



HMDA Data Collection Requirements for Calendar Year 2020

If your credit union makes residential mortgage loans and meets all four criteria outlined below, you must comply with the Consumer Financial Protection Bureau's Regulation C, which implements the Home Mortgage Disclosure Act.¹

Regulation C requires you to collect HMDA data associated with mortgage loan applications processed during 2020, if:

1. Your credit union's total assets as of December 31, 2019, exceeded \$47 million;²
2. Your credit union had a home or branch office in a Metropolitan Statistical Area on December 31, 2019;
3. Your credit union originated at least one home purchase loan (other than temporary financing such as a construction loan) or refinanced a home purchase loan, secured by a first lien on a one-to-four-unit dwelling during 2019; and
4. Your credit union originated at least 25 closed-end mortgage loans in each of the two preceding calendar years (2018 and 2019) or 500 open-end lines of credit in each of the two preceding calendar years (2018 and 2019).³

If your credit union meets all four criteria, you must collect HMDA data during calendar year 2020 and submit the data to the CFPB no later than March 1, 2021.

If your credit union does not meet all four criteria, you are exempt from filing HMDA data for calendar year 2020.

HMDA Data Partial Exemptions

Section 104(a) of the Economic Growth, Regulatory Relief, and Consumer Protection Act amended HMDA by adding partial exemptions from HMDA's requirements for certain transactions. On October 10, 2019, the CFPB issued a [final rule](#) that implemented those changes.

¹ 12 U.S.C. 2801-2810; 12 CFR Part 1003.

² See 84 FR 69993 (December 20, 2019) (adjusting asset-size exemption threshold).

³ On January 1, 2022, the open-end line of credit threshold will adjust to 100. See 84 FR 57946 (October 29, 2019) (2019 HMDA Final Rule).



The final rule provides that a credit union does not need to collect or report certain data with respect to closed-end mortgage loans if it originated fewer than 500 closed-end mortgage loans in each of the two preceding calendar years. Similarly, the final rule provides that a credit union does not need to collect or report certain data with respect to open-end lines of credit if it originated fewer than 500 open-end lines of credit in each of the two preceding calendar years. The table below provides partial exemption examples.

Credit Union	Loan Type	Originations During Calendar Year 2018	Originations During Calendar Year 2019	Partial Exemption In 2020
A	Closed-end mortgage loans	650	700	Neither
	Open-end lines of credit	550	575	
B	Closed-end mortgage loans	495	499	Only closed-end mortgage loans
	Open-end lines of credit	485	505	
C	Closed-end mortgage loans	480	525	Only open-end lines of credit
	Open-end lines of credit	475	490	
D	Closed-end mortgage loans	425	450	Both closed-end mortgage loans and open-end lines of credit
	Open-end lines of credit	375	400	

The final rule specifies the data points that do not need to be collected and reported if a transaction qualifies for a partial exemption, as well as those data points that must be collected and reported even if a transaction qualifies for a partial exemption. There are a total of 48 data points currently required by Regulation C. Under the final rule, 26 of the 48 data points do not need to be collected and reported if the transaction qualifies for a partial exemption.

As a result, a credit union subject to HMDA, but eligible for a partial exemption, is only required to collect and report the 22 non-exempt data points for transactions to which a partial exemption applies.



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For questions about HMDA, see the information available on NCUA's [Fair Lending Compliance Resources](#) webpage, or contact NCUA's Office of Consumer Financial Protection at 703.518.1140 or ComplianceMail@ncua.gov.

If you have further questions, please contact your regional NCUA office or state supervisory authority.