

# BULLETIN



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BROKER / WAREHOUSE LINES / NON-DELEGATED CORRESPONDENT

Tuesday, December 16, 2026

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## NOTICE TO ALL CUSTOMERS

### CFPB Annual Adjustments for Qualified Mortgages (QM) Points and Fees Thresholds

The CFPB's final rule for the 2026 Regulation Z annual threshold adjustments for ATR/QM and HOEPA points and fees test and adjusted total loan amounts effective January 1, 2026, has been announced and the new thresholds to be complied with are as follows:

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

Loan amount thresholds for loans with an interview date on or after 1/1/2026	Allowable Points and Fees for loans with an interview date on or after 1/1/2026
Greater than or equal to \$137,958	3% of the ATR/QM Total Loan Amount
Greater than or equal to \$82,775 but less than \$137,958	Flat dollar cap of \$4,139
Greater than or equal to \$27,592 but less than \$82,775	5% of the ATR/QM Total Loan Amount
Greater than or equal to \$17,245 but less than \$27,592	Flat dollar cap of \$1,380

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

#### HOEPA Points and Fees Test

Loan amount thresholds for loans with an interview date on or after 1/1/2026	Allowable Points and Fees for loans with an interview date on or after 1/1/2026
Greater than or equal to \$27,592	5% of the HOEPA Total Loan Amount
Greater than or equal to \$17,245 but less than \$27,592	Points and fees exceed the lesser of \$1,380 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.

Loan Amount	APR – APOR Spread	QM Category
Any loan amount	Less than 2.25%	QM Safe Harbor
Greater than or equal to \$137,958	Greater than or equal to 2.25%	QM Rebuttable Presumption -HPML
Greater than or equal to \$82,775 but less than \$137,958	Greater than or equal to 3.50%	QM Rebuttable Presumption – HPML
Less than \$82,775	Greater than or equal to 6.50%	QM Rebuttable Presumption - HPML
Second Lien greater than or equal to \$82,775	Greater than or equal to 3.50%	QM Rebuttable Presumption - HPML
Second Lien less than \$82,775	Greater than or equal to 6.50%	QM Rebuttable Presumption - HPML

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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](#).