

## **Compliance Bulletin**

January 03, 2020 | CB 2020-01

Attention: All AFR and eLEND Staff

Topics:

- TRID Timing
- 2020 TRID Calendars

#### General Business Days

AFR/eLEND utilizes "General Business Days" for the purposes of the Loan Estimate disclosure timing **and** all changed circumstance disclosure events. A General Business Day is defined as all calendar days except Sundays and company holidays as specified in 12 CFR 1024.2

#### Specific Business Days

AFR/eLEND utilizes "Specific Business Days" for the purposes of the Closing Disclosure <u>and</u> Rescission timing. A Specific Business Day is defined as all calendar days <u>except</u> Sundays and Federal legal public holidays as specified in 5 U.S.C. 6103(a), such as:

- New Year's Day,
- Birthday of Martin Luther King, Jr.,
- Washington's Birthday,
- Memorial Day,
- Independence Day,
- Labor Day,
- Columbus Day,
- Veterans Day,
- Thanksgiving Day, and
- Christmas Day.

When a Federal legal public holiday falls on a Saturday or Sunday, Federal offices and other entities might observe the holiday on the preceding Friday or following Monday. In cases where the specific rule applies, the observed holiday **is** a business day.



See the Definition Chart on page 4 for the applicable business days for specific regulation requirements. A copy of the 2020 Federal and Company Encompass calendars are below for your reference. **Note:** The Company calendar may change annually and will be provided by Human Resources.

### 2020 General Business Day Calendar

	January 2020							1	Febr	uary	202	0				Mar	ch 2	020					Α¢	oril 20	020		
S	Μ	Т	W	Т	F	S	S	M	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S
			1	2	3	4							1	1	2	3	4	5	6	7				1	2	3	4
5	6	7	8	9	10	11	2	3	4	5	6	7	8	8	9	10	11	12	13	14	5	6	7	8	9	10	11
12	13	14	15	16	17	18	9	10	11	12	13	14	15	15	16	17	18	19	20	21	12	13	14	15	16	17	18
19	20	21	22	23	24	25	16	17	18	19	20	21	22	22	23	24	25	26	27	28	19	20	21	22	23	24	25
26	27	28	29	30	31		23	24	25	26	27	28	29	29	30	31					26	27	28	29	30		
May 2020							Jur	ne 20	020					Ju	ly 20	)20					Aug	just :	2020	)			
S	Μ	Т	W	Т	F	S	s	Μ	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S
					1	2		1	2	3	4	5	6				1	2	3	4							1
3	4	5	6	7	8	9	7	8	9	10	11	12	13	5	6	7	8	9	10	11	2	3	4	5	6	7	8
10	11	12	13	14	15	16	14	15	16	17	18	19	20	12	13	14	15	16	17	18	9	10	11	12	13	14	15
17	18	19	20	21	22	23	21	22	23	24	25	26	27	19	20	21	22	23	24	25	16	17	18	19	20	21	22
24	25	26	27	28	29	30	28	29	30					26	27	28	29	30	31		23	24	25	26	27	28	29
31																					30	31					
	Se	eptei	mber	r 202	20			October 2020						November 2020							December 2020						
S	Μ	Т	W	Т	F	S	S	M	Т	$\forall \forall$	Т	F	S	S	Μ	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S
		1	2	3	4	5					1	2	3	1	2	З	4	5	6	7			1	2	З	4	5
6	7	8	9	10	11	12	4	5	6	7	8	9	10	8	9	10	11	12	13	14	6	7	8	9	10	11	12
13	14	15	16	17	18	19	11	12	13	14	15	16	17	15	16	17	18	19	20	21	13	14	15	16	17	18	19
20	21	22	23	24	25	26	18	19	20	21	22	23	24	22	23	24	25	26	27	28	20	21	22	23	24	25	26
27	28	29	30				25	26	27	28	29	30	31	29	30						27	28	29	30	31		

The General Business Day Calendar excludes Sundays and company holidays

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### Specific Business Day 2020 Reg Z Calendar

January 2020							February 2020							March 2020							April 2020							
S	Μ	Т	W	Т	F	S	s	M	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S	s	Μ	Т	W	Т	F	S	
			1	2	3	4							1	1	2	З	4	5	6	7				1	2	3	4	
5	6	7	8	9	10	11	2	3	4	5	6	7	8	8	9	10	11	12	13	14	5	6	7	8	9	10	11	
12	13	14	15	16	17	18	9	10	11	12	13	14	15	15	16	17	18	19	20	21	12	13	14	15	16	17	18	
19	20	21	22	23	24	25	16	17	18	19	20	21	22	22	23	24	25	26	27	28	19	20	21	22	23	24	25	
26	27	28	29	30	31		23	24	25	26	27	28	29	29	30	31					26	27	28	29	30			
May 2020						June 2020					July 2020							August 2020										
S	Μ	Т	W	Т	F	S	s	M	Т	W	Т	F	S	S	Μ	Т	W	Т	F	S	s	Μ	Т	W	Т	F	S	
					1	2	1	1	2	3	4	5	6				1	2	3	4							1	
3	4	5	6	7	8	9	7	8	9	10	11	12	13	5	6	7	8	9	10	11	2	3	4	5	6	7	8	
10	11	12	13	14	15	16	14	15	16	17	18	19	20	12	13	14	15	16	17	18	9	10	11	12	13	14	15	
17	18	19	20	21	22	23	21	22	23	24	25	26	27	19	20	21	22	23	24	25	16	17	18	19	20	21	22	
24	25	26	27	28	29	30	28	29	30					26	27	28	29	30	31		23	24	25	26	27	28	29	
31																					30	31						
	Se	epte	mber	202	20			October 2020						November 2020								December 2020						
S	M	Т	W	Т	F	S	l s	M	Т	W	Т	F	S	s	M	Т	W	Т	F	S	s	M	Т	W	Т	F	s	
		1	2	3	4	5					1	2	3	1	2	3	4	5	6	7			1	2	3	4	5	
6	7	8	9	10	11	12	4	5	6	7	8	9	10	8	9	10	11	12	13	14	6	7	8	9	10	11	12	
13		15	-		18	. –	11	_	-	14	-	16	17	15	-	17			20	21	13		_	16	17	• •		
20	21	22	23	24	25	26	18	19	20	21	22	23	24	22	23	24	25	26	27	28	20	21	22	23	24	25	26	
		29					25	26		28		30			30						27			30	31			

