

# HMDA

Webinar | February 2017



Consumer Financial  
Protection Bureau

*This document is current as of the date set forth on the document. It has not been updated to reflect the changes and clarifications set forth in the HMDA final rule issued on August 24, 2017. The Bureau will post an updated document when it is available.*

# CFPB HMDA Webinars

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1. Overview of the HMDA final rule and effective dates
- 2. Overview of identifiers, applications and data points**

# CFPB HMDA Webinars

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1. Overview of the HMDA final rule and effective dates

[http://www.consumerfinance.gov/policy-compliance/guidance/implementation-guidance/hmda-implementation/?utm\\_source=newsletter&utm\\_medium=email&utm\\_term=081716\\_a1&utm\\_campaign=RegImp](http://www.consumerfinance.gov/policy-compliance/guidance/implementation-guidance/hmda-implementation/?utm_source=newsletter&utm_medium=email&utm_term=081716_a1&utm_campaign=RegImp)

# Topics

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1. Identifiers
2. Applications or loans
3. Property and loan originator
4. Data points related to applicants and borrowers

# General Disclaimer

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- This presentation is not a substitute for the rule.
- While efforts have been made to ensure accuracy, only the rule and its official interpretations can provide complete and definitive information regarding requirements.
- We refer to the official interpretations generally as commentary or as individual comments.
- This presentation is current as of February 3, 2017.

# Identifiers

HMDA

# Legal Entity Identifier

---



Legal Entity  
Identifier

# Legal Entity Identifier

---



LEI



# Legal Entity Identifier

---



LEI

HMDA Data  
2018



Federal  
Agency

# Legal Entity Identifier

---



LEI

HMDA Data  
2018



Federal  
Agency

March 1, 2019

# Legal Entity Identifier

---

HMDA  
reporter's ID #

LEI

# Legal Entity Identifier

---

LEI

20 Digit Code

LEI Regulatory Oversight  
Committee

Global LEI Foundation

# Legal Entity Identifier

---

LEI

Global LEI Foundation

[www.gleif.org](http://www.gleif.org)

# LEI Implementation

---



LEI

# LEI Implementation

---



LEI

Universal  
Loan Identifier



ULI

# LEI Implementation

---





# LEI Implementation

---



Applications received

# LEI Implementation

---



Applications received

Covered loans it originates

# LEI Implementation

---



Applications received

Covered loans it originates

Purchased covered loans

# Universal Loan Identifier

---

ULI

All covered loans and applications

Reported on your HMDA submission

# Universal Loan Identifier

---

What is a ULI?

# Universal Loan Identifier

---

ULI

Identify

Retrieve

# Universal Loan Identifier

---

ULI

1

2

3

# Universal Loan Identifier

---

ULI

1

The Financial Institution's LEI

2

3



# Universal Loan Identifier

---

ULI

1

The Financial Institution's LEI

2

23 Characters For Identification

3

# Universal Loan Identifier

---

ULI

1

The Financial Institution's LEI

2

23 Characters For Identification

3

Check Digit

# Universal Loan Identifier

---

ULI

2

23 Characters For Identification

Unique

# Universal Loan Identifier

---

ULI

2

23 Characters For Identification

Unique

Assign only one

# Universal Loan Identifier

---

ULI

②

23 Characters For Identification

Unique

Assign only one

One Application

# Universal Loan Identifier

---

ULI

2

23 Characters For Identification

Unique

Assign only one

One Application

Contain no Identifying Information



# Universal Loan Identifier

---

ULI

2

23 Characters For Identification

Contain no Identifying Information



Name

Date of Birth

SS#

Driver's License

# Universal Loan Identifier

---

ULI

2

23 Characters For Identification

Contain no Identifying Information



Passport  
number

Alien  
Registration

Employer ID

Taxpayer ID



# Universal Loan Identifier

---

Purchased Covered  
Loan



ULI

# Universal Loan Identifier

---

Purchased Covered  
Loan



ULI

May not have been assigned by the institution  
who originated the loan

# Universal Loan Identifier

---

Purchased Covered  
Loan



ULI

May not have been assigned by the institution  
who originated the loan

3

Check Digit

# Universal Loan Identifier

---

ULI

1

The Financial Institution's LEI

2

23 Characters For Identification

3

Check Digit

# Property Identifier

---



Information about property  
location

# Property Identifier

---



Information about property  
location

Property address

# Property Identifier

---



Information about property location

Property address

Property located in MSA or MD in which the financial institution has a home or branch office

# Property Identifier

---



Information about property location

Property address

Property located in MSA or MD in which the financial institution has a home or branch office

Subject to Community Reinvestment Act



# Property Identifier

---



Information about property location

Property address

Property located in MSA or MD in which the financial institution has a home or branch office

Subject to Community Reinvestment Act

State, county, and census tract

# Property Identifier

---



Information about property location

State, county, and census tract

Census Tract – Population of 30,000 or more

# Property Identifier

---



Information about property location

State, county, and census tract

Census Tract – Population of 30,000 or more

2018 data collection



11 digit number with state, county, and census tract codes

# Property Identifier

---



Information about property  
location

# Property Identifier

---



Information about property  
location



Property taken as a security

# Property Identifier

---



Information about property location



Property taken as a security

# Property Identifier

---



Information about property location

If...



More than one property taken as a security

# Property Identifier

---



Information about property location

If...



More than one property taken as a security

Report property that contains a dwelling



# Property Identifier

---



Information about property  
location

If...

Application



Origination

# Property Identifier

---



Information about property location

If...

Application



Origination

Report property used to secure the loan

# Property Identifier

---



Information about property location

Report property proposed to secure the loan

Report physical location of property securing loan

# Property Identifier

---



Information about property location

Report property proposed to secure the loan

Report physical location of property securing loan

Information related to physical location

# Property Identifier

---



Information about property location

Report property proposed to secure the loan

Report physical location of property securing loan

Information related to physical location

Address

City

State Name

Zip code

# Property Identifier

---



Property Address

Address not known or provided

# Property Identifier

---



Property Address

Address not known or provided

Denied

# Property Identifier

---



Property Address

Address not known or provided

Denied

Withdrawn



# Property Identifier

---



Property Address

Address not known or provided

Denied

Withdrawn

Incomplete

# Property Identifier

---



Property Address

Address not known or provided

Denied

Withdrawn

Incomplete



Reports not applicable



# Mortgage Loan Originator Identifier

---



Report the mortgage loan  
originator's unique  
identifier

# Mortgage Loan Originator Identifier

---



Report the mortgage loan originator's unique identifier

Assigned by the Nationwide Mortgage Licensing System and Registry

# Mortgage Loan Originator Identifier

---



Report the mortgage loan originator's unique identifier



NMLSR ID

Assigned by the  
**Nationwide Mortgage  
Licensing System and  
Registry**

# Mortgage Loan Originator Identifier

---

NMLSR ID



Assigned to individuals

# Mortgage Loan Originator Identifier

---

NMLSR ID



Assigned to individuals

Registered

OR

Licensed

# Mortgage Loan Originator Identifier

---

NMLSR ID



Assigned to individuals

Registered

OR

Licensed

National Mortgage Licensing  
System and Registry



# Mortgage Loan Originator Identifier

---

If...



More than one mortgage loan originator

# Mortgage Loan Originator Identifier

---



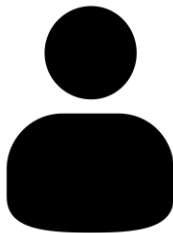
NMLSR ID

# Mortgage Loan Originator Identifier

---



NMLSR ID

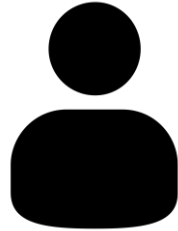


Primary responsibility  
for the transaction

# Mortgage Loan Originator Identifier

---

If...

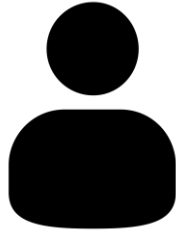


Mortgage loan originator

# Mortgage Loan Originator Identifier

---

If...



Mortgage loan originator

Assigned



OR

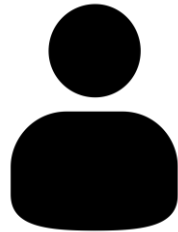
Required



# Mortgage Loan Originator Identifier

---

If...



Mortgage loan originator

Assigned



OR

Required

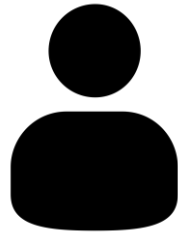


NMLSR ID

# Mortgage Loan Originator Identifier

---

If...



Mortgage loan originator

Assigned



OR

Required



NMLSR ID



=

Not applicable

# Applications

HMDA



# Preapproval Requests

---



# Preapproval Requests

---



Preapproval  
request



Applications  
under HMDA



Reportable

# Preapproval Requests

---



## Section 1003.4(a)(4)

Report if the application involves a request for preapproval of a home purchase loan under preapproval program.

# Preapproval Requests

---



Section 1003.2(b)

An application that contains a request for a preapproval

# Preapproval Requests

---



Section 1003.2(b)

An application that contains a request for a preapproval

Reviewed under a program with a comprehensive analysis of creditworthiness

# Preapproval Requests

---



Section 1003.2(b)

An application that contains a request for a preapproval

Reviewed under a program with a comprehensive analysis of creditworthiness

Issues a written commitment to the applicant

# Preapproval Requests

---



Section 1003.2(b)

Issues a written commitment to the applicant

May not be subject to conditions other than

# Preapproval Requests

---



Section 1003.2(b)

Issues a written commitment to the applicant

May not be subject to conditions other than

Suitable property



# Preapproval Requests

---



Section 1003.2(b)

Issues a written commitment to the applicant

May not be subject to conditions other than

Suitable property

No material change in  
creditworthiness

# Preapproval Requests

---



Section 1003.2(b)

Issues a written commitment to the applicant

May not be subject to conditions other than

Suitable property

No material change in  
creditworthiness or  
financial condition

# Preapproval Requests

---



Section 1003.2(b)

Issues a written commitment to the applicant

May not be subject to conditions other than

Suitable property

No material change in  
creditworthiness or  
financial condition

Limited conditions

# Preapproval Requests

---

IF...



# Preapproval Requests

---

Section 1003.4(a)(4)

IF...

Application

Covered Loan



Request under  
a preapproval  
program



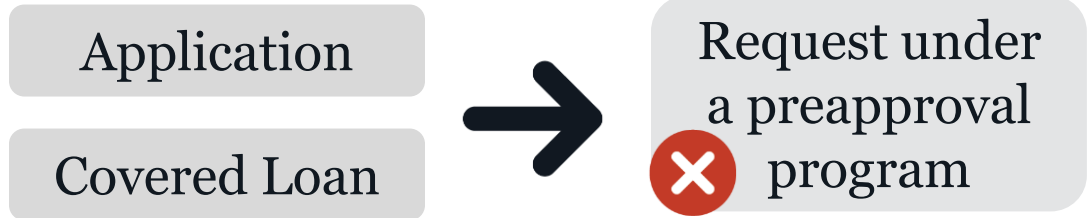
Preapproval  
request



# Preapproval Requests

---

IF...



