Designated Home Mortgage Disclosure Act (HMDA) Key Data Fields

The Board of Governors of the Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC) have designated HMDA key data fields to support the efficient and effective evaluation of financial institutions' compliance with HMDA's requirements.

The Home Mortgage Disclosure Act (HMDA), which is implemented by Regulation C, 12 C.F.R. 1003, requires certain financial institutions to collect, record, and report information about their mortgage lending activity.[1] The Bureau of Consumer Financial Protection's (Bureau) amendments to Regulation C (HMDA Amendments)[2] and section 104(a) of the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA)[3] establish the data to be collected.[4] For the purpose of ensuring compliance with HMDA's requirements, traditionally the Board, the FDIC, and the OCC have identified and focused examination-related testing of HMDA data on certain agency-designated "key fields." Key fields are those data fields considered to be most important to ensuring the integrity of analyses of overall HMDA data.

Separately, the FFIEC members have issued FFIEC HMDA Examiner Transaction Testing Guidelines (FFIEC Guidelines) for the FFIEC members' examination staffs to use in assessing the accuracy of the HMDA data that financial institutions collect, record, and report.[5] The FFIEC Guidelines include a data sampling process that involves prioritizing designated data fields for review or reviewing all data fields within a sample.

However, the FFIEC Guidelines themselves do not establish designated HMDA key data fields. In an effort to promote efficiency, coordination, and consistency, the Board, the FDIC, and the OCC have jointly identified and designated 37 of the HMDA data fields to be collected since January 1, 2018, pursuant to the HMDA Amendments, as Designated HMDA Key Data Fields. For institutions eligible for a partial exemption pursuant to EGRRCPA,[6] 21 of the 37 Designated

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[1] 12 U.S.C. 2801 *et seq.*

[2] 80 FR 66127 (October 28, 2015); 82 FR 43088 (September 13, 2017).

[3] 132 Stat. 1296 (2018), section 104(a) (codified at 12 U.S.C. 2803).

[4] Beginning with data collected on or after January 1, 2018, financial institutions subject to HMDA collect and report data on covered loans specified in 12 C.F.R. § 1003.4(a)(1)-(38) on a loan application register (LAR) containing 110 "data fields," as specified in the applicable Federal Financial Institutions Examination Council (FFIEC) Filing Instructions Guide (FIG), available through the FFIEC HMDA File Specifications webpage at https://www.ffiec.gov/hmda/fileformats.htm or with other FFIEC HMDA resources at https://ffiec.cfpb.gov/.

[5] The FFIEC members are the Board, the Bureau, the FDIC, the National Credit Union Administration, the OCC, and the State Liaison Committee. The FFIEC members promote compliance with federal consumer protection laws and regulations through supervisory and outreach programs. Among these laws and regulations is HMDA.

[6] Provided that they are not subject to the exception to the partial exemptions for adverse Community Reinvestment Act (CRA) examination history, insured depository institutions eligible for a partial exemption are not required to collect, record, and report certain HMDA data points specified in EGRRCPA, as further explained in the Bureau's interpretive and procedural rule to clarify and implement the legislation (83 FR 45325 (September 7, 2018)). Various HMDA data points are associated with multiple HMDA data fields. Financial institutions subject to a partial exemption also collect and report their HMDA data, on a LAR, as specified in the applicable FIG.

HMDA Key Data Fields are among the data fields that they remain responsible for collecting, recording, and reporting. In identifying Designated HMDA Key Data Fields, the Board, the FDIC, and the OCC considered a variety of factors, including HMDA's requirements, the goal of ensuring the efficiency of bank examinations, and the effective validation of HMDA data important to evaluating compliance with the CRA and fair lending requirements. The Board, the FDIC, and the OCC also took into account the likelihood that a data field would be reported correctly based on past examination experience.

Accordingly, for the purpose of evaluating financial institutions' compliance with HMDA requirements, the Board, the FDIC, and the OCC will focus primary attention on the Designated HMDA Key Data Fields during transaction testing for HMDA data collected on or after January 1, 2018.[7] However, in certain circumstances, consistent with the FFIEC Guidelines, examination staff may determine that it is necessary to review additional HMDA data fields, as appropriate.

Table 1 lists all 110 HMDA data fields and their corresponding HMDA data points. The 37 Designated HMDA Key Data Fields applicable to financial institutions not eligible for an EGRRCPA partial exemption from HMDA's data collection, recording, and reporting requirements are shown in *italicized bold* text. The 21 Designated HMDA Key Data Fields applicable to financial institutions that are eligible for an EGRRCPA partial exemption from HMDA's data collection, recording, and reporting requirements are identified by an asterisk (*****).

Table 2 solely lists the 37 Designated HMDA Key Data Fields (Column B) applicable to financial institutions not eligible for an EGRRCPA partial exemption from HMDA's data collection, recording, and reporting requirements and, separately, the 21 Designated HMDA Key Data Fields (Column C) applicable to financial institutions that are eligible for an EGRRCPA partial exemption from HMDA's data collection, recording, and reporting requirements.

