APPLICABILITY OF KEY REGULATORY RELIEF PROVISIONS OF BIPARTISAN SENATE BILL

PROVISIONS BY BANK SIZE

NO ASSET RESTRICTION
- **TRID Relief**: Removes three-day waiting period required under TILA-RESPA mortgage disclosure when creditor extends a second offer of credit with lower APR.
- **Appraisal Requirement Exemption**: Exemption for rural mortgage portfolio loans of less than $400,000 if unable to find a state-certified/licensed appraiser to perform the appraisal in a timely manner.
- **Reciprocal Deposits**: Certain reciprocal deposits will not be considered brokered deposits.
- **HMDA Exemption**: Exemptions from collecting the new Dodd-Frank Act data fields for banks that originate fewer than 500 closed-end mortgage loans or fewer than 500 open-end lines of credit.

BANKS $3 BILLION OR LESS
- **Fed’s Small BHC Policy**: Raises the Federal Reserve’s Small Bank Holding Company Policy Statement’s asset threshold from $1 billion to $3 billion.
- **Exam Cycle**: Well-managed, well-capitalized banks qualify for 18-month exam cycle, up from $1 billion.

BANKS UNDER $5 BILLION
- **Short-Form Call Report**: Agencies required to reduce reporting requirements for the first and third quarters for banks that meet appropriate criteria.

BANKS UNDER $10 BILLION
- **QM Relief**: Certain mortgage loans originated and retained in portfolio deemed to be qualified mortgages.
- **Escrow Requirement Exemption**: Exemption from TILA escrow requirement for banks that make 1,000 or fewer first lien mortgages on principal dwellings.
- **Capital Simplification**: Agencies to establish a tangible equity leverage ratio between 8-10 percent; banks exceeding the ratio meet risk-based capital and leverage requirements and are “well-capitalized.”
- **Volcker Rule Exemption**: Banks with total trading assets and liabilities not exceeding 5 percent of total assets exempt from the Volcker rule.

BANKS $10 BILLION-$50 BILLION
- **DFAST Eliminated**: These institutions no longer subject to mandatory Dodd-Frank Act stress testing.
• Risk Committees: These publicly held institutions no longer required to have a risk committee.

BANKS $50 BILLION-$100 BILLION
• DFA Prudential Standards: On enactment date, these institutions will be exempt from the Dodd-Frank enhanced prudential standards.

BANKS $100 BILLION-$250 BILLION
• DFA Prudential Standards: Eighteen months after date of enactment, these institutions will be exempt from the Dodd-Frank enhanced prudential standards, other than stress testing. However, the Fed will have the discretionary authority to apply the standards to these banks.

BANKS OVER $250 BILLION
• Treatment of Municipal Bonds in Liquidity Coverage Ratio: Agencies directed to classify investment-grade muni bonds as level 2B liquid assets under the LCR rule.

FEDERAL SAVINGS INSTITUTIONS; MUTUAL HOLDING COMPANIES
• Federal Savings Associations: Institutions with assets of $15 billion or less can elect to operate with national bank powers.

• Mutual Holding Company Dividend Waiver: To waive dividends of subsidiaries, mutual holding company members must have voted to do so in the prior 24, rather than 12, months.

OTHER
• Credit bureaus to provide consumers with one free freeze alert and one free unfreeze alert per year.
• Protections for certain bank employees who disclose the suspected exploitation of a senior citizen to a regulatory or law-enforcement agency.
• Treasury to study/report on the risks of cyber threats to financial institutions and the U.S. capital markets.
• Certain medical debts incurred by veterans excluded from consumer reporting under FCRA.
• Loans secured by 1- to 4-family dwelling, that is not the primary residence of a member, is not a member business loan under Federal Credit Union Act.
• Registered/licensed loan originators given temporary authority to act under SAFE Mortgage Licensing Act when changing employers.
• TILA amended to exclude as a “mortgage originator” an employee of a retailer of manufactured/modular homes who does not receive compensation from residential mortgage loan applications.
• The Protecting Tenants at Foreclosure Act (sunset in 2014) permanently restored.
• Real property retrofit (PACE) loans subject to consumer protections.
• Treasury Dept. authorized to use loan guarantees and credit enhancements to remediate lead and asbestos hazards in residential properties.
• Appraisal services donated by fee appraisers as charitable contributions will be “customary and reasonable” under TILA (Habitat for Humanity).
• Parity for exemption from state regulation given to any securities listed on any “national securities exchange.”
• Certain funds able to share the same name as their bank-affiliated investment adviser.