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Description	Specific Business Days (Except Sunday & Federal Holidays)	General Business Days (except Sunday and Company Holidays	Regulatory Section Definition Applies
<b>Your Home Loan Toolkit:</b> Provide no later than 3 business days from receiving an application for a purchase transaction regarding a Closed-end Consumer Purpose Loan Secured to Real Property with a lien in the 1 <sup>st</sup> position		х	1026.19(g)(1)(i)
Adjustable Rate Mortgage Disclosures: Not later than 3 business days after receiving an application for Closed-end Consumer Purpose Loan Secured to Principal Dwelling with a term greater than 1 year that has an ARM feature, creditor must provide Early ARM and CHARM Booklet		Х	1026.19(b)
HOEPA (Section .32) Loans: 3 business day waiting period to close from provision of high-cost mortgage disclosures (6 business days total if disclosures mailed) on Consumer Credit Transaction Secured to Principal Dwelling (open-end or closed-end)	Х		1026.31
Service Providers List: Provide no later than 3 business days after receiving an application on a Closed-end Consumer Purpose Loan Secured to Real Property		Х	1026.19(e)(3)(ii)(C) and(e)(1)(vi)(C)

## **Regulation Z – "Business Day" Definition Chart**



Loan Estimate Disclosure:			
Provide no later than 3 business			
days after receiving an application		Х	1026.19(e)(1)(iii)
on a Closed-end Consumer Purpose			
Loan Secured to Real Property			
Assume receipt after 3 business			
days from mailing Loan Estimate	Х		1026 10(a)(1)(bar)
on Closed-end Consumer Purpose	Λ		1026.19(e)(1)(iv)
Loan Secured to Real Property			
Restriction on collecting fees			
during the 3 business days when			
Loan Estimate is mailed on Closed-	Х		1026.19(e)(2)(i)(A)
end Consumer Purpose Loan			
Secured to Real Property			
Wait to Close Period: 7 business			
day from provision of Loan			
Estimate (do not extend for mailing			
days) is the waiting period to close	Х		1026.19(e)(1)(iii)(B)
Closed-end Consumer Purpose			
Loan Secured to Real Property			
Loan Secured to Real Property			
Changed Cincumstances Within			
Changed Circumstance: Within			
3 business days from receiving			
information sufficient to establish			
"changed circumstance," creditor		X	1026.19(e)(4)(i)
must provide revised Loan			
Estimate on Closed-end Consumer			
Purpose Loan Secured to Real			
Property			
4 business day waiting period to			
close if a revised Loan Estimate is			
provided on Closed-end Consumer			
Purpose Loan Secured to Real	Х		1026.19(e)(4)(ii)
Property (add three days excluding			
Sundays and Holidays for mailing			
if disclosure was mailed)			
Definition of "changed			
circumstance" is met if consumer			
indicates intent to proceed more			
than 10 business days after Loan		Х	1026.19(e)(3)(iv)(E)
Estimate provided on Closed-end			
Consumer Purpose Loan Secured			
to Real Property			



Closing Disclosure: 3 business day waiting period to close from provision of Closing Disclosure on Closed-end Consumer Purpose Loan Secured to Real Property	Х		1026.19(f)(1)(ii)
Assume receipt after 3 business days from mailing Closing Disclosure (6 business days total before actual closing when mailed) on Closed-end Consumer Purpose Loan Secured to Real Property	Х		1026.19(f)(1)(iii)
Corrected Closing Disclosure: Provide a corrected Closing Disclosure to a consumer that requires a new waiting period of 3 business days before closing on Closed-end Consumer Purpose Loan Secured to Real Property	Х		1026.19(f)(2)(ii)
Corrected Closing Disclosure: Provide a corrected Closing Disclosure to a consumer during the business day preceding consummation for changes that do not require a new waiting period on Closed-end Consumer Purpose Loan Secured to Real Property		Х	1026.19(f)(2)(i)
<b>Rescission</b> : 3 day rescission	Х		1026.15 & 1026.23

Please contact <u>Compliance@afrcorp.com</u> with any questions.

Thank you.