Furthermore, as indicated in the Bureau's interpretive and procedural rule, institutions eligible for a partial exemption may nevertheless opt to report HMDA data covered by that partial exemption.

[7] Each agency shall operate in accordance with its supervisory authority.

Table 1

#	Data Field Name	Data Point Name
1	Record Identifier – Value is 2	
2	Legal Entity Identifier (LEI)	Legal Entity Identifier (LEI)
3	*Universal Loan Identifier (ULI)* or Non-Universal Loan Identifier (NULI)	*Universal Loan Identifier (ULI)* or Non-Universal Loan Identifier (NULI)
4	*Application Date**	*Application Date**
5	*Loan Type**	*Loan Type**
6	*Loan Purpose**	*Loan Purpose**
7	Preapproval	Preapproval
8	Construction Method	Construction Method
9	*Occupancy Type**	*Occupancy Type**
10	*Loan Amount**	*Loan Amount**
11	*Action Taken**	*Action Taken**
12	*Action Taken Date**	*Action Taken Date**
13	Street Address	Property Address
14	City	Property Address
15	State	Property Location & Property Address
16	ZIP Code	Property Address
17	County	Property Location
18	*Census Tract**	*Property Location**
19	*Ethnicity of Applicant or Borrower: 1**	*Ethnicity**
20	Ethnicity of Applicant or Borrower: 2	Ethnicity
21	Ethnicity of Applicant or Borrower: 3	Ethnicity
22	Ethnicity of Applicant or Borrower: 4	Ethnicity
23	Ethnicity of Applicant or Borrower: 5	Ethnicity
24	Ethnicity of Applicant or Borrower: Free Form Text Field for Other Hispanic or Latino	Ethnicity
25	*Ethnicity of Co-Applicant or Co-Borrower: 1**	*Ethnicity**
26	Ethnicity of Co-Applicant or Co-Borrower: 2	Ethnicity
27	Ethnicity of Co-Applicant or Co-Borrower: 3	Ethnicity
28	Ethnicity of Co-Applicant or Co-Borrower: 4	Ethnicity
29	Ethnicity of Co-Applicant or Co-Borrower: 5	Ethnicity
30	Ethnicity of Co-Applicant or Co-Borrower: Free Form Text Field for Other Hispanic or Latino	Ethnicity
31	Ethnicity of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	Ethnicity
32	Ethnicity of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	Ethnicity
33	*Race of Applicant or Borrower: 1**	*Race**

#	Data Field Name	Data Point Name
34	*Race of Applicant or Borrower: 2**	*Race**
35	Race of Applicant or Borrower: 3	Race
36	Race of Applicant or Borrower: 4	Race
37	Race of Applicant or Borrower: 5	Race
38	Race of Applicant or Borrower: Free Form Text Field for American Indian or Alaska Native Enrolled or Principal Tribe	Race
39	Race of Applicant or Borrower: Free Form Text Field for Other Asian	Race
40	Race of Applicant or Borrower: Free Form Text Field for Other Pacific Islander	Race
41	*Race of Co-Applicant or Co-Borrower: 1**	*Race**
42	*Race of Co-Applicant or Co-Borrower: 2**	*Race**
43	Race of Co-Applicant or Co-Borrower: 3	Race
44	Race of Co-Applicant or Co-Borrower: 4	Race
45	Race of Co-Applicant or Co-Borrower: 5	Race
46	Race of Co-Applicant or Co-Borrower: Free Form Text Field for American Indian or Alaska Native Enrolled or Principal Tribe	Race
47	Race of Co-Applicant or Co-Borrower: Free Form Text Field for Other Asian	Race
48	Race of Co-Applicant or Co-Borrower: Free Form Text Field for Other Pacific Islander	Race
49	Race of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	Race
50	Race of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	Race
51	*Sex of Applicant or Borrower**	*Sex**
52	*Sex of Co-Applicant or Co-Borrower**	*Sex**
53	Sex of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	Sex
54	Sex of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	Sex
55	*Age of Applicant or Borrower**	*Age**
56	*Age of Co-Applicant or Co-Borrower**	*Age**
57	*Income**	*Income**
58	Type of Purchaser	Type of Purchaser
59	Rate Spread	Rate Spread
60	HOEPA Status	HOEPA Status
61	*Lien Status**	*Lien Status**
62	*Credit Score of Applicant or Borrower*	*Credit Score*
63	*Credit Score of Co-Applicant or Co-Borrower*	*Credit Score*

