# Index of PPDocs Newsletter Articles

(Through January 2024)

## Announcements and Tips Regarding PPDocs System & Documents

- It is Tax Paying Time 9/23
- PPDocs Released Updated FHA Instruments on May 1 5/23
- <u>New FNMA/FHLMC Uniform Instruments Update</u> 08/22
- PPDocs System: LIBOR Audit to Change March 1 2/22
- Announcement 4506-C Changes 2/22
- IRS Changes to Form 4506-C Requirements 11/21
- PPDocs 4506-C Announcement 11/21
- PPDocs System Tip: Contacting Your Operator 9/21
- PPDocs Updates Available Qualified Mortgage Tests for Secondary Market Loans 7/21
- New QM Selections 6/21
- Federal Juneteenth Holiday Enacted PPDocs Systems Updated 6/21
- Conforming PPDocs Form SSA-A with SSA version 12/20
- PPDocs system change: Modifications and Reg. Z (including tests found in Sections 32, 35, 43)
  6/20
- Notice of Servicing Transfer 2/20
- <u>PPDocs System Update: Your Home Loan Toolkit</u> 1/20
- New PPDocs form addresses Taxpayer First Act 12/19
- New PPDocs.com Design 9/19
- Notice To Co-Signer 9/19
- Guaranty Fee 4/19
- Balloon Payment QM 4/19
- Important Notice From PPDocs (Unfiltered and Consolidated Documents) 2/19
- Important Notice From PPDocs (Unfiltered and Consolidated Documents) 1/19
- TRID 2.0 Construction Lending PPDocs Webinar 9/18
- Ordering a Rate/Term Refinance of a Texas Home Equity Loan under Section 50(f)(2) of the Texas Constitution 1/18
- <u>Stella Loan Editor</u> 2/16

## **Announcements by PPDocs - Miscellaneous**

- PPDocs Introduces Central Billing 1/24
- <u>PPDocs and Path Software Announce Strategic Partnership to Streamline Mortgage Document</u> <u>Preparation</u> 11/23
- PPDocs Can Review Your Condo Project Docs for FNMA Compliance 09/23
- PPDocs, Inc., eClosing Offering 6/22
- Try SkopeDocs, the Commercial Loan Documents Solution by Full Skope 6/22

- PPDocs Announces Services for Commercial Loan Documents 4/22
- <u>PPDocs and Full Skope Announce "Lights Out" Integration with Full Skope's Innovative</u> <u>SkopeLend Loan Origination Platform</u> 4/22
- PPDocs Announces Launch of eClosing Offering 2/22
- Including Warranty Deeds In Texas Purchase Document Packages We Prepare Memo 5/21
- PPDocs addresses newly redesigned URLA 2/21
- <u>Statutory Durable Power of Attorney Form on PPDocs Website</u> 2/20
- Want your pressing questions for PPDocs answered more quickly than ever? 2/20
- <u>Client Memo: Summary of the Economic Growth, Regulatory Relief, and Consumer Protection</u> Act (S. 2155) 6/18
- Free Disaster Relief Loan Modification Services for Customers of Clients Affected by Hurricane Harvey 9/17
- <u>Texas Unauthorized Practice of Law Update</u> 1/17

## Compliance

- <u>Remote Ink Notarization Comes to Texas</u> 7/23
- OCC Issues Revisions to Fair Lending Booklet 1/23
- Federal Regulatory Agencies Issue Revised Flood Insurance FAQs 5/22
- Reportable HMDA Data Regulatory and Reporting Reference Chart 2/22
- CFPB announces availability of new CHARM booklet 7/20
- <u>CFPB Releases Factsheets on ECOA Valuation Rule</u> 5/20
- Updated version of HMDA Small Entity Compliance Guide available 2/20
- Notice To Co-Signer 9/19
- Lookback Period for ARMs 4/19

