# **Split Premiums** and TRID



### How are MGIC's Split Premiums disclosed on the Loan Estimate (LE) and Closing Disclosure (CD)?

The Split MI Premium is disclosed in the Projected Payments table of both the LE and CD. Because MGIC's Split Premium plan allows for part of the MI premium to be paid up front — reducing the monthly MI premium paid along with the mortgage payment — it is also reflected in the Closing Cost Details. The MI premium is included in the 5-year payment total of the LE Comparisons table (pg. 3) and the Total of Payments table (pg. 5) on the CD.

#### Which tolerance applies?

TRID 0% tolerance applies to the upfront split premium paid at consummation. Tolerances do not apply to the monthly MI portion because the borrower pays no monthly MI premium at consummation. The disclosed monthly premium must be based on the best available information at the time of disclosure.

#### What if the cost changes?

If the upfront premium changes, the lender is required to provide a revised LE disclosure within 3 business days if a cost increase occurs due to a permitted changed circumstance and the lender will pass the cost on to the borrower. The lender is not required to provide a new LE disclosure when only the cost for monthly MI premium changes; however, if the lender issues a revised LE disclosure, it must reflect the updated cost. If the lender does not issue an updated LE, then the revised cost would be reflected only on the CD.

See reverse for a sample Split MI disclosure.

For additional information, go to consumerfinance.gov/regulatory-implementation/tila-respa/ or consult your regulatory counsel.



## Sample Split MI disclosure

MGIC's Split Premium upfront portion paid at consummation must be disclosed on page 2 of the LE and CD.

In this example, the upfront Split Premium is disclosed in the LE's Services You Cannot Shop For and the CD's Services Borrower Did Not Shop For sections. The monthly portion of the Split MI payment is disclosed in the Projected Payments table.

Years 1-7 column reflects initial monthly payments of Principal & Interest, Mortgage Insurance and Estimated Escrow. The column label reflects the years during which the payments shown in that column will apply.

Years 8-30 column reflects monthly payments after triggering event — automatic cancellation of mortgage insurance in year 7 under the Homeowners Protection Act. After automatic cancellation, there is no monthly MI premium, indicated with a dash (—) and reflected in the lower Estimated Total Monthly Payment amount.

**Services Borrower Did Not Shop For section** reflects the upfront split premium portion paid at consummation.

**Note:** The MI premium is also included in the 5-year payment total of the LE Comparisons table (pg. 3) and the Total of Payments table (pg. 5) on the CD.

The information and illustrations provided here are for informational purposes only and do not constitute legal advice. Lenders should refer to the TILA/RESPA regulations and consult with counsel for compliance with all applicable TRID requirements.

