



# DISCLOSURE DELIVERY TIMELINE

DISCLOSURE	TIMING	BUSINESS DAY DEFINITION
INITIAL LOAN ESTIMATE	Within <b>3 business days</b> from receipt of the <b>application</b>	All days on which your offices are open for substantially all of your business functions
REVISED LOAN ESTIMATE	<b>4 business days</b> before <b>consummation</b>	All calendar days (i.e. except Sundays and federal holidays)
CLOSING DISCLOSURE	<b>3 business days</b> before <b>consummation</b>	All calendar days (i.e. except Sundays and federal holidays)

Let's assume **consummation** will occur on **Business Day 22**. In this scenario, we had a **changed circumstance on Business Day 12**, which prompted a **revised LE** that must be mailed by **Business Day 15**. In this example, the bank is open for substantially all business functions on Saturdays.

*(Example assumes delivery by mail. Electronic delivery could expedite this process).*

SUN	MON	TUE	WED	THU	FRI	SAT
	Application Received	Business Day 1	Business Day 2	Business Day 3 <i>Loan Estimate must be provided by this day</i>	Business Day 4	Business Day 5
	Business Day 6 <i>Loan Estimate received by this date</i>	Business Day 7	Business Day 8	Business Day 9	Business Day 10	Business Day 11
	Business Day 12 <i>Changed Circumstance</i>	Business Day 13	Business Day 14	Business Day 15 <i>Mail Revised Loan Estimate</i>	Business Day 16 <i>Mail Closing Disclosure</i>	Business Day 17
	Business Day 18 <i>Revised Loan Estimate must be received by this date</i>	Business Day 19 <i>Consumer must receive Closing Disclosure by this date</i>	Business Day 20	Business Day 21	Business Day 22 <i>Consummation Date</i>	Business Day 23

*If you received the application on Monday as shown above and there was no changed circumstances, the earliest possible consummation date would be Business Day 13, which means you would have to mail the Closing Disclosure on Business Day 10. Remember that a revised Closing Disclosure could result in an additional 3-business day waiting period in certain circumstances.*

The example on the preceding page, while throwing some curve balls into the transaction, is relatively optimistic and simplistic. Twenty-two days to consummation is a timeline many consumers could accept. The CFPB provided another example within their [TILA RESPA Integrated Disclosure Timeline Example](#) that we have plotted out using a similar illustration as the example on Page 1. The example that follows may present a more realistic illustration of the events that may occur during the course of a mortgage transaction.

### **CFPB DISCLOSURE DELIVERY TIMELINE EXAMPLE**

For the purpose of this example, the CFPB made the following assumptions:

- The bank is not open for business on Saturdays.
- The property is located in a state where consummation is the date of closing.
- All parties are targeting a closing date of December 30<sup>th</sup>.
- The consumer's application was received on October 5, 2015

**Please refer to the calendars provided on the following pages to observe how this transaction is processed given the events that take place from application to consummation.**

**KEY DATES IN OCTOBER**

- October 5, 2015**            Application is received. You may only collect the cost of the credit report.
- October 8, 2015**            Loan Estimate delivered or placed in the mail. You may request verifying information.
- October 13, 2015**          Consumer receives the Loan Estimate.
- October 15 2015**          Consumer indicates the intent to proceed.
- October 16, 2015**          Copy of Contract received by bank.
- October 17, 2015**          Earliest date when consummation could occur (i.e. End of 7-business day waiting period for consummation after delivery of Loan Estimate).
- October 19, 2015**          Appraisal ordered by bank.
- October 21, 2015**          Title insurance ordered by real estate agent.
- October 30, 2015**          Receipt of an addendum to contract modifying the allocation of transfer taxes between the consumer and seller.

OCTOBER						
SUN	MON	TUE	WED	THU	FRI	SAT
				1	2	3
4	5 <i>Application Received</i>	6	7	8 <i>Loan Estimate Mailed</i>	9	10
11	12 <i>Columbus Day</i>	13 <i>Consumer receives Loan Estimate</i>	14	15 <i>Consumer expresses Intent to Proceed</i>	16 <i>Copy of contract received</i>	17 <i>Earliest date when consummation could occur</i>
18	19 <i>Appraisal ordered by the bank</i>	20	21 <i>Title insurance ordered by real estate agent</i>	22	23	24
25	26	27	28	29	30 <i>Contract addendum to modify allocation of transfer taxes received</i>	31


**KEY DATES IN NOVEMBER**

- November 4, 2015**      Last day for bank to issue a revised Loan Estimate for allocation of transfer taxes on addendum to contract.
- November 6, 2015**      Appraisal provides a property value resulting in a loan-to-value ratio higher than 80%, triggering mortgage insurance.
- November 12, 2015**      Last day for bank to issue revised LE to add mortgage insurance due to changed circumstance of LTV exceeding 80%.
- November 24, 2015**      An updated credit report obtained by the bank shows a changed credit score, triggering a loan level price adjustment.
- November 30, 2015**      Last day for bank to issue revised LE for addition of any charge or change in loan terms due to change in credit score.

