September 13, 2017

Revised Interagency Home Mortgage Disclosure Act Sampling, Verification, and Resubmission Procedures

To the Officers and Managers in Charge of Consumer Compliance of Each Tenth District State Member Bank:

The Task Force on Consumer Compliance of the Federal Financial Institutions Examination Council (FFIEC) recently developed interagency Home Mortgage Disclosure Act (HMDA) Examiner Transaction Testing Guidelines that include sampling, verification, and resubmission procedures for use in connection with HMDA data collected beginning on January 1, 2018 pursuant to the Consumer Financial Protection Bureau's (Bureau) October 15, 2015 amendments to Regulation C (Home Mortgage Disclosure). HMDA, as implemented by Regulation C, requires 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.

With regard to HMDA data collected prior to January 1, 2018, Reserve Banks will continue to examine financial institutions pursuant to the interagency HMDA examination procedures transmitted with CA 09-10 and the HMDA sampling and resubmission procedures transmitted with CA 04-4. The FFIEC members are currently developing a comprehensive set of revised interagency HMDA examination procedures in connection with HMDA requirements relating to HMDA data collected from January 1, 2018 onward. The referenced sampling, verification, and resubmission procedures will be incorporated into those revised examination procedures, which will also include information regarding an updated list of HMDA key data fields.

A copy of the CA 17-2 letter is available on the Board of Governors of the Federal Reserve System’s public web site at: https://www.federalreserve.gov/supervisionreg/caletters/caltr1702.htm

Please direct any questions concerning the revised HMDA procedures to the Consumer Affairs Department of the Federal Reserve Bank of Kansas City at (800) 333-1010, extension 8812802, or via email to Sandy.Williams@kc.frb.org.

Sincerely,

Trina Parsley
Assistant Vice President