

July 2017

# HMDA Loan Scenarios

Hypothetical Transactions for HMDA Reporting

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# Introduction

The Consumer Financial Protection Bureau (CFPB) is providing the following examples to help financial institutions prepare their Home Mortgage Disclosure Act (HMDA) loan/application register (LAR) for data collected in 2018 or beyond. This document provides illustration only, and is not intended as a legal interpretation or guidance on the requirements of [Regulation C](#), effective January 1, 2018.

**The data displayed in these examples represent hypothetical scenarios from a hypothetical financial institution.** Please refer to [Regulation C](#), effective January 1, 2018, the [Filing Instructions Guide for data collected in 2018](#) (FIG), as well as your financial institution's policies and procedures for details on how to comply.

This is an exercise in **information mapping**,<sup>1</sup> focusing not on each data value, but on where these data are inserted into each data field of the HMDA LAR. The appearance of data in a particular field in the LAR translates the facts within the storyline into the values described in the FIG.

CFPB is presenting scenarios in a storyline, keeping many parts the same. But as the storyline changes, the information is interpreted, and then mapped with the corresponding value from the FIG based on the changing information. Each storyline becomes one line of data on the LAR. Certain assumptions will be made for the sake of simplicity and continuity; we emphasize that this document is only an example.

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<sup>1</sup> Mapping is used here with the following definition: "Information mapping is writing without paragraphs. Instead, there is a set format to guide the writer and reader along the easiest pathway to communication." Robert E. Horn, Information Mapping, Training in Bus & Ind. 27 (1974).

The three scenarios described in this document include the following:

1. A description of the scenario:

- Scenario 1 is an originated closed-end purchase loan for a one-to-four family property;
- Scenario 2 is an originated closed-end purchase loan for a multifamily property to a non-natural person;
- Scenario 3 is an open-end line of credit transaction.

2. Data fields that are formatted in **BOLD** in the storyline:

- In scenario 1, the data fields that are in **BOLD** represent reported data fields for each transaction.
- In scenarios 2 and 3, the changes, **as compared with scenario 1**, are highlighted in **BOLD**.

3. Valid values as defined in the FIG.

4. Valid values illustrated in the pipe delimited text file format as it would appear on the submitted LAR. Data fields modified from the first scenarios are referenced in **BOLD**.

# 1. Scenario 1: Single-Family Closed-End Purchase Loan<sup>2</sup>

Michael Jones, who **self-reported as a male, with Ethnicity as Puerto Rican and Race as White**, and Mary Stone, who **self-reported as a female, with Ethnicity as Not Hispanic or Latino and Race as Native Hawaiian**, applied for a **fully amortizing, fixed-rate, 30-year conventional<sup>3</sup> loan to purchase<sup>4</sup>** a single family home.<sup>5</sup> Michael was **39** years old and Mary was **32** years old.

The application date was **7/21/2018**. **Preapproval was not requested**, and the applicants **intended to occupy** the home as a **principal residence**.<sup>6</sup> The application was for the amount of **\$162,000**, with an interest rate of **3.875%** for a **site-built dwelling** located at:

**456 Somewhere Avenue**

**Los Angeles, CA 90049**

In making the credit decision, Ficus Bank relied on a credit score from **Experian Fair Isaac score of 794** for Michael and a **VantageScore 3.0 of 803** for Mary, and a gross annual income of **\$123,000**. The couple **submitted an application directly** to Ficus Bank with Erika Otis, a loan officer whose **NMLSR ID is 12345**. There were **no prepayment penalty terms**,<sup>7</sup> **balloon payments**,<sup>8</sup> **negative amortization**,<sup>9</sup> or **other non-amortizing**

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<sup>2</sup> For purposes of this illustration, this example assumes that the transaction is subject to Regulation Z, 12 C.F.R. §§ 1026.19(f), 43(c). This example also assumes that the transaction is not a high-cost mortgage loan as defined by Regulation Z, 12 C.F.R. § 1026.32(a).

<sup>3</sup> Conventional means that the loan is not insured by the Federal Housing Administration, or guaranteed by the Rural Housing Service or the Farm Service Agency.

<sup>4</sup> Home purchase refers to a home purchase loan as defined by Regulation C, 12 C.F.R. § 1003.2(j).

<sup>5</sup> For purposes of this illustration, the dwelling has one individual dwelling unit.

