



Federal Deposit Insurance Corporation
550 17th Street NW, Washington, D.C. 20429-9990

Financial Institution Letter
FIL-51-2017
October 17, 2017

FDIC Releases Interagency Designated Key HMDA Data Fields List

Summary: 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 Home Mortgage Disclosure Act (HMDA) data fields to support the efficient and effective evaluation of financial institutions' compliance with HMDA's requirements.

Statement of Applicability to Institutions With Total Assets Under \$1 Billion: This Financial Institution Letter applies to all FDIC-supervised institutions subject to HMDA and Regulation C. A HMDA exemption applies to institutions with assets at or below a threshold specified in Regulation C.

Distribution:

FDIC-Supervised Banks

Suggested Routing:

Chief Executive Officer
Compliance Officer

Related Topics:

Home Mortgage Disclosure Act

Attachment:

[Designated Key HMDA Data Fields](#)

Contact:

Tim Kalyvas, Examination Specialist, (202) 898-7102, tkalyvas@fdic.gov

Monika Jansen, Policy Analyst, 202-898-7060, mjansen@fdic.gov

Note:

FDIC financial institution letters (FILs) may be accessed from the FDIC's website at <https://www.fdic.gov/news/news/financial/2017/>

To receive FILs electronically, please visit <https://service.govdelivery.com/accounts/USFDIC/subscribe/new>.

Paper copies of FDIC financial institution letters may be obtained through the FDIC's Public Information Center, 3501 Fairfax Drive, E-1002, Arlington, VA 22226 (1-877-275-3342 or 703-562-2200).

Highlights:

- Amendments to Regulation C effective January 1, 2018, (the HMDA Amendments) establish the data financial institutions will collect and report pursuant to HMDA requirements.
- The Federal Financial Institutions Examination Council (FFIEC) issued HMDA Examiner Transaction Testing Guidelines (the Guidelines) establishing procedures for examination staff to use when validating HMDA data.
- 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.
- To promote efficiency, coordination, and consistency, the FRB, the FDIC, and the OCC have jointly identified and Designated Key HMDA Data Fields, consistent with their traditional practice of designating key fields considered to be most important to ensuring the integrity of analyses of HMDA data.
- FDIC compliance examination staff will prioritize the Designated Key HMDA Data Fields in reviewing data that is collected by financial institutions in or after 2018 pursuant to the HMDA Amendments.

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.

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.

Accordingly, for the purposes of evaluating financial institutions' compliance with HMDA requirements, OCC, FDIC, and FRB 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.

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	<i>Universal Loan Identifier (ULI)</i>	<i>Universal Loan Identifier (ULI)</i>
4	<i>Application Date</i>	<i>Application Date</i>
5	<i>Loan Type</i>	<i>Loan Type</i>
6	<i>Loan Purpose</i>	<i>Loan Purpose</i>
7	Preapproval	Preapproval
8	Construction Method	Construction Method
9	<i>Occupancy Type</i>	<i>Occupancy Type</i>
10	<i>Loan Amount</i>	<i>Loan Amount</i>
11	<i>Action Taken</i>	<i>Action Taken</i>
12	<i>Action Taken Date</i>	<i>Action Taken Date</i>
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	<i>Census Tract</i>	<i>Property Location</i>
19	<i>Ethnicity of Applicant or Borrower: 1</i>	<i>Ethnicity</i>
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: Conditional Free Form Text Field for Code 14	Ethnicity
25	<i>Ethnicity of Co-Applicant or Co-Borrower: 1</i>	<i>Ethnicity</i>
26	Ethnicity of Co-Applicant or Co-Borrower: 2	Ethnicity
27	Ethnicity of Co-Applicant or Co-Borrower: 3	Ethnicity

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

#	Data Field Name	Data Point Name
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: Conditional Free Form Text Field for Code 14	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	<i>Race of Applicant or Borrower: 1</i>	<i>Race</i>
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: Conditional Free Form Text Field for Code 1	Race
39	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 27	Race
40	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 44	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: Conditional Free Form Text Field for Code 1	Race
47	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 27	Race
48	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 44	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>

#	Data Field Name	Data Point Name
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>
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	<i>Origination Charges</i>	<i>Origination Charges</i>
76	<i>Discount Points</i>	<i>Discount Points</i>
77	<i>Lender Credits</i>	<i>Lender Credits</i>
78	<i>Interest Rate</i>	<i>Interest Rate</i>
79	Prepayment Penalty Term	Prepayment Penalty Term
80	<i>Debt-to-Income Ratio</i>	<i>Debt-to-Income Ratio</i>
81	<i>Combined Loan-To-Value Ratio</i>	<i>Combined Loan-To-Value Ratio</i>
82	<i>Loan Term</i>	<i>Loan Term</i>
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

#	Data Field Name	Data Point Name
87	Other Non-Amortizing Features	Non-Amortizing Features
88	<i>Property Value</i>	<i>Property Value</i>
89	<i>Manufactured Home Secured Property Type</i>	<i>Manufactured Home Secured Property Type</i>
90	Manufactured Home Land Property Interest	Manufactured Home Land Property Interest
91	<i>Total Units</i>	<i>Total Units</i>
92	Multifamily Affordable Units	Multifamily Affordable Units
93	Submission of Application	Application Channel
94	Initially Payable to Your Institution	Application Channel
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>