

HMDA Rule Key Dates Timeline

January 1, 2020 to December 31, 2022¹



| 2020 | 2021 | 2022 |
|--|---|---|
| 1/1 Effective date for quarterly reporting provisions Open-end line of credit threshold temporarily remains at 500 7/1 Closed-end mortgage loan threshold permanently increases from 25 to 100 | 1/1 No new regulatory requirements go into effect | 1/1 Open-end line of credit threshold permanently adjusts to 200 |
| Q1 – Q4 Collect 2020 data as required under Regulation C (for reporting in 2021 and, if a FI is quarterly reporter, 2020) ² | Q1 – Q4 Collect 2021 data as required under Regulation C (for reporting in 2022 and, if a FI is quarterly reporter, 2021) | Q1 – Q4 Collect 2022 data as required under Regulation C (for reporting in 2023 and, if a FI is quarterly reporter, 2022) |
| 1/1 – 3/1 Submit 2019 data to the CFPB, as required under Regulation C 4/1 – 5/30 Quarterly FI reporters submit Q1, 2020 data to the CFPB, as required under Regulation C ² 7/1 FIs that originated fewer than 100 closed-end mortgage loans during 2018 or 2019 may stop collecting 2020 HMDA data on closed-end mortgage loans | 1/1 – 3/1 Submit 2020 data to the CFPB, as required under Regulation C | 1/1 – 3/1 Submit 2021 data to the CFPB, as required under Regulation C |
| <p> This HMDA Rule Key Dates Timeline was published on April 16, 2020, and has not been updated to reflect the <i>2022 NCRC et al. v. CFPB Order</i>, final rules, guidance, or post to address questions regarding the NCRC Order: https://www.consumerfinance.gov/about-us/blog/changes-to-hmda-closed-end-loan-reporting-threshold/.</p> | | |

¹ This document is a Compliance Aid issued by the Consumer Financial Protection Bureau (Bureau). The Bureau published a Policy Statement on Compliance Aids, available at <https://www.consumerfinance.gov/policy-compliance/rulemaking/final-rules/policy-statement-compliance-aids/>, that explains the Bureau's approach to Compliance Aids. Version 1.0, 4/16/2020.

Following the issuance of the HMDA 2015 Final Rule, the Bureau published a Key Dates Timeline that provides an overview of the effective dates for certain provisions of the 2015 HMDA Final Rule. That deliverable is available at https://www.consumerfinance.gov/documents/5628/201709_cfpb_hmda-key-dates-timeline.pdf. This Key Dates Timeline provides an overview of the effective dates for certain provisions of Regulation C, as amended, for the 2020, 2021, and 2022 HMDA data collection periods.

² As of March 26, 2020, and until further notice, the Bureau does not intend to cite in an examination or initiate an enforcement action against any institution for failure to report its HMDA data quarterly. At a later date, the Bureau will provide information as to how and when it expects institutions under its jurisdiction to resume quarterly HMDA data submissions. Entities should continue collecting and recording HMDA data in anticipation of making annual data submissions. Entities may continue making quarterly HMDA data submissions even though the Bureau does not intend to cite or take any actions against them if they do not do so. See https://files.consumerfinance.gov/f/documents/cfpb_hmda-statement_covid-19_2020-03.pdf.