

The CFPB has now confirmed the extended compliance deadlines for its Small Business Lending Data Collection rule by 290 days.

Compliance Tier	Original Compliance Date	New Compliance Date	First Filing Deadline
Tier 1 institutions (highest volume lenders)	October 1, 2024	July 18, 2025	June 1, 2026
Tier 2 institutions (moderate volume lenders)	April 1, 2025	January 16, 2026	June 1, 2027
Tier 3 institutions (smallest volume lenders)	January 1, 2026	October 18, 2026	June 1, 2027

To determine the Compliance Tier your institution will fall under, you may continue using the total number of small business originations from 2022 and 2023, or you can use total originations from 2023 and 2024.

The CFPB said that during the first year of examinations, they do not plan to penalize reporting errors found. As long as lenders engage in good faith compliance efforts, their plan will be to help find weaknesses and train lenders on the new requirements.

You can read the interim final rule <u>here.</u>

For any questions, you can reach out to us at inquiries@completecompli.com.