<sup>6</sup> Principal residence as defined by Regulation C, 12 C.F.R. § 1003.4(a)(6).

<sup>7</sup> Prepayment penalty refers to prepayment penalty as defined in Regulation Z, 12 C.F.R. § 1026.32(b)(6)(i) or (ii), as applicable.

**features**<sup>10</sup> for the loan. The relied upon debt-to-income ratio was **42%** and the relied upon combined loan-to-value ratio was **80%**. Ficus Bank evaluated the application using **Desktop Underwriter**® which generated an **Approve/Eligible** result. The calculated rate spread was **0.428**.<sup>11</sup> Based on the rate spread and the points and fees, this is not a **HOEPA**<sup>12</sup> **loan**.

The closing cost details disclosed to the borrower on the Closing Disclosure required by Regulation Z, 12 C.F.R. § 1026.19(f), are as follows:

- **Origination Charges:**<sup>13</sup> **\$1,802**
- **Total Loan Costs:**<sup>14</sup> **\$5,672**
- **Total Discount Points:**<sup>15</sup> **\$0**
- **Lender Credits:**<sup>16</sup> **\$0**

This application was **approved** by Ficus Bank, and Michael and Mary **decided to accept the loan**. The loan closed in the name of Ficus Bank on **09/12/2018**. This is a **first lien on the dwelling**. The value of the property relied upon in making the credit decision was **\$202,500**.

Ficus Bank later **sold this loan to Fannie Mae** in the same calendar year.

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<sup>8</sup> Balloon payment refers to balloon payment as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(5)(i).

<sup>9</sup> Negative amortization means contract terms that would cause the covered loan to be a negative amortization loan as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(7)(v).

<sup>10</sup> Non-amortizing features means contract terms that would allow for payments other than amortizing payments, as defined in Regulation Z, 12 C.F.R. § 1026.43(b)(2), during the loan term, other than contract terms described in 12 C.F.R. § 1003.4(a)(27)(i)–(iii).

<sup>11</sup> This is a hypothetical rate spread not based on actual average prime offer rate (APOR).

<sup>12</sup> HOEPA loan as defined in the [2013 Home Ownership and Equity Protection Act](#).

<sup>13</sup> This refers to the total of all itemized amounts that are designated borrower-paid at or before closing, as disclosed pursuant to Regulation Z, 12 C.F.R. § 1026.38(f)(1).

<sup>14</sup> This refers to the total loan costs disclosed pursuant to Regulation Z, 12 C.F.R. § 1026.38(f)(4).

<sup>15</sup> This refers to the points paid to the creditor to reduce the interest rate expressed in dollars, as described in Regulation Z, 12 C.F.R. § 1026.37(f)(1)(i), and disclosed pursuant to Regulation Z, 12 C.F.R. § 1026.38(f)(1).

<sup>16</sup> This refers to the amount of lender credits, as disclosed pursuant to Regulation Z, 12 C.F.R. § 1026.38(h)(3).

## 1.1 Data mapping information for Scenario 1

The table below illustrates how a financial institution would map the information included in the scenario above to each of the required data fields in the FIG for data collected in 2018.

Data Field #	Data Field Name	Value
1	Record Identifier	2
2	Legal Entity Identifier (LEI)	10Bx939c5543TqA1144M
3	Universal Loan Identifier (ULI)	10Bx939c5543TqA1144M999143X38
4	Application Date	20180721
5	Loan Type	1
6	Loan Purpose	1
7	Preapproval	2
8	Construction Method	1
9	Occupancy Type	1
10	Loan Amount	162000
11	Action Taken	1
12	Action Taken Date	20180912
13	Street Address	456 Somewhere Ave
14	City	Los Angeles
15	State	CA
16	ZIP Code	90049
17	County	06037
18	Census Tract	06037264000
19	Ethnicity of Applicant or Borrower: 1	12
20	Ethnicity of Applicant or Borrower: 2	
21	Ethnicity of Applicant or Borrower: 3	
22	Ethnicity of Applicant or Borrower: 4	
23	Ethnicity of Applicant or Borrower: 5	
24	Ethnicity of Applicant or Borrower: Conditional Free Form Text Field for Code 14	
25	Ethnicity of Co-Applicant or Co-Borrower: 1	2
26	Ethnicity of Co-Applicant or Co-Borrower: 2	
27	Ethnicity of Co-Applicant or Co-Borrower: 3	
28	Ethnicity of Co-Applicant or Co-Borrower: 4	
29	Ethnicity of Co-Applicant or Co-Borrower: 5	
30	Ethnicity of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 14	
31	Ethnicity of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2
32	Ethnicity of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2
33	Race of Applicant or Borrower: 1	5
34	Race of Applicant or Borrower: 2	
35	Race of Applicant or Borrower: 3	
36	Race of Applicant or Borrower: 4	
37	Race of Applicant or Borrower: 5	