# Preapproval Requests

---

IF...



Application

Covered Loan



Request under  
a preapproval  
program



Application

Covered Loan



Preapproval request  
(regardless whether  
there is a program and  
the applicant did not  
apply through that  
program or the  
institution does not  
have a program)



# Preapproval Requests

---

Transactions



Application

Covered Loan



Preapproval  
request



# Preapproval Requests

---

Transactions

Application

Covered Loan



Preapproval  
request

# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

② Open-end line of credit

# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

④ Denied application

# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

④ Denied application


⑤ Closed for incompleteness

# Preapproval Requests

---

Transactions



Preapproval  
 request

① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

④ Denied application

⑤ Closed for incompleteness


⑥ Withdrawn application

# Preapproval Requests

---

Transactions



Preapproval  
 request

① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

④ Denied application

⑤ Closed for incompleteness

⑥ Withdrawn application

⑦ Application for other purposes



# Preapproval Requests

---

Transactions



Preapproval  
request



① Purchased covered loan

② Open-end line of credit

③ Reverse mortgage

④ Denied application

⑤ Closed for incompleteness

⑥ Withdrawn application

⑦ Application for other purposes

⑧ Covered loan for multi-family dwelling

# Preapproval Requests

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=

Current HMDA reporters

# Preapproval Requests

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=

Current HMDA reporters

Report  
a preapproval  
not requested

Distinction

Report  
requirement  
not applicable

# Preapproval Requests

---



Final HMDA Rule

Report  
a preapproval  
not requested

Distinction

Report  
requirement  
not applicable

# Preapproval Requests

---



Final HMDA Rule

Report  
a preapproval  
not requested

Report  
requirement  
not applicable

Application

Covered Loan



Request under  
a preapproval  
program



# Preapproval Requests

---



Final HMDA Rule

Report  
a preapproval  
not requested



Report  
requirement  
not applicable

Application

Covered Loan



Request under  
a preapproval  
program



# Application Date

---

① Application date

② Action taken date

# Application Date

---



Section 1003.4(a)(1)(ii)

Date application  
received

Date shown on  
application



# Application Date

---



Section 1003.4(a)(1)(ii)

Date application  
received

Date shown on  
application

Application

=

Oral or written request for a covered loan that is made with procedures used by a financial institution for the credit requested

# Application Date

---



Section 1003.4(a)(1)(ii)

Application  
Date

Required for all loans and applications



# Application Date

---



Section 1003.4(a)(1)(ii)

Application  
Date

Required for all loans and applications



Purchased covered loans



# Application Date

---



Comment 4(a)(1)(ii)

Date application  
received

OR

Date shown on  
application

# Application Date

---



Comment 4(a)(1)(ii)

Date application  
received

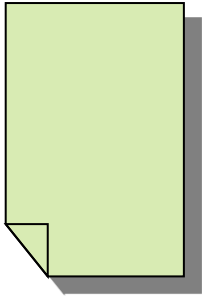
OR

Date shown on  
application

Generally be consistent

# Application Date

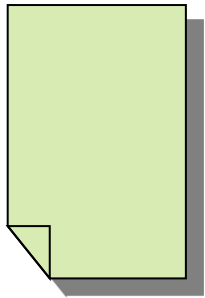
---



Not submitted directly to  
the financial institution

# Application Date

---



Not submitted directly to  
the financial institution

Date the application  
was received



Date received by  
financial institution

Date shown on the  
application form

# Action Taken Date

---



Section 1003.4(a)(8)(ii)

1 Application date

2 Action taken date



# Action Taken Date

---



Comment 4(a)(8)(ii)

Loan  
originations

# Action Taken Date

---



Comment 4(a)(8)(ii)

Date of closing or  
account opening

Loan  
originations

# Action Taken Date

---



Comment 4(a)(8)(ii)

Funds disbursed  
later than closing  
or account  
opening

# Action Taken Date

---



Comment 4(a)(8)(ii)

Funds disbursed  
later than closing  
or account  
opening

Date funds  
disbursed

# Action Taken Date

---



Comment 4(a)(8)(ii)

Acquires  
application  
from another  
party

# Action Taken Date

---



Comment 4(a)(8)(ii)

Date of closing or  
account opening

Acquires  
application  
from another  
party

# Action Taken Date

---



Comment 4(a)(8)(ii)

Date of closing or  
account opening

Date acquired from  
third party

Acquires  
application  
from another  
party

# Action Taken Date

---



Comment 4(a)(8)(ii)

Construction to  
permanent  
covered loans



# Action Taken Date

---



Comment 1003.4(a)(8)(ii)

Date of closing or  
account opening

Construction to  
permanent  
covered loans

# Action Taken Date

---



Comment 1003.4(a)(8)(ii)

Date of closing or  
account opening

Construction to  
permanent  
covered loans

Date the covered  
loan converts to  
permanent  
financing

# Action Taken Date

---



Comment 4(a)(8)(ii)

Withdrawn  
applications

# Action Taken Date

---



Comment 4(a)(8)(ii)

Withdrawn  
applications

Date express  
withdrawal received

# Action Taken Date

---



Comment 4(a)(8)(ii)

Withdrawn  
applications

Date express  
withdrawal received

Date shown on the  
notification form

# Action Taken Date

---



Comment 4(a)(8)(ii)

Date action taken  
was taken

Denied  
applications  
and files closed  
for  
incompleteness

# Action Taken Date

---



Comment 4(a)(8)(ii)

Date action was  
taken

Denied  
applications  
and files closed  
for  
incompleteness

Date notice was  
sent to applicant

# Action Taken Date

---



Comment 4(a)(8)(ii)

Covered loan  
purchased by  
the financial  
institution



# Action Taken Date

---



Comment 4(a)(8)(ii)

Covered loan  
purchased by  
the financial  
institution

Date of the  
purchase

# Ethnicity, Race, and Sex

---



Section 1003.4(a)(10)(i)

# Ethnicity, Race, and Sex

---



Section 1003.4(a)(10)(i)

Ethnicity

Race

Sex

# Ethnicity, Race, and Sex

---



Section 1003.4(a)(10)(i)

Ethnicity

Race

Sex

Visual  
observation

OR

Surname

# Ethnicity, Race, and Sex

---



Appendix B

Ethnicity

Race

Sex

Questions

# Ethnicity, Race, and Sex

---



## Appendix B

Ethnicity

Race

Sex

## Questions

Loan  
application  
forms

OR

Separate form  
that refers to  
application

# Ethnicity, Race, and Sex

---



Ethnicity

Race

Sex

Questions

Loan  
application  
forms

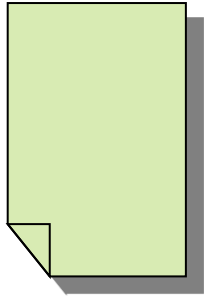
OR

Separate form  
that refers to  
application

Appendix B 2015 HMDA Rule – Sample form

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet



# Ethnicity, Race, and Sex

---



Ethnicity

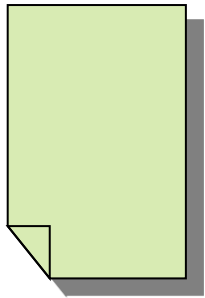
Race

Sex

Must ask but cannot require applicant to provide it

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

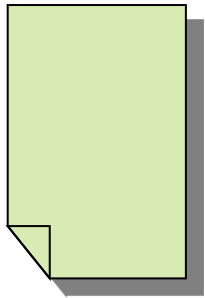
Phone

Internet

Information must be stated orally

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Information must be stated orally

Appendix B 2015 HMDA Rule – Sample form

# Ethnicity, Race, and Sex

---



Federal law requires

Ethnicity

Race

Sex

Collected to protect consumers

# Ethnicity, Race, and Sex

---



Federal law requires

Ethnicity

Race

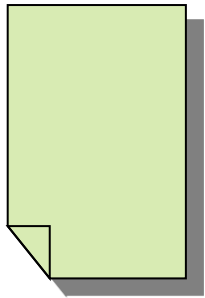
Sex

Collected to protect consumers

Prohibit discrimination on these bases

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Does not provide the information

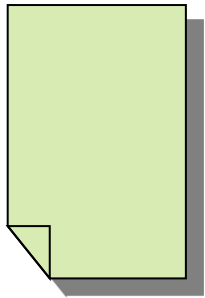
Visual  
observation

OR

Surname

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Declines to answer these questions

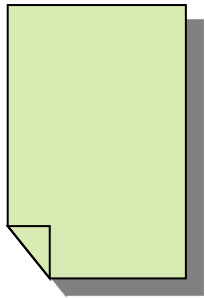
Ethnicity

Race

Sex

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Declines to answer these questions

Ethnicity

Race

Sex

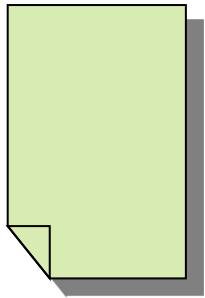


“I do not wish to provide this information”



# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Declines to provide the information

Ethnicity

Race

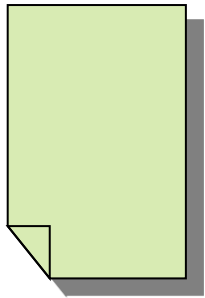
Sex

OR

He or she does not wish to provide information

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

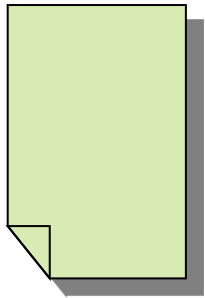
Internet



“Information not provided by applicant in mail, internet, or telephone application”

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Does not provide the information

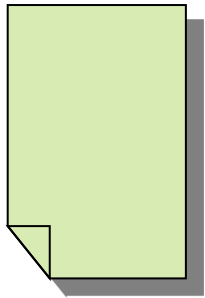
Ethnicity

Race

Sex

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Does not provide the information

Ethnicity

Race

Sex

But...



