

TILA-RESPA Integrated Disclosure Rule Webinar Index

The following topics and questions were addressed during the [Outlook Live](#) webinars on the TILA-RESPA Integrated Disclosure rule. Each of the webinars has been broken out by chapters, or by question number and time stamp, to facilitate access to specific areas of interest. To navigate directly to the topic of interest, access the webinar by clicking on the webinar link and refer to the chapter or question / time stamp in which the item was discussed. If you experience any issues with the webinars or recordings, please direct your inquiries to fedwebinar@sf.frb.org.

Topic / Question	Answered in Webinar on	Location in Webinar
PRE-APPLICATION ACTIVITY		
Can a creditor review detailed written documentation of income and assets prior to delivering a Loan Estimate?	May 26, 2015	Pre-application Activity
APPLICATION		
Does the new definition of “application” under the rule apply to home equity lines of credit (HELOCs)? Will the previous definition of “application” still apply to HELOCs and other products?	May 26, 2015	Application
May an institution collect more information than the six pieces of information that would constitute an application before issuing a loan estimate?	June 17, 2014	Questions Addressed
Does a creditor have to collect all six pieces of information at once or can they strategically collect it to better control when they have to generate the loan estimate?	June 17, 2014	Questions Addressed
Do the disclaimer requirements for pre-disclosure estimates of loan costs and terms apply to general advertisements?	June 17, 2014	Questions Addressed
The definition of application does not include loan term or product type. What if a consumer submits the six elements listed in the rule, but does not specify the type of product or term?	August 26, 2014	Application - Definition
What if the consumer starts filling out an online application and saves it with the six pieces of information entered, but has not yet submitted it to the creditor?	August 26, 2014	Application - Definition
What if the loan is a refinance and creditor already has this particular information on file?	August 26, 2014	Application - Definition
May an online application system reject applications submitted by a consumer that contain the six elements of an application because other preferred information is not included?	August 26, 2014	Application - Definition
SCOPE OF RULE		
Scope of Rule Overview	August 26, 2014	Scope of Rule
Do the new disclosure requirements apply to assumptions?	August 26, 2014	Scope of Rule
Would a successor-in-interest be considered a “subsequent purchaser” for the purpose of the assumption disclosure?	August 26, 2014	Scope of Rule
Section 1026.3(h) exempts certain down payment assistance loans from the new rules. Do creditors still need to provide the existing TILA disclosures for those loans?	August 26, 2014	Scope of Rule
RECORD RETENTION		
Record Retention Overview	August 26, 2014	Record Retention
For seller Closing Disclosures Provided on a separate document by the settlement agent pursuant to 1026.38(t)(5) and 1026.19(f)(4), are creditors required to collect and retain documentation related to the seller that were provided only to the settlement agent?	August 26, 2014	Record Retention

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VARIATIONS / TOLERANCES		
Variations / Tolerances – General Rule	August 26, 2014	Variations / Tolerances
Is owner’s title insurance not required by the creditor subject to the 10% cumulative tolerance?	August 26, 2014	Variations / Tolerances
In a scenario where the creditor’s estimate of closing costs changes, but the prior estimates remains “in good faith” for purposes of section 1026.19(e)(3), is the creditor prohibited from providing the consumer with a revised disclosure?	May 26, 2015	Revised Disclosures
DISCLOSURE / REDISCLOSURE TIMING		
Disclosure / Redisclosure Timing – General Rule Requirements	August 26, 2014	Disclosure / Redisclosure Timing
Does the 7-day waiting period before consummation that applies to Loan Estimates apply to revised disclosures?	August 26, 2014	Disclosure / Redisclosure Timing
Are creditors required to provide revised Loan Estimates on the same business day that a consumer or loan officer requests a rate lock? (1026.19(e)(3)(iv)(D))	August 26, 2014	Disclosure / Redisclosure Timing
May a Closing Disclosure be provided early and revised Closing Disclosures used in place of revised Loan Estimates for redisclosing estimates that changed due to changed circumstances?	August 26, 2014	Disclosure / Redisclosure Timing
Is an additional 3-business-day waiting period required if the APR decreases by more than 1/4 or 1/8 percentage points?	August 26, 2014	Disclosure / Redisclosure Timing
Is an additional 3-business day waiting period required if the APR decreases by more than 1/4 or 1/8 of a percentage point, but the finance charge remains accurate?	April 12, 2016	Question 2 8:44
LOAN ESTIMATE		
Loan Estimate – General Questions		
Loan Estimate Form, Page 1 Overview	October 1, 2014	Overview
For second mortgages issued simultaneously with first mortgages as part of a purchase transaction (or “simultaneous seconds”) is the creditor allowed to use the alternative Loan Estimate for transactions without a seller?	August 26, 2014	Loan Estimate
In a refinance transaction, how may a creditor disclose on the alternative Loan Estimate that it is using the balance in the escrow account associated with the prior loan to fund the escrow account associated with the new loan?	April 12, 2016	Question 10 31:32
If there is more than one applicant/consumer, what needs to be disclosed on the Loan Estimate?	August 26, 2014	Loan Estimate
Is there a required font and font size for the Loan Estimate? (1026.37(o); Comment 37-2)	October 1, 2014	General Questions
Can the disclosure be completed by hand printing?	May 26, 2015	Formatting
Can the designation “N/A” be used where no value is to be disclosed on the Loan Estimate? (Comment 37-1)	October 1, 2014	General Questions
Is there a required naming convention used for charges on the Loan Estimate?	October 1, 2014	General Questions
Does the creditor have to disclose an itemization of the amount financed with the Loan Estimate?	October 1, 2014	General Questions
How does a creditor determine whether it must disclose a particular item on the Loan Estimate and Closing Disclosure?	April 12, 2016	Question 1 4:57

