
HOME MORTGAGE DISCLOSURE ACT (REGULATION C)

REVIEW CONSIDERATIONS

Review Considerations

Review Area	Requirements / Recommendations
General Coverage	<p>Determine whether the credit union is subject to the requirements of HMDA / Regulation C.</p> <p>Credit unions are exempt from reporting requirements for a given year if on the preceding December 31:</p> <ul style="list-style-type: none">• The credit union did not have a home or branch office in an MSA; or• The credit union's total asset were at or below the asset threshold; or• The credit union did not make a first lien home purchase loan (or refinancing) on a one-to-four family dwelling in the preceding calendar year.
Policies / Procedures	Ensure policy and procedures for implementing HMDA are in place for collecting and maintaining accurate data of covered loans and applications.
Collection of Data	<p>Compile data on applications for, and originations and purchases of, home purchase and home improvement loans (including refinancings of both).</p> <p>The required information must be retained on a loan application register (LAR) in the format prescribed in Appendix A to Regulation C.</p>
Data on Race or National Origin, Sex, and Income	<p>Ensure information on race or national origin and sex is collected in the manner prescribed in Appendix B to Regulation C.</p> <p>If the application is taken in person, the lender must ask for this information. If the applicant chooses not to provide this information for an application taken in person, the lender must note this fact on the form and note the data based on the basis of visual observation or surname, to the extent possible.</p>

	<p>A lender need not ask for information about race or national origin and sex if an application is taken entirely by telephone. Also, this information need not be collected when an application is by mail, or Internet, if the applicant does not complete the portions of the application requesting this information.</p> <p>Information on race or national origin, sex, and income need not be collected for purchased loans.</p>
Excluded Data	<p>Ensure certain transactions are excluded from being reported, including:</p> <ul style="list-style-type: none"> ▪ Loans originated or purchased in a fiduciary capacity ▪ Loans on unimproved land ▪ Temporary financing (e.g. construction loans) ▪ The purchase of an interest in a pool of loans (e.g. mortgage-backed securities) ▪ The purchase solely of loan servicing rights ▪ Loans acquired as part of a merger or acquisition
Reporting Requirements	Submit the completed HMDA-LAR to NCUA HMDA Processing at the Federal Reserve Board by March 1 following the calendar year for which loan data is compiled.
Modified Loan Application Register	Ensure the modified register is made available to the public after removing the following information: application or loan number, date the application was received, and date of action taken.
Disclosure Statements	<p>Ensure the disclosure statement prepared by the FFIEC is made available to the public for inspection and copying at its home office within three business days of receipt from the FFIEC.</p> <p>If a credit union has branches in other MSAs, it must make disclosure statements available using one of two options (not described here).</p>
Lobby Notice	Post a general notice regarding availability of HMDA data in the lobby of its home office and each branch office located in a MSA.
Training	Provide training to employees whose duties are impacted by HMDA.
Monitoring	Ensure collection of data for the HMDA-LAR is

	being properly recorded within the required timeframes.
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