“I do not wish to provide this information”

# Ethnicity, Race, and Sex

---



Applicant

Phone

Mail

Internet

**1** Does not provide the information

**2** Does not check the box “I do not wish to provide this information”

In person

# Ethnicity, Race, and Sex

---



Applicant

Phone

Mail

Internet

**1** Does not provide the information

**2** Does not check the box “I do not wish to provide this information”

In person

**3** Request ethnicity, race, and sex

# Ethnicity, Race, and Sex

---



Applicant

In person

Mail

OR

Phone

Internet

Does not provide the information

# Ethnicity, Race, and Sex

---



Applicant

In person

Mail

OR

Phone

Internet

Does not provide the information

Visual  
observation

OR

Surname



# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Occurs after application process is complete

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Occurs after application process is complete

Ethnicity

Race

Sex



# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Provides some information

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

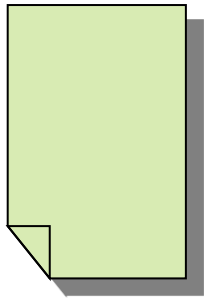
Provides some information

Reports information provided



# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Provides some or all information

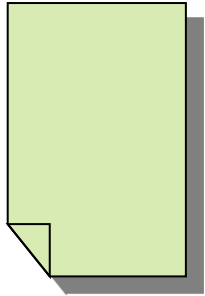
BUT



“I do not wish to provide this information”

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet



Reports information provided by the applicant

# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Does not provide information

# Ethnicity, Race, and Sex

---



Application

In person

Mail

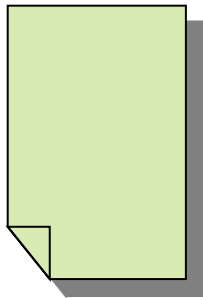
OR

Phone

Internet

Does not provide information

Note this on the collection form





# Ethnicity, Race, and Sex

---



Application

In person

Mail

OR

Phone

Internet

Does not provide information

Visual  
observation

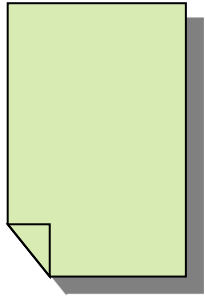
OR

Surname



# Ethnicity, Race, and Sex

---



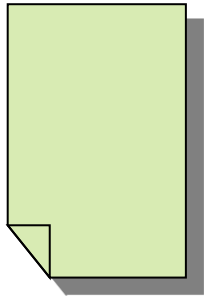
Electronic media with  
video component



In person

# Ethnicity, Race, and Sex

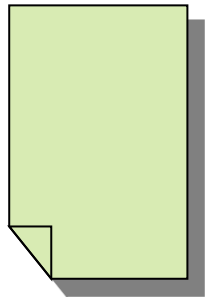
---



Electronic media with  
video component



In person



Electronic media  
without video  
component

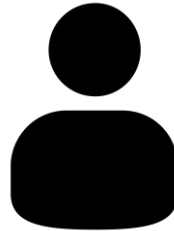


Mail

# Ethnicity, Race, and Sex

---

Applicant

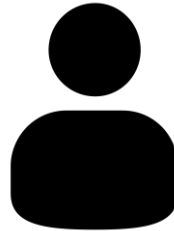


Option to select more than one ethnicity or race

# Ethnicity, Race, and Sex

---

Applicant



Hispanic ✓

Asian ✓

White ✓

# Ethnicity, Race, and Sex

---

Ethnicity

Hispanic or  
Latino

AND

Not Hispanic or  
Latino

# Ethnicity, Race, and Sex

---

Ethnicity

Hispanic or  
Latino

AND

Not Hispanic or  
Latino

**1** Mexican

**2** Puerto Rican

**3** Cuban

**4** Other Hispanic or Latino

# Ethnicity, Race, and Sex

---



Ethnicity category

Ethnicity subcategory



# Ethnicity, Race, and Sex

---

Ethnicity

Hispanic or  
Latino

OR

Not Hispanic or  
Latino

**1** Mexican

**2** Puerto Rican

**3** Cuban

**4** Other Hispanic or Latino



Ethnicity  
subcategory  
not listed

# Ethnicity, Race, and Sex

---



Other Hispanic or Latino

Additional information  
provided by the applicant

# Ethnicity, Race, and Sex

---

## Race

American Indian  
or Alaska Native

Asian

Black or African  
American

Native Hawaiian  
or Other Pacific  
Islander

White

# Ethnicity, Race, and Sex

---

## Race

American Indian  
or Alaska Native

Asian

Black or African  
American

Native Hawaiian  
or Other Pacific  
Islander

White

# Ethnicity, Race, and Sex

---

Race

Asian

Asian Indian

Chinese

Filipino

Japanese

Korean

Vietnamese

Other Asian

# Ethnicity, Race, and Sex

---

## Race

American Indian  
or Alaska Native

Asian

Black or African  
American

Native Hawaiian  
or Other Pacific  
Islander

White

# Ethnicity, Race, and Sex

---

Race

Native Hawaiian  
or Other Pacific  
Islander

Native Hawaiian

Samoaan

Guamanian or Chamorro

Other Pacific Islander

# Ethnicity, Race, and Sex

---



Race category



# Ethnicity, Race, and Sex

---



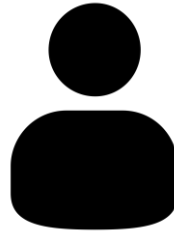
Race category

Race subcategory

# Ethnicity, Race, and Sex

---

Applicant



Other Asian or Other Pacific  
Islander



Ethnicity  
subcategory  
not listed

# Ethnicity, Race, and Sex

---



Report selection as applicable up to  
five-race maximum

Other Asian ✓

Other Pacific  
Islander ✓

Additional information provided by the  
applicant

# Ethnicity, Race, and Sex

---



No co-applicant



Report  
no co-applicant

# Ethnicity, Race, and Sex

---



More than one co-applicant

Ethnicity

Race

Sex

First co-applicant on application form

# Ethnicity, Race, and Sex

---



When do you **not** report?

Ethnicity

Race

Sex

# Ethnicity, Race, and Sex

---



When do you **not** report?

Ethnicity 

Race 

Sex 

Applicants or borrowers who are not natural persons

# Ethnicity, Race, and Sex

---



When do you **not** report?

Ethnicity ❌

Race ❌

Sex ❌

Applicants or borrowers who are not natural persons

Corporation

Partnership

Trust



# Ethnicity, Race, and Sex

---



When do you **not** report?

Ethnicity 

Race 

Sex 

Applicants or borrowers who are not natural persons

Corporation

Partnership

Trust

If covered loan of application includes a guarantor

# Ethnicity, Race, and Sex

---



When do you **not** report?

Ethnicity 

Race 

Sex 

Purchased covered loans

Not applicable if financial institution chooses  
not to report

# Ethnicity, Race, and Sex

---



Detailed requirements

Ethnicity

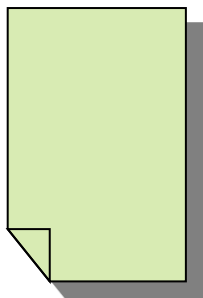
Race

Sex

Appendix B 2015 HMDA Rule – Final rule

# Ethnicity, Race, and Sex

---



Comment 4(a)(10)(i)

Received prior  
to  
January 1, 2018

AND

Final action on  
application  
occurs on or  
after  
January 1, 2018

# Ethnicity, Race, and Sex

---



Collects

Ethnicity

Race

Sex

In accordance with the requirements at the  
time the information was collected

# Ethnicity, Race, and Sex

---

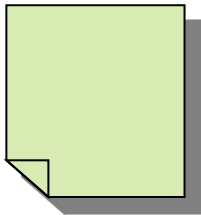
**December 1, 2017**

January 1, 2018

---



Application  
received



# Ethnicity, Race, and Sex

---

December 1, 2017

**January 1, 2018**



Final action  
taken

# Ethnicity, Race, and Sex

December 1, 2017

January 1, 2018

Final action  
taken



Collects

Ethnicity

Race

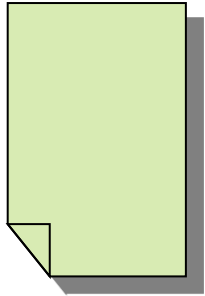
Sex

In accordance with the requirements in effect  
on December 1, 2017



# Ethnicity, Race, and Sex

---



Regulation C

Ethnicity

Race

Applications received in 2017

# Ethnicity, Race, and Sex

---



Collects

Ethnicity

Race

Sex

In accordance with the requirements at the  
time the information was collected

# Ethnicity, Race, and Sex

---

Approval  
notice

January 1, 2017

December 31, 2017

# Ethnicity, Race, and Sex

---

Approval  
notice

January 1, 2017

December 31, 2017

Permit applicants to self-identify

Disaggregated ethnic and racial categories

Appendix B 2015 HMDA Rule – Final rule

# Ethnicity, Race, and Sex

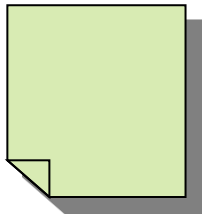
---

2017

2018



Application  
received



# Ethnicity, Race, and Sex

---

2017

2018



Final action  
taken

# Ethnicity, Race, and Sex

---

2017

2018

Final action  
taken



Report

Ethnicity

Race

Using aggregate codes listed in the Bureau's filing instructions guide for data collected in 2017

# Ethnicity, Race, and Sex

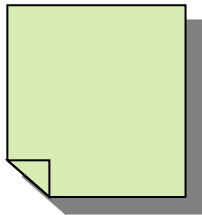
---

2017

2018



Application  
received





# Ethnicity, Race, and Sex

---

2017

2018



Final action  
taken

# Ethnicity, Race, and Sex

---

2017

2018



Final action  
taken



Report

Ethnicity

Race

Using the disaggregated categories

# Ethnicity, Race, and Sex

---

2017

2018



Final action  
taken



Report

Ethnicity

Race

Transition rule in comment 4(a)(10)(i)-2

# Ethnicity, Race, and Sex

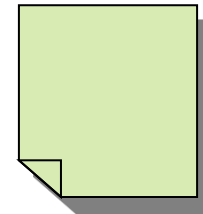
---

2017

2018



Application  
received



# Ethnicity, Race, and Sex

2017

2018



Final action  
taken



Report

Ethnicity

Race

Using the disaggregated categories

# Ethnicity, Race, and Sex

2017

2018



Final action  
taken



Report

Ethnicity

Race

Visual  
observation

OR

Surname

# Ethnicity, Race, and Sex

Effective January 1, 2017

## Collection and Reporting of HMDA Information about Ethnicity and Race

This chart summarizes the options available to financial institutions to collect and report HMDA race and ethnicity information.

[Current Regulation C](#), which implements HMDA, requires certain financial institutions to collect and report information about the ethnicity, race, and sex of applicants for mortgages. Regulation C, as amended by the [2015 HMDA Rule](#), will generally require financial institutions to permit applicants to self-identify using disaggregated ethnicity and race categories\* beginning January 1, 2018, but which provides a [transition rule](#) for applicant data collected prior to January 1, 2018 where final action is taken on or after January 1, 2018. However, because [Regulation B](#) generally prohibits creditors from asking for information about ethnicity and race unless authorized by law, including by Regulation C, the [Bureau Official Approval Notice](#) issued on September 23, 2016 allows creditors, at their option, at any time from January 1, 2017, through December 31, 2017, to permit applicants to self-identify using the disaggregated ethnicity and race categories\* provided in appendix B to Regulation C, as amended by the 2015 HMDA final rule.

