



Final Regulation

Consumer Financial Protection Bureau: Home Mortgage Disclosure Act (Regulation C)

15-EF-17

NAFCU would like to highlight the following:

- The Consumer Financial Protection Bureau (CFPB) has issued a final rule making several substantive revisions to Regulation C's reporting requirements under the *Home Mortgage Disclosure Act* (HMDA).
- The Bureau is going to “phase in” the implementation of a modified institutional coverage test under the following schedule:
 - Phase I (effective January 1, 2017) - A credit union will not report HMDA data in 2017 unless it meets the asset-size, location, federally related, and loan activity tests and it originates 25 or more home purchase loans, including refinancings of home purchase loans, in both 2015 and 2016.
 - Phase II (effective January 1, 2018) - A credit union will not report HMDA data unless it meets the asset-size, location, federally related, and loan activity tests and it originates 25 or more covered closed-end mortgage loans or 100 or more covered open-end lines of credit in each of the two preceding calendar years.
- In addition, the Bureau has amended the class of covered transactions to most dwelling-secured open-end and closed-end lending, effectively mandating reporting on HELOCs.
- The final rule also expanded the HMDA data set, requiring credit unions to report on a total of roughly 38 data points.
- Beginning in 2020, credit unions that reported at least 60,000 covered loans and applications, combined, in the preceding calendar year will be required to conduct quarterly data submissions.

Effective Dates:

- Institutional coverage phase I: **January 1, 2017.**
- Institutional coverage phase II; transactional coverage; additional data points; etc.: **January 1, 2018.**
- Quarterly submission for large-volume filers: **January 1, 2020.**

Summary of Final Rule

The CFPB finalized amendments to Regulation C that make several substantive changes to financial institutions' reporting requirements under HMDA. As a result of the final rule, credit unions have a number of noteworthy and new compliance obligations:

1. Institutional Coverage Test

The final rule amends the institutional coverage test in two phases. This test is used to determine which entities are subject to Regulation C's reporting requirement. Currently, credit unions meeting four specified institutional characteristics under Regulation C must collect and report HMDA data. Under the final rule, the institutional coverage test is modified to the following:

Phase I – In 2017, a credit union will not report HMDA data unless it meets the four institutional characteristics (see analysis section below) *and* it originates 25 or more home purchase loans, including refinancings of home purchase loans, in both 2015 and 2016.

Phase II – After January 1, 2018, a credit union will not report HMDA data unless it meets the institutional characteristics (see analysis section below) *and* it originates 25 or more covered closed-end mortgage loans *or* 100 or more covered open-end lines of credit in each of the two preceding calendar years.

2. Transactional Coverage Test

The final rule expands the transactional coverage test. This test is used to define “covered loans,” which are subject to Regulation C's reporting requirement. Currently, Regulation C requires reporting of three types of loans: home purchase, home improvement, and refinancing. Home-equity lines of credit (HELOCs) may be reported at the credit union's option, but are not required to be reported.

Under the final rule, credit unions will be required to report activity on closed-end mortgage loans and open-end lines of credit secured by a lien on a dwelling, regardless of whether the loans are for home purchases, home improvement, or refinancing. Effectively, the final rule requires credit unions to report all closed-end loans, open-end lines of credit, and reverse mortgages secured by dwellings. While the final rule removes the current requirement to report unsecured home improvement loans, it mandates reporting data on applications and accounts opened for HELOCs.

3. Additional Data Points

The final rule expands the HMDA data set substantially beyond the 17 data points currently reported. While the *Dodd-Frank Wall Street Reform and Consumer Protection Act* (Dodd-Frank Act) merely directed the Bureau to add 10 new data points, the rule finalizes roughly 38 total data points many of which are justified under the guise that the non-mandated data points are “necessary to carry out the purposes of HMDA.”

4. Quarterly Data Submissions

The final rule requires quarterly data submissions for institutions that report a high volume of transactions. Regulation C currently requires all covered credit unions to submit their HMDA data by March 1 following the calendar year for which the data is compiled. The CFPB will now require financial institutions that report large volumes of HMDA data to submit their data on a quarterly, rather than an annual basis. A large volume reporter is defined as a credit union that reported at least 60,000 covered loans and applications, combined, for the preceding calendar year.

