



Good day, lending staff! It's that time of year again. The CFPB has issued several annual inflation adjustment final rules. See all below!

Home Mortgage Disclosure (Regulation C) Adjustment to Asset-Size Exemption Threshold

The CFPB has issued a final rule to adjust the exemption threshold for HMDA reporting requirements to increase to \$58 million from \$56 million. Therefore, banks, savings associations, and credit unions with assets of \$58 million or less as of December 31, 2024, are exempt from collecting HMDA data in 2025. You can access the Regulation C notice [here](#). These adjustments are effective on January 1, 2025. If your bank is exempt from collecting and reporting HMDA data, we suggest documenting this annual exemption each year.

Truth in Lending Act (Regulation Z) Adjustment to Asset-Size Exemption Threshold

The CFPB has issued a final rule to adjust Regulation Z's escrow account exemption threshold to increase to \$2.717 billion from \$2.640 billion. Therefore, creditors with assets of less than \$2.717 billion (including assets of certain affiliates) as of December 31, 2024, are exempt, if other requirements of Regulation Z are also met, from establishing escrow accounts for higher-priced mortgage loans in 2025. You can access the Regulation Z notice [here](#). These adjustments are effective on January 1, 2025.

Civil Penalty Inflation Adjustments

The CFPB has issued a final rule to adjust the maximum amount of each civil penalty within their jurisdiction.

Law	Penalty Description	New Penalty Amount
Consumer Financial Protection Act, 12 U.S.C. 5565(c)(2)(A)	Tier 1 penalty	\$7,217
Consumer Financial Protection Act, 12 U.S.C. 5565(c)(2)(B)	Tier 2 penalty	\$36,083
Consumer Financial Protection Act, 12 U.S.C. 5565(c)(2)(C)	Tier 3 penalty	\$1,443,275
Interstate Land Sales Full Disclosure Act, 15 U.S.C. 1717a(a)(2)	Per violation	\$2,515
Interstate Land Sales Full Disclosure Act, 15 U.S.C. 1717a(a)(2)	Annual cap	\$2,513,215
Real Estate Settlement Procedures Act, 12 U.S.C. 2609(d)(1)	Per failure	\$118
Real Estate Settlement Procedures Act, 12 U.S.C. 2609(d)(1)	Annual cap	\$236,451
Real Estate Settlement Procedures Act, 12 U.S.C. 2609(d)(2)(A)	Per failure, where intentional	\$236
SAFE Act, 12 U.S.C. 5113(d)(2)	Per violation	\$36,439
Truth in Lending Act, 15 U.S.C. 1639e(k)(1)	First violation	\$14,435
Truth in Lending Act, 15 U.S.C. 1639e(k)(2)	Subsequent violations	\$28,866

You can access the final rule [here](#), effective January 15, 2025. When completing

your compliance risk assessment this year, we suggest considering these civil money penalty amounts.

CCI suggests sharing these final rules with your lending department, and as always, we are available for any questions at inquiries@completecompli.com.

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