



Mortgage Compliance Hot Topics Fall 2026 Edition

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Meet the Experts

Leaders from Asurity, Sandler Law Group, Mitchell Sandler, and Hudson Cook



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TRID & the Mortgage Compliance Dataset

Disclosure developments and examination preparation

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CFPB Request for Information (RFI) on TRID

Background

- Issued on **July 13, 2026**. Comments were due on **August 10**.
- The CFPB issued a Request for Information (RFI) seeking input on **potential changes** to mortgage-credit regulations, including TRID.
 - The RFI asks whether **TRID disclosure timing requirements** should be modified, including consideration of a materiality-based approach.
 - The CFPB sought input on whether **TRID tolerance thresholds** should be changed and whether additional guidance is needed regarding **changed circumstances**. The RFI asked about possible changes to TRID requirements for **construction loans** and other specialized mortgage transactions.
 - The CFPB also sought input on **simplifying disclosure forms** and accommodating **electronic and digital mortgage processes**.

CFPB Request for Information (RFI) on TRID

Implications

- **Potential changes could affect** lender disclosure workflows, fee-change monitoring, closing timelines, compliance controls, and LOS requirements.
- **The RFI does not change current TRID requirements.** Lenders should continue to comply with existing Regulation Z requirements unless and until the CFPB takes further action.
- However, questions hint at future de-regulation.

CSBS Adoption of the Mortgage Compliance Dataset (MCD)

Background

- CSBS and state regulators are working with MISMO to implement the MCD as a **standardized data-exchange format** for state mortgage compliance examinations.
- The MCD **standardizes the data and file format** regulators can request from lenders, reducing the need for different state-specific examination data requests.
- CSBS has identified three key implementation issues: **bulk transmission of closed-loan data**, validation of data **accuracy**, and **effective use and analysis** of the data during examinations.
- CSBS has stated that lenders will need to ensure their loan origination system (LOS) providers can **produce MCD-formatted data** when regulators begin using the standard for examinations.

CSBS Adoption of the Mortgage Compliance Dataset (MCD)

Implications

- Lenders should engage now with their LOS and compliance technology providers to **confirm MCD capabilities**, identify data gaps, and establish a process for **producing and validating MCD files**.
- MCD readiness also creates an opportunity for lenders to use the same standardized data for **pre-examination compliance testing**, defect identification, and remediation before a regulator begins an examination.

Bottom line: Lenders should treat MCD readiness as an **examination-preparation initiative**—not simply a future technology project.



HUD/FHA Policy Updates

Handbook 4000.1 updates affecting origination and servicing
Overview of August 12, 2026 Origination and Servicing Revisions

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Overview

Publication and scope

The August 12, 2026 update to FHA Handbook 4000.1 adds new guidance and clarification, eliminates outdated guidance, and incorporates previously published Mortgagee Letters.

Effective-date distinction

Handbook Update 18 was published August 12, 2026, with a general effective date of **November 10, 2026**, unless an underlying Mortgagee Letter specified an **earlier or later mandatory compliance date**.

Topics Covered

VOEs, Credit Scores, DPAs, 203k, Loss Mitigation, Partial Payments.

Origination – Streamlining Underwriting

Employment verification: clearer definitions

What changed: Historically, lenders relied on informal or varying methods to document a borrower's employment history. The update establishes standardized definitions for three distinct verification pathways:

- **Written VOE:** Explicitly defined as a document sent **directly between the employer and the lender** with zero borrower handling. Borrower-hand-delivered forms no longer meet HUD's definition for a Written VOE.
- **Electronic VOE:** Formally recognizes automated, third-party vendor databases. Lenders must ensure vendor reports capture the vendor name, access timestamp, and exact payroll period covered.
- **Re-verification of Employment:** Clarified as a distinct pre-closing check conducted shortly before the note date. Its specific purpose is to confirm **continued active employment status**, rather than re-underwriting the borrower's qualifying income.

Implementation review: Review underwriting checklists, VOE vendor outputs, staff guidance and QC sampling; do not assume the new definitions eliminate other verification rules.

Handbook sections impacted: II.A.4.c.ii (TOTAL Mortgage Scorecard) and II.A.5.b.ii (manual underwriting).

