



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.

You can access the Regulation C notice at

https://www.federalregister.gov/documents/2019/01/31/2018-28373/home-mortgage-disclosure-regulation-c-adjustment-to-asset-size-exemption-threshold?utm_campaign=subscription%20mailing%20list&utm_source=federalregister.gov&utm_medium=email.

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.

You can access the Regulation Z notice at

https://www.federalregister.gov/documents/2019/02/04/2018-28374/truth-in-lending-act-regulation-z-adjustment-to-asset-size-exemption-threshold?utm_campaign=subscription%20mailing%20list&utm_source=federalregister.gov&utm_medium=email.

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



OFFICE OF
CONSUMER FINANCIAL
PROTECTION

Consumer Financial
Protection Update 19-02

January 15, 2019

or by email at ComplianceMail@ncua.gov. You can also contact your NCUA regional office or your state supervisory authority.