Data Field #	Data Field Name	Value
38	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 1	
39	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 27	
40	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 44	
41	Race of Co-Applicant or Co-Borrower: 1	41
42	Race of Co-Applicant or Co-Borrower: 2	
43	Race of Co-Applicant or Co-Borrower: 3	
44	Race of Co-Applicant or Co-Borrower: 4	
45	Race of Co-Applicant or Co-Borrower: 5	
46	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 1	
47	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 27	
48	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 44	
49	Race of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2
50	Race of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2
51	Sex of Applicant or Borrower	1
52	Sex of Co-Applicant or Co-Borrower	2
53	Sex of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2
54	Sex of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2
55	Age of Applicant or Borrower	39
56	Age of Co-Applicant or Co-Borrower	32
57	Income	123
58	Type of Purchaser	1
59	Rate Spread	0.428 <sup>17</sup>
60	HOEPA Status	2
61	Lien Status	1
62	Credit Score of Applicant or Borrower	794
63	Credit Score of Co-Applicant or Co-Borrower	803
64	Applicant or Borrower, Name and Version of Credit Scoring Model	2

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<sup>17</sup> This is a hypothetical rate spread not based on actual average prime offer rate (APOR).



Data Field #	Data Field Name	Value
65	Applicant or Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field for Code 8	
66	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model	6
67	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field for Code 8	
68	Reason for Denial: 1	10
69	Reason for Denial: 2	
70	Reason for Denial: 3	
71	Reason for Denial: 4	
72	Reason for Denial: Conditional Free Form Text Field for Code 9	
73	Total Loan Costs	5672
74	Total Points and Fees	NA
75	Origination Charges	1802
76	Discount Points	0
77	Lender Credits	0
78	Interest Rate	3.875
79	Prepayment Penalty Term	NA
80	Debt-to-Income Ratio	42
81	Combined Loan-to-Value Ratio	80
82	Loan Term	360
83	Introductory Rate Period	NA
84	Balloon Payment	2
85	Interest-Only Payments	2
86	Negative Amortization	2
87	Other Non-amortizing Features	2
88	Property Value	202500
89	Manufactured Home Secured Property Type	3
90	Manufactured Home Land Property Interest	5
91	Total Units	1
92	Multifamily Affordable Units	NA
93	Submission of Application	1
94	Initially Payable to Your Institution	1
95	Mortgage Loan Originator NMLSR Identifier	12345
96	Automated Underwriting System: 1	1
97	Automated Underwriting System: 2	
98	Automated Underwriting System: 3	
99	Automated Underwriting System: 4	
100	Automated Underwriting System: 5	
101	Automated Underwriting System: Conditional Free Form Text Field for Code 5	
102	Automated Underwriting System Result: 1	1
103	Automated Underwriting System Result: 2	
104	Automated Underwriting System Result: 3	
105	Automated Underwriting System Result: 4	
106	Automated Underwriting System Result: 5	

Data Field #	Data Field Name	Value
107	Automated Underwriting System Result: Conditional Free Form Text Field for Code 16	
108	Reverse Mortgage	2
109	Open-End Line of Credit	2
110	Business or Commercial Purpose	2

## 1.2 Pipe Delimited File Format for Scenario 1

The example below displays how Scenario 1 would appear on the financial institution's LAR as a single row of data in the pipe delimited format:<sup>18</sup>

```
2|10Bx939c5543TqA1144M|10Bx939c5543TqA1144M999143X38|20180721|1|1|2|1|1|162000|1
|20180912|456 Somewhere Ave|Los Angeles|CA|90049|06037|06037264000|
12|||||2|||||2|2|5|||||||41|||||||2|2|1|2|2|2|39|32|123|1|0.428|2|1|794|803|
2||6||10|||||5672|NA|1802|0|0|3.875|NA|42|80|360|NA|2|2|2|2|202500|3|5|1|NA|1|1|12345
|1|||||1|||||2|2|2
```

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<sup>18</sup> This example is displayed on multiple lines for viewing purposes only. In the LAR, all the data for each loan are reported on the same row; with each data field separated with a pipe character, and ends with a carriage return. Please refer to the [Filing Instructions Guide for data collected in 2018](#) for further instructions.