5. Disclosures

The final rule allows HMDA reporters to satisfy their disclosure obligations by providing the public with written notice that the disclosure statements and modified loan application register are available on the Bureau's website. The final rule also includes sample language for a Regulation C compliant notice.

A copy of the final rule can be found [here](#).

This Final Regulation includes a brief summary of the final rule, background information, and section-by-section analysis. We urge you to read the materials carefully. Should you have any questions or require additional information, please contact Alicia Nealon, Director of Regulatory Affairs, at (703) 842-2266 or anealon@nafcu.org, or Alexander Monterrubio, Regulatory Affairs Counsel, at (703) 842-2244 or amonterrubio@nafcu.org.

Background

The Dodd-Frank Act transferred HMDA rulemaking authority to the CFPB and directed the Bureau to expand the HMDA dataset to include additional loan information that would help in spotting troublesome trends. Congress made major amendments to HMDA in the Dodd-Frank Act, including specifying ten new data points for collection. However, the Act also provided the Bureau with broad authority to, among other things, require the collection of additional data points and change the format and submission requirements for HMDA reporting.

In February 2014, the Bureau announced the convening of a Small Business Review Panel, as required by the *Small Business Regulatory Enforcement Fairness Act* (SBREFA), seeking feedback from small businesses on possible changes to the information reported under HMDA. After the SBREFA panel gathered information from the small entity representatives, the panel made findings and recommendations and included them in the Small Business Review Panel Report to be considered by CFPB in drafting the proposal and final rule.

Section-by-Section Analysis

The following is a section-by-section analysis of the proposed reporting requirements under HMDA, which are located in 12 C.F.R. 1003. This analysis does not summarize all of Regulation C, only the sections that were substantially revised by the final rule.

§1003.2 – Definitions

Transactional Coverage Test

Currently, Regulation C requires institutions to collect and report data on applications for, originations of, and purchases of three types of loans: 1) home purchase, 2) home improvement, and 3) refinancing. This approach is known as “purpose-based reporting.”

Under the final rule, the Bureau is eliminating “purpose-based reporting” for consumer transactions. Instead, starting January 1, 2018, credit unions will begin collecting and reporting activity for dwelling-secured closed-end mortgage loans, open-end lines of credit, and reverse mortgages, regardless of the transaction’s purpose. This shift to “dwelling-secured transactional reporting” significantly expands the scope of reportable transactions. For example, HELOCs are required reporting under the new HMDA transactional coverage test.

Be sure to note that some transactions are specifically identified as “excluded” under the new transactional coverage test. (See the Excluded Institutions and Excluded Transactions analysis below.)

Institutional Coverage Test

HMDA imposes reporting responsibilities on all credit unions that meet specific institutional criteria. Currently, Regulation C requires a credit union to report HMDA data when it meets the following four institutional characteristics:

1. On the preceding December 31, it had assets in excess of the **asset threshold** established and published annually by the Bureau (for 2015, the asset threshold was \$44 million);
2. On the preceding December 31, it had a home or branch office in an **Metropolitan Statistical Area** (MSA);
3. During the previous calendar year, it **originated at least one home purchase loan** or refinancing of a home purchase loan secured by a first-lien on a one-to-four unit dwelling;
4. The institution is **federally insured or regulated**, or the mortgage loan referred to above was insured, guaranteed, or supplemented by a Federal agency or intended for sale to Federal National Mortgage Association or the Federal Home Loan Mortgage Corporation.

The final rule maintains these four base institutional characteristics. A credit union that does not meet any one of the four is not subject to Regulation C. However, the Bureau is adding two

additional conditions in two phases for depository institutions related to the volume of covered transactions.

Phase I

Starting on **January 1, 2017**, the institutional coverage test will require reporting by depository institutions that meet the four institutional criteria in outlined above **and** the following:

- A) In each of the two preceding calendar years, at least 25 home purchase loans, including refinancings of home purchase loans, that are not excluded under §1003.3(c)(1)-(10).

If a credit union falls below the home purchase loans threshold in either 2015 or 2016, then it will not be subject to Regulation C in 2017.

