



The CFPB has released the annual asset size exemption thresholds for depository institutions under Regulation C. Banks, savings associations, and credit unions with assets of \$50 million or less as of December 31, 2021, are exempt from collecting HMDA data in 2022.

The Bureau has also released the annual asset size exemption thresholds for certain creditors under the escrow requirements as well as the small creditor exemption from the prohibition against balloon-payment high-cost mortgages under Regulation Z. Creditors with assets of less than \$2.336 billion (including assets of certain affiliates) as of December 31, 2021, are exempt, if other requirements of Regulation Z also are met, from establishing escrow accounts for higher-priced mortgage loans in 2022. Insured depository institutions and insured credit unions that during the calendar year 2021 had assets of \$10.473 billion or less on December 31, 2021, will meet the asset-size exemption threshold for purposes of any loan consummated in 2022 and for purposes of any loan secured by a first lien on a principal dwelling of a consumer consummated in 2023 for which the application was received before April 1, 2023.

The above threshold changes are effective on January 1, 2022. Please reach out to CCI with any lending compliance-related questions.