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Loan Estimate, Page 1 – General Information Section		
Loan Estimate Form, General Information Section Overview	October 1, 2014	General Information
When the Sale Price of the property is not yet known, does the creditor disclose a label other than "Sale Price" for the Sale Price on the Loan Estimate? (1026.37(a)(7))	October 1, 2014	General Information
If a loan product consists of a combination of two product types – e.g. a step rate for a set period of time, followed by an adjustable rate for the remaining term of the loan – how is the product to be described? Should it be described as an Adjustable Rate loan or as a Step Rate loan? (1026.37(a)(10))	October 1, 2014	General Information
Is the mailing address for each Applicant the U.S. postal mailing address or can it be some other type of address? (1026.37(a)(5))	October 1, 2014	General Information
Loan Estimate, Page 1 – Brokered Transactions		
If a broker is issuing a Loan Estimate but does not know the creditor, may the broker put its name in place of the creditor's? (1026.37(a)(3))	October 1, 2014	Brokered Transactions
Section 1026.37(a)(12) indicates the creditor must disclose a unique loan ID number. If the creditor is unknown: <ul style="list-style-type: none"> • Is the broker required to generate and disclose a unique ID number? • Is the creditor required to disclose its own unique loan ID once there is a creditor for the loan? 	October 1, 2014	Brokered Transactions
Loan Estimate, Page 1 – Loan Terms Section		
Loan Estimate Form, Loan Terms Section Overview	October 1, 2014	Loan Terms Section
What interest rate should be disclosed where the initial interest rate is calculated using a different formula than that used for subsequent rate adjustments? (1026.37(b)(2))	October 1, 2014	Loan Terms Section
How does a creditor disclose items in the Loan Terms table where the applicable dates for changes to interest rate, periodic payments, balloon payments, or prepayment penalties are not in whole years? (1026.37(b)(8) and .37(a)(10))	October 1, 2014	Loan Terms Section
Loan Estimate, Page 1 – Project Payments Table		
Loan Estimate Form, Projected Payments Table Overview	October 1, 2014	Projected Payments Table
Can the amount disclosed for Estimated Taxes, Insurance & Assessments be for a time period of other than monthly? (1026.37(c)(4) and .37(o)(5))	October 1, 2014	Projected Payments Table
Can a creditor disclose a zero amount or make a rough guess for the amount of property taxes on the Loan Estimate and later update that information?	April 12, 2016	Question 18 49:56
If mortgage insurance will automatically terminate in the time period that would be included in the 4th column, how do I indicate that mortgage insurance will terminate before the end of the loan? (1026.37(c)(1)(ii))	October 1, 2014	Projected Payments Table
Must the escrow row be shown if no escrow account is established? (1026.37(c)(2))	October 1, 2014	Projected Payments Table
Are flood insurance premiums included in Homeowner's Insurance for purposes of the Escrow disclosure and the Taxes, Insurance & Assessments disclosure on the Projected Payments table? (1026.37(c)(4))	October 1, 2014	Projected Payments Table
How are premiums for flood insurance disclosed on the Loan Estimate and Closing Disclosure?	April 12, 2016	Question 8 26:32
How does a creditor disclose on the Projected Payments Table that the creditor is paying only flood insurance and not other casualty insurance from escrow account funds?	April 12, 2016	Question 9 29:36

