



Regulation C - HMDA Exemption Threshold for 2016 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 reflecting the threshold level for applicability, which is effective in 2016.

Alert Date: December 22, 2015
Status: Threshold Effective January 1, 2016
Links: [Final Rule - 12/16/2015](#)

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The CFPB has issued a final rule amending Regulation C. This rule communicates the asset-size exemption threshold that will become effective January 1, 2016.

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 by the CFPB. The threshold is subject to adjustment annually, based on the year-to-year change in the average Consumer Price Index for Urban Wage Earners and Clerical Workers. **The CFPB has issued a final rule that this threshold will remain at \$44 million effective January 1, 2016.**

This means that, **under Regulation C**, banks, savings associations and credit unions with assets of \$44 million or less as of December 31, 2015, are exempt from collecting data in 2016. An institution's exemption from collection in 2016 does not affect its responsibility to report data it was required to collect in 2015.

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, 2016:

As the asset size threshold is not changing, it is anticipated that no action will need to be taken except for a possible adjustment in a HMDA policy, depending on how that policy is worded.