



October 15, 2019

Office of Regulations
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Re: Home Mortgage Disclosure (Regulation C); Reopening of Comment Period; Docket No. CFPB-2019-0021; RIN 3170-AA76

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB or Bureau) re-opening of the comment period for its Notice of Proposed Rulemaking (NPRM) related to the transactional thresholds for reporting data pursuant to the Home Mortgage Disclosure Act's (HMDA) Regulation C.

MCUA recognizes that recent developments have led to some HMDA relief for the smallest mortgage lenders—including the current reporting thresholds and the S. 2155 partial exemption—however we urge the Bureau to make the following additional amendments to HMDA's transactional coverage thresholds to further relieve unnecessary regulatory burden for credit unions:

- Increase the closed-end mortgage loan threshold for required HMDA reporting to 500 loans in each of the prior two years. Barring the adoption of a 500-closed end mortgage loan threshold, the CFPB should finalize the proposed 100 loan threshold at a minimum to exempt credit unions with small mortgage lending portfolios from HMDA reporting.
- Allow the reporting of open-end lines of credit to once again be voluntary. HMDA reporting for these loans was voluntary prior to the 2015 HMDA Rule, as these loans are separately treated and distinctive from dwelling-secured mortgages.

The CFPB's proposal to increase the closed-end mortgage loan threshold from its current level of 25 to 100 loans would provide HMDA relief to many credit unions, HCUA recommends the Bureau go further and establish a threshold of 500 closed-end mortgage loans, which would reduce the regulatory costs associated with HMDA compliance.

With respect to open-end lines of credit, if the Bureau implements the proposed decrease in the open-end reporting threshold from 500 to 200 lines after the year 2022, as stated in its proposal we are concerned about the costs that could be incurred by affected credit unions and, instead, request the Bureau to make HMDA reporting voluntary for these products—as it was prior to the 2015 HMDA Rule. Barring a return to voluntary reporting, the CFPB should make permanent the current 500 open-end line threshold rather than reducing the threshold after a brief extension.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Bradley D. Douglas". The signature is written in a cursive, flowing style.

Brad Douglas
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