

**THOUGHT LEADERSHIP**

LEGAL UPDATES

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# Mark Your Calendars: 2026 Compliance Dates for Consumer and Small Business Financial Services

Welcome to 2026! As we begin another year in the fast-evolving world of consumer financial services regulation, we're here with our annual roadmap of key compliance dates to help you plan ahead. Whether you're in mortgage lending, consumer credit, student loan servicing, or other areas of consumer finance and fintech, this guide will help you stay on top of the year's most important regulatory milestones.

We've organized everything chronologically so you can mark your calendars and coordinate with the right teams well in advance. Let's dive in.

## **January 1, 2026: The Annual Avalanche**

The new year brings the usual flurry of annual adjustments and some significant sunsets worth noting:

### ***Regulation Z Gets Its Annual Tune-Up***

The CFPB's annual adjustments to Regulation Z are here, affecting multiple mortgage lending thresholds. HOEPA loan-amount and points-and-fees triggers have been updated, along with revised APR-to-APOR spreads and points-and-fees thresholds for qualified mortgages. The higher-risk mortgage appraisal threshold has also been adjusted, while the \$1 minimum interest charge disclosure remains unchanged. If you're in mortgage lending, now's the time to update your pricing models, disclosure systems, and ensure your teams are aligned on the new numbers.

Speaking of mortgages, the asset-size thresholds for small-creditor and insured depository/credit union exemptions (related to escrows and balloon

payments on higher-priced mortgage loans) have also increased. Review your institution's size and eligibility accordingly.

### ***Data Reporting Thresholds Shift***

HMDA reporters should note that the small-institution threshold has risen to \$59 million. Meanwhile, CRA thresholds for "small bank" and "intermediate small bank" designations have been adjusted. If you're hovering near these thresholds, double-check your reporting obligations for 2026.

### ***Consumer-Facing Fee and Threshold Updates***

Several consumer-facing adjustments took effect on January 1, 2026:

**FCRA file-disclosure fee cap** increases to \$16. Make sure your fee schedules and vendor configurations reflect this change.

**Regulation Z Consumer Credit and Regulation M Consumer Lease** exemption thresholds rise to \$73,400.

**Federal housing program and GSE loan limits** (FHA, HECM, VA, Fannie Mae, and Freddie Mac) have been updated for 2026. Your underwriting, eligibility, and disclosure systems should reflect the new limits.

### ***Two Important Tax Exclusions Sunset***

January 1 marks the end of two significant tax exclusions that could affect your borrowers:

1. **Qualified principal residence indebtedness (QPRI) exclusion** has sunset, meaning mortgage debt forgiveness may now be taxable income unless another exclusion applies. If your institution handles loss mitigation or loan modifications, borrower communications and 1099 processes should address this change.
2. **ARPA student-loan tax exclusion** also expires, potentially making federal student-loan discharges and cancellations taxable. Those who service student loans should update borrower communications accordingly.

### ***State Law Changes Take Effect***

January 1 is also a popular effective date for state legislation. This year brings:

Comprehensive privacy laws in **Indiana** and **Kentucky**, plus privacy updates in **Rhode Island**

**Colorado's "junk fee" totals-in-price requirements**

**UCC 2022 amendments** in Connecticut and Oregon

**Oregon's medical debt reporting ban**

**California's overdraft/NSF fee cap** for state credit unions (capped at \$14 or the CFPB benchmark, whichever is lower)

Additionally, **19 states** increased their minimum wages on January 1, which has downstream impacts on garnishment calculations where state formulas reference the state minimum wage. Collections teams should recalculate protected amounts.

### **Late January: TCPA Relief and Student Loan Developments**

#### ***January 6, 2026: TCPA Consent-Revocation Rule Delayed***

Good news for those tracking the FCC's TCPA consent-revocation rule: the effective date for new revocation mechanics has been extended to January 31, 2027. You can continue monitoring developments without rushing to implement new methods just yet.

#### ***Week of January 7: Federal Student-Loan Wage Garnishment Restarts***

The Department of Education is resuming administrative wage garnishment notices for federal student loans. If you service student loans or handle wage garnishments, prepare for an uptick in borrower inquiries and hardship requests.

### **February 16, 2026: New York Expands AG Authority**

New York is giving its Attorney General expanded enforcement authority under the **FAIR Business Practices Act**, extending beyond deceptive practices to include unfair and abusive acts and practices. This gives the AG state-level UDAAP authority. If you operate in New York, it's time to reassess risk areas in marketing, fee structures, and servicing practices.

The same date brings **new coerced-debt protections** in New York, creating additional defenses and restrictions for creditors when debts arise from fraud, coercion, or identity theft. Collections teams should review and adjust dispute workflows and documentation requirements.

### **March 2026: PACE, HPPA and Credit Union Rate Caps**

#### ***March 1, 2026: CFPB Clarifies PACE Under Regulation Z***

The CFPB's rule clarifying the treatment of Property Assessed Clean Energy (PACE) obligations under Regulation Z becomes effective, confirming that voluntary PACE obligations fall within TILA/Reg Z. While litigation is pending, there's currently no injunction on the effective date. Companies involved in PACE financing should ensure compliance.

