

# Product Support Bulletin



Information for Correspondent Lenders of SunTrust Mortgage, Inc.  
February 6, 2015 • COR15-010

Alert

**Update**

Reminder

Clarification

Training  
Information

Preview

## 2015 CFPB Threshold Adjustments

SunTrust Mortgage, Inc. announces an update to the Compliance Overview Guideline for the 2015 annual threshold adjustments required by the Consumer Financial Protection Bureau (CFPB).

### Intended Audience

<b>Origination Processing</b>	Secondary Marketing	<b>Underwriting</b>	<b>Closing Delivery Funding</b>	<b>Compliance Legal</b>	Other
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### Effective Dates

**Thursday, January 1, 2015**  
Became effective for all new applications on or after this date.

### Background Information

The CFPB requires an annual adjustment to the Section 32 (HOEPA) and Qualified Mortgage thresholds based on changes in the Consumer Price Index. Correspondent lenders are urged to consult with their Compliance Officer or Legal Counsel for information, interpretation, and/or additional requirements related to all CFPB annual threshold adjustments.

### Bulletin Details

#### Qualified Mortgage Points and Fees Test

SunTrust Mortgage will not knowingly purchase or fund any loan delivered that fails the Qualified Mortgage Points and Fees Test.

- Coverage applies to purchase money, refinance, and equity loans secured by the owner's primary residence or second home.
- Points and fees caps are based on loan amount and are either a percentage or fixed dollar amount:
  - Loan amounts greater than or equal to \$101,953 = 3%
  - Loan amounts greater than or equal to \$61,172 and less than \$101,953 = \$3,059
  - Loans amounts greater than or equal to \$20,391 and less than \$61,172 = 5%
  - Loan amounts greater than or equal to \$12,744 and less than \$20,391 = \$1,020
  - Loan amounts less than \$12,744 = 8%

### Action Required

**Origination, Processing, Underwriting, Closing, Funding, Compliance and Legal**  
**Beginning January 1, 2015**  
All loans submitted for purchase by SunTrust Mortgage on or after this date, must conform with the annual CFPB threshold requirements.

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## Bulletin Details, continued

### Revised Material

Click [Compliance Overview](#) for the revised materials.

### Former Guidelines

Points and fees caps are based on loan amount and are either a percentage or fixed dollar amount:

- Loan amounts greater than or equal to \$100,000 = 3%
- Loan amounts greater than or equal to \$60,000 and less than \$100,000 = \$3,000
- Loans amounts greater than or equal to \$20,000 and less than \$60,000 = 5%
- Loan amounts greater than or equal to \$12,500 and less than \$20,000 = \$1,000
- Loan amounts less than \$12,500 = 8%

## Other Resources

Support Group	Description and Contact Information:
Correspondent Relations Coordinator	Specific questions on applying this procedure to specific loan files. Direct contact information for each correspondent relations coordinator is located in General Section 1.01: The Correspondent Division.
Product Support	Provides phone and email support on products, policies, and procedures as well as new product rollout and existing product enhancement. Contact Product Support at 800.382.2111, option 4.

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