



The CFPB has issued a final rule amending Regulation Z, which implements TILA, to update the dollar amounts of various thresholds that it must adjust annually to reflect the annual percentage change in the Consumer Price Index.

Effective January 1, 2025:

- The threshold that triggers requirements to disclose minimum interest charges for open-end consumer credit plans under the TILA will remain unchanged at \$1.00 in 2025.
- The adjusted total loan amount threshold for high-cost mortgages in 2025 (HOEPA) will be \$26,968.
- The adjusted points-and-fees dollar trigger for high-cost mortgages in 2025 will be \$1,348.
- For qualified mortgages (QMs) under the General QM loan definition, the thresholds for the spread between the annual percentage rate (APR) and the average prime offer rate (APOR) in 2025 will be:
  - 2.25 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$134,841
  - 3.5 or more percentage points for a first-lien covered transaction with a loan amount greater than or equal to \$80,905 but less than \$134,841
  - 6.5 or more percentage points for a first-lien covered transaction with a loan amount less than \$80,905
  - 6.5 or more percentage points for a first-lien covered transaction secured by a manufactured home with a loan amount less than \$134,841
  - 3.5 or more percentage points for a subordinate-lien covered transaction with a loan amount greater than or equal to \$80,905
  - 6.5 or more percentage points for a subordinate-lien covered transaction with a loan amount less than \$80,905
- For all categories of QMs, the thresholds for total points and fees in 2025 will be:
  - 3% of the total loan amount for a loan greater than or equal to \$134,841
  - \$4,045 for a loan amount greater than or equal to \$80,905 but less than \$134,841
  - 5% of the total loan amount for a loan greater than or equal to \$26,968 but less than \$80,905
  - \$1,348 for a loan amount greater than or equal to \$16,855 but less than \$26,968
  - 8% of the total loan amount for a loan amount less than \$16,855

You can read the TILA final rule [here](#).

CCI suggests sharing this information with your lending staff to ensure loan software is updated with these thresholds come the new year. For any questions, please get in touch with us via [inquiries@completecompli.com](mailto:inquiries@completecompli.com).

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