## 2. Scenario 2: Non-Natural Person, Multifamily Purchase Loan<sup>19</sup>

**The Dylan Corporation** applied for a fully amortizing, fixed-rate, 30-year conventional<sup>20</sup> home purchase<sup>21</sup> loan to purchase an **investment property**<sup>22</sup> multifamily dwelling.<sup>23</sup>

**There is no co-applicant.** The application date was 07/21/2018. There are **10 units** in the building, **5 of which are income-restricted** according to local affordable housing programs. The application was for the amount of **\$585,000** with an interest rate of 3.875% for a site-built dwelling located at:

456 Somewhere Avenue

Los Angeles, CA 90049

Dylan Corporation submitted an application directly to Ficus Bank with Erika Otis, a loan officer whose NMLS ID is 12345. There were no prepayment penalty terms,<sup>24</sup> balloon payments,<sup>25</sup> negative amortization,<sup>26</sup> or other non-amortizing<sup>27</sup> features for the loan. The relied upon combined loan-to-value ratio was **59%**.

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<sup>19</sup> For purposes of this illustration, the example assumes that the transaction is not subject to Regulation Z, 12 C.F.R. § 1026.

<sup>20</sup> Conventional means that the loan is not insured by the Federal Housing Administration, or guaranteed by the Rural Housing Service or the Farm Service Agency.

<sup>21</sup> Home purchase refers to a home purchase loan as defined by Regulation C, 12 C.F.R. § 1003.2(j).

<sup>22</sup> Investment property refers to investment as defined in Regulation C, 12 C.F.R. § 1003.4(a)(6) cmt. 4.

<sup>23</sup> Multifamily as defined in Regulation C, 12 C.F.R. § 1003.2(n).

<sup>24</sup> Prepayment penalty refers to prepayment penalty as defined in Regulation Z, 12 C.F.R. § 1026.32(b)(6)(i) or (ii), as applicable.

<sup>25</sup> Balloon payment refers to balloon payment as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(5)(i).

<sup>26</sup> Negative amortization means contract terms that would cause the covered loan to be a negative amortization loan as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(7)(v).

The financial institution approved the application on 09/05/2018, and The Dylan Corporation accepted the loan. The loan closed on 09/12/2018 in the name of Ficus Bank. This is a first lien on the dwelling. Ficus Bank relied on a property value of **\$985,500** in making a credit decision.

Ficus Bank later sold this loan to **FreddieMac** in the same calendar year.

## 2.1 Data mapping that will change for non-natural person, multifamily scenario as compared to origination scenario 1 based on the storyline

The table below illustrates how a financial institution would map the differing information included in Scenario 2 to the data fields in the FIG for data collected in 2018. This table includes only the data fields that would be modified between Scenario 1 and Scenario 2. Data fields not listed below would have the same values listed in Scenario 1.

Data Field #	Data Field Name	Value
9	Occupancy Type	3
10	Loan Amount	585000
19	Ethnicity of Applicant or Borrower: 1	4
25	Ethnicity of Co-Applicant or Co-Borrower: 1	5
31	Ethnicity of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	3
32	Ethnicity of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	4
33	Race of Applicant or Borrower: 1	7
41	Race of Co-Applicant or Co-Borrower: 1	8
49	Race of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	3
50	Race of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	4
51	Sex of Applicant or Borrower	4
52	Sex of Co-Applicant or Co-Borrower	5

<sup>27</sup> Non-amortizing features means contract terms that would allow for payments other than amortizing payments, as defined in in Regulation Z, 12 C.F.R. § 1026.43(b)(2), during the loan term, other than contract terms described in 12 C.F.R. §1003.4(a)(27)(i)–(iii).

