and regulations pertaining to consumer mortgage lending practices. If you are certified as being ALTA compliant by a third-party entity, such as a CPA firm, we also request that you provide us with documentation of that certification." Provides checklist with letter allowing closing agent/attorney to attest that they meet the ALTA Best Practices and to include a copy of a third-party certification that the firm is compliant with the Best Practices.	<ul style="list-style-type: none"> • Community Bank letter to current closing agents/attorneys
FlagStar Bank	Unknown	Email from FlagStar Bank to settlement agent: "The following document(s) are still needed to update the Agent's Profile: Need ALTA Best Practices	

Gulf Coast Bank and Trust Company	August 7, 2015	Gulf Coast Bank and Trust Company letter to approved closing attorneys and title companies: "In order to comply with the CFPB's guidance regarding the ALTA Best Practices Certification, we are asking that you provide an ALTA Best Practices 2.0 Certification, by an independent third party." Requests that all certifications be completed by September 15, 2015.	• August 7, 2015: Gulf Coast Bank and Trust Company letter to approved closing attorneys and title companies
	September 18, 2015	Email from Gulf Coast Bank and Trust Company employee to settlement provider: "[I]t has been a recent development that Gulf Coast is no longer requiring a third party certification."	• September 18, 2015: Gulf Coast Bank and Trust Company email
IBERIABANK Mortgage Company	June 1, 2015	IBERIABANK letter to approved closing attorneys, closing agents, and title companies: "IBERIABANK Mortgage Company now requires all our approved Closing Attorneys, Closing Agents, and Title Companies to adhere to ALTA Best Practices 2.0... Your adherence to ALTA Best Practices must be verified by an independent third party. <i>IBERIABANK Mortgage Company will not accept self-certifications ...</i> ALTA Best Practices Certifications must be completed by 8/1/2015."	• June 1, 2015: IBERIABANK Mortgage Company letter to approved closing attorneys, closing agents, and title companies
	April 6, 2016	IBERIABANK email to title company/attorney: "As of December 1, 2015, we require any title company/attorney that we use to adhere to the ALTA Best Practices guidelines. Before we can engage in your services, we must verify that you are certified."	• April 6, 2016: IBERIABANK Email to title company/attorney
Metairie Bank	September 3, 2015	Metairie Bank letter to approved closing attorneys and title companies: "In order to comply with the CFPB's guidance regarding ALTA Best Practices Certification, we are asking that you provide an ALTA Best Practice 2.0 Certification, by an independent third party." Requests that all certifications be completed by September 30, 2015.	• September 3, 2015: Metairie Bank letter to approved closing attorneys and title companies
The Mortgage Connection	September 3, 2015	The Mortgage Connection letter to closing agents/attorneys: "The Mortgage Connection, LLC will apply a two-tiered approach to meeting certification requirements, which will be based upon your total volume of loan closings being conducted on an annual basis, office size, and number of office locations. The first tier will require less stringent requirements and will be based upon total annual loan closings of 360 or less, five employees or less, and no more than two locations. Any closing agent/attorney over those thresholds will be required to be fully ALTA compliant. <i>You will need to be certified by an independent third party acceptable to us . . .</i> Please note that self-certification is not acceptable to either the OCC of the CFPB." (emphasis added) Requests that agents/attorneys actively begin the certification process by January 1, 2016 *Provides list of certification specialists that can fulfill certification requirements	• September 3, 2015: The Mortgage Connection letter to closing agents/attorneys
Pulte Mortgage Regions Servis1st Bank	Unknown	Questionnaires to settlement agents: compliance with the Best Practices is required too complete lender questionnaire Third-party certification by August 15, 2015	
RML Advisors - Fulton Mortgage Company	September 8, 2015	Fulton Mortgage Company letter: "In order to perform closing services for Fulton and borrowers, you need to have provided the following: (1) Closing Agent [ALTA] Best Practices Certification; (2) Closing Agent Confidentiality Agreement; (3) Satisfactory Evidence of Insurance." Requested information by September 21, 2015.	• September 8, 2015: Fulton Mortgage Company letter
Signature Home Lending	September 30, 2015	Signature Home Lending letter to closing attorneys: "All approved attorneys will be required to provide the items listed below by October 10, 2015. . . 2. Proof of compliance from an independent third party of ALTA Best Practices	• September 8, 2015: Signature Home Lending letter to closing attorneys
SunTrust Bank	January 2015	SunTrust letter to settlement providers: "ALL candidates for approval [as an approved closing attorney or settlement agent] will be required to provide a ALTA best practices self-evaluation."	• April 23, 2015: ALTA News Room Story SunTrust Shares TRID Plans; Requires ALTA Best Practice Self Assessment by July 1