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Loan Estimate, Page 1 – Costs at Closing Table		
Loan Estimate Form – Costs at Closing Table Overview	October 1, 2014	Costs at Closing Table
Are the modifications to the Loan Estimate for transactions without a seller required? (1026.37(d) and .37(h))	October 1, 2014	Costs at Closing Table
Loan Estimate, Page 2		
Loan Estimate Form – Page 2 Overview	October 1, 2014	Overview
Loan Estimate, Page 2 – Loan Costs		
If a creditor charges an origination fee that is a percentage of the loan amount, but it is not a “point paid to the creditor to reduce the interest rate,” may the creditor identify it as a point in some way to preserve its tax deductibility for the consumer? (1026.37(f)(1))	October 1, 2014	Loan Costs
Assume the creditor will pay a Loan-Level Price Adjustment (LLPA) to the secondary market purchaser (1026.37(f)(1)):		Loan Costs
<ul style="list-style-type: none"> • If the creditor does not charge the consumer an upfront fee, but passes the cost of the LLPA on to the consumer through interest, is the creditor required to disclose the LLPA? • If the creditor does charge the consumer an upfront fee, should it be disclosed as a “point” or an “origination charge”? • If the creditor offers the borrower a zero or lower point option, and the consumer chooses to pay for discount points in an amount greater than the LLPA to obtain a lower rate, may the creditor disclose the amount paid as discount points rather than an origination charge? 	October 1, 2014	Loan Costs Loan Costs Loan Costs (continued)
Must a creditor disclose fees that are not allowed by FHA/VA? If so, where? (Comment 37-1; 1026.17(c))	October 1, 2014	Loan Costs (continued)
How does the creditor disclose charges for third-party administrative and processing fees that are currently rolled up into Block 1 of the GFE? (1026.37(f)(1) and (f)(2))	October 1, 2014	Loan Costs (continued)
Can a creditor change the number of lines for each category of costs if there are more or fewer charges in each category? (1026.37(f)(6))	October 1, 2014	Loan Costs (continued)
Can premium rate credits or other types of lender credits be applied to reduce the finance charge and APR?	April 12, 2016	Question 3 13:11
Can seller points or credits be applied to reduce the finance charge and APR?	April 12, 2016	Question 4 16:36
How should premium rate credit or “negative points” be disclosed? May the creditor add a separate addendum to detail the offset? (1026.37(g)(6))	October 1, 2014	Loan Costs (continued)
Loan Estimate, Page 2 – Other Costs		
Recording fees and other taxes appear to encompass all government taxes which are not transfer taxes. Does this include taxes on separate services, such as title insurance? (1026.37(g)(1))	October 1, 2014	Other Costs
Credit life insurance is usually paid on a monthly basis, but is only mentioned in the “Other” section of “Other Costs.” Is that where I should disclose the premium? (1026.37(g)(4))	October 1, 2014	Other Costs
Loan Estimate, Page 2 – Calculating Cash to Close Table		
Calculating Cash to Close Table Overview	October 1, 2014	Calculating Cash to Close
How does a creditor determine the "third party" payments to be deducted from the loan amount to calculate the Closing Costs Financed? (1026.17(c) &.37(g))	October 1, 2014	Calculating Cash to Close
Is the deposit or down payment subtracted as part of the calculation of Closing Costs Financed? (1026.37(h))	October 1, 2014	Calculating Cash to Close