Data Field #	Data Field Name	Value
53	Sex of Applicant or Borrower Collected on the Basis of Visual Observation or Full Name	3
54	Sex of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Full Name	4
55	Age of Applicant or Borrower	8888
56	Age of Co-Applicant or Co-Borrower	9999
57	Income	NA
58	Type of Purchaser	3
59	Rate Spread	NA
60	HOEPA Status	3
62	Credit Score of Applicant or Borrower	8888
63	Credit Score of Co-Applicant or Co-Borrower	9999
64	Applicant or Borrower, Name and Version of Credit Scoring Model	9
66	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model	10
73	Total Loan Costs	NA
74	Total Points and Fees	NA
75	Origination Charges	NA
76	Discount Points	NA
77	Lender Credits	NA
80	Debt-to-income Ratio	NA
81	Combined Loan-to-Value Ratio	59
88	Property Value	985500
91	Total Units	10
92	Multifamily Affordable Units	5
96	Automated Underwriting System: 1	6
102	Automated Underwriting System Result: 1	17
110	Business or Commercial Purpose	1

## 2.2 Pipe Delimited File Format for Scenario 2

The example below displays how the new information (**bold**) presented in Scenario 2 would appear on the financial institution's LAR as a single row of data in the pipe delimited format:<sup>28</sup>

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<sup>28</sup> This example is displayed on multiple lines and in bold for viewing purposes only. In the LAR, all the data for each loan are reported on the same row; with each data field separated with a pipe character, and ends with a carriage

2|10Bx939c5543TqA1144M|10Bx939c5543TqA1144M999143X38|20180721|1|1|2|1|**3**|  
**585000**|1|20180912|456 Somewhere Ave|Los Angeles|CA|90049|06037|06037264000|  
**4**|||||**5**|||||**3**|**4**|**7**|||||**8**|||||**3**|**4**|**4**|**5**|**3**|**4**|**8888**|**9999**|**NA**|**3**|**NA**|**3**|1|**8888**|**9999**|  
**9**||**10**||10||||**NA**|**NA**|**NA**|**NA**|**NA**|3.875|**NA**|**NA**|**59**|360|**NA**|2|2|2|2|**985500**|3|5|**10**|**5**|1|1|  
12345|**6**|||||**17**|||||2|2|**1**

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return. The data fields do not need to be bolded. Please refer to the [Filing Instructions Guide for data collected in 2018](#) for further instructions.

### 3. Scenario 3: Open-end line of credit <sup>29</sup>

Michael Jones, who self-reported as a male, with an Ethnicity of Puerto Rican and Race as White, and Mary Stone, who self-reported as a female, with an Ethnicity of Not Hispanic or Latino, and Race as Native Hawaiian, applied for a conventional,<sup>30</sup> **open end line of credit**<sup>31</sup> secured by their single family home in order to **make improvements** to their property. Michael is 39 years old and Mary is 32 years old.

The application date was 7/21/2018. This is the applicants' principal residence.<sup>32</sup> The loan amount available under the terms of the open-end plan was for the amount of **\$40,000** at a **one year adjustable** interest rate of 3.875%; with interest paid on a quarterly basis on the unpaid balance of the amount drawn; **with a 240-month term** for a site-built dwelling located at:

456 Somewhere Avenue

Los Angeles, CA 90049

In making the credit decision, Ficus Bank relied on Experian Fair Isaac score of 794 for Michael and a VantageScore 3.0 of 803 for Mary, as well as a gross annual income of \$123,000. The couple submitted an application directly to Ficus Bank with Erika Otis, a loan officer whose NMLSR ID is 12345. There were no prepayment penalty terms,<sup>33</sup> balloon payments<sup>34</sup> or negative

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<sup>29</sup> For the purposes of this illustration, the example assumes that the transaction is not subject to Regulation Z, 12 C.F.R. §§ 19(e), (f) or 43(c).

<sup>30</sup> Conventional means that the loan is not insured by the Federal Housing Administration, or guaranteed by the Rural Housing Service or the Farm Service Agency.

<sup>31</sup> Open-end line of credit means open-end line of credit as defined by Regulation C, 12 C.F.R. § 1003.2(o).

<sup>32</sup> Principal residence as defined by Regulation C, 12 C.F.R. § 1003.4(a)(6).

<sup>33</sup> Prepayment penalty refers to prepayment penalty as defined in Regulation Z, 12 C.F.R. § 1026.32(b)(6)(i) or (ii), as applicable.

