

Designated Key HMDA Data Fields

The Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC) are issuing designated key HMDA 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 Amendments to Regulation C (HMDA Amendments)² establish the data to be collected.³ For the purpose of ensuring compliance with HMDA's requirements, traditionally the FRB, 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 fields considered to be most important to ensuring the integrity of analyses of overall HMDA data.

Separately, the Federal Financial Institutions Examination Council (FFIEC) members have issued FFIEC HMDA Examiner Transaction Testing Guidelines (Guidelines) for the FFIEC members' examination staff to use in assessing the accuracy of the HMDA data that financial institutions record and report.⁴ The Guidelines include a data sampling process that involves prioritizing designated data fields for review or reviewing all data fields within a sample. However, the Guidelines themselves do not establish designated key data fields. In an effort to promote efficiency, coordination, and consistency, the FRB, FDIC, and OCC have jointly identified and designated 37 of the HMDA data fields to be collected beginning January 1, 2018, pursuant to the HMDA Amendments, as Designated Key HMDA Data Fields. In identifying Designated Key HMDA Data Fields, the FRB, FDIC, and 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 Community Reinvestment Act and fair lending requirements. The FRB, FDIC, and 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, FRB, FDIC, and OCC examination staffs will focus primary attention on the Designated Key HMDA Data Fields during transaction testing pursuant to HMDA for data collected on or after January 1, 2018.⁵ However, in certain circumstances, consistent with the FFIEC Guidelines, such examination staff may determine that it is necessary to review additional HMDA data fields, as appropriate.

¹ 12 U.S.C. 2801 *et seq.*

² 80 FR 66127 (Oct. 28, 2015), as further amended.

³ Beginning with data collected on or after January 1, 2018, financial institutions subject to HMDA will collect and report data on covered loans specified in 12 C.F.R. 1003.4(a)(1)-(38) on a loan application register containing 110 "data fields," as specified in the FFIEC Filing Instructions Guide (FIG). The FIG is available on the [FFIEC webpage](#) or on the [Consumer Financial Protection Bureau \(CFPB\) webpage](#).

⁴ The FFIEC members are the FRB, the FDIC, the OCC, the CFPB, the National Credit Union Administration, 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.

⁵ Each agency shall operate in accordance with its supervisory authority.

All 110 data fields are listed in the table below. Designated Key HMDA Data Fields are shown in *italicized bold* text.

#	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)	Universal Loan Identifier (ULI)
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	<i>Race of Applicant or Borrower: 2</i>	<i>Race</i>
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	<i>Race of Co-Applicant or Co-Borrower: 1</i>	<i>Race</i>
42	<i>Race of Co-Applicant or Co-Borrower: 2</i>	<i>Race</i>
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	<i>Sex of Applicant or Borrower</i>	<i>Sex</i>
52	<i>Sex of Co-Applicant or Co-Borrower</i>	<i>Sex</i>
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	<i>Age of Applicant or Borrower</i>	<i>Age</i>
56	<i>Age of Co-Applicant or Co-Borrower</i>	<i>Age</i>
57	<i>Income</i>	<i>Income</i>
58	Type of Purchaser	Type of Purchaser
59	Rate Spread	Rate Spread
60	HOEPA Status	HOEPA Status
61	<i>Lien Status</i>	<i>Lien Status</i>
62	<i>Credit Score of Applicant or Borrower</i>	<i>Credit Score</i>
63	<i>Credit Score of Co-Applicant or Co-Borrower</i>	<i>Credit Score</i>

#	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
93	Submission of Application	Application Channel
94	Initially Payable to Your Institution	Application Channel

#	Data Field Name	Data Point Name
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	<i>Automated Underwriting System Result: 1</i>	<i>Automated Underwriting System</i>
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	<i>Reverse Mortgage</i>	<i>Reverse Mortgage</i>
109	<i>Open-End Line of Credit</i>	<i>Open-End Line of Credit</i>
110	<i>Business or Commercial Purpose</i>	<i>Business or Commercial Purpose</i>