



June 30, 2016
TRID FAQs #9

Q: When can a changed circumstance be disclosed on the initial CD rather than a revised LE?

A: A changed circumstance can only be disclosed on the initial CD *if it's less than 4 days to the closing date*. This means the closing date must be scheduled. The necessary borrower(s) must *receive* the CD the day it's disclosed since the closing date is only 3 days away.

Q: If it's less than 4 business days to closing, can the rate lock be disclosed on the initial CD?

A: Yes, just like other valid changed circumstances, a rate lock can be disclosed on the initial CD *if there's less than 4 days to the closing date*. For example, if the rate was locked Monday 6/20 and the closing date is Thursday 6/23, you can disclose the rate lock on the initial CD dated 6/20. The borrower must receive this initial CD on 6/20.

This is not meant to be legal advice. Please seek legal counsel as you implement TRID.

***Please contact your Correspondent National Sales Manager
or Correspondent Liaison with any questions.***

