



Last week, the CFPB amended the requirements of Regulation C (Home Mortgage Disclosure Act) to reflect the asset-size exemption threshold for banks. The exemption threshold is adjusted to \$48 million from \$47 million. Therefore, banks with assets of \$48 million or less as of December 31, 2020, are exempt from collecting HMDA data in 2021.

The CFPB also amended Regulation Z (Truth in Lending Act) to reflect a change in the asset-size threshold for certain creditors to qualify for an exemption to the requirement to establish an escrow account for a higher-priced mortgage loan. The exemption threshold is adjusted to \$2.230 billion from \$2.202 billion. Therefore, creditors with assets of less than \$2.230 billion (including assets of certain affiliates) as of December 31, 2020, are exempt, if other requirements of Regulation Z also are met, from establishing escrow accounts for higher-priced mortgage loans in 2021.

Both HMDA and TILA adjustments are effective January 1, 2021.

You can access the HMDA Final Rule [here](#).

You can access the TILA Final Rule [here](#).