



The CFPB is required to annually calculate the dollar amounts for several provisions in Regulation Z. Effective January 1, 2022, the dollar amounts for provisions implementing TILA and amendments to TILA, including under the CARD Act, HOEPA, and the Dodd-Frank Act are updated as follows:

1. For open-end consumer credit plans under TILA, the threshold that triggers requirements to disclose minimum interest charges will remain unchanged at \$1.00 in 2022.
2. For open-end consumer credit plans under the CARD Act amendments to TILA, the adjusted dollar amount in 2022 for the safe harbor for a first violation penalty fee will increase to \$30 and the adjusted dollar amount for the safe harbor for a subsequent violation penalty fee will increase to \$41.
3. For HOEPA loans, the adjusted total loan amount threshold for high-cost mortgages in 2022 will be \$22,969. The adjusted points and-fees dollar trigger for high-cost mortgages in 2022 will be \$1,148.
4. For qualified mortgages (QMs) the thresholds for the spread between the annual percentage rate (APR) and the average prime offer rate (APOR) in 2022 will be:
 - a. 2.25 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$114,847;
 - b. 3.5 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$68,908 but less than \$114,847;
 - c. 6.5 or more percentage points for a first-lien covered transaction with a loan amount less than \$68,908;
 - d. 6.5 or more percentage points for a first-lien covered transaction secured by a manufactured home with a loan amount less than \$114,847;
 - e. 3.5 or more percentage points for a subordinate-lien covered transaction with a loan amount greater than or equal to \$68,908; or

- f. 6.5 or more percentage points for a subordinate-lien covered transaction with a loan amount less than \$68,908.
5. For all categories of QMs, the thresholds for total points and fees in 2022 will be:
- a. 3 percent of the total loan amount for a loan greater than or equal to \$114,847;
 - b. \$3,445 for a loan amount greater than or equal to \$68,908 but less than \$114,847;
 - c. 5 percent of the total loan amount for a loan greater than or equal to \$22,969 but less than \$68,908;
 - d. \$1,148 for a loan amount greater than or equal to \$14,356 but less than \$22,969; and
 - e. 8 percent of the total loan amount for a loan amount less than \$14,356.

You can access the final rule here: https://files.consumerfinance.gov/f/documents/cfpb_truth-in-lending-reg-z-annual_threshold-adjustment_2021-10.pdf

CCI suggests sharing this information with your lending department to ensure your loan software is updated appropriately.