Application Year	Final Action Year	Ethnicity and Race Collection and Reporting Requirements	Regulatory References
2017	2017	Collect aggregate and report aggregate, OR	<a href="#">Current Regulation C</a> (12 CFR part 1003, appendices A and B)
		Collect disaggregated and report aggregate	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930)
2017	2018	Collect aggregate and report aggregate, OR	<a href="#">Current Regulation C</a> (12 CFR part 1003, appendices A and B) AND <a href="#">transition rule</a> (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
		Collect disaggregated and report aggregate, OR	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930) AND <a href="#">transition rule</a> (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
2018 and beyond	2018 and beyond	Collect disaggregated and report disaggregated	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930)
		Collect disaggregated and report disaggregated, AND Report whether ethnicity, race, and sex were collected on the basis of visual observation or surname**	<a href="#">2015 HMDA Rule</a> (80 FR 66127)

\*Only an applicant may self-identify using the disaggregated ethnicity and race categories. When a financial institution collects ethnicity, race, and sex on the basis of visual observation or surname for an application taken in person because the applicant chose not to provide the information, the financial institution must select from the aggregate categories.

\*\* Current Regulation C requires that the financial institution note the ethnicity, race, and sex on the basis of visual observation if the applicant chose not to furnish the information and the application was made in person, but the financial institution is not required to report that ethnicity, race, and sex were collected on the basis of visual observation.

This chart provides an overview of the ethnicity and race collection and reporting requirements under HMDA, Regulation C, and the Bureau's Official Approval Notice. It does not by itself establish any binding obligations. It is intended only to act as a reference and not as a substitute for the regulation or its official commentary. Always consult the regulation text and official commentary for a complete understanding of the law. Version 1.0, 1/30/2017



<http://www.consumerfinance.gov/policy-compliance/guidance/implementation-guidance/hmda-implementation/>



Application Year	Final Action Year	Ethnicity and Race Collection and Reporting Requirements	Regulatory References
2017	2017	Collect aggregate and report aggregate, OR	<a href="#">Current Regulation C</a> (12 CFR part 1003, appendices A and B)
		Collect disaggregated and report aggregate	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930)

Application Year	Final Action Year	Ethnicity and Race Collection and Reporting Requirements	Regulatory References
2017	2018	Collect aggregate and report aggregate, OR	<a href="#">Current Regulation C</a> (12 CFR part 1003, appendices A and B) AND <a href="#">transition rule</a> (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
		Collect disaggregated and report aggregate, OR	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930) AND <a href="#">transition rule</a> (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
		Collect disaggregated and report disaggregated	<a href="#">Bureau Official Approval Notice</a> (81 FR 66930)

Application Year	Final Action Year	Ethnicity and Race Collection and Reporting Requirements	Regulatory References
2018 and beyond	2018 and beyond	Collect disaggregated and report disaggregated, AND	
		Report whether ethnicity, race, and sex were collected on the basis of visual observation or surname**	<a href="#">2015 HMDA Rule</a> (80 FR 66127)

# HMDA

---

Age

Credit score

Income

Debt-to-income ratio



# Age

---



Section 1003.4(a)(10)(ii)

Report the applicant's age

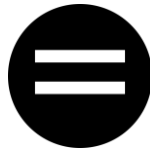
# Age

---



Comment 4(a)(10)(ii)

Age



# of whole years based  
on date of birth as of  
application date

# Age

---



Comment 4(a)(10)(ii)-2

If...



Co-applicant



Report no co-applicant

# Age

---



Comment 4(a)(10)(ii)-2

If...



Report age for first  
co-applicant on  
application form

More than one  
co-applicant

# Age

---



Comment 4(a)(10)(ii)

Reports Not Applicable for age

# Age

---



Comment 4(a)(10)(ii)

Reports Not Applicable for age

①

The covered loan was purchased and institution chose not to report age

# Age

---



Comment 4(a)(10)(ii)

Reports Not Applicable for age

- ① The covered loan was purchased and institution chose not to report age
- ② The applicant is not a natural person

Corporation

Partnership

Trust

# Age

---



Comment 4(a)(10)(ii)

Reports Not Applicable for age

- 1 The covered loan was purchased and institution chose not to report age
- 2 The applicant is not a natural person

Corporation

Partnership

Trust

Do not report guarantor's age



# Credit Score

---



Section 1003.4(a)(15)

Report the credit score(s) relied on in making credit decision

# Credit Score

---



Section 1003.4(a)(15)

Report the credit score(s) relied on in making credit decision

Report the name and version of the scoring model used for credit score

# Credit Score

---



Section 1003.4(a)(15)

Report the credit score(s) relied on in making credit decision

Report the name and version of the scoring model used for credit score

What does “relied on” mean?

# Credit Score

---



Comment 4(a)(15)-1

Relies on a credit scores in making the credit decision

If...

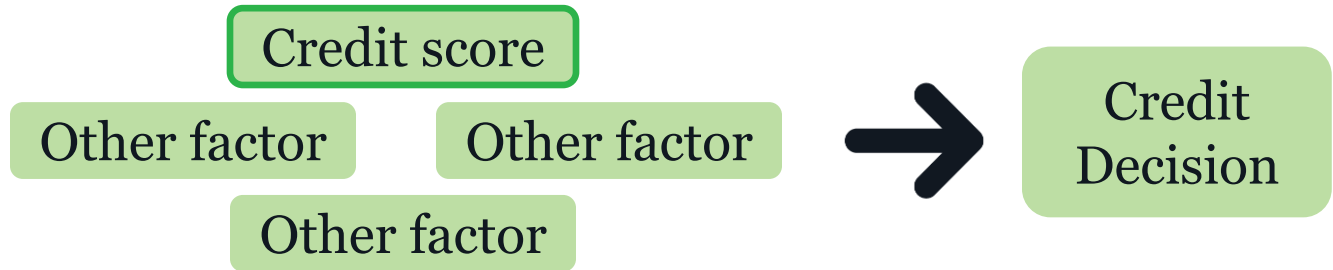
Credit score was a factor in the credit decision

Even if...

Credit score was not a dispositive factor

# Credit Score

---



# Credit Score

---



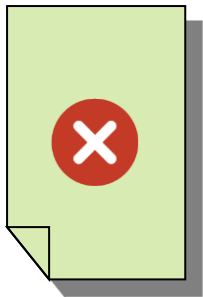
“Relied on” credit score to make credit decision

# Credit Score

---



“Relied on” credit score to make credit decision



Even if application denied due to underwriting factor other than credit score

# Credit Score

---



What happens if the financial institution obtains or creates two or more credit scores for a single applicant or borrower?



# Credit Score

---

Comment 4(a)(15)-2



Obtained two or more credit scores for a single applicant or borrower, but relied only on one score in making the credit decision



Reports credit score it “relied on” in making the credit decision and information about the scoring model used

# Credit Score

---



What happens if the financial institution obtains or creates two or more credit scores for a single applicant or borrower but relies on multiple credit scores in making the credit decision?

# Credit Score

---

Comment 4(a)(15)-2

Obtained two or more credit scores for a single applicant or borrower, but relied on multiple scores in making the credit decision



Report one of the credit score(s) relied on in making the credit decision

# Credit Score

---



In choosing which credit to report

Need not use the same approach for  
entire HMDA submission

But general consistency

# Credit Score

---



Report the name and version of the credit scoring model for the score reported

# Credit Score

---



What does a financial institution report if there are two or more applicants or borrowers for which it obtained or created a single credit score and it “relied on” it?

# Credit Score

---



Comment 4(a)(15)-3

Reports credit score for either applicant

OR

Reports credit score for first co-applicant

# Credit Score

---



Reports the credit score(s) for the applicant that it relied on in making credit decision, if any



# Credit Score

---



Reports the credit score(s) for the applicant that it relied on in making credit decision, if any

AND

the credit score for the first co-applicant that it relied on in making the credit decision, if any

# Credit Score

---



What circumstance would a financial institution report Not Applicable for credit score information?

# Credit Score

---

What circumstance would a financial institution report  
Not Applicable for credit score information?

1

File closed for incompleteness or withdrawn before credit decision, even if the financial institution obtained or created a credit score

# Credit Score

---

What circumstance would a financial institution report Not Applicable for credit score information?

- 1 File closed for incompleteness or withdrawn before credit decision, even if the financial institution obtained or created a credit score
- 2 Financial institution did not rely on a credit score

# Credit Score

---

What circumstance would a financial institution report Not Applicable for credit score information?

- 1 File closed for incompleteness or withdrawn before credit decision, even if the financial institution obtained or created a credit score
- 2 Financial institution did not rely on a credit score
- 3 Covered loan was purchased by financial institution

# Credit Score

---

What circumstance would a financial institution report  
Not Applicable for credit score information?

- 1 File closed for incompleteness or withdrawn before credit decision, even if the financial institution obtained or created a credit score
- 2 Financial institution did not rely on a credit score
- 3 Covered loan was purchased by financial institution
- 4 Applicant and co-applicant, if applicable, are not natural persons

# Income

---



Section 1003.4(a)(10)(iii)

Report the gross annual income  
relied on in making the credit decision

OR

If a credit decision was not made, the  
gross annual income relied on in  
processing the application

Report income to the nearest thousand

# Income

---



What does “relied on” mean?

Income evaluated as part of a credit decision

Report the gross annual income it  
relied on in making the credit decision



# Income

---



“Relies on” applicant’s salary and bonus  
for creditworthiness

# Income

---



“Relies on” applicant’s salary and bonus  
for creditworthiness



Report the salary and bonus

# Income

---



“Relies on” a portion of the gross annual income for credit decision

# Income

---



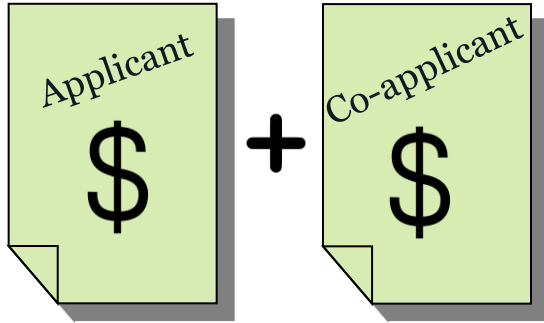
“Relies on” a portion of the gross annual income for credit decision



Report only the portion of the income “relied on”

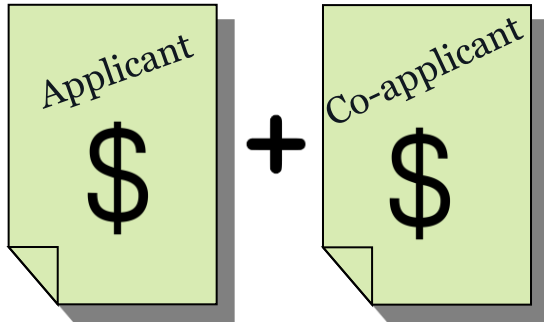
# Income

---



# Income

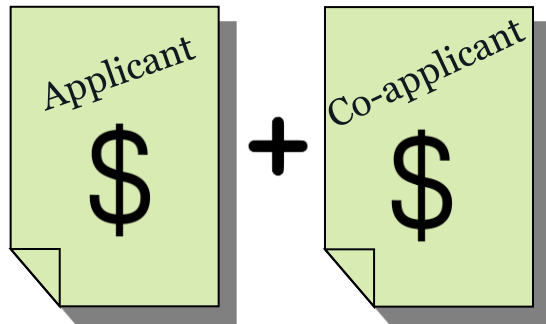
---



“Relies on” only one of the incomes for creditworthiness

# Income

---



“Relies on” only one of the incomes for creditworthiness



Report only the income “relied on”

# Income

---



What if an application is withdrawn before a credit decision?



