

The CFPB has announced the 2024 dollar amounts for the annual threshold adjustments for Regulation Z, Truth in Lending Act (TILA).

- For open-end consumer credit plans under TILA, the threshold that triggers requirements to disclose minimum interest charges will remain unchanged at \$1 in 2024.
- For HOEPA loans, the adjusted total loan amount threshold for high-cost mortgages will be \$26,092. The adjusted points-and-fees dollar trigger for high-cost mortgages will be \$1,305.
- For qualified mortgages (QM) under the general QM loan definition, the thresholds for the spread between the APR and the APOR in 2024 will be:
 - 2.25 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$130,461;
 - 3.5 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$78,277 but less than \$130,461;
 - 6.5 or more percentage points for a first-lien covered transaction with a loan amount less than \$78,277;
 - 6.5 or more percentage points for a first-lien covered transaction secured by a manufactured home with a loan amount less than \$130,461;
 - 3.5 or more percentage points for a subordinate-lien covered transaction with a loan amount greater than or equal to \$78,277; or
 - 6.5 or more percentage points for a subordinate-lien covered transaction with a loan amount less than \$78,277.
- For all categories of QMs, the thresholds for total points and fees in 2024 will be:
 - 3% of the total loan amount for a loan greater than or equal to \$130,461;
 - \$3,914 for a loan amount greater than or equal to \$78,277 but less than \$130,461;
 - 5% of the total loan amount for a loan greater than or equal to \$26,092 but less than \$78,277;
 - \$1,305 for a loan amount greater than or equal to \$16,308 but less than \$26,092; and

• 8% of the total loan amount for a loan amount less than \$16,308.

You can access the final rule **here.**

CCI suggests sharing this information with your lending staff and the person responsible for updating loan software at your institution. As always, CCI is available for any compliance-related questions.