***March 4, 2026: Homebuyers Privacy Protection Act Takes Effect***

**The Homebuyers Privacy Protection Act (H.R. 2808) that was signed into law on September 5, 2025, takes effect March 4, 2026. The Act amends FCRA to significantly restrict the use of mortgage-related inquiry data in prescreen programs (often referred to as "trigger leads" because they are issued by the credit bureaus to third parties when a consumer applies for mortgage credit with a lender), unless the person receiving the trigger leads has express authorization from the consumer or has certain existing relationships with the consumer.**

***By March 10, 2026: NCUA Interest-Rate Cap Decision Point***

Federal credit unions should watch for NCUA Board action regarding interest-rate caps. An 18% general cap (28% for PALs) is in effect through March 10, but the Board may take action, affecting rates after that date. Credit card and unsecured lending teams should stay tuned.

***April 1, 2026: Incarcerated People's Communications Services Compliance***

Some facilities may rely on the extended compliance date of April 1, 2026, for the FCC's Incarcerated People's Communications Services (IPCS) rules. If your institution handles payment processing or disputes related to these services, coordinate with vendors on any necessary adjustments.

***June 1, 2026: Maryland Statute-of-Limitations Restrictions***

Maryland now prohibits consumer contract clauses that shorten statutory limitation periods. Review your Maryland forms, loan agreements, and arbitration provisions to ensure compliance.

***July 1, 2026: Major Student Loan and State Law Changes***

July 1 is shaping up to be a busy day, particularly for those servicing student loans and tracking state-level consumer protection developments.

***Federal Student-Loan Repayment Overhaul***

For "new" federal student loans, only two repayment plans will be available: a tiered standard plan and a new income-driven RAP (Revised Affordable Payment) plan. Consolidation timing

will matter significantly, and Parent PLUS loans face new constraints. Servicers should update systems, disclosures, and prepare customer care teams for questions.

The same date brings changes to **federal student-loan program limits and PSLF**. Grad PLUS loans are eliminated, new dollar limits apply, and schools gain authority to lower annual limits. Additionally, pending rules will add employer-eligibility screening for Public Service Loan Forgiveness (PSLF), though litigation is expected. Government relations and servicing policy teams should monitor these developments closely.

### ***State Law Updates with Consumer Finance Impact***

Several states have significant changes effective July 1, 2026:

**Connecticut** implements "junk fee" requirements, interconnected device regulations, right-to-repair mandates, and auto-renewal requirements. Non-compliant auto-renewals create UDAP risk, so marketing and product teams should review current practices.

**Mississippi** extends its Credit Availability Act through 2030, while its debt management services statute sunsets.

**Oregon** increases wage-garnishment protections to the greater of 75% of disposable earnings or \$400 per week, up from current thresholds. Collections teams should update their calculations.

**Virginia's Medical Debt Protection Act** takes effect, limiting extraordinary collection actions, interest and fees, and foreclosures related to medical debt. Collections practices for medical debt should be reviewed for Virginia compliance.

Additionally, minimum-wage changes in **Alaska, California's health care sector, and Oregon** may alter state-based garnishment formulas.

### **September 30, 2026: Florida Minimum Wage Reaches \$15**

Florida's minimum wage steps up to \$15 per hour, requiring adjustments to garnishment calculations where they're tied to the state minimum wage.

### **October 1, 2026: California CARS Act Takes Effect**

California's new Consumer Auto Retail Sales (CARS) Act brings significant changes to auto retail practices, including broad misrepresentation prohibitions, total price disclosure requirements, limits on add-on products, and a three-day cancellation right for certain used-vehicle sales. If you're in indirect auto lending or dealer management, this is a major compliance lift that requires coordination across multiple departments.

## **December 1, 2026: Bankruptcy Rules and Forms**

Building on significant Rule 3002.1 changes that took effect December 1, 2025 (affecting mortgage servicing in Chapter 13 bankruptcies), additional targeted rules and forms changes are expected on December 1, 2026. Bankruptcy operations and mortgage servicing teams should stay alert for further guidance.

## **Planning Note: CFPB Registry and Adjudication Actions**

As you plan for 2026, note that the CFPB published final actions on October 29, 2025, rescinding the nonbank order registry, withdrawing the proposed form-contract registry, and rescinding the 2022/2023 adjudication rule amendments. Regulatory change management teams can adjust compliance architecture planning accordingly.

## **Your 2026 Action Plan**

As you work through this calendar, here are some practical next steps:

**Validate and Update Systems:** Review each item for applicability to your products and channels. Update pricing models, disclosure templates, and system thresholds where required.

**Refresh Policies and Communications:** Update policies, scripts, and customer communications—particularly around garnishment calculations, student-loan changes, and state UDAP and privacy requirements.

**Coordinate with Vendors:** Engage early with your credit reporting agencies, communications vendors, payment processors, and document prep providers to ensure timely configuration changes.

**Assign Clear Ownership:** Use the suggested team owners throughout this post as a starting point but customize based on your organization's structure.

## **Contact us**

If you have questions regarding Compliance Dates for Consumer and Small Business please contact Christopher Friedman, Marci Kawski, Alex McFall, Leslie Sowers, Cat Albrecht-Wiese, Shelby Lomax, or your Husch Blackwell attorney.