Phase II

Starting on **January 1, 2018**, the institutional coverage test will require reporting by depository institutions that meet the four institutional criteria outlined above **and** the following:

- A) In each of the two preceding calendar years, the institution originated *25 or more (dwelling-secured) closed-end mortgage loans*; **OR**
- B) In each of the two preceding calendar years, the institution originated *100 or more (dwelling-secured) open-end lines of credit*.

On January 1, 2018, the majority of the final rule’s revisions take effect, including the expanded transaction coverage. The switch to “dwelling-secured transactional coverage” coincides with the addition of an open-end line of credit reporting threshold. If a credit union falls below the 100 or more open-end lines of credit threshold in either of the two preceding years, then it is not required to report HMDA data on its open-end lines of credit.

The two transactional thresholds are designed to apply independent of each other. For example, a credit union exceeding only the 25 closed-end mortgage loan threshold is required to report HMDA data on its closed-end mortgage loans but not its open-end lending. At the same time, a credit union exceeding only the 100 open-end lines of credit threshold is required to report HMDA data on its open-end lines of credit but not its closed-end lending. Clearly, if a credit union surpasses both volume thresholds, then it will be required to report both closed-end and open-end lending.

§1003.3 – Excluded Institutions and Excluded Transactions

The final rule consolidates all excluded transactions into Section 1003.3 and includes additional commentary. Accordingly, the final rule’s version of Section 1003.3 provides that the HMDA reporting requirements do not apply to the following dwelling-secured closed-end mortgage loans and open-end lines of credit:

1. A loan/line of credit originated or purchased by the financial institution acting in a **fiduciary capacity**;
2. A loan/line of credit secured by a lien on **unimproved land**;
3. **Temporary financing**;
4. The purchase of an **interest in a pool** of loans/lines of credit;
5. The purchase **solely of the right to service** a loan/line of credit;
6. The purchase of loans/lines of credit as part of a **merger or acquisition**, or as part of the acquisition of all of the assets and liabilities of a branch office;
7. A loan/line of credit or an application for a loan/line of credit with a total dollar amount of **less than \$500**;
8. The purchase of a **partial interest** in a covered loan/line of credit; or
9. A loan/line of credit used primarily for **agricultural purposes**.
10. A loan/line of credit used primarily for a **business or commercial purpose**, UNLESS:
 - a. The loan/line of credit is for home purchase, home improvement, or refinancing.

NOTE: Business or Commercial Purpose

Currently, closed-end mortgage loans or open-end lines of credit primarily for a business or commercial purpose are reported if the transaction is for home purchase, home improvement, or refinancing. However, at this time, Regulation C does not require financial institutions to report which of its covered transactions have a business or commercial purpose.

The Bureau initially proposed to expand HMDA's reporting requirements to cover additional business or commercial purpose loans. Ultimately, the final rule maintains the current reporting standard for business or commercial transactions. While "dwelling-secured transactional reporting" will be used for *consumer* purpose transactions, a credit union will continue to use "purpose-based reporting" for business or commercial transactions. Business or commercial purpose transactions will only be reported if the loan is for home purchase, home improvement, or refinancing.

In addition, the Bureau added Section 1003.4(a)(38) to the HMDA data set, which requires credit unions to report whether a covered loan or application is or will be made primarily for a business or commercial purpose.

Additional Staff Commentary for §1003.3

The Bureau also finalized added staff commentary which offers additional guidance related to the exclusions for "loans secured by a lien on unimproved land" and "temporary financing."

Comment 3(c)(2)-1 – Loans secured by a lien on unimproved land

The final commentary explains that a loan or line of credit is "secured by a lien on unimproved land" if the transaction is secured by a vacant or unimproved property. This exception applies unless the institution knows that the transaction's proceeds will be used to construct or purchase a dwelling to be placed on the land within two years. This determination is based on information the institution receives from the applicant or borrower at the time the application is received or

the credit decision is made.

Comment 3(c)(3)-1 – Temporary Financing

The Bureau’s final rule eliminated a proposed cross-reference to Regulation X when determining the meaning of temporary financing that is excluded from HMDA data.

