

CFPB Effective Dates & Confusion

With so much uncertainty surrounding the Consumer Financial Protection Bureau (CFPB), where does that leave us with certain rules that have been finalized, but may be either held up in litigation or subject to further legislative action? We've tried to summarize some rules that are on the horizon, with planned effective dates for the credit union to implement, as we know it at the time we are writing this article.

- **Effective March 30, 2025** – [CFPB Payday Lending Rule](#) – Credit unions that originate less than 2,500 covered loans in a calendar year are exempt from this rule. In addition, alternative loans that generally conform to the NCUA's requirements for the Payday Alternative Loan (PAL) program (701.21) are not considered covered loans under this rule. This original rule's effective date was in 2019 but has gone through several rounds of litigation resulting in numerous stays.
- **Effective June 15, 2025** – [CFPB Prohibition on Creditors and CRAs Concerning Medical Information](#) – Originally scheduled to be effective on March 17, 2025 the CFPB amended Regulation V which implements the Fair Credit Reporting Act prohibiting creditors from considering medical information in credit eligibility determinations. The effective date is currently stayed until June 15 pending further litigation.
- **Effective July 18, 2025** – [CFPB Small Business Lending](#) – When the original injunction was lifted, the CFPB set new mandatory compliance dates as identified in the table below. However, the rule is now being challenged at the 5th Circuit Court of Appeals. As of February 7, 2025, the plaintiffs and intervenors in the case (e.g., members of America's Credit Unions) are protected under another injunction. That injunction will be lifted once the 5th Circuit decides on the merits of the case.

Origination threshold for the compliance effective date	Date that a covered financial institution begins collecting data and otherwise complying with the final rule (Updated May 2024)	Deadline for a covered financial institution to report first year of data to the CFPB (Updated May 2024)
At least 2,500 covered originations in both 2022 and 2023	July 18, 2025	June 1, 2026
At least 500 covered originations in both 2022 and 2023 but not 2,500 or more covered originations in both 2022 and 2023	January 16, 2026	June 1, 2027
At least 100 covered originations in both 2022 and 2023 but not 500 or more covered originations in both 2022 and 2023	October 18, 2026	June 1, 2027

- Effective October 1, 2025** - [CFPB Overdraft Lending: Very Large Financial Institutions](#) - Lawsuit filed in federal district court challenging the rule. No updates from the court as of yet, and no injunction in place. The current effective date is October 1, 2025, although the CFPB filed a motion to delay the rule's effective date until December 30, 2025. In addition, the rule is subject to be overturned by Congress using the Congressional Review Act and resolutions have already been introduced in both houses of Congress to do so.
- Effective March 6, 2026** - [CFPB Residential Property Assessed Clean Energy \(PACE\) Financing](#) – although not currently available in all states, many states have active legislation to establish residential PACE financing programs. This rule prescribes ability-to-repay requirements and disclosure rules for PACE financing, which is financing to cover the cost of home improvements that result in a tax assessment on the real property of the consumer.
- Effective May 1, 2026** - [Personal Financial Data Rights](#) - Rule is currently stayed for 30 days to give the CFPB time to determine its path forward with the rule. First compliance dates begin May 1, 2026, for the largest financial institutions (\$250 billion or more in assets). This rule is also subject to be overturned by Congress using the Congressional Review Act.

Keep in mind, InfoSight has a Compliance Calendar that we try to keep up to date with all of these active changes. Any question, please don't hesitate to reach out to us at info@leagueinfosight.com.

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News and Alerts!

- [Hauptman Announces Changes to NCUA's Overdraft/NSF Fee Collection](#)
- [NCUA Chairman Kyle S. Hauptman Board Meeting Opening Remarks](#)
- [Welcome to National Consumer Protection Week \(NCPW\) 2025](#)



Questions, Comments, Concerns? We are here to help! Email us at info@leagueinfosight.com