<sup>34</sup> Balloon payment refers to balloon payment as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(5)(i).

amortization<sup>35</sup> or other non-amortizing features<sup>36</sup> for the loan. The relied upon debt-to-income ratio was 42%, and the relied upon combined loan-to-value ratio was 80%. The calculated rate spread was 0.428.<sup>37</sup>

This is a **subordinate lien on the property**. This application was approved by Ficus Bank on 09/01/2018, and Michael and Mary decided to accept the loan. The account's opening date is 09/12/2018. The value of the property relied on in making the credit decision was \$202,500.

Ficus Bank held **this loan in its portfolio** for more than a year after origination where initial payments were made.

### 3.1 Data mapping that will change for open-end scenario 3 as compared to origination scenario 1 based on the storyline

The table below illustrates how a financial institution would map the differing information included in Scenario 3 to the data fields in the FIG for data collected in 2018. This table includes only the data fields that would be modified between Scenario 1 and Scenario 3. Data fields not listed below would have the same values listed in Scenario 1.

Data Field #	Data Field Name	Value
6	Loan Purpose	2
10	Loan Amount	40000
58	Type of Purchaser	0
61	Lien Status	2
73	Total Loan Costs	NA
75	Origination Charges	NA

<sup>35</sup> Negative amortization means contract terms that would cause the covered loan to be a negative amortization loan as defined in Regulation Z, 12 C.F.R. § 1026.18(s)(7)(v).

<sup>36</sup> Non-amortizing features means contract terms that would allow for payments other than amortizing payments, as defined in in Regulation Z, 12 C.F.R. § 1026.43(b)(2), during the loan term, other than contract terms described in 12 C.F.R. § 1003.4(a)(27)(i)–(iii).

<sup>37</sup> This is a hypothetical rate spread not based on actual average prime offer rate (APOR).



Data Field #	Data Field Name	Value
76	Discount Points	NA
77	Lender Credits	NA
82	Loan Term	240
83	Introductory Rate Period	12
96	Automated Underwriting	NA
102	Automated Underwriting Response	NA
109	Open-End Line of Credit	1

### 3.2 Pipe Delimited File Format for Scenario 3

The example below displays how the new information (**bold**) presented in Scenario 3 would appear on the financial institution's LAR as a single row of data in the pipe delimited format:<sup>38</sup>

```
2|10Bx939c5543TqA1144M|10Bx939c5543TqA1144M999143X38|20180721|1|2|2|1|1|40000|
1|20180912|456 Somewhere Ave|Los Angeles|CA|90049|06037|06037264000|12|
2|2|2|5|41|2|2|1|2|2|2|39|32|123|0|0.428|2|2|794|803|2|6|10|NA|NA|
NA|NA|NA|3.875|NA|42|80|240|12|2|2|2|2|202500|3|5|1|NA|1|1|12345|NA|NA|2
|1|2
```

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<sup>38</sup> This example is displayed on multiple lines and in bold for viewing purposes only. In the LAR, all the data for each loan are reported on the same row; with each data field separated with a pipe character, and ends with a carriage return. The data fields do not need to be bolded. Please refer to the [Filing Instructions Guide for data collected in 2018](#) for further instructions.

## 4. Comparison Synopsis

This is a comparison of the reported values, highlighting the changes to illustrate the differences among the previous scenarios.

Data Field #	Data Field Name	Origination scenario	Non-natural person, multifamily scenario	Open-end line of credit scenario
1	Record Identifier	2	2	2
2	Legal Entity Identifier (LEI)	10Bx939c5543TqA1144M	10Bx939c5543TqA1144M	10Bx939c5543TqA1144M
3	Universal Loan Identifier (ULI)	10Bx939c5543TqA1144M999143X38	10Bx939c5543TqA1144M999143X38	10Bx939c5543TqA1144M999143X38
4	Application Date	20180721	20180721	20180721
5	Loan Type	1	1	1
6	Loan Purpose	1	1	2
7	Preapproval	2	2	2
8	Construction Method	1	1	1
9	Occupancy Type	1	3	1
10	Loan Amount	162000	585000	40000
11	Action Taken	1	1	1
12	Action Taken Date	20180912	20180912	20180912
13	Street Address	456 Somewhere Ave	456 Somewhere Ave	456 Somewhere Ave
14	City	Los Angeles	Los Angeles	Los Angeles
15	State	CA	CA	CA
16	ZIP Code	90049	90049	90049
17	County	06037	06037	06037
18	Census Tract	06037264000	06037264000	06037264000
19	Ethnicity of Applicant or Borrower: 1	12	4	12
20	Ethnicity of Applicant or Borrower: 2			
21	Ethnicity of Applicant or Borrower: 3			
22	Ethnicity of Applicant or Borrower: 4			
23	Ethnicity of Applicant or Borrower: 5			
24	Ethnicity of Applicant or Borrower: Conditional Free Form Text Field for Code 14			

