

Bulletin # 96 September 24, 2015

To: CHFA Lenders

From: CHFA Single Family Underwriting

Subject: TRID Compliance Obligations of Participating Lenders Update

On August 14, 2015, CHFA published Bulletin #93 titled: TRID Compliance Obligations of Participating Lenders for CHFA Downpayment Assistance Program (DAP) Loans. This announcement advised Lenders that to comply with the Consumer Financial Protection Bureau (CFPB) Mortgage Disclosure Rule (TRID), CHFA requires Participating and Correspondent Lenders to continue to fulfill the requirements of federal and state laws regarding RESPA and Truth-in-Lending, specifically:

## PARTICIPATING LENDER OBLIGATIONS

The CHFA Downpayment Assistance Program (DAP) Participating Lender Agreement includes warranties representations, and agreements by Participating Lenders that (among other things): (1) all requirements of federal and state law (including without limitation, the Truth-in-Lending Act) have been fully complied with; and (2) the Participating Lender will deliver to CHFA such assurances and information as CHFA may reasonably require with respect to the Participating Lender's compliance with such laws.

## PARTICIPATING LENDER OBLIGATIONS UNDER TRID

Participating Lenders should be aware that the obligations of the Participating Lenders extend to these new TRID rules and the issuance of TRID disclosures for the CHFA Downpayment Assistance Program (DAP) loans.

In response to Lender requests for specific guidance, this notice will further clarify that CHFA will require Lenders to follow applicable CFPB TRID rules regarding issuing the "integrated disclosures" which includes both the **Loan Estimate** and the **Mortgage Loan Transaction Closing Disclosure** applicable to the second-lien DAP loan transaction.

All questions regarding this Bulletin should be directed to Valencia Taft-Jackson at (860) 571-4224 or <u>valencia.taft-jackson@chfa.org</u> or Norbert J. Deslauriers at (860)571-4374 or <u>norbert.deslauriers@chfa.org</u>.