



November 9, 2021

Director Francisco Menchaca
Illinois Department of Financial and Professional Regulation,
Division of Financial Institutions

Director Chasse Rehwinkel
Illinois Department of Financial and Professional Regulation,
Division of Banking

320 West Washington, 3rd Floor
Springfield, Illinois 62786

Re: Anti-Predatory Lending Database Compliance

Dear Directors Menchaca and Rehwinkel,

The Illinois Land Title Association (ILTA) appreciates the open lines of communication with the Department regarding Anti-Predatory Lending Database (APLD) compliance.

ILTA members continue to have concerns regarding regulatory enforcement and are hopeful at least some issues can be addressed without the need for legislation. We have outlined these concerns and related requests below and look forward to discussing them further with the Department next month.

Issues with APLD Responsibilities

The title insurance industry does not receive data relevant to APLD system input until the end of a real estate transaction and is then often required to make specific judgments on financial disclosures and real estate categories that go beyond determinations of insurability, which can create unnecessary conflict with lenders as well as buyers and sellers.

To the extent the title insurance industry is required to input data into the APLD system for purposes of tracking similar data from a loan originator, the information should be made available in a timely manner and there should be no question of what data to input.

Issues with the APLD System

- Loan originator system input lines are not identical to title industry input;

- Input requirements for points and fees and miscellaneous data are not uniformly defined;
- Input corrections are not allowed;
- Applications expire before many transactions close;
- System does not allow users to run reports for purposes of self-compliance audits
- System limits closing disclosure upload to 500 KB
- Loan originators can no longer input PINs (parcel index numbers)

These issues with the APLD system interfere with industry compliance and self-auditing. ILTA requests that where the Department currently has statutory authority, these issues with the APLD system be corrected, and where necessary, changes to the APLD Act be made.

Sincerely,



Linda Grahovec

President,

Illinois Land Title Association

Senior Vice President,

FNF National Agency Director

of Education & Marketing Strategy