## COVID

- Are Texas Residential and Commercial Real Property Foreclosures Possible Again? 3/21
- <u>Texas' Residential and Commercial Real Property Foreclosures Called into Question</u> 1/21
- Payroll Protection Program Round Two 1/21
- Texas Home Equity COVID-19 Emergency Measures Guidance Issued 12/20
- CFPB issues two new HMDA FAQs 8/20
- FDIC issues rule to codify permissible interest on transferred loans 7/20
- <u>CFPB and CSBS Release Guide to Mortgage Relief</u> 6/20
- FHFA Announces Payment Deferral as New Repayment Option for Homeowners in COVID-19
  Forbearance Plans 6/20
- Fannie and Freddie extend foreclosure moratorium 6/20
- Federal Banking and Credit Union Agencies Defer Appraisals and Evaluations for Transactions Affected by COVID-19 5/20
- Federal Banking and Credit Union Agencies Provide Flexibility for Appraisals and Evaluations 5/20
- PPDocs COVID-19 Relief Modification Follow-up Memo 4/20

- <u>SBA PPP: Complimentary Use of Our Platform to Assemble Your Notes</u> 4/20
- <u>COVID-19: Texas Agencies Issue Home Equity Guidance</u> 4/20
- <u>Texas Title Insurance "Gap" Coverage</u> 3/20
- PPDocs Special Announcement 3/20
- A Message to Our Clients and Friends 3/20
- <u>Coronavirus</u> 2/20

### DocuSign

- <u>DocuSign and 4506-C</u> 2/22
- DocuSign Phishing Schemes Reported 6/20
- DocuSign Guide 5/18
- <u>Electronic Document Delivery Basics</u> 9/21

### **Federal Regulatory Agencies**

- OCC Issues Revisions to Fair Lending Booklet 1/23
- CFPB to Mortgage Borrowers: You May Challenge Inaccurate Appraisals 10/22
- CFPB Factsheet on Prepaid Interest Under General QM Rule 3/22
- Federal Regulatory Agencies Issue Revised Flood Insurance FAQs 5/22
- <u>CFPB Initiative Takes Aim at Homebuying Fees</u> 2/22
- <u>CFPB Amending Reg. Z to facilitate LIBOR Transition</u> 12/21
- Federal Reserve Issues Additional LIBOR Transition FAQs 12/21
- Acting Comptroller's remarks on LIBOR cessation and replacement 11/21
- <u>State and Federal Financial Institution Regulators Issue Joint Statement on LIBOR Transition</u> 11/21
- OCC LIBOR Transition Updated Self-Assessment Tool for Banks 10/21
- <u>CFPB Publishes Escrow Account FAQs</u> 6/21
- <u>CFPB Facilitating Transition Away from LIBOR Index</u> 6/21
- General Qualified Mortgage Final Rule Compliance Date Delayed by CFPB 5/21
- <u>Report on Mortgage Borrowers' COVID-19 Challenges</u> 5/21
- Agencies Release Proposed Q&A Regarding Private Flood Insurance 3/21
- <u>CFPB Proposes Delay of Mandatory Compliance Date for General QM Final Rule</u> 3/21
- <u>CFPB Finalizes HPML Escrow Exemptions 2/21</u>
- Federal Financial Institution Agencies Statement on LIBOR Transition 12/20
- Interagency Statement: LIBOR Transition for Loans 11/20
- OCC Issues "True Lender" Rule 11/20
- <u>CFPB Provides RESPA Section 8 FAQs</u> 10/20
- <u>CFPB Issues Assessment of TRID Rule</u> 10/20
- <u>CFPB issues two new HMDA FAQs</u> 8/20
- <u>Agencies release proposed revisions to Interagency Questions and Answers regarding flood</u> <u>insurance</u> 7/20

- FDIC issues rule to codify permissible interest on transferred loans 7/20
- CFPB releases factsheet on TRID title insurance disclosures and FAQ on lender credits 7/20
- CFPB announces availability of new CHARM booklet 7/20
- <u>CFPB proposes Reg. Z amendments to address LIBOR sunset</u> 7/20
- Notice of availability of revised CHARM Booklet 6/20
- <u>CFPB Issues Interpretative Rule Addressing TRID Waiting Periods and Reg. Z Rescission Rules</u>
  5/20
- NCUA Increases Residential Appraisal Threshold 5/20
- <u>CFPB Releases Factsheets on ECOA Valuation Rule</u> 5/20
- <u>CFPB TRID Construction Guide</u> 1/20

### FHA

- FHA Updates Instructions for GSE Security Instruments and Notes 1/23
- PPDocs Released Updated FHA Instruments on May 1 5/23

