



**CITADEL**  
SERVICING CORPORATION

# Non-TRID Initial Disclosure – Process Update Overview

## Non-TRID Initial Disclosure Requirements

Regulation B – The Equal Credit Opportunity Act – Applies to CSC transactions, including loans made for Business Purpose and loans extended to Foreign National borrowers. To comply with Federal regulations CSC will disclose, within 3 days of application, the borrower’s right to receive a copy of any appraisal completed in connection with the transaction.

## ECOA Compliance by Department:

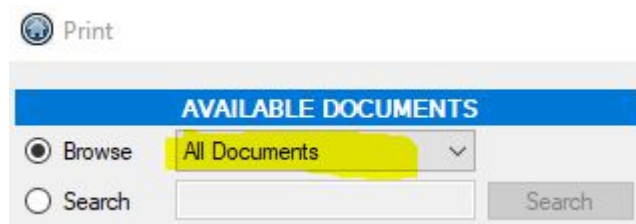
### Disclosures:

The Disclosures department will be responsible for issuing the “ECOA Appraisal Notice” to all borrowers within 3 days of the application date to CSC.

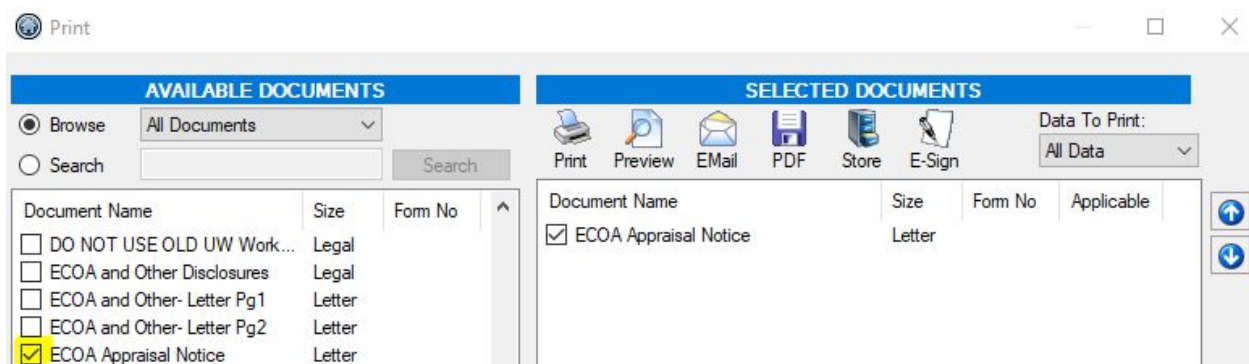
The “ECOA Appraisal Notice” can be generated by clicking the “Print Icon” in BytePro.



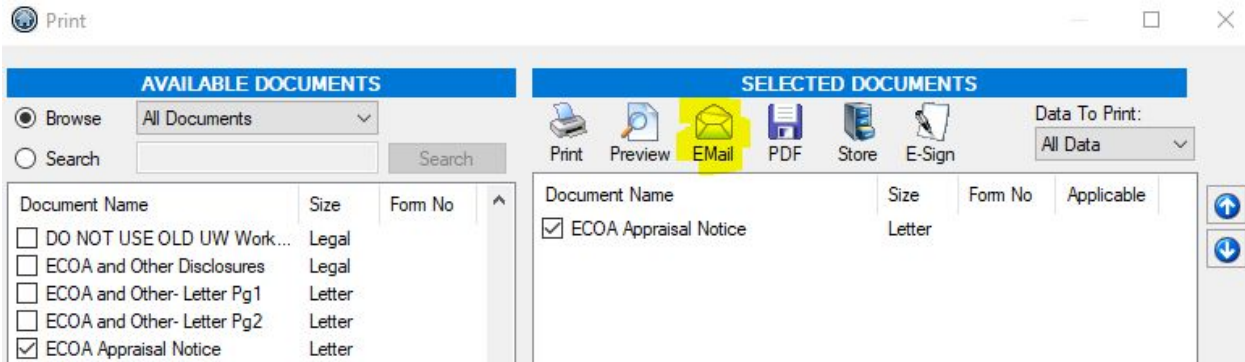
In the “Print Window” select “All Documents” from the Browse dropdown menu.



Click the checkbox next to “ECOA Appraisal Notice” to select the form.



If the borrower has provided an e-consent, use the Email Icon to deliver a copy of the ECOA Appraisal Notice to the borrower.



The screenshot shows a software window with two main sections: "AVAILABLE DOCUMENTS" and "SELECTED DOCUMENTS".

**AVAILABLE DOCUMENTS:**

- Buttons: Browse (selected), Search
- Dropdown: All Documents
- Table:
 