Instead, the commentary provides that a loan or line of credit is considered “temporary financing” and excluded under § 1003.3(c)(3) if “the loan or line of credit is designed to be replaced by permanent financing at a later time.” The Bureau also incorporated five situational examples to clarify when a loan or line of credit is designed to be replaced by permanent financing.

§1003.4 Compilation of Reportable Data

Currently, Regulation C requires credit unions to report roughly 17 data fields, many of which have subfields within themselves. The final rule drastically expands the data set and requires credit unions to collect and report on a total of roughly 38 data fields, not including subfields.

Below is a list of the 38 data fields that covered credit unions would be required to report under the final rule.

1. A universal loan identifier (ULI).
2. Whether the covered loan or application is insured by the Federal Housing Administration, guaranteed by the Veterans Administration, or guaranteed by the Rural Housing Service or the Farm Service Agency.
3. Whether the covered loan is, or the application is for, a home purchase loan, a home improvement loan, a refinancing, or for a purpose other than home purchase, home improvement, or refinancing.
4. Whether the application or covered loan is a request for preapproval for a home purchase loan.
5. Whether the construction method for the dwelling is or will be a site built or a manufactured home.
6. Whether the property is or will be used by the applicant or borrower as a principal residence, as a second residence, or as an investment property.
7. The amount of the covered loan or the amount applied for.
8. The type of action taken by the financial institution and the date of the action.
9. The address of the property and other information related to the property’s location.
10. Information about the applicant or borrower, including:
 - a. Ethnicity, race, sex, and age; and
 - b. Gross annual income relied on in making the credit decision requiring consideration of income or, if a credit decision requiring consideration of income was not made, the gross annual income collected as part of the application process

11. The type of entity purchasing a covered loan that the financial institution originates or purchases and then sells within the same calendar year.
12. For covered loans subject to Regulation Z, other than purchased covered loans and reverse mortgages, the difference between the covered loan's annual percentage rate and the average prime offer rate for a comparable transaction as of the date the interest rate is set.
13. Whether a covered loan is a high-cost mortgage, and the reason that its high-cost.
14. The lien status of the property.
15. Except for purchased covered loans, the credit score or scores relied on in making the credit decision and the name and version of the scoring model used to generate each credit score.
16. The reason(s) the credit union denied the application.
17. Other than purchased covered loans, the total points and fees payable in connection with the covered loan or application, expressed in dollars and calculated in accordance with Regulation Z.
18. The total of all itemized amounts that are designated borrower-paid at or before closing, expressed in dollars, as disclosed pursuant to Regulation Z.
19. The points designated as paid to the creditor to reduce the interest rate, expressed in dollars, as described in Regulation Z.
20. The total amount of lender credits, as disclosed pursuant to Regulation Z.
21. The interest rate applicable to the approved application or covered loan at closing or opening of the account.
22. For covered loans, except for reverse mortgages or purchased covered loans, the term in months of any prepayment penalty, as defined in Regulation Z.
23. Except for purchased covered loans, the ratio of the applicant's or borrower's total monthly debt to the total monthly income relied on in making the credit decision.
24. Except for purchased covered loans, the ratio of the total amount of debt secured by the property to the value of the property relied on in making the credit decision.
25. The scheduled number of months after which the legal obligation will mature or would have matured.
26. The number of months until the first date the interest rate may change after closing or account opening.
27. Whether the contractual terms include or would have included any of the following:
 - a. A balloon payment
 - b. Interest-only payments
 - c. A contractual term that would cause the covered loan to be a negative amortization loan
 - d. Any other contractual term that would allow for payments other than fully amortizing payments

