

Regulatory Updates

The CFPB is required to annually calculate the dollar amounts based on the percentage change of the Consumer Price Index (CPI) for several provisions of the Truth in Lending Act (TILA, Reg Z). Changes made by the CFPB in response to the CPI result in changes to the loan amount and points and fees thresholds for both HOEPA and QM/ATR. Details of the changes are listed below.

Truth in Lending Act (Reg Z)

Home Ownership and Equity Protection Act (HOEPA)

Effective for applications dated 1/1/2015 or later

Loan amount thresholds for loans with an interview date on or after 1/1/2015	Allowable Points and Fees for loans with an interview date on or after 1/1/2015
Greater than or equal to \$20,391	5% of the Total Loan Amount
Greater than or equal to \$12,750 but less than \$20,391	Flat dollar cap of \$1,020
Less than \$12,750	8% of the Total Loan Amount

Qualified Mortgage and Ability to Repay Rule

Effective for applications dated 1/1/2015 or later

Loan amount thresholds for loans with an interview date on or after 1/1/2015	Allowable Points and Fees for loans with an interview date on or after 1/1/2015
Equal to or Greater than \$101,953	3% of the Total Loan Amount
Greater than or equal to \$61,172 but less than \$101,953	Flat dollar cap of \$3,059
Greater than or equal to \$20,391 but less than \$61,172	5% of the Total Loan Amount
Greater than or equal to \$12,744 but less than \$20,391	Flat dollar cap of \$1,020
Less than \$12,743	8% of the Total Loan Amount