### FNMA/Freddie Mac

- Eligibility requirements for Fannie Mae limited cash-out refinance transactions 7/23
- <u>Selling Guide Update: Cash-out Refinance Eligibility</u> 2/23
- Freddie Mac: Cash-Out Refinance: Seasoning Requirement For The Mortgage Being Refinanced 1/23
- New FNMA/FHLMC Uniform Instruments 11/22
- PPDocs 4506-C Announcement 11/22
- FHFA Eliminates Adverse Market Refinance Fee 7/22
- Fannie Mae and Freddie Mac Report Changes to QM Loan Eligibility 4/21
- Fannie Mae and Freddie Mac retirement of CMT-Indexed ARMs 2/21
- Breaking News: Fannie Mae/Freddie Mac Delay Announced New Adverse Market Refinance Fee to December 1<sup>st</sup> 8/20
- Fannie Mae/Freddie Mac New Adverse Market Refinance Fee 7/20
- FNMA Updates Notes and Riders for ARM Index Language 2/20
- Freddie Mac and Fannie Mae publish implementation timeline for URLA 1/20

#### IRS

- Updated IRS Form 4506-C 4/23
- PPDocs 4506-C Announcement 11/22
- PPDocs Advisory on Use of IRS Form 4506-C 2/22
- <u>DocuSign and 4506-C</u> 2/22
- Announcement 4506-C Changes 2/22
- <u>New IRS Form 4506-C</u> 11/20
- <u>Taxpayer First Act</u> 1/20

- New PPDocs form addresses Taxpayer First Act 12/19
- <u>4506 and 4506-T</u> Changes 8/19

#### RESPA

- <u>RESPA CFPB Publishes Escrow Account FAQs</u> 6/21
- RESPA CFPB Provides Section 8 FAQs 10/20

#### Texas Law

 <u>Texas Joint Financial Regulatory Agencies Adopt Amendments to Payoff Statements for Home</u> <u>Loans</u> 9/20

#### Texas Home Equity

- Product Spotlight: HELOCs 5/23
- <u>Texas Home Equity Business Day Definition Amended</u> 07/22
- <u>Texas Home Equity Lending Rule Changes</u> 1/22
- <u>PPDocs' New 50(f)(2) Home Equity Rate/Term Refinance FAQs</u> 12/20
- Texas Joint Financial Regulatory Agencies Finalize Home Equity Rule Changes 12/20
- Proposed Amendments to Texas Home Equity Interpretations Published 9/20
- <u>Texas Finance and Credit Union Commissions Propose Home Equity Rule Changes</u> 08/20
- Texas Joint Regulatory Agencies request comments on potential home equity rule changes 7/20
- Home Equity: Equitable Subrogation Upheld by Texas Supreme Court 5/20
- Texas Supreme Court case involving Texas home equity loans pending 12/19
- <u>12-Day Notice Requirement for a 50(f)(2) Rate/Term Refinance of a Home Equity Loan after</u> January 1, 2018 12/17
- Texas Home Equity Constitutional Amendments 11/17
- Texas Supreme Court Opinion on Modifications Sims v. Carrington 5/14

#### **Texas Legislature**

- Texas Legislature 2023 Relevant Bills Passed 6/23
- Remote Ink Notarization Comes to Texas 7/23
- Texas Legislature 2021 Relevant Bills Passed 7/21
- <u>Supplement To: New Texas Legal Requirement for Accepting/Rejecting a Durable POA</u> 8/17
- New Texas Legal Requirement for Accepting/Rejecting a Durable POA 8/17

TRID

- When Is An Assumption Subject to TRID? 10/23
- Product Spotlight: Temporary Buydowns Webinar 10/22
- <u>Rise in Prime Rate or other Variable Rate Indexes TRID Impact</u> 3/22
- Enactment of Juneteenth Holiday Memo 6/21
- CFPB releases factsheet on TRID title insurance disclosures and FAQ on lender credits 7/20
- <u>CFPB Issues Interpretative Rule Addressing TRID Waiting Periods and Reg. Z Rescission Rules</u> 5/20
- <u>CFPB TRID Construction Guide</u> 1/20
- TRID 2.0 Construction Lending PPDocs Webinar 9/18
- TRID: Title Fee Descriptions 3/17
- TRID Impact of the Rise in Prime Rate or other Variable Rate Indexes 3/17
- TRID How to Count Legal Public Holidays 2/17
- TRID Coverage Testing Tool 10/15

