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**To:** Clients and Friends

**From:** David F. Dulock

**Subject:** HMDA Asset-Size Exemption Threshold Increased for 2019 – Regulation C, Supplement I, Paragraph 1003.2-2(g)

In the January 31, 2019, issue of the *Federal Register* (Vol. 84, No. 513, [click here](#)) the Bureau of Consumer Financial Protection published a final rule amending the official staff commentary in Supplement I to Regulation C (12 CFR part 1003), which implements the Home Mortgage Disclosure Act, to reflect a change in the asset-size exemption threshold for banks, savings associations, and credit unions. The exemption threshold has been adjusted to increase to \$46 million from \$45 million. The adjustment is based on the 2.6 percent increase in the average of the CPI-W (*i.e.*, the Consumer Price Index for Urban Wage Earners and Clerical Workers) for the twelve-month period ending in November 2018. Therefore, banks, savings associations, and credit unions with assets of \$46 million or less as of December 31, 2018, are exempt from collecting data in 2019.

In supplement I to part 1003, under Section 1003.2—Definitions, 2(g) Financial Institution is revised to read in pertinent part as follows:

Supplement I to Part 1003—Official Interpretations

*Section 1003.2—Definitions.*

2(g) Financial Institution.

2. *Adjustment of exemption threshold for banks, savings associations, and credit unions.* For data collection in 2019, the asset-size exemption threshold is \$46 million. Banks, savings associations, and credit unions with assets at or below \$46 million as of December 31, 2018, are exempt from collecting data for 2019.

Be aware, however, that this exemption for banks, savings associations, and credit unions from collecting data in 2019 because of the above increase in the threshold exemption does not affect their responsibility to report data they were required to collect in 2018.

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