

HMDA Process Changes Coming in 2017

by kblanchard@keycomplianceservices.com - Tuesday, November 01, 2016

<http://www.kaybeescomplianceinsights.com/hmda-process-changes-coming-2017/>

2017 HMDA Process Changes

Are you ready for the new HMDA process in 2017?

I have been asked many times recently if it is true that there are HMDA changes coming in 2017. The answer is yes! Please share this article if you have any peers in the industry who might not be aware that there are changes for 2017. So much has been heard about the major changes coming in 2018 that many have not focused on 2017.

The rules regarding data to be reported remain the same in 2017, but the software, file format and submission process are all changing. This affects every HMDA reporter in some way, even those using vendor software.

HMDA Software

The familiar FFIEC HMDA software is going away after the 2016 HMDA submission. For any transactions with an action date in 2017, there will be a new online browser based HMDA platform that will be used to run edits and submit HMDA data. The FFIEC downloadable software will no longer be used after the 2016 submission.

If vendor software is not used, an institution will maintain data in a spreadsheet and upload it to the HMDA platform after conversion to a pipe delimited file using a CFPB provided conversion tool.

Web submission via the HMDA platform will be the only submission method. There will be no mailing of paper loan application registers or disks or CD-ROMs, nor will encrypted files be emailed by financial institutions or their vendors. The 2016 submission in 1st quarter 2017 will be the last year for those filing methods.

All edits and error checks will be run online, including the macro edits that are currently emailed after a HMDA file is submitted. Macro edits will be presented online and the file cannot be submitted until all edits are resolved. This means processes must change to allow time to review and respond to all macro edits prior to submission.

Registration and Certification

An online certification by an individual authorized to certify to the accuracy and completeness of the data will be required prior to submission.

All HMDA reporters will be required to register to access the CFPB HMDA platform. Information on the registration process will be issued at a later date.

Availability of the HMDA Platform

The new HMDA software is expected to be made available in the summer of 2017.

Many HMDA reporting institutions run monthly or quarterly edits on their data as part of the HMDA quality control process and to comply with the requirements to have the HMDA loan application register available within 30 days of each quarter end. To assist with that process prior to the release of the new platform, the CFPB is planning to provide a solution to be used until the full HMDA platform is released. More information on the edit solution is expected in January 2017.

CFPB Resources

You can keep up to date with the technology changes [at this link](#) at the CFPB website.

The Filing Instructions Guide (FIG) for 2017 is available [at this CFPB link](#) as well as at the FFIEC site under HMDA file specifications.

Questions?

If you have questions, you can contact me [at this link](#).