# Income

---



Report the income “relied on” in processing the application at the time the application was withdrawn or file closed for incompleteness


# Income

---



 Does not include amount in addition to income



 Annuitized assets or depletion of applicant's remaining assets

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

1

Income is not required to be considered

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

1

Income is not required to be considered

2

The applicant or co-applicant is not a natural person

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

① Income is not required to be considered

② The applicant or co-applicant is not a natural person

Corporation

Partnership

Trust

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

1 Income is not required to be considered

2 The applicant or co-applicant is not a natural person

Corporation

Partnership

Trust

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

3

Covered loan or application is secured by a multifamily dwelling



# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

③

Covered loan or application is secured by a multifamily dwelling

④

Covered loan is a purchased loan and the financial institution chose not to report income

# Income

---



Comment 4(a)(10)(iii)

Reports “Not Applicable” for the income data point

③

Covered loan or application is secured by a multifamily dwelling

④

Covered loan is a purchased loan and the financial institution chose not to report income

⑤

Applicant or borrower is the financial institution’s employee

# Debt-to-Income Ratio (DTI)

---



Section 1003.4(a)(23)

Report the DTI of the applicant or borrower if “relied on” in making credit decision

# Debt-to-Income Ratio (DTI)

---

DTI



$$\frac{\text{Total monthly debt}}{\text{Total monthly income}}$$

# Debt-to-Income Ratio (DTI)

---



Comment 4(a)(23)

“Relies on” the applicants DTI in making credit decision if it was a factor in credit decision

Even if...

It was not a dispositive factor

# Debt-to-Income Ratio (DTI)

---

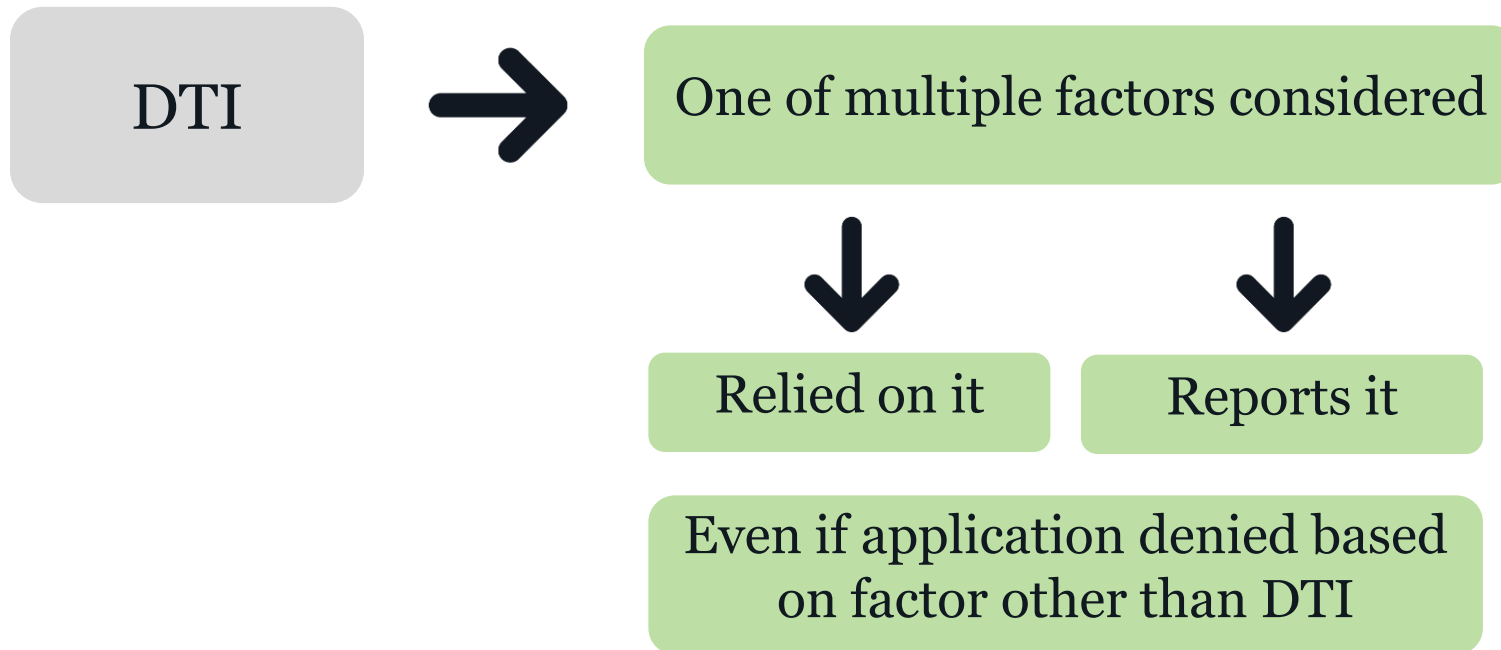
DTI



One of multiple factors considered

# Debt-to-Income Ratio (DTI)

---



# Debt-to-Income Ratio (DTI)

---



Section 1003.4(a)(23)

Reports “Not Applicable” for DTI



# Debt-to-Income Ratio (DTI)

---



Comment 4(a)(23)

Reports “Not Applicable” for DTI

① Credit decision was made without relying on DTI

# Debt-to-Income Ratio (DTI)

---



Comment 4(a)(23)

Reports “Not Applicable” for DTI

- 1 Credit decision was made without relying on DTI
- 2 File closed for incompleteness or application withdrawn before credit decision, even if DTI was calculated

# Debt-to-Income Ratio (DTI)

---



Comment 4(a)(23)

Reports “Not Applicable” for DTI

- 1 Credit decision was made without relying on DTI
- 2 File closed for incompleteness or application withdrawn before credit decision, even if DTI was calculated
- 3 The applicant and co-applicant, if applicable, are not natural persons

# Debt-to-Income Ratio (DTI)

---



Comment 4(a)(23)

Reports “Not Applicable” for DTI

4

The covered loan or application  
is secured by a multifamily dwelling

# Debt-to-Income Ratio (DTI)

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Comment 4(a)(23)

Reports “Not Applicable” for DTI

④

The covered loan or application is secured by a multifamily dwelling

⑤

The covered loan is a purchased loan

# HMDA

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Combined loan-to-value ratio

Application channel

# Combined Loan-to-Value Ratio (CLTV)

---



Section 1003.4(a)(24)

Report the ratio of the total amount of debt secured by the property to the value of the property relied on in making the credit decision.

# Combined Loan-to-Value Ratio (CLTV)

---

CLTV



Total amount of debt secured by  
property  
-----  
Value of the property



CLTV “relied on” in making  
credit decision



# Combined Loan-to-Value Ratio (CLTV)

---



Comment 4(a)(24)

“Relies on” the CLTV in making credit decision if the CLTV was a factor in credit decision

Even if...

It was not a dispositive factor

# Combined Loan-to-Value Ratio (CLTV)

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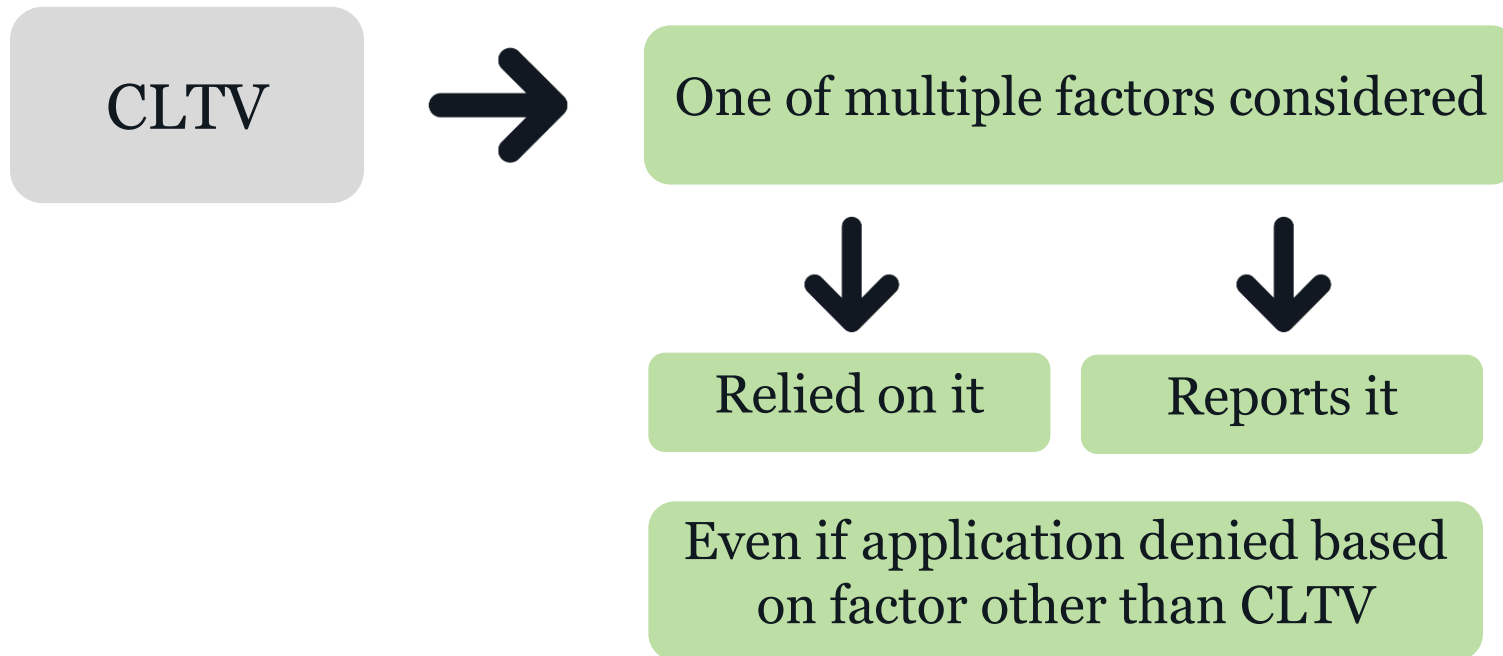
CLTV



