



**Property Tax Lending Bulletin**  
**Clarification on Annual Report Schedule D Reporting**  
**Schedule D, Line 1 and Line 2**

The Office of Consumer Credit Commissioner is issuing this bulletin to clarify reporting expectations for two items on Schedule D of the annual report for property tax lenders. The agency has identified inconsistent reporting of the number and amount for Line 1 and Line 2. This bulletin is intended to promote consistent reporting across the industry and to give lenders an opportunity to review and correct prior filings, if needed. The OCCC is allowing a three year look back period, and corrections for reporting years 2023, 2024, and 2025 must be submitted to [annualreport@occc.texas.gov](mailto:annualreport@occc.texas.gov) by July 31, 2026.

**Schedule D, Line 1**

**Number and Amount of Loans**

Line 1 should report the total number and total amount of loans made during the calendar year under Chapter 351, including refinances.

For purposes of Line 1:

- The **amount** reported should reflect the **full loan amount made during the year**, not merely the portion attributable to taxes transferred.
- This includes amounts advanced for **taxes, penalties, and interest**, together with **closing costs and other financed amounts**, as applicable.
- The amount should also include **balances refinanced or renewed** when those balances are part of a loan made during the reporting year.
- The **number** reported should include each loan made during the year, including a **traditional refinance that is only a rate and term restatement**. Even if no new taxes are transferred at that time, the refinance is still a loan made during the year and should be counted on Line 1.

In short, Line 1 is intended to capture the lender's **full lending activity** during the reporting year.

**Schedule D, Line 2**

**Number and Amount of Tax Lien Transfers**

Line 2 should report the total number and amount of tax lien transfers from taxing units during the calendar year.

For purposes of Line 2:

- The **amount** reported should be limited to the **taxes, penalties, interest, legal fees, and court costs** transferred from the taxing unit.
- The amount should **not** include closing costs, other financed charges, or amounts attributable to refinanced or renewed balances, unless those amounts were themselves part of a tax lien transfer from the taxing unit during the reporting year.

- The **number** reported should reflect the count of **tax lien transfers**, applying the Schedule D instruction that if **multiple taxing units or multiple tax years** are involved in the transaction, the transaction is considered **one transfer**.
- If **multiple properties** are involved, those should be counted as **multiple transfers**.

### **Reporting Distinction**

The key distinction is that Line 1 reports the lender's loan activity during the year, including refinances, using the full loan amount, while Line 2 reports only the tax lien transfer activity from taxing units, using only the applicable tax related transferred amounts. Because these lines measure different things, the number and amount reported on Line 1 and Line 2 will not necessarily match.

### **Examples**

#### **Rate and term refinance only.**

If a lender refinances an existing property tax loan during the reporting year and no new delinquent taxes are paid to a taxing unit, that transaction should be included on **Line 1** but not on **Line 2**.

#### **One property, multiple taxing units or tax years.**

If a single transaction pays delinquent taxes on one property but includes multiple taxing units or multiple tax years, the transaction should be reported as **one loan on Line 1** and **one transfer on Line 2**.

#### **One loan, multiple properties.**

If a single loan transaction pays delinquent taxes on more than one property, the transaction should be reported as **one loan on Line 1** and **multiple transfers on Line 2**, based on the number of properties involved. As a result, the number reported on Line 2 may exceed the number reported on Line 1.

### **Review and Correction of Prior Reports**

To promote accurate and consistent reporting, the OCCC is providing a **three year lookback period** for lenders to review prior Schedule D reporting.

If amendments are needed to correct the reporting of Schedule D, Line 1 or Line 2 on a lender's **2023, 2024, or 2025 annual report**, the lender should email the corrections to **annualreport@occc.texas.gov** by **July 31, 2026**.

### **Contact**

Questions regarding this bulletin or annual report corrections may be directed to the OCCC at **annualreport@occc.texas.gov**.