Implementation: Optional Aug. 12, 2026; required Nov. 10, 2026.

Origination - Streamlining Paperwork

HUD-92900-B Eliminated

What changed: Form HUD-92900-B (*Important Notice to Homebuyers*) was historically required. Following a temporary administrative waiver on November 19, 2025, HUD officially eliminated the requirement via Mortgagee Letter 2026-07 on June 23, 2026, citing form redundancy under its broader paperwork reduction initiative.

Implementation review: Ensure form is no longer included in initial packages.

Handbook sections impacted: II.A.1.a.ii(A)(2) (*Disclosures and Legal Compliance – Form HUD-92900-B, Important Notice to Homebuyers*)

Effective: June 23, 2026 (ML 2026-07)

Origination – Expansion of DPA Programs

Federal Home Loan Bank (FHLB) Set-Aside Program

Prior Requirements: These programs are designed to provide down payment and other homeownership assistance to low- and moderate-income borrowers. Previously, the handbook described it as a “grant” program and required lenders to verify that the FHLB retention agreement created a deed restriction rather than a second lien.

Revised Policy:

- expressly recognizes that the funds may be provided as either a grant or secondary financing.
- clarifies that FHA’s general prohibition on a balloon payment within the first 10 years does not apply to secondary financing provided through FHLB Homeownership Set-Aside Programs.

Implementation review: Lenders need to correctly classify FHLB assistance as a grant or secondary financing and ensure their closing packages accommodate FHLB subordinate financing, including permissible balloon payment provisions.

Handbook sections impacted: II.A.4.d.iii(L)(2)[Federal Home Loan Bank Homeownership Set-Aside Program (TOTAL)] and II.A.5.c.iii(L)(2)[Federal Home Loan Bank Homeownership Set-Aside Program (Manual)]

Implementation: Optional Aug. 12, 2026; required Nov. 10, 2026.

Origination – Refresh for Rehab Loans

Increased Flexibility for Limited 203k Programs

Key Updates:

- **Increase in Maximum Allowable Draws:**
 - **Previous Rule:** Underwriters and contractors were restricted to a rigid **two-draw cap** for Limited 203(k) projects.
 - **New Rule:** HUD increased the maximum allowable draw requests to **up to four draws** for Limited 203(k) loans.
- **Multiple Disbursements Per Draw:**
 - Clarified that lenders are permitted to issue **multiple disbursements per draw**, bringing Limited 203(k) draw administration in line with the Standard 203(k) release framework.
- **Ineligible Improvements & Repair Guidance:**
 - Removed former restrictions that disqualified repairs solely because they required more than two contractor payments.
 - Maximum repair limit remains \$75,000.
- **Effective:** June 23, 2026 (ML 2026-06); later codified in Handbook 4000.1, Update 18.

Reference: Handbook 4000.1 Section II.A.8.a (Rehabilitation Mortgage Insurance Program)

Originations – Breaking News

Implementation of Alternative Credit Scores

Key Update:

- Mortgagee Letter 2026-11 was issued on October 8, 2026, to permit the use of alternative credit score models **VantageScore® 4.0 (V4)** and **FICO® Score 10T (10T)** alongside traditional FICO scoring, providing broader underwriting flexibilities for non-traditional or “thin-file” borrowers whose credit history may have been considered insufficient under legacy models.
- Alternative models incorporate **trended credit data** and evaluate **recurring payment behavior** (such as rent and utility payments) in determining default risk.
- **Effective:** Jan. 1, 2027, for FHA case numbers assigned on or after that date (FHA INFO 2026-21; ML 2026-11).

Resources:

- [Mortgagee Letter 2026-11](#).
- [FHA Alternative Credit Scores Preparedness Guide](#) includes important information such as answers to transition questions and guidance for mortgagees and other industry partners for adopting the alternative credit score models.
- [TOTAL Scorecard Developer’s Guide Release 5.0](#) provides software mapping and technical specifications for Automated Underwriting System (AUS) vendors to integrate TOTAL Version 5.0.
- [Questions and Answers](#) have been developed to assist mortgagees and industry participants with implementation. The FHA Resource Center Knowledge base will be updated concurrently with the release of TOTAL Scorecard Version 5.0 on January 1, 2027.