One of multiple factors considered

# Combined Loan-to-Value Ratio (CLTV)

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# Combined Loan-to-Value Ratio (CLTV)

---



Comment 4(a)(24)

Reports “Not Applicable” for CLTV

# Combined Loan-to-Value Ratio (CLTV)

---



Comment 4(a)(24)

Reports “Not Applicable” for CLTV

1 Credit decision was made without relying on CLTV

# Combined Loan-to-Value Ratio (CLTV)

---



Comment 4(a)(24)

Reports “Not Applicable” for CLTV

- 1 Credit decision was made without relying on CLTV
- 2 File closed for incompleteness or application withdrawn before credit decision, even if CLTV was calculated

# Combined Loan-to-Value Ratio (CLTV)

---



Comment 4(a)(24)

Reports “Not Applicable” for CLTV

- ① Credit decision was made without relying on CLTV
- ② File closed for incompleteness or application withdrawn before credit decision, even if CLTV was calculated
- ③ The covered loan is a purchased loan

# Application Channel

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Section 4(a)(33)(i) and (ii)



# Application Channel

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Section 4(a)(33)(i) and (ii)

Report if application was submitted directly to the financial institution

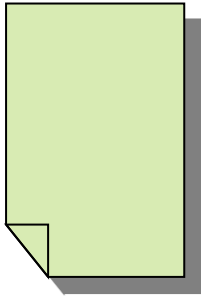
AND

Report whether the obligation was or would have been initially payable to the financial institution

# Application Channel

---

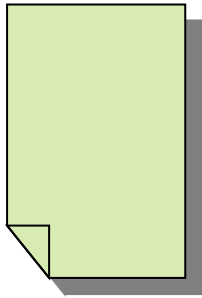
## Scenario 1



# Application Channel

---

## Scenario 1

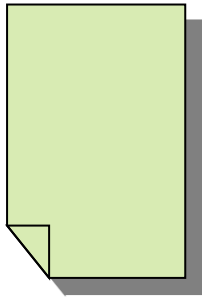


IF

# Application Channel

---

## Scenario 1



IF

Mortgage loan originator was employee of financial institution at the time activities were performed

# Application Channel

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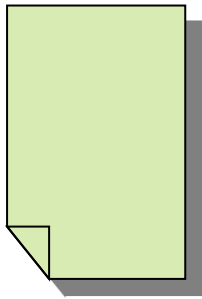
## Scenario 2



# Application Channel

---

## Scenario 2



IF

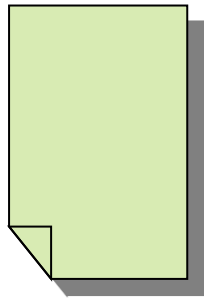


Directed  
applicant to  
third-party agent

# Application Channel

---

## Scenario 2



IF



Performed activities on behalf of the financial institution and did not assist applicant with applying with other institutions

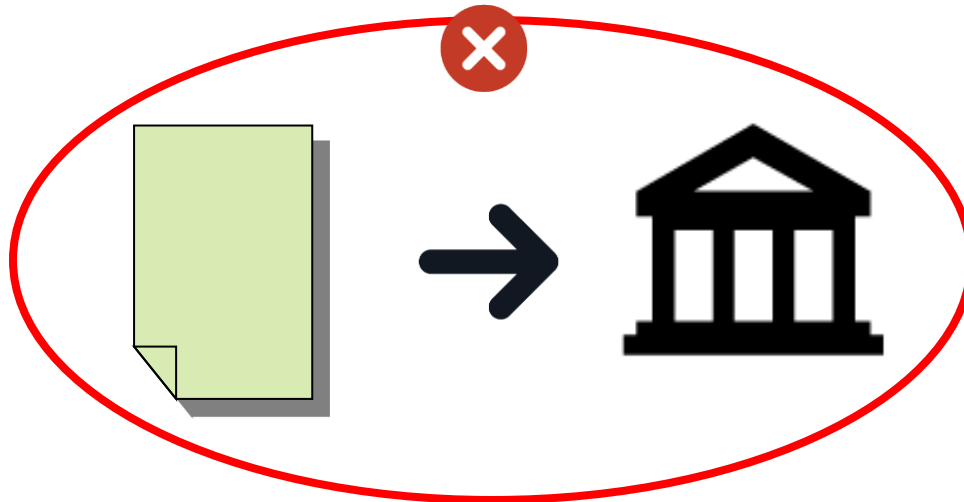
Directed applicant to third-party agent

# Application Channel

---



When is an application not submitted directly to the institution?

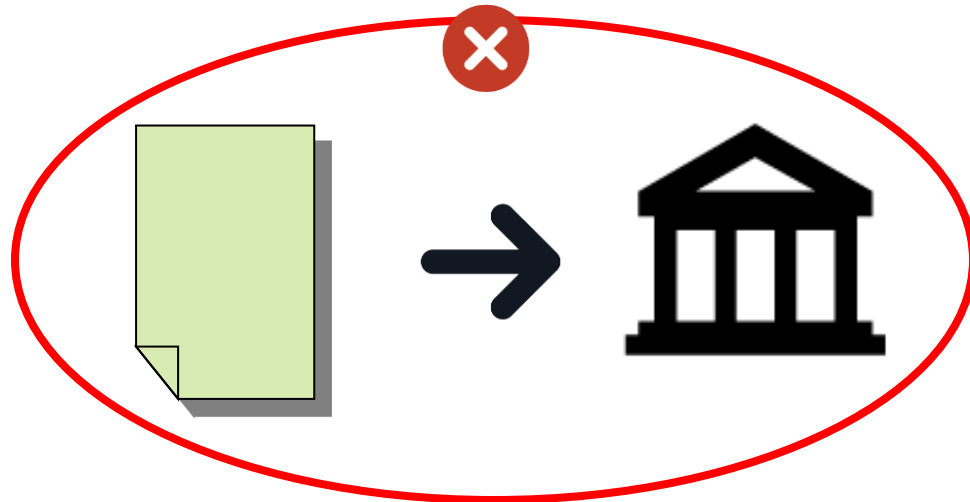




# Application Channel

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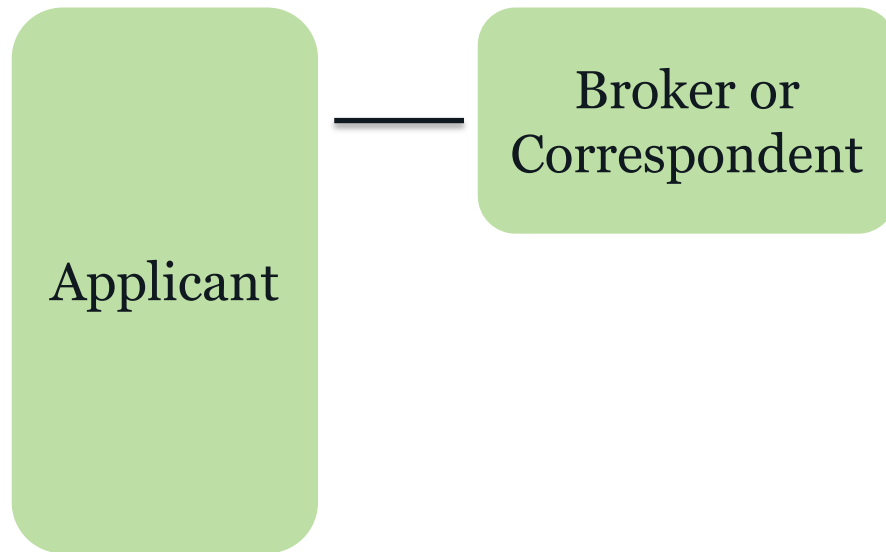
## Example