<b>Data Field #</b>	<b>Data Field Name</b>	<b>Origination scenario</b>	<b>Non-natural person, multifamily scenario</b>	<b>Open-end line of credit scenario</b>
25	Ethnicity of Co-Applicant or Co-Borrower: 1	2	5	2
26	Ethnicity of Co-Applicant or Co-Borrower: 2			
27	Ethnicity of Co-Applicant or Co-Borrower: 3			
28	Ethnicity of Co-Applicant or Co-Borrower: 4			
29	Ethnicity of Co-Applicant or Co-Borrower: 5			
30	Ethnicity of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 14			
31	Ethnicity of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2	3	2
32	Ethnicity of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2	4	2
33	Race of Applicant or Borrower: 1	5	7	5
34	Race of Applicant or Borrower: 2			
35	Race of Applicant or Borrower: 3			
36	Race of Applicant or Borrower: 4			
37	Race of Applicant or Borrower: 5			
38	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 1			

Data Field #	Data Field Name	Origination scenario	Non-natural person, multifamily scenario	Open-end line of credit scenario
39	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 27			
40	Race of Applicant or Borrower: Conditional Free Form Text Field for Code 44			
41	Race of Co-Applicant or Co-Borrower: 1	41	8	41
42	Race of Co-Applicant or Co-Borrower: 2			
43	Race of Co-Applicant or Co-Borrower: 3			
44	Race of Co-Applicant or Co-Borrower: 4			
45	Race of Co-Applicant or Co-Borrower: 5			
46	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 1			
47	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 27			
48	Race of Co-Applicant or Co-Borrower: Conditional Free Form Text Field for Code 44			
49	Race of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2	3	2

<b>Data Field #</b>	<b>Data Field Name</b>	<b>Origination scenario</b>	<b>Non-natural person, multifamily scenario</b>	<b>Open-end line of credit scenario</b>
50	Race of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2	4	2
51	Sex of Applicant or Borrower	1	4	1
52	Sex of Co-Applicant or Co-Borrower	2	5	2
53	Sex of Applicant or Borrower Collected on the Basis of Visual Observation or Surname	2	3	2
54	Sex of Co-Applicant or Co-Borrower Collected on the Basis of Visual Observation or Surname	2	4	2
55	Age of Applicant or Borrower	39	8888	39
56	Age of Co-Applicant or Co-Borrower	32	9999	32
57	Income	123	NA	123
58	Type of Purchaser	1	3	0
59	Rate Spread	0.428 <sup>39</sup>	NA	0.428 <sup>40</sup>
60	HOEPA Status	2	3	2
61	Lien Status	1	1	2
62	Credit Score of Applicant or Borrower	794	8888	794
63	Credit Score of Co-Applicant or Co-Borrower	803	9999	803

<sup>39</sup> This is a hypothetical rate spread not based on actual average prime offer rate (APOR).

<sup>40</sup> This is a hypothetical rate spread not based on actual average prime offer rate (APOR).

Data Field #	Data Field Name	Origination scenario	Non-natural person, multifamily scenario	Open-end line of credit scenario
64	Applicant or Borrower, Name and Version of Credit Scoring Model	2	9	2
65	Applicant or Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field for Code 8			
66	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model	6	10	6
67	Co-Applicant or Co-Borrower, Name and Version of Credit Scoring Model: Conditional Free Form Text Field for Code 8			
68	Reason for Denial: 1	10	10	10
69	Reason for Denial: 2			
70	Reason for Denial: 3			
71	Reason for Denial: 4			
72	Reason for Denial: Conditional Free Form Text Field for Code 9			
73	Total Loan Costs	5672	NA	NA
74	Total Points and Fees	NA	NA	NA
75	Origination Charges	1802	NA	NA
76	Discount Points	0	NA	NA
77	Lender Credits	0	NA	NA
78	Interest Rate	3.875	3.875	3.875
79	Prepayment Penalty Term	NA	NA	NA
80	Debt-to-Income Ratio	42	NA	42
81	Combined Loan-to-Value Ratio	80	59	80

