



FEDERAL RESERVE BANK *of* KANSAS CITY

October 26, 2017

CA 17-3: Designated Home Mortgage Disclosure Act Key Data Fields

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

The Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC) have revised the list of Home Mortgage Disclosure Act (HMDA) key data fields that their respective examiners will use in connection with validating the accuracy of HMDA data collected beginning on January 1, 2018 pursuant to the Consumer Financial Protection Bureau's October 15, 2015 and August 24, 2017 amendments to Regulation C (Home Mortgage Disclosure).

The 37 designated HMDA key fields are those that the Federal Reserve, the FDIC, and the OCC have collectively determined to be most critical to the integrity of analyses of overall HMDA data. This revised list of HMDA key data fields will be used in conjunction with the sampling, verification, and resubmission procedures (FFIEC HMDA Examiner Transaction Testing Guidelines) for HMDA data collected from January 1, 2018 onward, which were transmitted with CA 17-2. Accordingly, once examiners have selected a random sample of entries from a financial institution's HMDA Loan Application Register (HMDA LAR) and have received the corresponding loan files, they would verify the accuracy of the HMDA key data fields in the entries in the HMDA LAR sample(s) against information in the loan files.

As noted in CA 17-2, 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 FFIEC HMDA Examiner Transaction Testing Guidelines and the attached list of HMDA key data fields will be incorporated into those revised examination procedures. 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, including HMDA key data fields, transmitted with CA 04-4.

A copy of the CA 17-3 letter is available on the Board of Governors of the Federal Reserve System's public web site at: <https://m-pubtest.frb.gov/supervisionreg/caletters/caltr1703.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