## UCD

- <u>Are Your Vendors UCD Ready?</u> 9/17
- Are You UCD Ready? 9/17
- Does the UCD Requirement Affect Me? Your Questions Answered 8/17
- Quick Uniform Closing Dataset (UCD) Training Video! 7/17
- The Problems: Are Your Vendors UCD Ready? 5/17

## Webinars and Training by PPDocs

- Training Opportunity on Title Commitments and Surveys 10/23
- Product Spotlight: Temporary Buydowns Webinar 10/22
- HELOC Webinar 9/22
- Quick Uniform Closing Dataset (UCD) Training Video! 7/17

# **Frequently Asked Questions**

# **Disclaimer**

The questions below link to answers that are provided for informational purposes only and do not constitute legal advice. Because the answers are not updated after publication, PPDocs, Inc., recommends that users conduct their own research and/or consult with an attorney or compliance officer. PPDocs, Inc., provides no representation or warranty for any information provided in such answers.

- <u>01.2024 Question</u>: In 2023, we made a lot loan to an individual for a business purpose. The borrower now wants a loan to pay off the current lot loan and to construct their primary residence on the lot; thus, the new loan will be a consumer purpose loan. Is it okay for the purpose to change from business to consumer because we are making a new loan?
- 2. <u>12.2023 Question</u>: Are there any regulations or Texas Codes that specifically address **time limits** and/or procedures for filing a release of lien?
- 3. <u>11.2023 Question</u>: My customer, who was the husband in a recent divorce proceeding, was awarded the homestead property in the divorce. In the divorce decree, the judge also imposed an owelty of partition against that homestead property to secure payment of the debt. The husband was required to pay the spouse because of the judge's award of the property to the husband. What is an owelty of partition and how is this kind of loan ordered in your system?
- 4. <u>10.2023 Question</u>: Our borrower executed and recorded a "lady bird deed" in which the borrower retained a **life estate** and named their daughter as the sole remainderman; does that mean the daughter needs to receive the Closing Disclosure and/or sign the Deed of Trust?
- 5. <u>09.2023 Question</u>: This month, instead of a single FAQ, we answer several questions related to loan **assumptions and modifications**.
- 6. <u>08.2023 Question</u>: If the **appraiser assigned no value** to existing improvements on a property, may we use the Unimproved Property Deed of Trust (DOT)?
- <u>07.2023 Question</u>: Can PPDocs please give me a list of the fees that are included in its compliance review for VA non-allowable fees? There is a discrepancy between the fee lists maintained by PPDocs, Encompass, our QC vendor, and one of our investors. I want to compare all the compliance reviews and hope that we can all get on the same page.
- 8. <u>06.2023 Question</u>: Is it permissible to ask for income verification (tax returns, K1's, etc.) during the initial underwriting phase before providing a Loan Estimate and receiving a borrower's intent to proceed?
- 9. <u>05.2023 Question</u>: May we charge a late fee on a consumer purpose HELOC in Texas? If so, how much and when?
- <u>04.2023 Question</u>: The Closing Disclosure (the "CD") was sent to both applicants through DocuSign. Applicant 1 did not open the file. Applicant 2 opened the file but did not sign the CD. I have two questions: Would this be considered acknowledgment of receipt of the CD by Applicant 2 or do they also need to sign the CD? When both applicants have a right of rescission,

would both need to sign or would both of them opening the file be considered acknowledgement of receipt?