Servicing – Eased Restrictions

Removed Maximum Arrearage Limitation for “Outside the Waterfall” Modifications

Key Update:

- An **Outside the Waterfall Modification (OWL)** is used when the borrower fails to qualify for standard waterfall options.
- Previously, the total arrearages **could not exceed 30% of the loan’s unpaid principal balance** in order to qualify for an “OWL” Modification.
- **This restriction has been removed**, making the option available for severely delinquent borrowers.
- **Implementation:** Optional Aug. 12, 2026; mandatory by Nov. 10, 2026.

Reference: Handbook 4000.1 Section III.A.2.i.vii(B)(Outside of the Waterfall Loan Modification)

Servicing – Clarifying and Realigning Policy

Treatment of Partial Payments

Key Update:

- Clarifies that when a defaulted borrower makes partial payments that **accumulate to equal a full monthly installment** (principal, interest, taxes, and insurance), the servicer must apply those funds to the earliest delinquent monthly installment.
- Resolves previous discrepancies regarding how partial payments impact the official “**Date of Default**” calculation.
- **Effective:** Dec. 11, 2025 (FHA Administrative Waiver; FHA INFO 2025-59, Dec. 18, 2025); later codified in Handbook 4000.1, Update 18.

Reference: Handbook 4000.1 Section III.A.2.d.ii.A (Partial Payments for Mortgages in Default)

Resources and Next Steps

Official FHA Handbook 4000.1 Resources:

- **Online SF Handbook Portal:** Access the fully searchable, online handbook on [HUDCLIPS / HUD.gov](https://hudclips.hud.gov).
- **FHA INFO & Email Notifications:** Subscribe to FHA INFO announcements for immediate updates on new Mortgagee Letters and Transmittals.
- **FHA Resource Center:** Direct questions or feedback to answers@hud.gov or 1-800-CALL-FHA.

Crucial Effective Date Compliance Reminder:

- **Transmittal vs. Mortgagee Letter Dates:** Handbook Transmittals (such as Update 18 on August 12, 2026) codify and incorporate previously issued Mortgagee Letters.
- **Mandatory Compliance Rule:** Policy changes published via standalone Mortgagee Letters (e.g., ML 2026-07 for HUD-92900-B or ML 2026-08 for Loss Mitigation) take effect on the **specific mandatory effective date stated within that underlying Mortgagee Letter**, rather than the later Transmittal publication date.
- **System & Overlay Review:** Ensure your Loan Origination System (LOS) mapping, underwriting overlays, and servicing workflows align with the individual ML effective dates.



State Enforcement Developments

Offshoring and loan originator compensation

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State Enforcement Actions

North Carolina

- North Carolina **requires the registration** of persons who provide “**mortgage origination support**” – i.e., persons who exclusively process or underwrite residential mortgage loans on a contract basis and do not otherwise engage in the mortgage business. N.C. Gen. Stat. § 53-244.030(21a); N.C. Gen. Stat. § 53-244.040(a).
- North Carolina prohibits mortgage origination support registrants from processing or underwriting loans **outside the U.S. and its territories**.
- The Office of the Commissioner of Banks has entered into several recent **consent orders with MOSRs and lenders** over alleged violations of this prohibition.

State Enforcement Actions

North Carolina

- **January 12, 2026**

Consent Order against a registered MOSR. The NCCOB determined that the MOSR employed individuals outside the U.S. and its territories to process and underwrite NC mortgage loans.

- **April 24, 2026**

Consent Order against lender for use of three registered MOSRs to provide services that were performed offshore.

- **May 29, 2026**

Consent Order against lender and affiliated processor/underwriter. The affiliate was not registered as an MOSR and performed services offshore.

- **June 2, 2026**

Consent Order against lender for contracting with an unregistered MOSR, which subcontracted underwriting to other MOSRs, one of which was also unregistered and which used individuals located offshore.

Note: Copies of the Consent Orders are available [here](#).

