



BOARD OF GOVERNORS  
OF THE  
**FEDERAL RESERVE SYSTEM**  
WASHINGTON, D. C. 20551

DIVISION OF CONSUMER AND  
COMMUNITY AFFAIRS

**CA 19-4**

**April 1, 2019**

**TO THE OFFICERS AND MANAGERS IN CHARGE OF CONSUMER AFFAIRS  
SECTIONS:**

**Applicability to Community Banking Organizations:** This guidance applies to all institutions supervised by the Federal Reserve, including those with total consolidated assets of \$10 billion or less.

**SUBJECT: Revised “A Guide to HMDA Reporting: Getting It Right!”**

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council recently developed a revised version of “A Guide to HMDA Reporting: Getting It Right!” (Guide). The updated Guide is for use in connection with Home Mortgage Disclosure Act (HMDA)<sup>1</sup> data collected beginning on January 1, 2019 pursuant to the Consumer Financial Protection Bureau’s (Bureau) October 15, 2015 and August 24, 2017 amendments to Regulation C (Home Mortgage Disclosure),<sup>2</sup> which implements HMDA, and the Economic Growth, Regulatory Relief, and Consumer Protection Act’s (EGRRCPA) May 24, 2018 amendments to HMDA.<sup>3</sup>

HMDA and Regulation C require certain depository institutions and for-profit non-depository institutions to collect, report, and disclose data about originations and purchases of mortgage loans as well as mortgage loan applications that do not result in originations. The Bureau’s October 2015 and August 2017 final rules modified: (1) the types of institutions that are subject to Regulation C; (2) the types of transactions that are subject to Regulation C; (3) the types of data that institutions are required to collect, record, and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. Additionally, the Bureau issued an August 31, 2018 interpretive and procedural rule to implement and clarify the EGRRCPA amendments to HMDA, which provide partial exemptions for some insured depository institutions and insured credit unions from certain HMDA requirements.<sup>4</sup>

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<sup>1</sup> 12 U.S.C. 2801 *et seq.*

<sup>2</sup> 80 FR 66127 (October 28, 2015); 82 FR 43088 (September 13, 2017).

<sup>3</sup> Pub. L. 115-174, 132 Stat. 1296 (2018), section 104(a) (codified at 12 U.S.C. 2803).

<sup>4</sup> 83 FR 45325 (September 7, 2018).

The updated Guide applies to HMDA data collected beginning on January 1, 2019 that is to be submitted by March 1, 2020, and is intended to assist financial institutions to comply with HMDA and Regulation C by providing helpful background information and an easy-to-use summary of key provisions, including those related to institutional coverage, transactional coverage, and data collection, reporting, and disclosure requirements.

If you have any questions, please contact Amal Patel, Counsel, at (202) 912-7879, or Meghan Karellas, Senior Supervisory Consumer Financial Services Analyst, at (202) 736-5536. In addition, questions may be sent via the Board's public website.<sup>5</sup>

Sincerely,

Carol A. Evans  
Associate Director

Attachment:

- Revised "A Guide to HMDA Reporting: Getting It Right!"

Cross-references:

- CA 18-9 "Designated Home Mortgage Disclosure Act Key Data Fields" (December 7, 2018)
- CA 18-6 "Statement on the Implementation of the Economic Growth, Regulatory Relief, and Consumer Protection Act Amendments to the Home Mortgage Disclosure Act" (July 5, 2018)
- CA 18-2 "Revised 'A Guide to HMDA Reporting: Getting It Right!'" (March 6, 2018)
- CA 17-4 "Expectations for Supervised Institutions Regarding Amended Regulation C" (December 21, 2017)
- CA 17-2 "Revised Interagency Home Mortgage Disclosure Act Sampling, Verification, and Resubmission Procedures" (August 22, 2017)

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<sup>5</sup> See <http://www.federalreserve.gov/apps/contactus/feedback.aspx>.