- 11. <u>03.2023 Question</u>: We have a Home Equity loan the borrower paid off, and we are preparing a Release of Lien. The borrower doesn't want to pay the **filing fee to record the Release**. Can we send it to him with a letter explaining that he must record it with the County Clerk to release the lien or are we required to file the Release when a loan is paid off?
- 12. <u>02.2023 Question</u>: I have two questions. Question 1) **Does TRID require separating an appraisal management company (AMC) fee and an appraisal fee**? Question 2) I know an appraisal fee is excluded from the finance charge, but **is an AMC fee also excluded from the finance charge**?
- 13. <u>01.2023 Question</u>: We are adopting the practice of holding back retainage on all future construction loans. Does that change the loan documentation verbiage, and what does that look like?
- 14. <u>12.2022 Question</u>: As I was completing early disclosures for a loan that we will be **modifying to add an ARM feature** into the permanent phase, I received an audit warning that a TRID loan may not be backdated. The current loan matures tomorrow and the date I entered for disclosing the LE causes the system to say that I cannot close the modification until a specific date next week. What do I need to do?
- 15. <u>11.2022 Question</u>: I did a redraw to correct the names for the loan officer and title. The periods to **first rate change should be 60**; **however, your system** will not let me pass the audit below unless I **use 61 months**. Can you help me get past this audit?
- 16. 10.2022 Question: When is a loan assumption subject to TRID?
- 17. <u>09.2022 Question</u>: When a lender takes a **deposit account** (e.g., a certificate of deposit) as **additional collateral on a TRID loan**, where does this appear on TRID disclosures? Similarly, when a lender takes real property as additional collateral, where does it appear on TRID disclosures?
- 18. <u>08.2022 Question</u>: Can an interim construction loan be closed on an **18-month term** or will we get a stop audit in your system?
- 19. <u>07.2022 Question</u>: Question: This loan was locked with a new investor that's **charging discount points**. We are wondering if we can use another investor's rate sheet to show that these points are **bona fide**.
- 20. <u>06.2022 Question</u>: Our loan administration department is working on a **commercial loan that** will be assumed by another individual. Is that subject to TRID?
- 21. <u>05.2022 Question</u>: Texas Home Equity: Can someone explain why a drive-by appraisal performed by a third-party appraiser is included in the 2% fee cap of a home equity loan?
- 22. <u>04.2022 Question</u>: **TRID**: With interest rates rising, if the **interest rate increases after we provide the initial Loan Estimate, how do we disclose** that? Also, how would we disclose an interest rate increase occurring after we provided the CD?
- 23. <u>03.2022 Question</u>: TRID: We have two questions. 1) When issuing the initial Loan Estimate, is it accurate to say that the aggregate adjustment for escrow is not credited on the LE? 2) When a borrower has an active escrow account and we refinance the property and move the current escrow account to the new rate term refinance, would we disclose the escrow credit on the initial LE so that a more accurate number for the cash to close is disclosed?

- 24. <u>02.2022 Question</u>: **TRID**: We are making a one-year interest-only construction loan with quarterly interest-only payments. The Loan Estimate Product reads "no principal until mo. 10;" shouldn't this read "no principal until mo. 12?"
- 25. <u>01.2022 Question</u>: **IVES**: We are ordering borrower transcript information from the IRS using an **IVES** participant. Can you tell me how to order the form in your system?
- 26. <u>12.2021 Question</u>: TRID: The appraisal for this loan came back lower than expected and the borrowers want to order another appraisal. This appraisal would be paid outside of closing. Would I have to notate this new appraisal fee on the CD even though this is being handled outside closing?
- 27. <u>11.2021 Question</u>: HOA Subordination: The title commitment contains a statement that "maintenance charge is not subordinated to purchase money and/or improvement liens," and the Homeowners Association (HOA) will not sign a subordination agreement. Does that put the HOA in a first lien position?
- 28. <u>10.2021 Question</u>: **TRID**: Do we disclose a single pay loan with "Monthly" instead of "Single Pay" in the Estimated Taxes, Insurance & Assessments section of the Loan Estimate?
- 29. <u>09.2021 Question</u>: We have a Texas Home Equity loan that we want to close on June 1, 2021. The rescission period goes through June 4, 2021, and the first payment will be August 1, 2021. I received an audit stating that the 1st payment is more than 60 days from the closing date. May the first payment be on August 1, 2021?
- 30. <u>08.2021 Question</u>: TRID: We have a loan that is supposed to close on Friday, but we did not get the CD out until Wednesday. However, because the real property collateral for the loan is investment property, am I correct that this loan is exempt from TRID, and we do not need to wait 3 business days after providing a CD to close?
- 31. 07.2021 Question: TRID: When is a loan modification subject to TRID?
- 32. <u>06.2021 Question</u>: Please explain **the one-year seasoning** requirement to refinance a Texas **home equity loan**. Also, as part of the seasoning requirement in Texas law, does the owner have to own the house for a year prior to the closing of a home equity loan?
- 33. <u>05.2021 Question</u>: If we deliver the Risk Based Pricing Exception Notice (Model H-3) to a customer, must we also send the Notice to Home Loan Applicant as well? Additionally, is the Notice to Home Loan Applicant required for a land only purchase?
- 34. <u>04.2021 Question</u>: May a mother name her daughter as a **DBA**? May an LLP name a corporation as a DBA? On a related note, does an assumed name certificate need to be filed by a borrower?
- 35. <u>03.2021 Question</u>: Do you have any information concerning when to use **Notice of Right to Cancel Model Form** H-8 and when to use Model Form H-9?
- 36. <u>02.2021 Question</u>: I know that when a married person purchases a lot, their spouse does not have to be a borrower or vested in title. But I have **a married person** purchasing a homestead who wants to be the **sole borrower and solely vested in title.** The borrower's spouse will live in the home. Because Texas is a community property state, I was wondering whether the borrower's spouse must be vested in title and on the sales contract?
- 37. <u>01.2021 Question</u>: We have a buyer with a 1<sup>st</sup> and 2<sup>nd</sup> lien that we are rolling into a new refinance loan. The 2<sup>nd</sup> lien was taken out after the home was purchased. Our underwriter has informed us that we have to structure this loan as a Texas A(6) Cash-out loan because we are paying off a 2<sup>nd</sup> lien that was not used to originally purchase the property. (**Oops. This looks suspiciously like FAQ from 08.2020.**)