#	Data Field Name	Data Point Name
64	Applicant or Borrower, Name and Version of Credit Scoring Model	Credit Score
65	Applicant or Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field For Code 8	Credit Score
66	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model	Credit Score
67	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field For Code 8	Credit Score
68	Reason for Denial: 1	Reason for Denial
69	Reason for Denial: 2	Reason for Denial
70	Reason for Denial: 3	Reason for Denial
71	Reason for Denial: 4	Reason for Denial
72	Reason for Denial: Conditional Free Form Text Field for Code 9	Reason for Denial
73	Total Loan Costs	Total Loan Costs or Total Points and Fees
74	Total Points and Fees	Total Loan Costs or Total Points and Fees
75	*Origination Charges*	*Origination Charges*
76	*Discount Points*	*Discount Points*
77	*Lender Credits*	*Lender Credits*
78	*Interest Rate*	*Interest Rate*
79	Prepayment Penalty Term	Prepayment Penalty Term
80	*Debt-to-Income Ratio*	*Debt-to-Income Ratio*
81	*Combined Loan-To-Value Ratio*	*Combined Loan-To-Value Ratio*
82	*Loan Term*	*Loan Term*
83	Introductory Rate Period	Introductory Rate Period
84	Balloon Payment	Non-Amortizing Features
85	Interest-Only Payments	Non-Amortizing Features
86	Negative Amortization	Non-Amortizing Features
87	Other Non-Amortizing Features	Non-Amortizing Features
88	*Property Value*	*Property Value*
89	*Manufactured Home Secured Property Type*	*Manufactured Home Secured Property Type*
90	Manufactured Home Land Property Interest	Manufactured Home Land Property Interest
91	*Total Units**	*Total Units**
92	Multifamily Affordable Units	Multifamily Affordable Units

#	Data Field Name	Data Point Name
93	Submission of Application	Application Channel
94	Initially Payable to Your Institution	Application Channel
95	Mortgage Loan Originator NMLSR Identifier	Mortgage Loan Originator NMLSR Identifier
96	Automated Underwriting System: 1	Automated Underwriting System
97	Automated Underwriting System: 2	Automated Underwriting System
98	Automated Underwriting System: 3	Automated Underwriting System
99	Automated Underwriting System: 4	Automated Underwriting System
100	Automated Underwriting System: 5	Automated Underwriting System
101	Automated Underwriting System: Conditional Free Form Text Field for Code 5	Automated Underwriting System
102	*Automated Underwriting System Result: 1*	*Automated Underwriting System*
103	Automated Underwriting System Result: 2	Automated Underwriting System
104	Automated Underwriting System Result: 3	Automated Underwriting System
105	Automated Underwriting System Result: 4	Automated Underwriting System
106	Automated Underwriting System Result: 5	Automated Underwriting System
107	Automated Underwriting System Result: Conditional Free Form Text Field for Code 16	Automated Underwriting System
108	*Reverse Mortgage*	*Reverse Mortgage*
109	*Open-End Line of Credit*	*Open-End Line of Credit*
110	*Business or Commercial Purpose*	*Business or Commercial Purpose*

Table 2

A	B	C
#	**Designated Key HMDA Data Fields for financial institutions not eligible for an EGRRCPA partial exemption from HMDA data collection, recording, and reporting requirements**	**Designated Key HMDA Data Fields for financial institutions that are eligible for an EGRRCPA partial exemption from HMDA data collection, recording, and reporting requirements**
3	Universal Loan Identifier (ULI)	
4	Application Date	Application Date
5	Loan Type	Loan Type
6	Loan Purpose	Loan Purpose
9	Occupancy Type	Occupancy Type
10	Loan Amount	Loan Amount
11	Action Taken	Action Taken
12	Action Taken Date	Action Taken Date
18	Census Tract	Census Tract
19	Ethnicity of Applicant or Borrower: 1	Ethnicity of Applicant or Borrower: 1
25	Ethnicity of Co-Applicant or Co-Borrower: 1	Ethnicity of Co-Applicant or Co-Borrower: 1
33	Race of Applicant or Borrower: 1	Race of Applicant or Borrower: 1
34	Race of Applicant or Borrower: 2	Race of Applicant or Borrower: 2
41	Race of Co-Applicant or Co-Borrower: 1	Race of Co-Applicant or Co-Borrower: 1
42	Race of Co-Applicant or Co-Borrower: 2	Race of Co-Applicant or Co-Borrower: 2
51	Sex of Applicant or Borrower	Sex of Applicant or Borrower
52	Sex of Co-Applicant or Co-Borrower	Sex of Co-Applicant or Co-Borrower
55	Age of Applicant or Borrower	Age of Applicant or Borrower
56	Age of Co-Applicant or Co-Borrower	Age of Co-Applicant or Co-Borrower
57	Income	Income
61	Lien Status	Lien Status
62	Credit Score of Applicant or Borrower	
63	Credit Score of Co-Applicant or Co-Borrower	
75	Origination Charges	
76	Discount Points	
77	Lender Credits	
78	Interest Rate	
80	Debt-to-Income Ratio	
81	Combined Loan-To-Value Ratio	
82	Loan Term	
88	Property Value	
89	Manufactured Home Secured Property Type	
91	Total Units	Total Units
102	Automated Underwriting System Result: 1	
108	Reverse Mortgage	
109	Open-End Line of Credit	
110	Business or Commercial Purpose	