# Application Channel

---

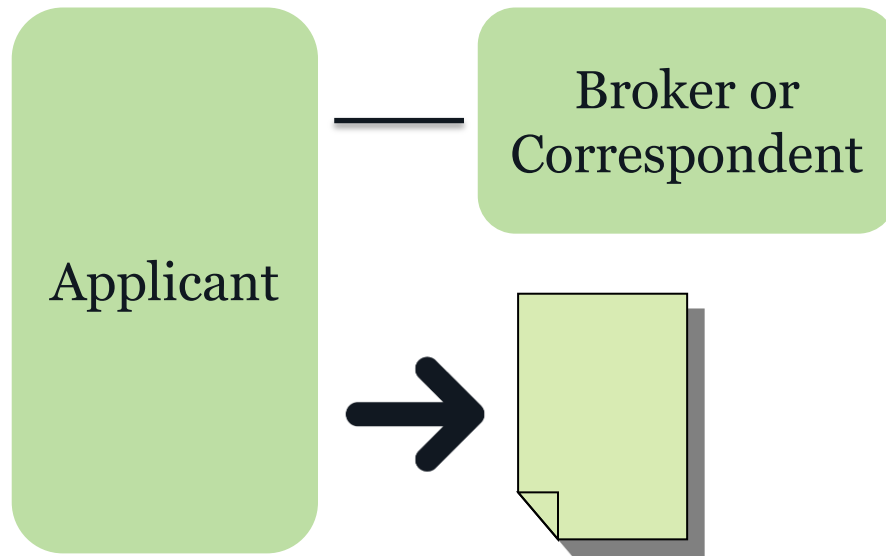
## Example



# Application Channel

---

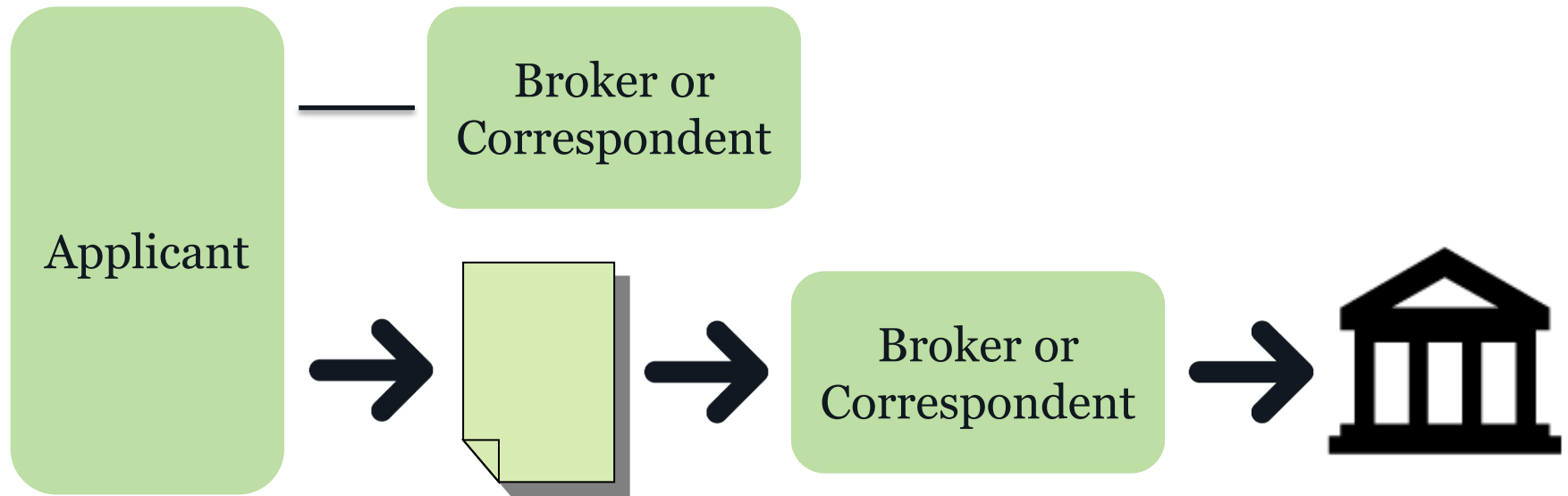
## Example



# Application Channel

---

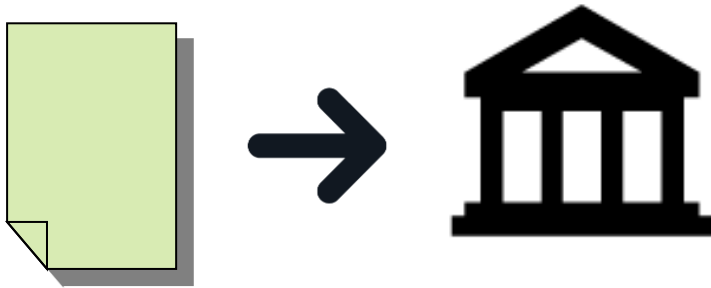
## Example



# Application Channel

---

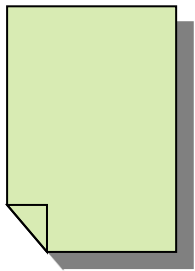
Obligation initially payable to financial institution



# Application Channel

---

Obligation initially payable to financial institution



IF...

Payable on the face of the note or contract to financial institution that is reporting



# Application Channel

---



Section 1003.4(a)(33) and Comment  
4(a)(33)(ii)

Reports “Not Applicable” for application  
channel data point

# Application Channel

---



Section 1003.4(a)(33) and Comment  
4(a)(33)(ii)

Reports “Not Applicable” for application  
channel data point

- 1 Application was withdrawn, denied, or closed for incompleteness, if the financial institution had not determined if loan would have been initially payable to financial institution



# Application Channel

---



Section 1003.4(a)(33) and Comment  
4(a)(33)(ii)

Reports “Not Applicable” for application  
channel data point

① Application was withdrawn, denied, or closed for  
incompleteness, if the financial institution had not  
determined if loan would have been initially  
payable to financial institution

② The covered loan is a purchased loan

# Automated Underwriting Systems (AUS)

---



Section 4(a)(35)(i)

Report the name of the AUS used in evaluating the application and the result generated by AUS

# Automated Underwriting Systems (AUS)

---



What is an AUS?

# Automated Underwriting Systems (AUS)

---



Section 4(a)(35)(ii)

AUS is an electronic tool developed by...

Securitizer

# Automated Underwriting Systems (AUS)

---



Section 4(a)(35)(ii)

AUS is an electronic tool developed by...

Securitizer

Federal  
government  
insurer

# Automated Underwriting Systems (AUS)

---



Section 4(a)(35)(ii)

AUS is an electronic tool developed by...

Securitizer

Federal  
government  
insurer

Federal  
government  
guarantor

# Automated Underwriting Systems (AUS)

---



Section 4(a)(35)(ii)

AUS is an electronic tool developed by...

Securitizer

Federal  
government  
insurer

Federal  
government  
guarantor

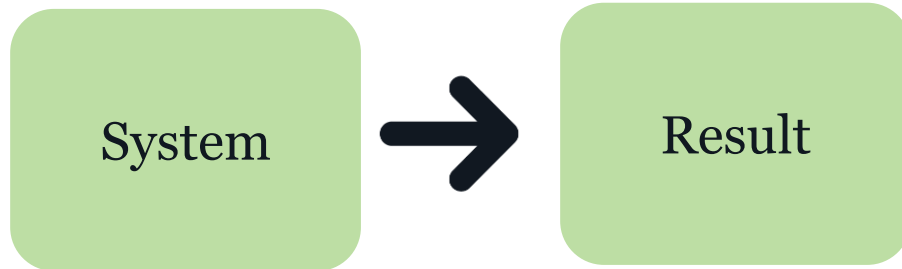
Credit risk of applicant

AND

Covered loan is eligible

# Automated Underwriting Systems (AUS)

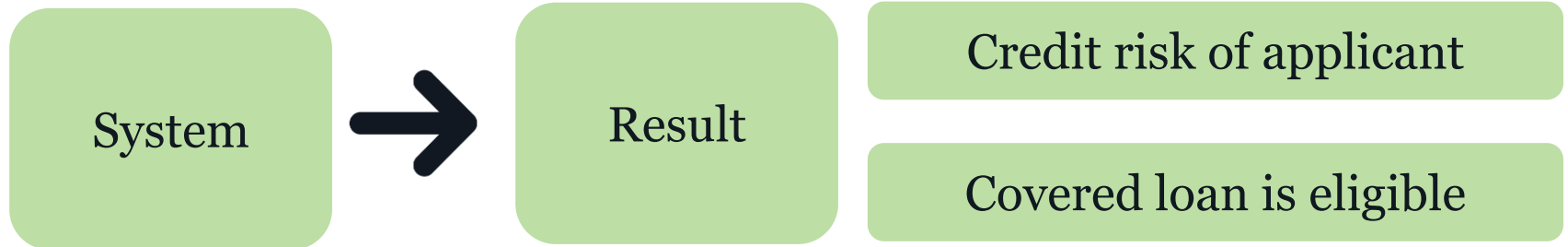
---





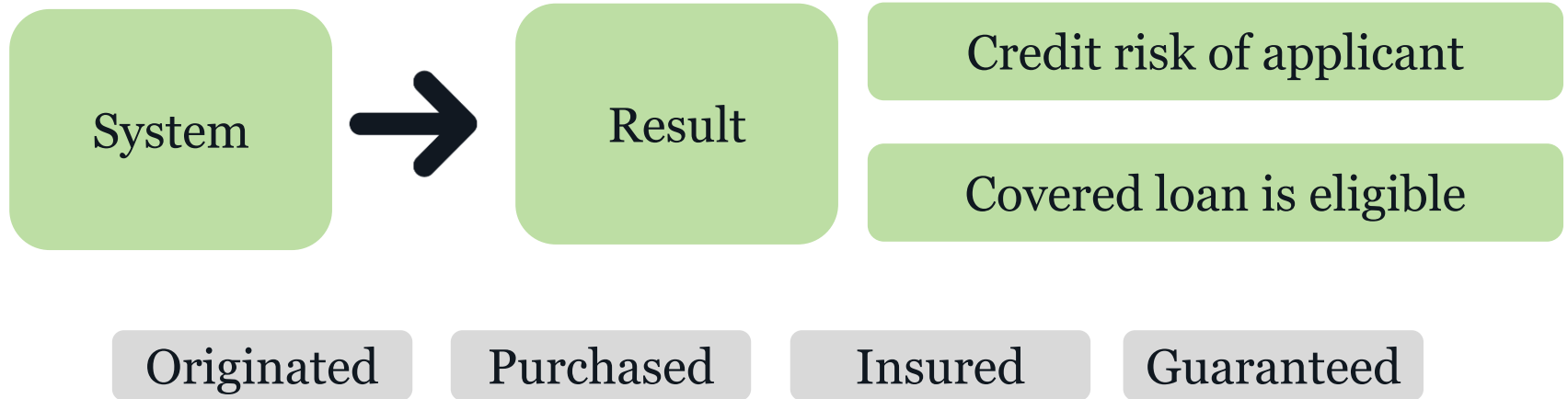
# Automated Underwriting Systems (AUS)

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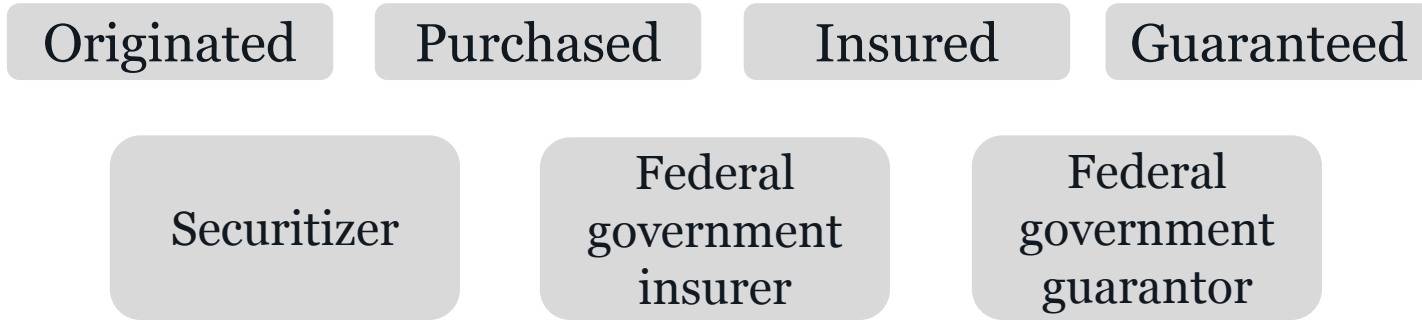
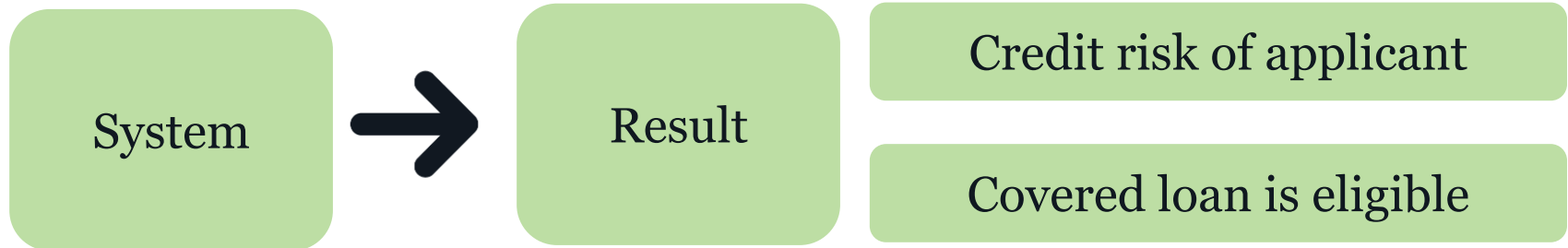
# Automated Underwriting Systems (AUS)

