# Closed End Disclosures

## Application Disclosures

Provide within 3 business days of application unless denied/withdrawn before 3 days.

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| --- | --- | --- | --- |
|  | **Reg Z** | **RESPA** | **Reg B** |
| Loan Estimate | Info Book | ARM Program & Booklet | Homeownership Counseling | Appraisal Notice (on LE) |
| 1st Lien | Y | Y (purchases only) | Y (ARMs only) | Y | Y (provide even if application is denied/withdrawn) |
| 2nd Lien | Y | N | Y (ARMs only) | Y | N |

## Processing Disclosures

Provide/complete prior to loan closing.

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| --- | --- | --- | --- |
| **Regulation** | **Disclosure** | **Timing** | **Restrictions** |
| Flood | Determination  | Within a reasonable time prior to closing (10 days) | All loans |
| Notice of SFHA | Within a reasonable time prior to closing | Real Estate located in a SFHA |
| Escrow Notice | Provide with SFHA notice | Certain exceptions apply |
| Reg B | Copy of Appraisal/ Valuation | At least 3 days prior to closing unless waived | 1st liens only, dwelling-secured Real Estate Loans |
| Reg V | Credit Score notice | As soon as possible after credit is pulled | Consumer RE loans |
| Reg Z | Initial Closing Disclosure | At least 3 business days prior to closing | All loans |

## Closing Disclosures

Provide/document at loan closing.

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| --- | --- | --- |
| **Regulation** | **Disclosure** | **Restrictions** |
| Flood | Proof of Insurance (from borrowers) | Real Estate located in a SFHA |
| Reg Z | Final Closing Disclosure | If re-disclosure is required (available for inspection 1 day prior) |
| Right of Rescission | Refinances, equity loans |
| RESPA | Initial Escrow Account Notice | Provide within 45 days of closing |
| HPA | PMI Disclosure | Loans with PMI |

# HELOC Disclosures

## Application Disclosures

Provide at least within 3 business days of application unless denied/withdrawn before 3 days.

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| **Regulation** | **Disclosure** | **Restrictions** |
| RESPA | Homeownership Counseling Notice | All loans |
| Reg Z | HELOC Program Disclosure & brochure | Provide with application during a face to face application  |
| Reg B | Appraisal Notice | 1st liens only |

## Processing Disclosures

Provide prior to loan closing.

|  |  |  |  |
| --- | --- | --- | --- |
| **Regulation** | **Disclosure** | **Timing** | **Restrictions** |
| Flood | Determination  | Within a reasonable time prior to closing (10 days) | All loans |
| Notice of SFHA | Within a reasonable time prior to closing | Real Estate located in a SFHA |
| Reg B | Copy of Appraisal/ Valuation | At least 3 days prior to closing unless waived | 1st liens only, dwelling-secured Real Estate Loans |
| Reg V | Credit Score notice | As soon as possible after credit is pulled | All consumer Real Estate loans |

## Closing Disclosures

Provide/document at loan closing.

|  |  |  |
| --- | --- | --- |
| **Regulation** | **Disclosure** | **Restrictions** |
| Flood | Proof of Insurance (from borrowers) | Real Estate located in a SFHA |
| Reg Z | Account opening disclosure | All HELOCs |
| Right of Rescission | All HELOCs |