- 38. <u>12.2020 Question</u>: TRID: We have a few questions regarding how holidays affect TRID. Can you help us with them? When may we close on an initial CD deliver on a holiday? May we close on a holiday? How do we count the three-day waiting period after the initial CD when closing on a holiday? When Friday is an observed holiday for a weekend holiday, is it considered a holiday or a business day?
- 39. <u>11.2020 Question</u>: I have two questions. First, are we required to order **legal reviews** for Trusts, Powers of Attorney or Leaseholds? Second, how do we order these legal reviews?
- 40. <u>10.2020 Question</u>: Here are my escrow entries; however, I keep getting an error. Can you please help me with this? (**Year-end escrow question**)
- 41. <u>09.2020 Question</u>: We have a **cost overrun** on a Texas homestead construction loan. What are our options?
- 42. <u>08.2020 Question</u>: We are refinancing a second lien Texas home equity cash out loan and a first lien purchase loan into one new loan and have a question. Some folks here are saying that the loan is still considered a cash-out because we are refinancing a second lien Texas home equity cash out and the first lien purchase funds into one loan. I am certain that is not true, but I need to know the reasoning. **FNMA**
- 43. <u>07.2020 Question</u>: **TRID**: I received this audit warning unexpectedly: "all fees paid to the lender must be in Section A. Only fees paid to third parties can be placed in Section B." I have two fees that we have always disclosed as being payable to the lender "FBO the third-party service provider." I thought RESPA required us to do so because those two fees (flood and credit bureau) are deposited into one of our general ledger accounts. Then we write one check per month to the service provider for all the flood certs and credit bureaus we pull. I have not received this error before. Has something changed or am I just overlooking a mistake on my part?
- 44. <u>06.2020 Question</u>: Must both spouses receive the 12-day notices on a: 1) Texas home equity loan; and 2) Texas rate/term refinance of a home equity loan?
- 45. <u>05.2020 Question</u>: With all the requests we are getting for **mortgage deferrals related to COVID-19**, we want to make sure we understand how to enter them into the PPDocs system. We are keeping our program simple, regular mortgages and home equity will be handled the same. We are allowing up to 3 months forbearance, then capitalizing and recasting interest for the remainder of the original term. No extensions of maturity date will be granted. We are requiring escrow payments be made. As an example, one of the requests we received was for a 2-month forbearance with the April 1, 2020 payment unpaid. They will not pay for April or May, and their next payment will be June 1. Can you advise me on how to complete the forbearance letter? What would the effective date of the modification be?
- 46. <u>02.2020 Question</u>: The borrower does not want his or her **spouse to sign the Deed of Trust** because the borrower doesn't want the spouse to vest in title. I know the difference, but can you give me an explanation of the difference between a vesting Deed and a Deed of Trust so I can educate myself before I address this with the borrower?
- 47. <u>01.2020 Question</u>: TRID: Under what circumstances should we deliver revised Loan Estimates and revised Closing Disclosures to consumers?
- 48. <u>12.2019 Question</u>: We are doing the **modification to add a variable rate** to a loan that matured on November 27, 2019. Our disclosures will be dated December 3, 2019. Is this ok?