



TRID COC REDISCLOSURE GUIDE

Fee Tolerances

0% Tolerances: Must be disclosed upfront!

- Origination charges
- Appraisal Fee
- Credit Report Fee
- Condo Review Fee
- Final Inspection Fee (New Builds)
- State/County-Specific Transfer Tax
- Mortgage Insurance: FHA MIP and VAFF
 - Check LTV and Government charts

10% Tolerance: (1200 section)

- Government Recording Fee
- State-specific (Georgia GRMA Fee)

Allowed to Change (No Tolerance Restrictions):

- Termite, HOA, Home Warranty, Survey or ILR Fees (1300 section)
- Title Services, Notary Fees (1100 section)

***Discount Points: (Itemization #802e)**

Can only be increased or added with relevant lock changes (lock, extension, rate buydown, etc.)

This cannot be added without valid justification from the lock desk.

PCR Note: If discount point fee is added or increased at time of doc request with a valid reason, we will need a reflect the increase as a cure to pass Mavent (work around), and then it can be locked down as a valid change (no cure) for the Funder's Final CD/COC.

Timing & Waiting Periods (Do not include Sundays or Federal Holidays)

7 Days

- Initial LE Disclosure
- New Borrower added
- New Co-mortgagor added

3 Days

- Initial CD
- Revised CD
- If O/O Refi: CD with Non-Borr Title-Only

No waiting period

- Final CD

Lock Re-Disclosure: Must issue within 3 days after the lock date!

If applicable, must include *state-specific* lock agreements: **CA, DC, FL, IL, MA, MI, MN, MT, NJ, NM, OR, PA, TN, VA, WA, and WY**

Do NOT Issue:

- Multiple LE's on the same day
- LE and CD on the same day
- LE after CD has already been sent

Re-Disclosure Requirements

Major changes - Revised LE and COC

- Initial Lock
- Loan type (Conv, FHA, VA, USDA)
- Amortization type (Fixed, ARM)
- APR increase >.125% (fixed) or >.25% (ARM)
- Pre-payment penalty
- Loan Purpose (Refinance to Purchase) – Construction to Perm loans ONLY!
- Adding borrower or co-mortgagor
 - ❖ 7 days for earliest closing date

Other changes – COC for Revised LE, Initial CD, Revised CD, Final CD

Allowable so long as APR is within tolerance and within a timely manner

- *Discount Points with valid reason
- Lender Credit reduced or removed (due to relock)
- Applying a lender cure for 0% or 10% Tolerance Violations
- Sales Price, Appraised Value, Loan Amount
- Interest Rate & Loan Term
- Escrow Waiver or Change in prepaids
- Subordination fees (Borrower POC)
- Mortgage Insurance corrections
- Monthly, Upfront, Financed or Paid in Cash
- **Tolerance Fees & Finance Charges: [Best Practice: within 3 days of change/update]**
 - *Discount Points with valid reason
 - Broker Admin Fee (Line 1310 or below)
 - RE Commissions (Section 700)
 - Additional Appraisal Services (UW requested)
 - Final Inspections (Existing homes with repairs)
 - Condo Review Fees (Property Type errors)
 - Doc Prep - Trust, POA, Escrow Holdbacks
 - Title Services, HOA, Contract Related Fees
 - Special Program / DPA fees
 - Manufactured Home Fees (Engineer/Foundation Cert, IBTS HUD Cert/Label)
 - Upfront Fees paid by VIP and collected for reimbursement
 - Subordination Fees, HOA Insurance Cert Fees, etc.
 - X marks the spot for APR box, since payee reflects “VIP Paid to xxx”

Major changes - Revised CD and COC

Do not issue Revised CD until we have the signed Initial CD and 3-day wait period has ended

- Loan type (Conv, FHA, VA, USDA)
- Amortization type (Fixed, ARM)
- APR increase >.125% (fixed) or >.25% (ARM)
- Pre-payment penalty
- Adding Non-Borrowing as Title Only** (**Rescindable loans O/O Refinances**)
- Loan Purpose (Refinance to Purchase) – Construction to Perm loans ONLY!

Misc. Disclosure Requirements – 3 Day Waiting Periods

Flood Loans

- Flood Notices: Page 2 of Flood Cert

Appraisal Services:

- A.I.R. Cert (processor-signed and secure delivery) -OR- A.I.R. Disclosure (borrower-signed)
- A.I.R. Waiver: Form must be signed and dated at least three days prior to closing.
 - Must also include either the A.I.R. disclosure or A.I.R. Cert for our records (no additional wait since the waiver signature/date serves as our 3 day wait)