	April 22, 2015	SunTrust letter to settlement providers: "SunTrust believes that the most efficient and comprehensive way to comply with this guidance is to require our approved settlement agents to adhere to ALTA's Best Practices. In order to remain eligible to close loans for SunTrust, all settlement service providers are required to complete an ALTA Best Practice's Self-Assessment no later than July 1, 2015."	• April 22, 2015: SunTrust letter to Settlement Service Providers
	June 30, 2015	SunTrust Title & Settlement Approval Form: form that title insurance and settlement providers complete and submit to SunTrust. No mention of Best Practices on this form	• June 30, 2015: SunTrust Title & Settlement Approval Form

Synovus Mortgage Corporation	Unknown	Synovus Mortgage Corporation's letter to approved closing attorney/settlement agent list: "By no later than the DEADLINE of October 3, 2015, please complete the self-attestation on the following page confirming you are in compliance with the ALTA Title Insurance and Settlement Company Best Practice dated July 19, 2013 ("Best Practices"). By no later than the DEADLINE of January 15, 2016, please furnish the following documentation: (1) Copy of errors and omissions policy; (2) Verification of Approval from title insurance companies for whom you are approved to close loans; and (3) Certification from an acceptable, third-party firm ("Third Party") verifying compliance with the Best Practices, which certification must be based on the performance by such Third Party of the assessment procedures provided for under the Best Practices framework."	<ul style="list-style-type: none"> • Synovus Mortgage Corporation letter to approved closing attorney/settlement agent list
	September 29, 2015	Synovus Mortgage Corporation's email to approved closing attorney/settlement agent list: "We are no longer requiring closing attorneys and settlement agents become certified by a third-party firm to verify compliance with the Best Practices. Rather, we will require the self-attestation you previously signed and returned to us, which confirms you are in compliance with the Best Practices, on an annual basis."	<ul style="list-style-type: none"> • September 29, 2015: Synovus Mortgage Corporation email to approved closing attorney/settlement agent list
Triumph Mortgage	Unknown	<p>Triumph Mortgage letter to settlement agents: "Effective October 2, 2015, all settlement or closing agents and title companies providing services for residential mortgage loans originated, brokered to, or purchased by Triumph Mortgage must have in place a current certification as provided via adherence to the American Land Title Association (ALTA) Title Insurance and Settlement Company Best Practices Framework in its most current version. . . Settlement Agent or Title Company vendors seeking approval are required to submit the following Third Party Vendor Due Diligence Package when seeing approval with Triumph Mortgage:</p> <p>...</p> <p>3. ALTA Best Practices Framework: Certification Package Agency Letter on company letterhead, signed by an authorized officer with exact language as provided in ALTA guidance template</p> <p>4. ALTA Best Practices Framework: Certification Package Certificate signifying certification as audited by a Certified Public Accountant or similar auditing firm with requisite experience in auditing like entities</p>	<ul style="list-style-type: none"> • Triumph Mortgage Letter
Trustmark	June 1, 2015	Trustmark letter to closing agents/attorneys: "In order for Trustmark to meet both regulatory and investor requirements, we now feel it necessary to require closing agents/attorneys to be ALTA certified... You will need to be certified by an independent third party acceptable to us." Requested that all certifications be completed no later than January 1, 2016, but that in the interim, closing agents/attorneys must be fully capable of being in compliance with TRID by July 31, 2015.	<ul style="list-style-type: none"> • June 1, 2015: Trustmark letter to current closing agents/attorneys
UnionBank	May 6, 2015	UnionBank letter to partners: "As part of our vendor management process and in compliance with the CFPB regulations, we must perform due diligence on all of our settlement agent partners. In order to facilitate this, we have enlisted the services of Secure Settlements, Inc. (SSI). If you are an attorney, title agent, escrow agent or notary and will be handling our mortgage proceeds, document packages or both, then you must be reviewed through our due diligence process." Evidence that provider complies with ALTA Best Practices for internal controls is one method a company can meet the internal controls requirement	<ul style="list-style-type: none"> • May 6, 2015: UnionBank letter to partners
Wells Fargo	July 25, 2013	2013 National Settlement Services Summit, Penny Reed : "ALTA's Best Practices and underwriter audits are a good step" [in reducing lender liability]	<ul style="list-style-type: none"> • July 25, 2013: ALTA News Room Story Wells Fargo Exec: ALTA's Best Practices 'Good Step' in Reducing Lender Liability
	March 6, 2014	Wells Fargo Newsletter : ALTA's Best Practices "are designed to help illustrate to consumers and clients the industry's professionalism and best practices to help ensure a positive and compliant real estate settlement experience. Wells Fargo supports ALTA's Best Practices, and considers them to be guidelines for sound business practices that should ideally be already in place for businesses providing title and closing services to our customers."	<ul style="list-style-type: none"> • March 6, 2014: Wells Fargo Newsletter