RESCINDED

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Home Mortgage Disclosure Act: FFIEC's Revised 'A Guide to HMDA Reporting: Getting It Right!' Outdated-See OCC 2020-6

Summary

The Office of the Comptroller of the Currency (OCC) is announcing the issuance of the Federal Financial Institutions Examination Council's (FFIEC) revised "A Guide to HMDA Reporting: Getting It Right!," which reflects the new reporting requirements set forth in the October 2015 Home Mortgage Disclosure Act (HMDA) Final Rule as amended in 2017 (2015 HMDA Rule).¹ The 2018 version of "A Guide to HMDA Reporting: Getting It Right!" will assist banks in complying with the HMDA and Regulation C, its implementing regulation, which is found at 12 CFR 1003.

Note for Community Banks

This bulletin applies to all national banks, federal savings associations, and federal branches and agencies that are subject to HMDA data collection and reporting requirements.

Highlights

"A Guide to HMDA Reporting: Getting It Right!" provides a high-level summary of HMDA requirements under the 2015 HMDA Rule, including

- institutions covered by Regulation C.
- transactions covered by Regulation C.
- information that covered institutions are required to collect, record, and report.
- requirements for reporting and disclosing data.

Examiners will use this guide in conjunction with OCC Bulletin 2017-41, "Home Mortgage Disclosure Act: Interagency Key Fields," and OCC Bulletin 2017-31, "Home Mortgage Disclosure Act: Updated FFIEC Examiner Transaction Testing Guidelines," when validating the accuracy of data collected in 2018 and reported in 2019 for all applicable OCC-supervised institutions. Additional examination procedures are not being published at this time.

Further Information

Please contact Vonda Eanes, Director for Community Reinvestment Act and Fair Lending Policy, Compliance Risk Policy Division, at (202) 649-5470.

То

Chief Executive Officers and Compliance Officers of National Banks, Federal Savings Associations, and Federal Branches and Agencies; Department and Division Heads; All Examining Personnel; and Other Interested Parties

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Senior Deputy Comptroller for Compliance and Community Affairs

Related Links

- "A Guide to HMDA Reporting: Getting It Right!" (PDF)
- OCC Bulletin 2017-41, "Home Mortgage Disclosure Act: Interagency Key <u>Fields</u>" (October 17, 2017)
- OCC Bulletin 2017-31, "Home Mortgage Disclosure Act: Updated FFIEC Examiner <u>Transaction Testing Guidelines</u>" (August 25, 2017)

¹ On December 21, 2017, the Consumer Financial Protection Bureau (CFPB) announced plans to reopen the 2015 HMDA Rule. For HMDA data collected by banks in 2018 and reported in 2019, the OCC does not intend to require data resubmission unless data errors are material. Furthermore, the OCC does not intend to assess penalties with respect to errors in data collected in 2018 and reported in 2019. Information on any substantive changes to the 2015 HMDA Rule will be communicated to examiners as it becomes available.