State Enforcement Actions

Washington State

- The Washington State Department of Financial Institutions has entered into numerous recent **Consent Orders with mortgage lenders and brokers** arising from examinations under the Consumer Loan Act and Mortgage Broker Practices Act.
- Several of the enforcement actions have involved alleged violations of Regulation Z's loan originator compensation rule, 12 C.F.R. § 1026.36(d)(1), which **prohibits compensation based on a transaction term or proxy for a transaction term**.
- The alleged LO compensation violations are **not addressed in any detail** in the Consent Orders or Statements of Charges (which also allege other violations of state and federal law), so it is difficult to draw any firm conclusions other than that **LO compensation is an area of interest for the DFI**.

State Enforcement Actions

Washington State

- **November 5, 2025**

Alleged payments to LOs “which were based on terms of transactions.”

- **February 6, 2026**

“Respondent did not develop and implement a compliant loan originator compensation agreement. Respondent based loan originator compensation on a term of the transaction.”

- **June 11, 2026**

Respondent “did not have a compliant compensation plan for at least two mortgage loan originators.”

- **July 24, 2026**

Respondent “did not develop and implement a compliant loan originator compensation agreement. Respondent[’s] ... agreement did not clearly define how compensation is determined.”

Note: Copies of the Consent Orders and/or Statements of Charges are available [here](#).



AI Requirements & Governance

Existing laws, supervisory frameworks, and industry requirements

Matt Jones

Partner, Mitchell Sandler PLLC



AI Regulation: Existing Consumer Finance Laws

- The prior CFPB administration issued several guidance documents highlighting the compliance risks for various AI use cases.
- While the CFPB has not issued any new regulations concerning AI, **existing regulations apply to AI outputs and decisions**. For example:
 - **ECOA/Reg B**
 - Adverse action notices must identify **specific reasons for denial**, and the creditor cannot hide behind a black box underwriting algorithm. See Massachusetts AG action against Earnest Operations LLC; CFPB Circular 2022-03.
 - The use of AI in marketing may increase **digital redlining risk**.
 - **UDAAP**
 - **Lenders are responsible** for representations made by consumer-facing chatbots. Chatbots may hallucinate and provide inaccurate information to consumers.
 - Chatbots may not appropriately address consumer complaints. See June 2023 CFPB Spotlight on Chatbots in Consumer Finance.
 - **Disclosure Laws/Regs (e.g., TRID, state laws, etc.)**
 - If chatbots provide pre-disclosure estimates or reference other terms in consumer-facing communications, there may be **disclosure verbiage triggered**.
 - **GLBA/Safeguards Rule**
 - If sharing NPI with AI vendors, the contractual requirements under GLBA and the Safeguards Rule apply.
 - AI vendor contracts should **prohibit reuse/redisclosure beyond the contract's purpose** and provide access restrictions and audit rights, in addition to other AI-specific provisions.

AI Regulation: NIST Governance Framework

- In January 2023, the National Institute of Standards and Technology (NIST) published its **AI Risk Management Framework (RMF)** (NIST AI 100-1).
- This framework is cited by, and serves as a source for, other industry frameworks we will discuss shortly.
- The framework is **voluntary** and is intended to provide flexibility to organizations of all sizes and in all sectors throughout society (i.e., the NIST framework is **not mortgage-specific**).
- The robust framework provides 4 functions to help organizations manage AI risk:
 - (1) **Govern**: Outline risk management documents, processes, and schemes and provides AI risk management structure
 - (2) **Map**: Identify risks
 - (3) **Measure**: Assess, analyze, and track risks
 - (4) **Manage**: Prioritize and act upon risks
- <https://www.nist.gov/itl/ai-risk-management-framework>
- There is a companion resource published by NIST that is specific to **Generative AI**. (NIST AI 600-1).

AI Regulation – MISMO FRAME

- In May 2026, MISMO introduced **FRAME (Framework for Responsible AI in the Mortgage Ecosystem)**
- MISMO describes FRAME as a flexible structure – it is **optional**, and it can be evolved by users.
- FRAME is based on the NIST AI RMF, but FRAME is specifically designed for organizations that don't have the resources to implement NIST.
- FRAME explains how each NIST component aligns with mortgage regulations.
- FRAME **does not create a new compliance obligation**.
- **The purposes of FRAME:**
 - promote safe and responsible use of AI
 - address governance and risk considerations
 - support consistent evaluation of AI use cases
 - build trust and readiness for adoption
- **There are five components of FRAME:**
 - **AI System Inventory:** This explains and describes your AI use cases and systems.
 - **Governance Policy:** Governing corporate document that ties everything together.
 - **System Risk Assessment/Use Case Assessment:** Every use case will have a risk assessment.
 - **Performance & Fairness Testing:** This is the testing for each use case before it goes into production, and it will be use-case specific.
 - **Incident & Change Log:** When in production, this allows the entity to monitor each use case's hallucinations, model drift, etc. This is designed to ensure the model stays within established parameters.