28. The value of the property securing the covered loan or, in the case of an application, proposed to secure the covered loan relied on in making the credit decision.
29. If the dwelling related to the property is a manufactured home, whether the covered loan is or application would have been secured by a manufactured home and land *or* by a manufactured home but not land.
30. Whether any identified dwelling on the property is a manufactured home, whether the applicant or borrower owns the land on which such a dwelling is or will be located through a direct or indirect ownership interest or leases the land through a paid or unpaid leasehold.
31. The number of individual dwelling units related to the property securing the covered loan or, in the case of an application, proposed to secure the covered loan.
32. If the property securing the covered loan or, in the case of an application, proposed to secure the covered loan includes a multifamily dwelling, the number of individual dwelling units related to the property that are income-restricted pursuant to Federal, State, or local affordable housing programs.
33. Except for purchased covered loans, the following information about the application channel of the covered loan or application:
 - a. Whether the applicant or borrower submitted the application for the covered loan directly to the credit union; and
 - b. Whether the obligation arising from the covered loan was, or in the case of an application, would have been initially payable to the credit union.
34. The unique identifier assigned by the Nationwide Mortgage Licensing System and Registry (NMLSR ID) for the mortgage loan originator, as defined in Regulation G
35. Except for purchased covered loans, the name of the automated underwriting system used by the credit union to evaluate the application and the recommendation generated by that automated underwriting system.
36. Whether the covered loan is, or the application is for, a reverse mortgage.
37. Whether the covered loan is, or the application is for, an open-end line of credit (HELOC).
38. Whether the covered loan is, or the application is for, a covered loan made primarily for a business or commercial purpose.

Universal Loan Identifier

Section 1003.4 currently requires credit unions to report an identifying number for each loan or loan application reported. Under existing commentary, the number must be unique within the credit union, and credit unions are strongly encouraged not to use the applicant's or borrower's name or Social Security number. According to the current instructions in appendix A, the loan identifier can be any alphanumeric combination of the credit union's choosing, up to 25 characters.

The final rule requires credit unions to provide a universal loan identifier (ULI) for each covered loan or application that can be used to retrieve the covered loan or application file. For covered loans or applications for which any credit unions has previously reported a ULI the final rule provides that the ULI shall consist of the ULI that was previously reported. For all other covered loans and applications, the final rule provides that the ULI shall begin with the credit union's 20 character Legal Entity Identifier (LEI). The final rule also provides that LEI will be followed by the ULI up to 25 additional characters (45 characters total) to identify the covered loan or application, which:

1. May be letters, numerals, symbols, or a combination of any of these;
2. Must be unique within the financial institution; and
3. Must not include any information that could be used to directly identify the applicant or borrower.

§1003.5- Disclosure and Reporting

Quarterly Reporting of Data

Regulation C currently requires credit unions to submit their HMDA data by March 1 following the calendar year for which the data are compiled. The final rule requires credit unions that report high volumes of HMDA data to submit their data on a quarterly, rather than an annual basis. High volume reporters include credit unions that reported at least 60,000 covered loans and applications, combined, in the preceding calendar year.

Credit unions meeting this threshold will be required to submit their data within 60 calendar days after the end of each calendar quarter except the fourth quarter. Fourth quarter data will be reported as part of the institution's annual submission. In the annual submission, a quarterly reporter will report its fourth quarter data *and* resubmit all the data for the first three calendar quarters of the year, including any corrections.

The quarterly submission requirement will go into effect January 1, 2020. As a result, a financial institution surpassing the 60,000 loan-volume threshold in calendar year 2019 will conduct quarterly submissions in calendar year 2020, starting with the first quarter due date of May 31, 2020.

Disclosure Statement/ Modified Loan Application Register

Beginning in 2018, reporting credit unions will no longer be required to provide a disclosure statement or a modified loan application register (LAR) to the public upon request. Currently, Section 1003.5 requires a credit union to make its disclosure statement available to the public in its home office within three business days of receiving it from FFIEC and make its modified LAR available to the public after removing private applicant and borrower data.

The final rule has shifted the disclosure of HMDA data *entirely* to the agencies and credit unions will no longer be required to provide data directly to the public. Instead, in response to a request from the public, a covered institution will be required to provide a written notice that the

disclosure statement and a modified LAR are available on the Bureau's website at www.consumerfinance.gov/hmda. A credit union may still *choose* to directly provide the disclosure statement or a modified LAR in response to a public request but the credit union must still provide the new written notice. The final rule also includes sample language for the written notice.

Use of a disclosure balancing test

In the final rule, the Bureau interprets HMDA to require that data released to the public be modified based on a balancing test. This test would weigh the risks to privacy interests created by the release of the unmodified data against the benefits of such a release to the public. In applying the test, the Bureau plans to consider the benefits of the disclosure of HMDA data, the risks to applicant and borrower privacy created by such a disclosure, and any options for data use and access restrictions.

