

**NOTICE TO ALL CUSTOMERS****CFPB Annual Adjustments for Qualified Mortgages (QM) Points and Fees Thresholds**

The CFPB's final rule for the 2025 Regulation Z annual threshold adjustments for ATR/QM and HOEPA points and fees test and adjusted total loan amounts effective January 1, 2025, has been announced and the new thresholds to be complied with are as follows:

**Ability to Repay/ Qualified Mortgage Points and Fees Test**

<b>Loan amount thresholds for loans with an interview date on or after 1/1/2025</b>	<b>Allowable Points and Fees for loans with an interview date on or after 1/1/2025</b>
Greater than or equal to \$134,841	3% of the ATR/QM Total Loan Amount
Greater than or equal to \$80,905 but less than \$134,841	Flat dollar cap of \$4,045
Greater than or equal to \$26,968 but less than \$80,905	5% of the ATR/QM Total Loan Amount
Greater than or equal to \$16,855 but less than \$26,968	Flat dollar cap of \$1,348

**(NOTE: The minimum loan amount FLCBank allows is \$75,000.)**

**HOEPA Points and Fees Test**

<b>Loan amount thresholds for loans with an interview date on or after 1/1/2025</b>	<b>Allowable Points and Fees for loans with an interview date on or after 1/1/2025</b>
Greater than or equal to \$26,968	5% of the HOEPA Total Loan Amount
Greater than or equal to \$16,855 but less than \$26,968	Points and fees exceed the lesser of \$1,348 or 8% of the ATR/QM Total Loan Amount

All covered transactions under Regulation Z will be required to comply with the Revised General Qualified Mortgage Rule set forth in [§1026.43\(e\)\(2\)](#) are required to comply with the APR to Average Prime Offer Rate (APOR) spreads as required by the Revised General Qualified Mortgage Rule.

# BULLETIN



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Loan Amount	APR – APOR Spread	QM Category
Any loan amount	Less than 2.25%	QM Safe Harbor
Greater than or equal to \$134,841	Greater than or equal to 2.25%	QM Rebuttable Presumption -HPML
Greater than or equal to \$80,905 but less than \$134,841	Greater than or equal to 3.50%	QM Rebuttable Presumption – HPML
Less than \$80,905	Greater than or equal to 6.50%	QM Rebuttable Presumption - HPML
Second Lien greater than or equal to \$80,905	Greater than or equal to 3.50%	QM Rebuttable Presumption - HPML
Second Lien less than \$80,905	Greater than or equal to 6.50%	QM Rebuttable Presumption - HPML

Note: The amended QM Final Rule does not change the CFPB’s QM points and fees or High-Cost Mortgage calculations or FLCBank’s related requirements and High-Cost Mortgages remain ineligible for financing.

If you have any questions, please contact your [Account Executive or Client Relations Representative](#).

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