



8584 Katy Freeway, Suite 420

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Partners

Thomas E. Black, Jr.¹

Gregory S. Graham²

Shawn P. Black³

Regina M. Uhl⁴ ‡

Senior Lawyers

David F. Dulock

Diane M. Gleason

Associates

Peter B. Idziak³

Daniel S. Engle³

Nick Stevens

Syndy Davis

Margaret Noles

Ryan Black⁵

Of Counsel

David M. Tritter

Calvin C. Mann, Jr.

Retired Partner(s)

Calvin C. Mann, Jr.

¹ Also Licensed in Iowa, New York, and Washington

² Also Licensed in Georgia

³ Also Licensed in New York

⁴ Also Licensed in Kentucky and Illinois

‡ Board Certified- Residential Real Estate Law- Texas Board of Legal Specialization

⁵ Also Licensed in Washington D.C.

May 14, 2019

To: Clients and Friends

From: David F. Dulock

Subject: CFPB Proposed Rule to Amend HMDA Regulation C

In the May 13, 2019, *Federal Register* (84 FR 20972, [click here](#)) the Consumer Financial Protection Bureau (CFPB) published a proposed rule to amend Regulation C to: (i) propose two alternatives to increase the threshold for reporting data about closed-end mortgage loans so that institutions originating fewer than either 50 closed end mortgage loans, or alternatively 100 closed-end mortgage loans, in either of the two preceding calendar years would not have to report such data as of January 1, 2020; (ii) adjust the threshold for reporting data about open-end lines of credit by extending to January 1, 2022, the current temporary threshold of 500 open-end lines of credit and setting the threshold at 200 open-end lines of credit upon the expiration of the proposed extension of the temporary threshold; (iii) incorporate into Regulation C the interpretations and procedures from the interpretive and procedural rule that the CFPB issued on August 31, 2018¹; and (iv) implement further section 104(a) of the Economic Growth, Regulatory Relief, and Consumer Protection Act.

Comments on the proposed rule must be received on or before June 12, 2019, except that comments on the Paperwork Reduction Act analysis in part VIII of the Supplementary Information in the *Federal Register* (see page 21015) must be received on or before July 12, 2019.

Those readers wishing to do so may submit information and other comments, identified by Docket No. CFPB–2019–0021 or RIN 3170–AA76, by any of the following methods:

- *Federal eRulemaking Portal:* <http://www.regulations.gov>. Follow the instructions for submitting comments.
- *Email:* 2019-NPRMHMDAThresholds@cfpb.gov. Include Docket No. CFPB–2019–0021 or RIN 3170–AA76 in the subject line of the message.
- *Mail:* Comment Intake, Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20552.
- *Hand Delivery/Courier:* Comment Intake, Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20552.

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone, but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.

¹ September 7, 2018 *Federal Register* (83 FR 45325, [click here](#)); September 13, 2018 firm memo @ <https://www.bmandg.com/>