

May 15, 2026

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552

RE: Targeted Mortgage Regulatory Relief to Implement President Trump's Executive Order "Promoting Access to Mortgage Credit"

Dear Acting Director Vought:

The undersigned financial services trade organizations write to urge the Consumer Financial Protection Bureau (the Bureau) to prioritize targeted regulatory reforms to implement President Trump's March 13, 2026, Executive Order, "Promoting Access to Mortgage Credit."¹ The Order directs the Bureau to modernize the Home Mortgage Disclosure Act (HMDA) reporting requirements and to consider amendments to reform "origination and ability-to-repay (ATR)/Qualified Mortgage (QM)" requirements to reduce unnecessary origination costs and expand access to affordable, sustainable mortgage credit.

We strongly support the directive that the Bureau devote full efforts to modernizing regulatory requirements implemented under the Dodd-Frank Act that have increased origination and servicing costs without providing commensurate consumer benefit. Our organizations stand ready to partner with the Bureau and policymakers, so that the Order's objectives are implemented efficiently and effectively to advance housing affordability, support sustainable homeownership, empower community bank and credit union lending, and promote a resilient housing finance system.

Given the technical and operational complexity of regulatory change, the Bureau should prioritize the completion of pending rulemakings before advancing targeted proposals that can be implemented quickly, deliver near-term cost savings, and improve borrower outcomes. To that end, we support advancing on the proposed Regulation X servicing amendments, taking into account public comments from industry and other stakeholders. Well-crafted servicing regulations will go a long way in eliminating costs and barriers that limit a servicer's ability to offer timely and streamlined loss mitigation options to borrowers facing financial hardship.

Consistent with the Executive Order, we recommend the Bureau prioritize the following targeted actions:

1. **Modernize Loan Originator Compensation (Regulation Z).** Provide appropriate flexibility for borrowers to get the full benefits of shopping by allowing loan originators to lower their compensation to compete, allow lenders to lower compensation for material

¹ Promoting Access to Mortgage Credit, The White House Executive Order, March 13, 2026.
<https://www.whitehouse.gov/presidential-actions/2026/03/promoting-access-to-mortgage-credit/>

origination errors by employees where consistent with wage and hour law, and better align compensation structures with different loan types, particularly HFA bond loans.

2. **Reform TRID Tolerances, Cure Provisions, and Timing Requirements (Regulation Z):** Reduce operational complexity and regulatory uncertainty that drive significant compliance costs, while preserving clear and meaningful disclosures for consumers.
3. **Update HMDA Reporting Thresholds (Regulation C):** Revise the definition of "financial institution," including the asset threshold for depository institutions to better align with the Executive Order's focus on community and smaller banks and credit unions. Updating these thresholds would reduce unnecessary compliance costs associated with HMDA reporting requirements, including technology, staffing, and operational burdens.

Thank you for considering our recommendations. Ongoing dialogue is essential to address the full spectrum of challenges facing the mortgage market. We respectfully request the opportunity for follow-up conversations with the CFPB to collaboratively identify and comprehensively address these priorities, ensuring that our collective efforts continue to advance consumer interests through lower costs and strengthen the housing finance system.

Sincerely,

American Bankers Association
America's Credit Unions
Consumer Bankers Association
Housing Policy Council
Mortgage Bankers Association