AI Regulation – CSBS AI Supervisory Framework

- In September 2026, the Conference of State Bank Supervisors (CSBS) published an **Artificial Intelligence Supervisory Framework** designed to assist state examiners in identifying, understanding, and assessing AI-related risks at financial institutions.
- The framework is a **discretionary tool** that should be deployed with consideration given to an institution's size, complexity, risk profile, and use of AI.
- The framework is based in part on the NIST AI RMF, and it consists of several documents:
 - **Core Examiner Guide**
 - The examiner guide helps examiners understand how companies use AI and how to assess the **governance and risk management** of that use.
 - To reiterate, CSBS states that the examiner guide should be applied in a manner **proportionate to company's size, complexity, risk profile, and AI use cases**.
 - The guide suggests **initial scoping questions, document requests** (e.g., governance materials, inventory, LLM use policies, etc.), and procedures for assessing the adequacy of the company's AI governance and oversight and analyzing the company's AI use cases.
 - **Examiner Work Program**
 - This document provides further detail on the questions and procedures set forth in the Examiner Guide. The work program explains to examiners the appropriate focal points of each question and procedure identified in the Examiner Guide.

AI Regulation – CSBS AI Supervisory Framework

- **Nonbank AI Supplements**

- The CSBS provides supplemental examiner review details and procedures for **third-party and vendor oversight, model risk review, and consumer protections**.
- These supplements identify additional questions that examiners should consider in connection with these three areas.

- **AI Use Case Tiering Worksheet**

- The worksheet is designed to help companies **evaluate and document the risk of AI use cases**.
- The assigned risk tier helps to inform the level of governance, controls, testing, monitoring, and oversight that may be appropriate
 - **Tier 1 – Low risk:** Internal use, human-reviewed outputs, limited consumer impact, limited data sensitivity, low potential harm from errors
 - **Tier 2 – Moderate risk:** Consumer-facing or decision-support role, moderate data sensitivity, exception-based human oversight, moderate potential harm from errors
 - **Tier 3 – High risk:** Use cases involving direct consumer outcomes, sensitive personal data, limited human review, significant operational reliance, or material potential harm from errors
 - The worksheet provides a helpful risk assessment template for each use case

- **Source Support Document**

- This document references the source materials used to develop the framework (e.g., NIST AI RMF).

AI Regulation – Freddie Mac Requirements

- Freddie Mac's AI/ML use requirements became **effective 3/3/2026** (Section 1302.8 of the Seller Guide).
- AI/ML used in connection with the origination/servicing of loans sold to/guaranteed by FHLMC **must comply with applicable laws and FHLMC purchase agreements**.
- AI/ML use must only be used if the Seller/Servicer:
 - Develops and implements AI/ML P&Ps which, at a minimum, are (i) **approved by Senior Management**, (ii) **communicated to personnel** with responsibilities impacted by AI/ML use, and (iii) **have an owner** who implements and maintains the P&Ps at least annually.
- Seller/Servicer must establish clear governance frameworks by ensuring
 - Policies and procedures are in place to map, measure, and manage AI risk.
 - Legal requirements involving AI are understood and documented.
 - Characteristics of trustworthy AI are integrated into policies and procedures.
 - Policies and procedures are in place to assess the level of risk management needed for AI/ML use.
 - AI/ML is assessed for data poisoning and adversarial inputs.
 - Internal and external audits are conducted regularly to identify vulnerabilities and deviations from established policies.
 - AI systems are regularly monitored for performance, security breaches, and biases.
 - Audits are conducted to ensure compliance with NIST 800-53 and ISO 27001.
 - Segregation of duties is applied to prevent conflicts of interest.
 - Roles, responsibilities, and accountability structures are in place to ensure the company maps, measures, and manages AI/ML risk appropriately.
- Seller/Servicer agrees to **indemnify FHLMC** for all losses and costs arising out of the use of AI/ML.
- Upon request, the Seller **must disclose and describe AI use cases**, safeguards adopted to mitigate AI/ML risk, and other information that may be requested.

