

BULLETIN



WWW.FLCBMTG.COM

BROKER / WAREHOUSE LINES / NON-DELEGATED CORRESPONDENT

Tuesday, December 16, 2026

Bulletin #2025-AC-0XX

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 |

Please reference full product guidelines posted on the FLCBank website at www.flcbmtg.com. All products are subject to credit and property approval. Program terms and conditions are subject to change without notice. Not all products are available in all states for all dollar amounts. Other restrictions and limitations apply. FLCBank is a registered trademark of Florida Capital Bank, N.A. Member FDIC NMLS 790396 Equal Housing Lender. FLCBank 10151 Deerwood Park Blvd. Bldg. 100, Suite 200, Jacksonville, FL 32256 1.866.295.0014

BULLETIN



WWW.FLCBMTG.COM

BROKER / WAREHOUSE LINES / NON-DELEGATED CORRESPONDENT

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](#).

Please reference full product guidelines posted on the FLCBank website at www.flcbmtg.com. All products are subject to credit and property approval. Program terms and conditions are subject to change without notice. Not all products are available in all states for all dollar amounts. Other restrictions and limitations apply. FLCBank is a registered trademark of Florida Capital Bank, N.A. Member FDIC NMLS 790396 Equal Housing Lender. FLCBank 10151 Deerwood Park Blvd. Bldg. 100, Suite 200, Jacksonville, FL 32256 1.866.295.0014