



## Additional Information on Submission of 2017 Home Mortgage Disclosure Act Data

Credit unions located in metropolitan areas that engage in certain types and volume of residential mortgage lending, and that had assets exceeding \$44 million as of December 31, 2016, must file a report this year on mortgage loan applications received during 2017. The filing is required under the Home Mortgage Disclosure Act (HMDA), as implemented by the Consumer Financial Protection Bureau's Regulation C.<sup>1</sup>

To determine if your credit union must submit HMDA data for calendar year 2017 activity, please review Regulatory Alert 17-RA-02, "[Home Mortgage Disclosure Act Data Collection Requirements for Calendar Year 2017](#)" (January 2017).

### Changes to the Submission Process for Data Collected in 2017

#### *The agency with which you file your HMDA data*

Beginning with HMDA data collected in 2017 and submitted in 2018, responsibility to receive and process HMDA data transferred from the Federal Reserve Board to the Consumer Financial Protection Bureau (CFPB). Accordingly, credit unions subject to HMDA requirements in calendar year 2017 must submit loan/application register data to the CFPB **by March 1, 2018**.

#### *The way you submit your HMDA data*

Beginning with the 2017 data, credit unions must submit their HMDA data using a web interface referred to as the HMDA Platform. Credit unions will use the [HMDA Platform](#) to upload their loan/application register data, review edits, certify the accuracy and completeness of the data, and submit data for the filing year.

The HMDA Platform will walk you through the loan/application register filing process. Credit unions should use a modern web browser, such as the latest version of Google Chrome, Mozilla Firefox, Internet Explorer 11, Microsoft Edge, or other modern browsers.

HMDA data cannot be submitted in the following ways:

- Paper Submissions;
- Submission via web (from the Data Entry Software (DES));
- E-mail to HMDASUB@FRB.GOV; or
- PC Diskette and CD-ROM.

<sup>1</sup> 12 U.S.C. 2801-2810; 12 CFR Part 1003.



*The loan/application register file format for submitting your HMDA data*

Beginning with the data collected in 2017, credit unions must submit data collected in a pipe delimited text file (.txt). A loan/application register (LAR) formatting tool has been developed to help format certain data into a pipe delimited text file. The [LAR Formatting Tool](#) may be especially helpful for credit unions with small volumes of reported loans that do not use vendor or other software to prepare their HMDA data for submission.

*The process by which you validate the edit report*

Credit unions must address all edits prior to submitting their HMDA data collected in or after 2017. In contrast to the previous process for filing data with the FRB, all edits now must be addressed prior to filing HMDA data with the CFPB in order to complete the submission process. The edit report will be web-based:

- Edit reports will not be e-mailed to credit unions in PDF format. Instead, the CFPB edit reports will be viewed and can be downloaded from the HMDA Platform.
- Responses to the edits will not be faxed or e-mailed to the CFPB. The HMDA Platform will guide credit unions through the process of addressing edits.

*The Officer Certification process*

Beginning with the data collected in 2017, as part of the submission process, an authorized representative of your credit union with knowledge of the data submitted shall certify to the accuracy and completeness of the data submitted. Credit unions will not fax or e-mail the signed certification.

Additional resources, including the Filing Instructions Guide for HMDA data collected in 2017, can be found on the [Resources for HMDA filers](#) page on the CFPB's website.

Technical questions about reporting HMDA data collected in or after 2017 should be directed to [hmdahelp@cfpb.gov](mailto:hmdahelp@cfpb.gov).

**NCUA Policy Concerning Delinquent Filings**

NCUA expects every credit union required to report 2017 HMDA data to submit its file to the CFPB by the March 1, 2018, deadline. Credit unions appearing on a delinquent filers list could become subject to civil money penalty assessments.

If you have questions about this information, please contact NCUA's Office of Consumer Financial Protection at (703) 518-1140 or at [ComplianceMail@ncua.gov](mailto:ComplianceMail@ncua.gov), or contact your regional office or state supervisory authority.