



Documentation Checklist for Non-Originated Loans

For each application package in which a loan is not originated, the following documentation should be in the file:

- Completed Adverse Action Notice** (if denied, counteroffer made, or incomplete application)
- Business Denial Letter** (if loan is in Business name)
- Fair Lending Adverse Action Second Review** (Only for Denials, not needed for Approved Not Accepted or Withdrawn)  
*Ensure lender's GVP, or designee, has reviewed this, and signed off on it, prior to sending the Notice to the customer*
- Application** (required under ECOA)  
*Ensure income used to make the credit decision is documented on the application.  
Commercial loans - Lender must notate on the loan wall how the application was obtained (face-to-face/telephone) & application date.  
Government Monitoring must be completed if purpose is to Purchase, Refinance or Home Improvement of a Dwelling*
- Consent to Pull Credit** ( Only Commercial Loans - notated on the nCino loan wall for applicants and guarantors)
- Intent for Joint Credit Completed**  
*Consumer - On Application for in-person; Comment in placeholder for telephone.  
Commercial - notated on the nCino loan wall.*
- Government Monitoring Information** (ONLY IF PURPOSE IS TO PURCHASE, REFINANCE A PRINCIPAL DWELLING OR HOME IMPROVEMENT)  
**\*\* For in-person application:** collect at application. If borrower does not supply the information, lender must provide educated guess. Make a notation stating information is provided based on lender observation. "Not provided by applicant" is never an acceptable response for an in-person application.  
**\*\* For telephone applications:** lenders must request information over the phone at application. If borrower does not provide information, it is acceptable to indicate "not provided" form. Do not guess.  
**\*\*For internet or mail applications:** If the borrower does not provide the information, do not collect it at closing. Indicate "not provided by applicant" on form.
- Credit Bureau Reports**
- Your Credit Score and the Price You Pay for Credit Disclosure**  
*Not required if Adverse Action is based on Credit Report Information as this information will be included on the Adverse Action. If adverse action based on collateral or other items, disclosure must be provided with Adverse Action Notice*
- DTI Worksheet** (if applicable)
- Disclosure Letter** (Telephone applications)
- Insurance Disclosure for Credit Application**  
*At application if face to face, if insurance is available or offered for this loan type; must be signed and dated; disclosure must also be given to the consumer orally, which lender must sign disclosure stating they provided it to the customer)*
- Home Equity Application Disclosure and What you should know about Home Equity Lines of Credit Booklet**  
*Consumer Open end real estate secured only*
- Early ARM Disclosure Statement and Adjustable Rate Mortgages Booklet**  
*Consumer Adjustable rate real estate secured by primary residences only*
- ARM Loan Acknowledgement & Tangible Net Benefit Form**  
*At application , unless Telephone Application*
- Your Home Loan Toolkit Booklet**  
*Consumer purchase money loan only*
- Written Service Provider List**
- Attorney Preference Notice**
- Affiliated Business Arrangement Disclosure Statement**
- Reg Z Calendar**
- Early Disclosures Letter**
- Housing Counselors Near You**
- Intent to Proceed with Application**  
*Consumer, 3 day disclosure if secured by any 1-4 family dwelling*
- Loan Estimate**  
*Consumer, 3 day disclosure*
- Notice to Home Loan Applicant**  
*Consumer, 3 day disclosure if secured by any 1-4 family dwelling (Always required)*
- Appraisal Notice**  
*Consumer & Commercial, 3 day disclosure if secured by a 1st lien on a 1-4 family dwelling*
- Military Lending Act (MLA) Determination of Covered Borrower** (DoD Printout or CBR)
- MLA Checklist** (PEAK>Forms>Loans - if the borrower is a covered borrower)
- HMDA Data Worksheet for HMDA information** (ONLY IF PURPOSE IS TO PURCHASE, REFINANCE A PRINCIPAL DWELLING OR HOME IMPROVEMENT)
- Geo Code** (Only if HMDA Reportable)

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Lender Signature

\_\_\_\_\_  
Date