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Loan Estimate, Page 2 – Calculating Cash to Close Table (continued)		
Is the calculation of the Closing Costs Financed line item affected by a seller credit? (1026.37(h))	October 1, 2014	Calculating Cash to Close
For the “Downpayment/Funds for Borrower” line item, does the “existing debt” being satisfied include any type of debt, other than debts disclosed under §1026.37(g), whether or not the creditor required it to be repaid?	October 1, 2014	Calculating Cash to Close
What debt is disclosed under §1026.37(g) instead of as part of Payoffs and Payments under the alternative Calculating Cash to Close table?	October 1, 2014	Calculating Cash to Close (cont.)
Does the payoff of any outstanding debt of the consumer included as part of Payoffs and Payments or only those debts of the consumer that are required to be paid as a condition of the extension of credit? (1026.37(h)(2))	October 1, 2014	Calculating Cash to Close (cont.)
Can the alternative cash to close table be used for multiple loan transactions without a seller? There is no line for the application of subordinate financing in the alternative Cash to Close table. (1026.37(h)(2))	October 1, 2014	Calculating Cash to Close (cont.)
Can the standard Calculating Cash to Close table disclose the Estimated Cash to Close amount as a negative number? (1026.37(h)(1))	October 1, 2014	Calculating Cash to Close (cont.)
Comment 1 to Section 1026.37(h)(1)(ii) indicates that the amount disclosed is determined by subtracting the estimated total amount of payments to third parties not otherwise disclosed as Loan Costs or Other Costs. Some fees that are considered to be financed are already disclosed as Loan Costs. However, if these amounts are not considered financed, then the Cash to Close would be too high because the financed fees are not subtracted. Can you please clarify?	May 26, 2015	Calculating Cash to Close
Loan Estimate, Page 2 – AP & AIR Tables		
Are the adjustable payments and adjustable interest tables disclosed for a fixed rate loan? (1026.37(i) and .37(j))	October 1, 2014	AP & AIR Tables
Loan Estimate, Page 3		
Loan Estimate, Page 3 Overview	October 1, 2014	Overview
Loan Estimate, Page 3 – Contact Information		
In a loan with a mortgage broker, must both a creditor’s loan officer and a mortgage broker’s loan officer be listed? (1026.37(k); 1026.36(g))	October 1, 2014	Contact Information
Should we use the same person’s NMSLR identification number that will be identified on the note and other documents? (1026.37(k); 1026.36(g))	October 1, 2014	Contact Information
Loan Estimate, Page 3 – Comparisons Table		
Is the Annual Percentage Rate disclosed as a rounded amount or is it truncated at three decimal places? (1026.37(l) and .37(o)(4))	October 1, 2014	Comparisons Table
When calculating the Total Interest Percentage on the Loan Estimate, should prepaid interest be included, even if the amount is going to be offset by a credit to the consumer?	April 12, 2016	Question 5 19:48
Loan Estimate, Page 3 – Other Considerations		
How does a creditor determine whether to disclose on the Loan Estimate or Closing Disclosure that an assumption is permitted?	April 12, 2016	Question 17 46:53
Does the creditor need to disclose on the Loan Estimate that it will transfer servicing if the transfer is not immediate, but will happen at some later point in time during the life of the loan? (1026.37(m)(6))	October 1, 2014	Other Considerations
Does the creditor need to disclose on the Loan Estimate that it will transfer servicing if the transfer is to the creditor’s subsidiary or affiliate? (1026.37(m)(6))	October 1, 2014	Other Considerations
Does the Appraisal notice satisfy the requirements of Regulation B, or does the creditor need to provide a separate disclosure for that requirement? (1026.37(m)(7))	October 1, 2014	Other Considerations

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Loan Estimate, Page 3 – Service Provider List		
Loan Estimate, Page 3 – Service Provider List Overview	October 1, 2014	Service Provider List
How can a creditor communicate to the consumer that the identification of a service provider on the written list is not an endorsement of that service provider?	October 1, 2014	Service Provider List
If there is a valid changed circumstance or a borrower requested change that triggers another third-party service that the creditor permits the consumer to shop for, should the list of service providers be updated and re-disclosed, or is a written list of service providers required to be provided only once upon the initial Loan Estimate?	May 26, 2015	Written Service Provider List
CLOSING DISCLOSURE		
Closing Disclosure – General Questions		
How does a creditor determine whether it must disclose a particular item on the Loan Estimate and Closing Disclosure?	April 12, 2016	Question 1 4:57
How does a creditor determine whether to disclose on the Loan Estimate or Closing Disclosure that an assumption is permitted?	April 12, 2016	Question 17 46:53
How does the creditor disclose a principal curtailment when that is a feature of the transaction, including for example when it may be required under applicable loan program or investor requirements?	April 12, 2016	Question 21 57:20
What should creditors do if the information required to be disclosed doesn't fit in the space allotted on the form?	November 18, 2014	General Questions
Is there a model or sample of an addendum?	November 18, 2014	General Questions
Is there anything creditors are required to include on the addendum? (1026.17(a)(1))	November 18, 2014	General Questions
What are the formatting requirements for the addendum? (Comment 38(t)(5)-5)	November 18, 2014	General Questions
The current HUD-1 has a comparison chart to show the applicable tolerance levels and how the charges compare. Where is the equivalent chart on the Closing Disclosure?	May 26, 2015	Closing Disclosure
Does the rule require that both the consumer and the seller receive a Closing Disclosure?	April 12, 2016	Question 12 38:37
When a separate disclosure is provided to the seller, is the Settlement Agent required to provide the creditor with a copy of the seller's Closing Disclosure?	April 12, 2016	Question 13 40:54
When a separate disclosure is provided to the seller, what information is required to be disclosed on the seller's Closing Disclosure?	April 12, 2016	Question 14 41:55
When a separate disclosure is provided to the seller, must seller-paid Loan Costs and Other Costs be included on page 2 of the consumer's Closing Disclosure?	April 12, 2016	Question 15 43:01
When separate disclosures are provided to the consumer and the seller, must seller-paid real estate commissions be included on page 2 of the consumer's Closing Disclosure?	April 12, 2016	Question 16 44:54
Closing Disclosure, Page 1		
Closing Disclosure Form, Page 1 Overview	November 18, 2014	Page 1 – Closing Disclosure Form
Closing Disclosure, Page 1 – General Information Disclosures		
General Information Disclosures Overview (1026.38(a))	November 18, 2014	General Information
Closing Information (1026.38(a)(3))	November 18, 2014	General Information

