



MHI CFPB and Financial Services Update

CFPB Director Provides Regulatory Update, Again Questioned about Manufactured Housing Relief

On June 18th, CFPB Director Richard Cordray appeared before the House Financial Services Committee to provide a semi-annual update on the agency's regulatory activities. [Click here](#) to view the hearing.

During the hearing, Rep. Stephen Fincher (R-TN) commented that the manufactured housing industry has worked to provide lending data requested by the Bureau, yet the agency has not seen fit to analyze the data provided by the industry over the past year. Cordray indicated that the CFPB had received data, but provided no comment as to their findings. In addition, he indicated that the agency is developing a "white paper" on manufactured housing, which they intend to release later this summer.

FHA Unveils "Blueprint for Access"

Last month, the Federal Housing Administration (FHA) detailed a variety of strategies, entitled "Blueprint for Access," it will employ to expand access to credit for underserved borrowers. Under a new pilot program—Homeowners Armed With Knowledge (HAWK)—homebuyers will qualify for savings on their FHA-insured loans by completing HUD-approved housing counseling provided through independent nonprofit organizations. FHA proposes that homeowners who complete housing counseling before signing a contract to purchase a home and who complete additional pre-closing housing counseling will receive a 50 basis point reduction in the upfront FHA mortgage insurance premium (MIP) and a 10 basis point reduction in the annual FHA MIP. For more information, please [click here](#).

VA Issues QM Rule

In May, the Veterans Administration (VA) issued definitions for Qualified Mortgages (QMs) for mortgage loans guaranteed by the agency. Under the interim final rule, almost all VA loans that meet current VA underwriting standards will be safe harbor QMs, except for certain loans made through the Interest Rate Reduction Refinance Loan (IRRRL) program.

In order to receive safe harbor QM designation, an IRRRL must satisfy several specific seasoning and recoupment tests. IRRRLs that do not pass will qualify for a QM's rebuttable presumption of ability to repay. IRRRLs will also be exempt from several income verification requirements under certain circumstances. The department noted that a loan's QM status does not affect its eligibility for a VA guarantee provided that VA underwriting standards are met. For more information, [click here](#).

1655 N Fort Myer Dr. Suite 104 Arlington, VA 22209 Tel: 703.558.0400 Fax: 703.558.0401
<http://www.manufacturedhousing.org> info@mfghome.org

House Passes Bill Amending Points and Fees Definition

On June 9th, the House of Representatives approved legislation (H.R. 3211) amending the Truth in Lending Act's (TILA) definition of "points and fees." The "points and fees" definition is used to determine whether a mortgage loan triggers application of the TILA high-cost mortgage loan provisions under the points and fees test, and whether a loan satisfies the points and fees limitation to be a qualified mortgage loan under the TILA ability to repay provisions. The measure amends the definition to clarify that amounts escrowed for insurance are excluded, and to reverse the existing requirement that title charges must be included in points and fees if paid to an affiliate of the creditor. The measure now awaits Senate action, in which a companion bill (S. 1577) is under consideration.

CFPB Provides Guidance on RESPA-TILA Disclosures

On June 17th, the CFPB and Federal Reserve Board hosted a webinar on the final TILA-RESPA Integrated Disclosures Rule that will become effective August 1, 2015. The webinar was the first in a planned series intended to help creditors, mortgage brokers, settlement agents, and other stakeholders familiarize themselves with the rule requirements.

According to CFPB staff, subsequent webinars on the final TILA-RESPA Integrated Disclosures rule will function entirely as a spoken Q&A to answer questions that have been posed to the Bureau. This is in contrast to the CFPB staff's previous approach of providing private one-on-one interpretive guidance on implementing the Title 14 mortgage rules concerning the Ability-to-Repay and Qualified Mortgage rules.

[Click here](#) for more information or [click here](#) to view the webinar.

For more information, contact MHI Senior Vice President of Government Affairs Jason Boehlert at (703) 558-0660 or jboehlert@mfghome.org.