Data Field #	Data Field Name	Origination scenario	Non-natural person, multifamily scenario	Open-end line of credit scenario
82	Loan Term	360	360	240
83	Introductory Rate Period	NA	NA	12
84	Balloon Payment	2	2	2
85	Interest-Only Payments	2	2	2
86	Negative Amortization	2	2	2
87	Other Non-amortizing Features	2	2	2
88	Property Value	202500	985500	202500
89	Manufactured Home Secured Property Type	3	3	3
90	Manufactured Home Land Property Interest	5	5	5
91	Total Units	1	10	1
92	Multifamily Affordable Units	NA	5	NA
93	Submission of Application	1	1	1
94	Initially Payable to Your Institution	1	1	1
95	Mortgage Loan Originator NMLSR Identifier	12345	12345	12345
96	Automated Underwriting System: 1	1	6	NA
97	Automated Underwriting System: 2			
98	Automated Underwriting System: 3			
99	Automated Underwriting System: 4			
100	Automated Underwriting System: 5			
101	Automated Underwriting System: Conditional Free Form Text Field for Code 5			

Data Field #	Data Field Name	Origination scenario	Non-natural person, multifamily scenario	Open-end line of credit scenario
102	Automated Underwriting System Result: 1	1	17	NA
103	Automated Underwriting System Result: 2			
104	Automated Underwriting System Result: 3			
105	Automated Underwriting System Result: 4			
106	Automated Underwriting System Result: 5			
107	Automated Underwriting System Result: Conditional Free Form Text Field for Code 16			
108	Reverse Mortgage	2	2	2
109	Open-End Line of Credit	2	2	1
110	Business or Commercial Purpose	2	1	2



## 5. Additional HMDA Resources

The CFPB's website contains many resources to assist financial institutions as they assess their particular HMDA filing needs.

### 5.1 [HMDA Implementation Guidance](#)

- [Executive summary](#) – Overview of changes to the rule published in the Federal Register October 28, 2015.
- [Final Rule](#) – The final rule as published in the Federal Register on October 28, 2015.
- [E-Regulations](#) – An online tool that makes regulations easier to find, read, and understand.
- [Small Entity Compliance Guide](#) – The purpose of this guide is to provide an easy-to-use summary of Regulation C, as amended by the 2015 HMDA Rule.
- [Key dates timeline](#) – Overview of the effective dates for different elements of the rule.
- [2018 HMDA institutional coverage chart](#) – Reference tool illustrating the criteria to determine whether an institution is covered by Regulation C for data collected in 2018 and thereafter.
- [2018 HMDA transactional coverage chart](#) – Reference tool illustrating one approach to determine whether a transaction is reportable under HMDA.
- [Summary of reportable data](#) – Reference tool for HMDA data required to be collected, recorded, and reported.
- [Reporting “Not Applicable”](#) – Reference tool for when to report HMDA data as "not applicable."
- [Collection and Reporting of HMDA Information about Ethnicity and Race](#)
- [HMDA Webinar 1](#) – Overview of the HMDA final rule.

- [HMDA Webinar 2](#) – Overview of identifiers, including entity, applications or loans, property and loan originator, as well as data points related to applicants and borrowers.

## 5.2 [HMDA Technology Information for Filers](#)

- Technology Preview – The [Technology Preview](#) provides resources for financial institutions preparing their systems to file HMDA data with the CFPB.
- Filing Instructions Guide – The Filing Instructions Guide is a compendium of resources to help financial institutions file HMDA data. For data collected in or after 2017, please visit the [CFPB's website](#) for data submission resources. For data collected in or before 2016, please visit the [FFIEC's website](#) for data submission resources.
- Loan/Application Register (LAR) Formatting Tool – The [LAR Formatting Tool](#) is intended to help financial institutions, typically those with small volumes of covered loans and applications, to create an electronic file that can be submitted to the HMDA Platform.
- File Format Verification Tool (FFVT) – HMDA filers can use the [tool](#) to test whether their file meets certain formatting requirements provided in the Filing Instructions Guide for HMDA data collected in 2017. The web-based tool is for filers' convenience and is not part of the HMDA filing process. It does not transfer any data to the CFPB.
- Do you have additional questions? Please check out the [FAQs](#).