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Closing Disclosure, Page 1 – General Information Disclosures (continued)		
Transaction Information (1026.38(a)(4))	November 18, 2014	General Information
Loan Information (1026.38(a)(5))	November 18, 2014	General Information
Closing Disclosure, Page 1 – Loan Terms Table		
Loan Terms Table (1026.38(b))	November 18, 2014	Loan Terms
Closing Disclosure, Page 1 – Projected Payment Table		
Projected Payments Table (1026.38(c))	November 18, 2014	Projected Payments
Closing Disclosure, Page 1 – Costs at Closing Table		
Costs at Closing Table (1026.38(d))	November 18, 2014	Costs at Closing
For FHA loans with a Base Loan Amount and a Total Loan Amount, which loan amount should be used to complete the Calculating Cash to Close tables?	April 12, 2016	Question 20 56:10
Closing Disclosure, Page 2		
Closing Disclosure Form, Page 2 Overview	November 18, 2014	Page 2 – Closing Disclosure Form
If the consumer pays for a service before closing and the service ends up costing less than the amount collected by the creditor, does the creditor disclose those excess funds as a lender credit?	April 12, 2016	Question 19 52:38
Closing Disclosure, Page 2 – Origination Charges		
Origination Charges (1026.38(f)(1))	November 18, 2014	Origination Charges
Closing Disclosure, Page 2 – Services Borrower Did Not Shop For		
Services Borrower Did Not Shop For (1026.38(f)(2))	November 18, 2014	Services Borrower Did Not Shop For
Closing Disclosure, Page 2 – Services Borrower Did Shop for		
Services Borrower Did Shop For (1026.38(f)(3))	November 18, 2014	Services Borrower Did Shop For
Closing Disclosure, Page 2 – Other Costs		
Other Costs Overview (1026.38(g))	November 18, 2014	Other Costs
Taxes and Other Government Fees (1026.38(g)(1))	November 18, 2014	Other Costs
How does the disclosure of recording fees differ between the Loan Estimate and Closing Disclosure? (<i>compare</i> 1026.37(g)(1)(i) <i>with</i> .38(g)(1)(i))	November 18, 2014	Other Costs
How should creditors disclose the name of the government entity to whom a transfer tax fund is distributed? (1026.38(g)(1)(ii))	November 18, 2014	Other Costs
If the owner's title policy disclosed on the Closing Disclosure is not the same amount of the premium quoted by the title underwriter, how does a creditor show that a seller has agreed to pay for the owner's title policy?	May 26, 2015	Owner's Title Policy
The calculation of the owner's title policy premium in accordance with the rule might result in a negative number. Does the creditor disclose this negative number for the owner's title policy on the Loan Estimate and the Closing Disclosure?	April 12, 2016	Question 7 24:15
Prepays; Initial Escrow Payment at Closing (1026.38(g)(2) and .38(g)(3))	November 18, 2014	Other Costs
In a refinance transaction, how may a creditor disclose on the alternative Closing Disclosure that it is using the balance in the escrow account associated with the prior loan to fund the escrow account associated with the new loan?	April 12, 2016	Question 11 36:06
Closing Disclosure, Page 3		
Closing Disclosure, Page 3 – Overview	November 18, 2014	Closing Disclosure Form

