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Regulation C - HMDA Exemption Threshold for 2015 and Resources

Regulation C implements the Home Mortgage Disclosure Act (HMDA). This regulation contains an asset-size exemption threshold for banks, savings associations and credit unions, which is subject to adjustment. The Consumer Financial Protection Bureau (CFPB) has issued a final rule amending the threshold level for applicability, which is effective in 2015.

Alert Date: December 26, 2014
Status: Threshold Effective January 1, 2015
Links: [Final Rule - 12/29/2014](#)

The CFPB has issued a final rule amending Regulation C. This rule communicates the adjusted exemption threshold.

How is the Regulation C Threshold Changing?

Regulation C contains requirements for financial institutions to compile, disclose and report certain loan data. Within the regulation, financial institutions, in part, are defined as a bank, savings association or credit union that on the preceding December 31st had assets in excess of the asset threshold established and published annually by the CFPB. The threshold is to be adjusted annually, based on the year-to-year change in the average Consumer Price Index for Urban Wage Earners and Clerical Workers. **The CFPB has adjusted this threshold from \$43 million to \$44 million effective January 1, 2015.**

This means that, **under Regulation C**, banks, savings associations and credit unions with assets of \$44 million or less as of December 31, 2014, are exempt from collecting data in 2015. An institution's exemption from collection in 2015 does not affect its responsibility to report data it was required to collect in 2014.

Where Are HMDA Resources Available?

The FFIEC website for HMDA information provides a great deal of valuable information. It can be located here: <http://www.ffiec.gov/hmda/>. This website contains several links, which include but are not limited to, the following:

- Guide to HMDA Reporting – Getting it Right!
- Frequently Asked Questions and Answers –
 - Regulatory & Interpretive FAQs
 - Reporting & Technical FAQs
 - General Information & HMDA Price Data FAQs
- Rate Spread Calculator
- Geocoding System
- CRA/HMDA Newsletter
- Data Entry Software
- E-Mail Alert Sign-Up

Recommendations for Next Steps

By January 1, 2015:

1. Update any HMDA or other lending-related policy that references the HMDA asset threshold.
2. As needed, update any existing loan procedures that are being used to monitor this threshold and implement data collection, disclosure and reporting procedures when applicable.
3. Alert appropriate staff regarding the new threshold that will be in effect for 2015.