AI Regulation – Fannie Mae Requirements

- On **August 8, 2026**, Fannie Mae’s AI/ML governance framework became effective (LL-2026-04). LL 2026-04 was superseded on **October 21, 2026** by an updated Fannie Mae Information Security and Business Resiliency Supplement (“Supplement”).
- The October 21, 2026 update substitutes the term “Super intelligence” (SI) for AI/M. If seller/servicer uses SI “in connection with activities performed under, or relating to, its Underlying Agreements” (including the Lender Contract), the seller/servicer must implement an SI Governance program that includes, at a minimum:
 - **Documented and implemented formal SI governance program**
 - **Policies, processes, and procedures** regarding development, implementation, use, and maintenance of SI and SI risk measuring and management. The P&Ps must incorporate several specific items, including, but not limited to, items relating to the maintenance of an SI inventory; risk identification, assessment, and alignment processes; risk management activities, data governance and quality standards; model design, training, testing, and validation; monitoring, auditing, and ongoing oversight of SI use; change management controls for SI models, systems, and use cases; assessment of SI security risks (e.g., model inversion, data leakage, prompt injection, adversarial manipulation); data protection controls; communication of the P&Ps to appropriate personnel with SI responsibilities; controls for segregation of duties; characteristics of trustworthy, ethical, and responsible AI; and compliance with applicable legal and regulatory requirements regarding SI.
 - **Designated owner** responsible for implements, maintaining, and review the P&Ps
 - **Controls and training** to properly identify, classify and protect **Confidential Information** used in SI
 - **Third party risk management and governance**
 - Compliance with applicable laws, regulations, the Supplement, and applicable Underlying Agreements
 - Upon request, the Seller **must disclose and describe SI use cases**, safeguards adopted to mitigate SI risk, and other information that may be requested.

AI Regulation – AI-Specific State Laws/Regs

Several states have enacted legislation/regulations or provided guidance regulating the use of AI. For example:

Colorado

- Colorado's Automated Decision-Making Technology (ADMT) law becomes effective **January 1, 2027** (Co. Rev. Stat. § 6-1-1701).
- Includes requirements, such as **consumer disclosures**, for both developers and deployers concerning ADMT that materially influence a "consequential decision," which includes a decision concerning access to/eligibility for a loan.
- Draft regulations implementing the ADMT have been published (4 C.C.R. 904-6). The regulations include details on the ADMT law's requirements, including reference to a **Colorado-specific adverse action disclosure** which would be additional to ECOA/FCRA adverse action requirements.

California

- Disclosures may be triggered when **bots communicate with consumers**. (Cal. Bus. Prof. Code § § 17940 et seq.)
- Requires disclosure of **artificial voices** in prerecorded phone call messages. (Cal. Pub. Util. Code § 2874).
- Requires real estate brokers/salespersons to disclose **digitally altered images** in ads/promotions. (Cal. Bus. & Prof. Code § 10140.8)
- Requires disclosure of a **pre-use notice** to consumers containing prescribed information, and **the right to opt out**, when ADMT is used to make a significant decision about the consumer, including a decision that results in the provision or denial of lending or housing services. (11 C.C.R. § § 7000 et. seq.).
- In March 2026, California DRE issued a Licensee Advisory citing risks of licensee use of AI – "using AI tools to conduct licensed activity **may** be equivalent to asking an unlicensed assistant to do licensed activity, which is a violation of California real estate law."

Other States

- Other states including Maine, Utah, New York, Texas, Wisconsin, and New Jersey have passed AI legislation that may impact mortgage lenders.
- Additionally, the Michigan DIFS issued a bulletin in January 2026 setting forth DIFS expectations as to how financial service providers should govern the development and use of AI.



Audience Q&A

Please submit your questions using
the Zoom chat.

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Thank you for joining us – we appreciate your participation today.

Recording + Slides

We will send the recording and slide deck to all registrants within 24–48 hours.

Questions?

Please reach out to Jonas or any of today's panelists if you'd like to discuss a specific topic in more detail.

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