

# REGULATORY ALERT

**NATIONAL CREDIT UNION ADMINISTRATION  
1775 DUKE STREET, ALEXANDRIA, VA 22314**

**DATE:** January 2009

**NO:** 09-RA-02

**TO:** Federally-Insured Credit Unions

**SUBJ:** Home Mortgage Disclosure Act  
Data Collection Requirements for Calendar Year 2009

Dear Board of Directors:

Credit unions that engage in residential mortgage lending and meet certain criteria must comply with Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). Regulation C requires credit unions that meet all three of the following criteria to collect HMDA data associated with mortgage applications processed during 2009:

1. The credit union's total assets as of December 31, 2008 exceeded \$39 million. This is the threshold established by the Board of Governors of the Federal Reserve Board (FRB);
2. The credit union had a home or branch office in a metropolitan statistical area (MSA) on December 31, 2008; and
3. During 2008, the credit union originated at least one home purchase loan or a refinance of a home purchase loan secured by a first lien on a one-to-four-family dwelling.

Credit unions meeting all three of the above criteria must collect HMDA data during calendar year 2009 and submit the data to the FRB by no later than March 1, 2010. All other credit unions are exempt from filing HMDA data associated with mortgage applications processed during 2009.

If you have any questions about how to interpret these requirements, please contact your regional office or state supervisory authority. In addition, the Federal Financial Institutions Examination Council's Internet site provides a comprehensive discussion of HMDA and related reporting requirements at the address <http://www.ffiec.gov/hmda/default.htm>.

Sincerely,

/s/

Michael E. Fryzel  
Chairman

bcc: SSIC 3200

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