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Closing Disclosure, Page 3 (continued)		
Calculating Cash to Close Table (1026.38(i))	November 18, 2014	Calculating Cash to Close
Summaries of Transactions (1026.38(j)-(k))	November 18, 2014	Summaries of Transactions
Closing Disclosure, Page 4		
Closing Disclosure, Page 4 – Overview	November 18, 2014	Page 4 – Closing Disclosure Form
Partial Payments (1026.38(l)(1)-(6))	November 18, 2014	Loan Disclosure on Partial Payments
How a lender applies a partial payment may vary depending on the circumstances. Is a lender required to choose only one option for the Partial Payments disclosure required by 1026.38(l)(5), or is it possible to check multiple boxes?	November 18, 2014	Question
Closing Disclosure, Page 5		
Closing Disclosure, Page 5 – Overview	November 18, 2014	Page 5 – Closing Disclosure
When calculating the Total Interest Percentage on the Closing Disclosure, are specific credits that offset prepaid interest deducted from the calculation?	April 12, 2016	Question 6 22:54
Disclosure of Liability after Foreclosure	November 18, 2014	Page 5 – Closing Disclosure
What constitute an anti-deficiency law for purposes of this disclosure?	November 18, 2014	Page 5 – Closing Disclosure
Do statute of limitations on obtaining or collecting a deficiency judgment count as anti-deficiency protections for purposes of this disclosure?	November 18, 2014	Page 5 – Closing Disclosure
Are state laws that limit how much a creditor may collect in an anti-deficiency judgment considered anti-deficiency protections for purposes of this disclosure?	November 18, 2014	Page 5 – Closing Disclosure
How should a creditor make this disclosure if a state anti-deficiency law could apply to the loan, but whether it ultimately would apply depends on facts and circumstances at the time of the foreclosure?	November 18, 2014	Page 5 – Closing Disclosure
YOUR HOME LOAN TOOLKIT		
Your Home Loan Toolkit: A step-by-step guide	May 26, 2015	N/A
How to get the Toolkit	May 26, 2015	N/A
Can market participants place their logo on the Toolkit cover?	May 26, 2015	How to get the Toolkit
If a creditor makes the Toolkit available on its website, does that satisfy the rule's delivery requirement?	May 26, 2015	How to get the Toolkit

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CONSTRUCTION LENDING		
Construction Lending – General Questions		
What options does a creditor have for disclosing construction loans?	March 1, 2016	Question 1 6:58
Where on the Loan Estimate form is the creditor supposed to provide the language described in 1026.19(e)(3)(iv)(F) for construction loans where settlement may be delayed?	August 26, 2014	Loan Estimate
Construction-to-permanent loans can be structured to have a single closing at the beginning of the process, or to have two closings, one at the beginning and then another at the end of the construction phase before the loan converts into permanent financing. How should a creditor disclose terms in a single-close construction-to-permanent loan transaction?	May 26, 2015	Construction
Construction Lending – Sale Price and Estimated Value		
When does the creditor disclose a sale price or estimated value if the loan proceeds finance construction costs?	March 1, 2016	Question 2 10:34
What amount does a creditor disclose if the creditor has an appraisal or valuation that will be used, or may be used, during underwriting of the application?	March 1, 2016	Question 3 12:10
Construction Lending – Loan Purpose		
What purpose is disclosed when a consumer finances the purchase of real property and construction costs?	March 1, 2016	Question 4 13:10
If the creditor provides separate sets of disclosures for the construction phase and the permanent phase, what purpose is disclosed for the permanent phase?	March 1, 2016	Question 5 15:50
Construction Lending – Product		
What does a creditor disclose as the product if a construction-to-permanent loan disclosed in a single set of disclosures has different fixed rates for the construction and permanent phases?	March 1, 2016	Question 6 16:51
What does a creditor disclose as the product if a construction-to-permanent loan disclosed in a single set of disclosures has an adjustable rate for one phase and a fixed rate for the other phase?	March 1, 2016	Question 7 19:42
If a construction loan is disclosed separately from the permanent loan and has both an interest-only feature and a balloon payment, what feature is disclosed for the product disclosure?	March 1, 2016	Question 8 20:48
Construction Lending – Interest Rate		
In the case of separate disclosures, how does a creditor disclose the interest rate when the creditor does not know what interest rate will apply to the permanent phase?	March 1, 2016	Question 9 23:22
Construction Lending – Monthly Principal and Interest Payment		
What payment does the creditor disclose when using a single set of disclosures for a construction-to-permanent loan or for the construction phase of a construction-to-permanent loan when separate disclosures are used?	March 1, 2016	Question 10 25:40
How does the creditor calculate the initial payment for the construction phase?	March 1, 2016	Question 11 26:45
What options does Appendix D provide for computing the initial payment?	March 1, 2016	Question 12 27:24
Can you provide an example of how the initial payment would be calculated under Appendix D?	March 1, 2016	Question 13 29:12
In a construction loan, how does a creditor disclose an “interest reserve” established to ensure that interest is paid as it accrues?	April 12, 2016	Question 22 1:01:09

