

Friday, June 21, 2021
Bulletin #2021-AC-026

NOTICE TO ALL CUSTOMERS

Juneteenth Federal Holiday and Impact on Loan Rescission

On June 17th, President Joe Biden signed Senate Bill S.475 establishing June 19th as a new Federal Holiday as identified under 5 U.S.C §6103(a).

This new holiday brings forth the need for additional operational changes at FLCBank to ensure regulatory requirements continue to be adhered to; therefore, the following changes are effective immediately:

Regulation Z Rescission Timing: June 19th must be excluded when counting the number of days to determine the proper rescission period.

TRID LE and CD Disclosures Timing: Waiting Period: June 19th must be excluded when counting the number of days to determine proper waiting periods prior to loan consummation.

FLCBank will provide a rate lock extension free of charge on loans scheduled to fund/disburse next week that are impacted by this change.

Important: NDC/NDC-DDP Customers must ensure all rescission timing and waiting periods are adjusted to meet the requirement of the new federal holiday.

LE timing and wait period:

- You must provide a Loan Estimate to the consumer, either by delivering it by hand or placing it in the mail, no later than three business days of the receipt of an application. (§ 1026.19(e)(1)(iii)(A)), and no less than seven (7) specific business days prior to loan consummation, therefore:
 - If a Loan Application date is 06/17/2021 this requires the initial LE be provided to the consumer by Tuesday 6/22/2021, and
 - The loan cannot close until on or after 06/28/2021.

CD wait period:

- A Closing Disclosure must be provided to the consumer at least three business days prior to consummation §1026.19(f)(1)(ii), therefore:
 - CD signed Thursday 6/17/2021 dictates that the earliest closing date would be Tuesday 6/22/2021
 - CD signed Friday 6/18/2021 dictates that the earliest closing date would be Wednesday 6/23/2021

Thank you for being a valued FLCBank partner. Please contact your AE with any questions.