In addition, the Bureau is planning to provide an additional process through which the public and industry stakeholders will be able to offer feedback on the use of the balancing test, now that the additional data points have been finalized.

Appendix & Staff Commentary

The final rule also includes additional Instructions to Appendix A and Staff commentary to address questions and concerns that have been raised repeatedly by stakeholders over the years. For example, the Instructions and commentary include guidance on what types of residential structures are considered dwellings; the treatment of manufactured and modular homes and multiple properties; coverage of preapproval programs and temporary financing; how to report a transaction that involved multiple financial institutions; reporting the action taken on an application; and reporting the type of purchaser for a covered loan.

Effective Dates

- Institutional coverage phase I: **January 1, 2017.**
- Institutional coverage phase II; transactional coverage test; additional data points; etc.: **January 1, 2018.**
- Quarterly submission for large-volume filers: **January 1, 2020.**

This document is intended for informational purposes only. It does not constitute legal advice. If such advice or a legal opinion is required, please consult with competent local counsel.

NAFCU's Regulatory Committee 2015

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NAFCU'S 2015 REGULATORY ALERTS

Number	Topic	Date Issued
15-EA-01	CFPB: Amendments to Mortgage Servicing under TILA/RESPA	1/20/15
15-EA-02	NCUA-RBC2	1/21/15
15-EA-03	NCUA: EGRPRA	1/26/15
15-EA-04	NCUA: Capital Planning and Stress Testing Amendments	2/3/15
15-EA-05	CFPB: Small Creditor Exemption Adjustments	2/12/15
15-EA-06	NCUA: Small Entity Definition	3/9/15
15-EA-07	NCUA: Fixed Assets	3/31/15
15-EA-08	CFPB: Credit Card Market Review	3/31/15
15-EA-09	NCUA: 2015 Regulatory Review	5/5/15
15-EA-10	NCUA: Share Insurance	5/14/15
15-EA-11	FASB: Store-Valued Gift Card Accounting	5/19/15
15-EA-12	CFPB: Payday Lending	5/27/15
15-EA-13	CFPB: Request For Information On Student Loan Servicing	5/27/15
15-EA-14	DOE: Student Accounts Proposal	5/28/15
15-EA-15	NCUA: EGRPRA	7/1/15
15-EA-16	NCUA: Member Business Lending	7/6/15
15-EA-17	DOL: Minimum Wage & Overtime Pay	8/5/15
15-EA-18	NCUA: Bank Notes	10/22/15

NAFCU'S 2015 FINAL REGULATIONS

Number	Topic	Date Issued
15-EF-01	CFPB: TILA/RESPA Amendments	2/4/15
15-EF-02	CFPB: Disclosure to Consumer Complaint Narratives	4/8/15
15-EF-03	CFPB: Temporary Suspension of the Submission of Credit Card Agreements	4/22/15
15-EF-04	NCUA: Associational Common Bonds	5/11/2015
15-EF-05	NACHA Same Day ACH	5/29/15
15-EF-06	NCUA: Loans in Areas Having Special Flood Hazards	6/30/15
15-EF-07	Interagency: Policy Statement on Joint Standards for Diversity Policies & Practices	7/2/15
15-EF-08	FFIEC's Cybersecurity Self-Assessment Tool	7/9/15
15-EF-09	CFPB: TILA-RESPA Integrated Disclosures Delay	7/30/15
15-EF-10	NCUA: Fixed Assets	8/3/15
15-EF-11	DoD: Military Lending Act	8/4/15
15-EF-12	NCUA: Small Entity Definition	9/25/15
15-EF-13	NCUA: Civil Monetary Penalty Inflation Adjustment	9/29/15
15-EF-14	CFPB: Small Creditor Exemption Adjustments	10/6/15
15-EF-15	NCUA: Prompt Corrective Action – Risk Based Capital	10/21/15
15-EF-16	NCUA: Delegation of Community Charter Amendments	10/22/15
15-EF-17	CFPB: HMDA (Regulation C)	10/28/15