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To: Clients and Friends

From: David F. Dulock

Subject: Home Mortgage Disclosure (Regulation C) Asset-size Exemption Threshold Adjusted for Data Collection in 2020

In the December 20, 2019, issue of the *Federal Register* (84 FR 69993, [click here](#)) the Consumer Financial Protection Bureau published a final rule amending the official commentary that interprets the requirements of HMDA's Regulation C to reflect an increase in the asset-size exemption threshold for banks, savings associations, and credit unions for data collection in 2020. The exemption threshold is adjusted to increase to \$47 million from \$46 million. Therefore, banks, savings associations, and credit unions with assets of \$47 million or less as of December 31, 2019, are exempt from collecting HMDA data in 2020.

Please note, however, that this exemption from collecting data in 2020 does not affect the exempt depository financial institution's responsibility to report data it was required to collect in 2019.

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