



9575 Katy Freeway, Suite 300

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Thomas E. Black, Jr., P. C. *

Calvin C. Mann, Jr., P. C.

Gregory S. Graham, P. C.

David F. Dulock

Diane M. Gleason

Benjamin R. Idziak **

Shawn P. Black **

Margaret A. Noles

Regina M. Uhl

Peter B. Idziak**

Of Counsel

David M. Tritter

* Also Licensed in New York, Washington,
West Virginia and Iowa

** Also Licensed in New York

December 31, 2012

To: Clients and Friends

From: David F. Dulock

Subject: Home Mortgage Disclosure Act (HMDA) Asset-size Exemption Raised For Data Collection in 2013

In the December 31, 2012, issue of the *Federal Register* (Vol. 77, Pages 76839 – 76840, click [here](#)) the Bureau of Consumer Financial Protection 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 2013. The exemption threshold is adjusted to increase to \$42 million from \$41 million. Therefore, banks, savings associations, and credit unions with assets of \$42 million or less as of December 31, 2012, are exempt from collecting HMDA data in 2013.

Please note, however, that this exemption from collecting data in 2013 does not affect a depository institution's responsibility to report data it was required to collect in 2012.

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.