Consumer Financial Protection Bureau Announces Asset-size Threshold Adjustments Under HMDA and TILA

On December 31, 2018, the Consumer Financial Protection Bureau announced the asset-size exemption threshold adjustments for depository institutions under Regulation C and Regulation Z.

**Home Mortgage Disclosure Act (Regulation C)**

The HMDA exemption threshold increased to $46 million from $45 million. Therefore, credit unions with assets of $46 million or less as of Dec. 31, 2018, are exempt from collecting data in 2019.


**Truth in Lending Act (Regulation Z)**

The asset-size threshold increased from $2.112 billion to $2.167 billion in 2019 in connection with mortgage lending requirements. Therefore, creditors with assets of less than $2.167 billion (including assets of certain affiliates) as of Dec. 31, 2018, are exempt — if other requirements of Regulation Z are met — from establishing escrow accounts for higher-priced mortgage loans in 2019. The threshold increase also applies to credit unions that satisfy certain requirements for making small-creditor portfolio and balloon-payment originations qualified mortgages.


**Additional Information**

You can find additional information on HMDA and TILA on the NCUA’s Consumer Compliance Regulatory Resources page. If you have questions about this information, please contact the NCUA’s Office of Consumer Financial Protection at (703) 518-1140.