---



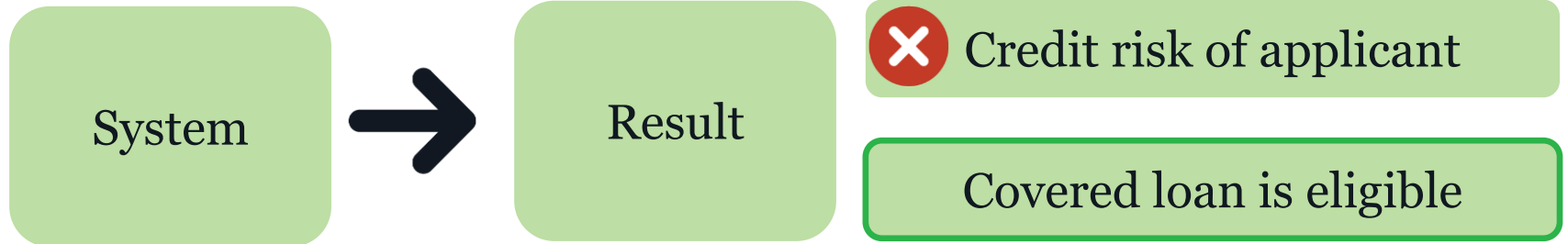
# Automated Underwriting Systems (AUS)

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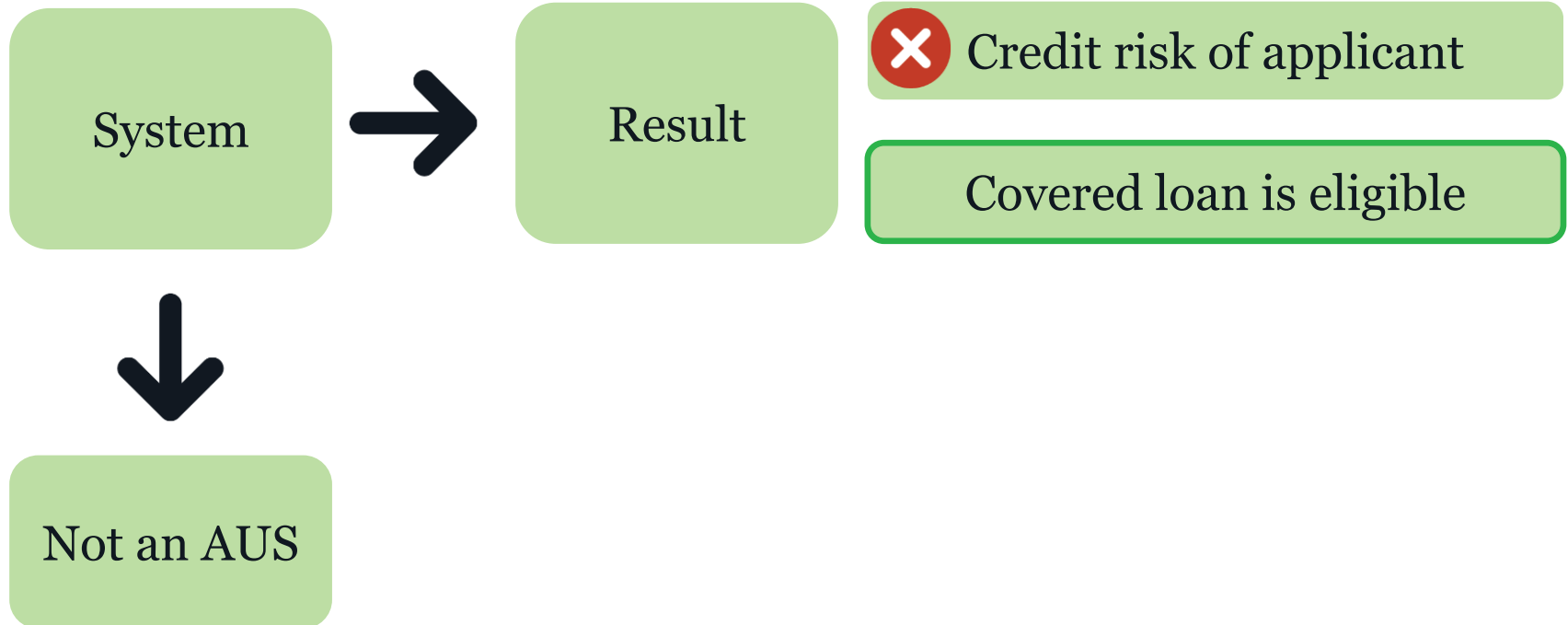
# Automated Underwriting Systems (AUS)

---



# Automated Underwriting Systems (AUS)

---

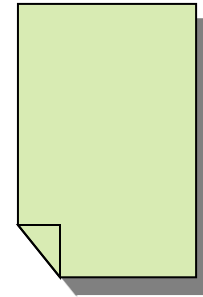


# Automated Underwriting Systems (AUS)

---



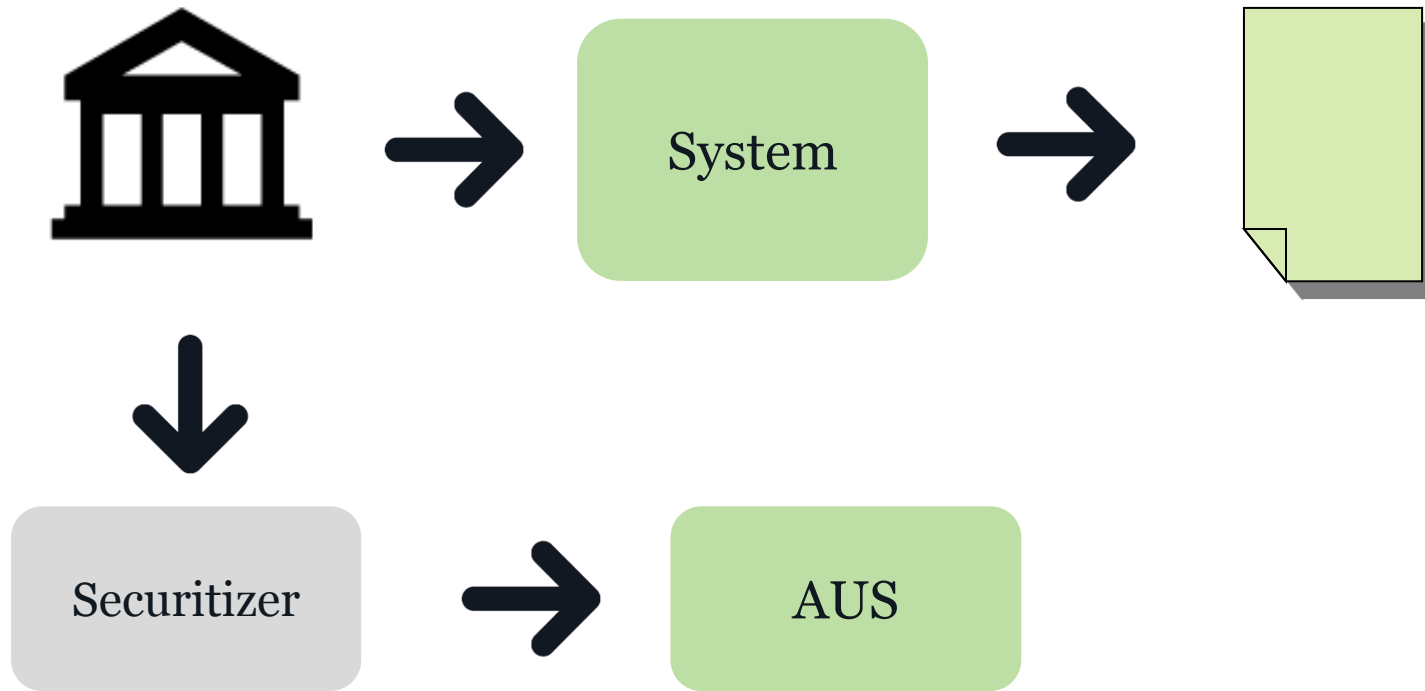
System



AUS

# Automated Underwriting Systems (AUS)

---



# Automated Underwriting Systems (AUS)

---



Used more than one AUS

OR

Used one AUS with multiple results



# Automated Underwriting Systems (AUS)

---



Used more than one AUS

OR

Used one AUS with multiple results



Determine  
which AUS(s)  
and result(s)  
to report

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

1

Determine if AUS used to evaluate application matches loan type it reported

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

- 1 Determine if AUS used to evaluate application matches loan type it reported
- 2 If AUS matches loan type, determine if the result was obtained from one AUS

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

① Determine if AUS used to evaluate application matches loan type it reported

② If AUS matches loan type, determine if the result was obtained from one AUS

Report AUS that matches the loan type

Report result obtained from AUS

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

③

If AUS does not match loan type or if more than one result matches loan type, determine whether AUS matches purchaser, insurer, or guarantor for covered loan

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

4

If AUS matches purchaser, insurer, or guarantor, determine whether only one result was obtained from that AUS

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

4

If AUS matches purchaser, insurer, or guarantor, determine whether only one result was obtained from that AUS

Report AUS that matches the purchaser, insurer, or guarantor

Report result obtained from that AUS



# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

5

If no AUS was used that matches purchaser, insurer, or guarantor, or if multiple results were obtained from an AUS that matches purchaser, insurer, or guarantor or loan type

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

5

If no AUS was used that matches purchaser, insurer, or guarantor, or if multiple results were obtained from an AUS that matches purchaser, insurer, or guarantor or loan type

Report result  
generated closest in  
time to credit decision

Report AUS that  
generated that result

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

- 6 If multiple results were obtained at the same time

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Determine which AUS(s) and result(s) to report

⑥ If multiple results were obtained at the same time

Report the name of all  
AUS(s) used

Report results from  
each of those systems

Do not report more than a total  
of five AUS(s) and results

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Reports “Not Applicable” for AUS  
data point

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Reports “Not Applicable” for AUS  
data point

1

Did not use AUS to evaluate application

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Reports “Not Applicable” for AUS data point

1

Did not use AUS to evaluate application

2

Applicants are not natural persons

# Automated Underwriting Systems (AUS)

---



Comment 4(a)(35)

Reports “Not Applicable” for AUS data point

1

Did not use AUS to evaluate application

2

Applicants are not natural persons

3

The covered loan is a purchased loan



# Closing

Home Mortgage Disclosure Act (HMDA)

# For more information

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## **CFPB Website**

<http://www.consumerfinance.gov/policy-compliance/guidance/implementation-guidance/>

## **FIG**

[www.consumerfinance.gov/hmda/for-filers](http://www.consumerfinance.gov/hmda/for-filers)

# Submit specific regulatory questions

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[CFPB\\_RegInquiries@cfpb.gov](mailto:CFPB_RegInquiries@cfpb.gov)

202-435-7700

**Technical questions:**

[hmdahelp@cfpb.gov](mailto:hmdahelp@cfpb.gov)

# Thank you

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Consumer Financial  
Protection Bureau