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Construction Lending – Balloon Payment		
If the creditor is using a separate set of disclosures for the construction phase, what amount does the creditor disclose as the balloon payment in the Loan Terms table?	March 1, 2016	Question 14 31:45
Construction Lending – Projected Payments		
If the construction phase is disclosed separately from the permanent phase, what payments are disclosed in the first column of the projected payments table if the construction phase has a fixed rate?	March 1, 2016	Question 15 35:55
If the construction phase is disclosed separately from the permanent phase, what payments are disclosed in the second column of the Projected Payments table if the construction phase has a fixed rate?	March 1, 2016	Question 16 37:30
If the construction phase is disclosed separately from the permanent phase, what payments are disclosed in the first column of the Projected Payments table if the construction phase has an adjustable rate?	March 1, 2016	Question 17 39:03
How would a range of payments in the first column of the Projected Payments table affect disclosure of the balloon payment?	March 1, 2016	Question 18 40:30
How are the disclosures in the Projected Payments table made if the creditor is using a single set of disclosures for both the construction phase and the permanent phase?	March 1, 2016	Question 19 43:00
Is the single, combined construction-to-permanent disclosure for projected payments different if the construction phase does not equal a whole number of years?	March 1, 2016	Question 20 44:31
What does a creditor disclose for mortgage insurance and estimated escrow for a construction loan?	March 1, 2016	Question 21 47:28
How can the escrow projected payments disclosure differ from the mortgage insurance disclosure?	March 1, 2016	Question 22 49:30
How does a creditor disclose whether the estimated taxes, insurance, and assessments will be in escrow?	March 1, 2016	Question 23 51:10
How does a creditor calculate the amount of estimated taxes, insurance, and assessments in the Projected Payments table when those amounts may change due to the construction of a dwelling?	March 1, 2016	Question 24 51:57
Construction Lending – Loan Costs and Other Costs		
How does a creditor disclose inspection and draw fees when the creditor does not know how many draws there will be?	March 1, 2016	Question 25 54:00
How may a creditor disclose a “construction holdback” on the Loan Estimate?	March 1, 2016	Question 26 55:44
Is there an alternative to disclosing a “construction holdback” and construction costs in the “other” category at section H of the Loan Estimate?	March 1, 2016	Question 26 58:50
Construction Lending – Adjustable Payment (AP) Table		
How is the Adjustable Payment (AP) table completed if a construction-to-permanent loan disclosed as a single transaction with one set of disclosures includes both interest-only payments for some period and an adjustable rate?	March 1, 2016	Question 27 01:01:17
Construction Lending – Adjustable Interest Rate (AIR) Table		
Does the creditor include the Adjustable Interest Rate (AIR) table when a creditor discloses a construction-to-permanent loan with a single set of disclosures and each phase has a different fixed rate?	March 1, 2016	Question 28 01:04:17
What does the creditor disclose in the Adjustable Interest Rate (AIR) table if the creditor does not know the interest rate for the permanent phase of a construction-to-permanent loan?	March 1, 2016	Question 29 01:05:37

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Construction Lending – Total of Payments		
How are the total principal, interest, mortgage insurance, and loan costs (total of payments) calculated when the construction phase is 12 months or less and is disclosed as a separate transaction?	March 1, 2016	Question 30 01:08:05
Construction Lending – Total Interest Percentage (TIP)		
How is the Total Interest Percentage (TIP) calculated for the construction phase?	March 1, 2016	Question 31 01:09:07