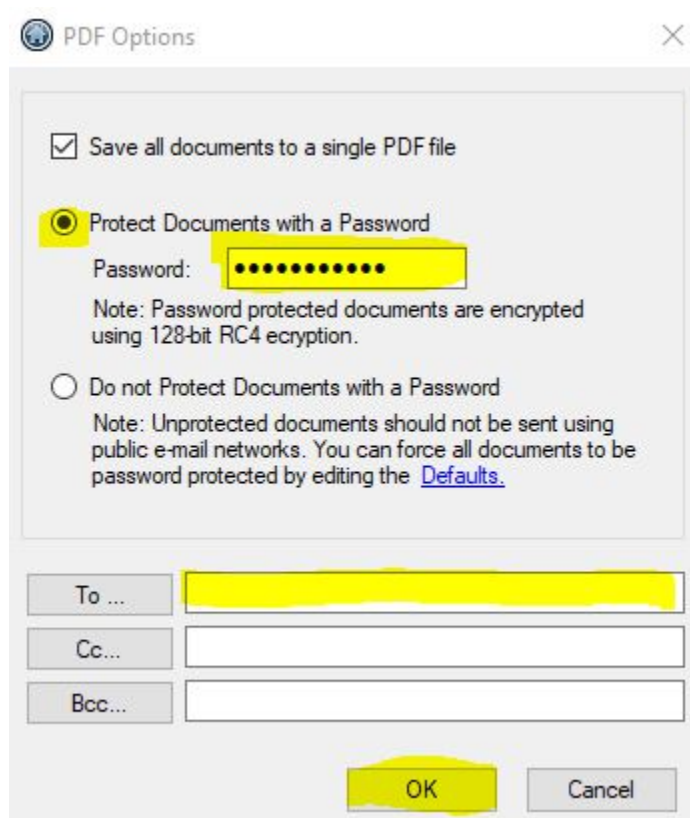
Document Name	Size	Form No
<input type="checkbox"/> DO NOT USE OLD UW Work...	Legal	
<input type="checkbox"/> ECOA and Other Disclosures	Legal	
<input type="checkbox"/> ECOA and Other- Letter Pg1	Letter	
<input type="checkbox"/> ECOA and Other- Letter Pg2	Letter	
<input checked="" type="checkbox"/> ECOA Appraisal Notice	Letter	

**SELECTED DOCUMENTS:**

- Buttons: Print, Preview, EMail (highlighted), PDF, Store, E-Sign
- Dropdown: Data To Print: All Data
- Table:
 

Document Name	Size	Form No	Applicable
<input checked="" type="checkbox"/> ECOA Appraisal Notice	Letter		

Select the option "Protect Documents with a Password" and enter "Citadel\*\*\*\*" (replace the asterisks with the last 4 digits of the borrower's social security number). Enter the borrower's email address in the "To" field and hit the OK button when ready to issue.



The screenshot shows the "PDF Options" dialog box with the following settings:

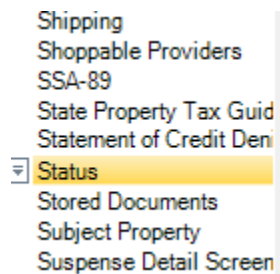
- ☒ Save all documents to a single PDF file
- ☒ Protect Documents with a Password
  - Password: [Redacted]
  - Note: Password protected documents are encrypted using 128-bit RC4 encryption.
- ☐ Do not Protect Documents with a Password
  - Note: Unprotected documents should not be sent using public e-mail networks. You can force all documents to be password protected by editing the [Defaults](#).

At the bottom, there are fields for "To ...", "Cc...", and "Bcc...", with the "To ..." field containing a redacted email address. "OK" and "Cancel" buttons are at the bottom right.

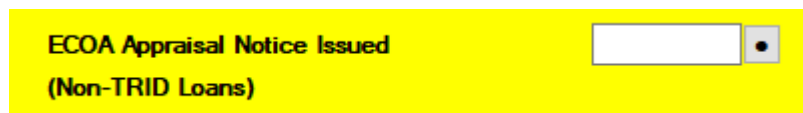
If the borrower has not provided an E-Consent form to CSC the disclosure will need to be mailed. Use the Print icon to print a copy of the disclosure and send a hard copy to the borrower.

## Documenting BytePro

The Disclosure Processor will be required to document the date the ECOA Appraisal Notice was issued on the Status Screen.



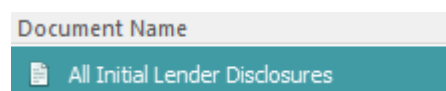
The “ECOA Appraisal Notice Issued” field is required to be filled on all non-TRID loans after the notice has been issued to the borrower.

A screenshot of a form field with a yellow background. The text "ECOA Appraisal Notice Issued" is displayed in bold black font. Below it, in parentheses, is "(Non-TRID Loans)". To the right of the text is a white input box with a small black dot inside.

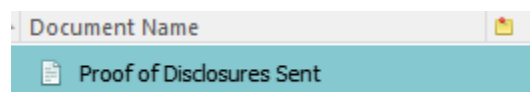
## Documenting DocVelocity

The Disclosure Processor will be responsible for documenting the delivery of this disclosure is DocVelocity using the same procedures that apply to a full Initial Disclosure Package.

A copy of the issued ECOA Appraisal Notice is required to be uploaded under the title “All Initial Lender Disclosures”.



A copy of the email, or proof of printed form delivery is required to be uploaded under the title “Proof of Disclosures Sent”.



*Contact your manager or the Compliance Department with any questions.*



## Notice of Right to Receive Copy of Appraisal Report

Borrower Name(s):	Property Address:	Date:	04/15/2019
<b>Sample Approval Sample</b>	<b>123 Anywhere St. Someplace, IL 92626</b>	File Name:	<b>ApprovalDisclosureT</b>

### COPY OF APPRAISAL REPORT

We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close.

You can pay for an additional appraisal for your own use at your own cost.

Signature	Sample Approval Sample	Date	Signature	Date
-----------	------------------------	------	-----------	------