NOVEMBER						
SUN	MON	TUE	WED	THU	FRI	SAT
1	2	3	4 <i>Last day for bank to issue revised LE for allocation of transfer taxes</i>	5	6 <i>Changed Circumstance LTV exceeds 80%  Revised LE permitted</i>	7
8	9	10	11 <i>Veteran's Day</i>	12 <i>Last day for bank to issue revised LE to add PMI</i>	13	14
15	16	17	18	19	20	21
22	23	24 <i>Changed Circumstance Updated credit report obtained showing a changed credit score. LLPA triggered.  Revised LE permitted</i>	25	26 <i>Happy</i>  <i>Thanksgiving</i>	27	28
29	30 <i>Last day for bank to issue revised LE due to changed credit score</i>					

## KEY DATES IN DECEMBER

<b>December 4, 2015</b>	Inspection contingency of contract is removed by the consumer.
<b>December 7, 2015</b>	A rate lock is requested by the consumer.
<b>December 8, 2015</b>	Bank executes rate lock agreement.
<b>December 11, 2015</b>	Last day for bank to issue revised LE due to rate lock.
<b>December 21, 2015</b>	Consumer decides to obtain an Owner's Title Policy the week prior to consummation.
<b>December 22, 2015</b>	If bank is delivering the Closing Disclosure by mail, bank must place it in the mail on this date. The Closing Disclosure must reflect information provided by the consumer through 12/21/2015.
<b>December 23, 2015</b>	Bank sends Closing Disclosure by overnight delivery.
<b>December 24, 2015</b>	Consumer receives and signs for the overnight delivery of the CD. Earliest closing date is 12/29/2015.
<b>December 28, 2015</b>	During a walk-through two days before consummation, a broken dishwasher is discovered. Seller credit for broken dishwasher provided in addendum to contract.
<b>December 29, 2015</b>	Bank required to permit inspection of CD by consumer on this day.
<b>December 30, 2015</b>	Closing Date. Revised CD reflecting seller credit for broken dishwasher provided to consumer and seller.

DECEMBER						
SUN	MON	TUE	WED	THU	FRI	SAT
		1	2	3	4 <i>Inspection contingency removed</i>	5
6	7 <i>Changed Circumstance Rate lock requested</i>	8 <i>Bank executes rate lock agreement</i>	9	10	11 <i>Last day for bank to issue revised LE due to rate lock</i>	12
13	14	15	16	17	18	19
20	21 <i>Consumer informs bank of intent to purchase owner's title insurance</i>	22 <i>If delivering the Closing Disclosure by mail, it must be placed in the mail on this date</i>	23 <i>Bank sends Closing Disclosure by overnight delivery</i>	24 <i>Consumer receives and signs for overnight delivery of CD</i>	25 	26 <i>If mailed, the consumer must receive CD by this date</i>
27	28 <i>Broken dishwasher discovered prompting seller credit</i>	29 <i>Bank required to permit consumer to inspect CD on this day</i>	30 <i>Closing Date Revised CD reflecting seller credit provided to consumer and seller</i>	31		

## POST-CONSUMMATION EVENTS

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|--------------------------|---|
| <b>January 4, 2016</b>   | The recording fees collected were \$100 more than needed when the documents are presented for recording after consummation. Amount refunded to consumer.                            |
| <b>February 3, 2016</b>  | Last day for bank to deliver or place in the mail corrected Closing Disclosure showing decrease in transfer taxes paid by consumer.   |
| <b>February 23, 2016</b> | Last day for bank to mail or refund any tolerance cure. Other delivery methods may be used as long as the refund is received no later than 60 <sup>th</sup> day after consummation. |
| <b>February 26, 2016</b> | Last day for bank to provide refund to consumer and to deliver or place in the mail a corrected Closing Disclosure reflecting this refund.  |