Tips for Reporting Accurate HMDA and CRA Data

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Objectives

- HMDA Data Collection
  - Regulatory requirements, challenges, and common errors

- CRA Data Collection
  - Regulatory requirements, challenges, and common errors

- HMDA and CRA Data: Maintaining Compliance

- Using HMDA and CRA Data in Internal Reviews
  - Fair Lending
  - CRA

- Dodd-Frank Wall Street Reform and Consumer Protection Act
  - Changes to HMDA Data Reporting
  - New Small Business Data Collection Requirements

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HMDA Data Collection and Reporting

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HMDA’s Goals

- Provide public with information on whether financial institutions are meeting community housing needs
- Aid public officials and private investors in identifying areas needing investment
- Identify possible discriminatory lending patterns and assist regulatory agencies in enforcing anti-discrimination statutes
HMDA – Who Reports the Data

Bank, savings association, or credit union that:

- Exceeds current asset threshold of $39M (adjusted annually);
- Had an office in an MSA on the preceding December 31; and
- Meets certain federal criteria, such as being FDIC insured.

For-profit mortgage lender that:

- Originated home purchase and refinance loans that exceeded 10% of loan volume; or
- Originated home purchase and refinance loans that equaled at least $25M;
- Had an office in an MSA on the preceding December 31; and
- Had total assets totaling more than $10M on the preceding December 31. or
- Originated at least 100 home purchase and refinance loans the previous year.

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### HMDA – What’s Reported

All applications for and originations and purchases of:

<table>
<thead>
<tr>
<th>Home Purchase Loans</th>
<th>Home Improvement Loans</th>
<th>Refinance Loans</th>
<th>Home Equity Lines of Credit (optional)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Purpose of purchasing a dwelling</td>
<td>• Dwelling secured: Repair, rehabilitate, remodel or improve a dwelling or real property on which located</td>
<td>• New obligation that satisfies and replaces existing obligation by same borrower</td>
<td>• Open-end credit plan secured by a dwelling as defined by Regulation Z</td>
</tr>
<tr>
<td>• Secured by a dwelling</td>
<td>• Non-dwelling secured: Same purpose and classified by FI as home improvement loan</td>
<td>• Existing obligation and new obligation secured by a dwelling</td>
<td>• Purpose: Home purchase or home improvement</td>
</tr>
<tr>
<td>• Preapprovals if have covered preapproval program</td>
<td></td>
<td>• NOT purpose driven</td>
<td>• Amount for home purchase or home improvement</td>
</tr>
</tbody>
</table>

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HMDA Exemptions

- Construction and temporary financing loans
- Loans on unimproved land
- Fiduciary loans
- Purchase of interest in mortgage pool
- Prequalification requests
- Purchase of servicing rights
- Loans acquired through merger/acquisition

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## Current HMDA Data Fields

<table>
<thead>
<tr>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifying number</td>
<td>Property location: MSA, county, state, census tract</td>
</tr>
<tr>
<td>Application date</td>
<td>Ethnicity, race, and gender of applicants/co-applicants</td>
</tr>
<tr>
<td>Loan type</td>
<td>Gross annual income</td>
</tr>
<tr>
<td>Loan purpose</td>
<td>Type of loan purchaser</td>
</tr>
<tr>
<td>Preapproval status</td>
<td>Rate spread</td>
</tr>
<tr>
<td>Property type</td>
<td>HOEPA status</td>
</tr>
<tr>
<td>Owner occupancy status</td>
<td>Lien status</td>
</tr>
<tr>
<td>Loan amount</td>
<td>Reason for denial (optional)</td>
</tr>
<tr>
<td>Type of action taken and date</td>
<td></td>
</tr>
</tbody>
</table>
Why is HMDA Reporting a Challenge

- Difficult to identify all reportable transactions
  - Multiple business lines affected
    (Residential real estate, consumer, commercial real estate)
  - Must meet HMDA purpose and other definitions
    - Dwelling: Includes mobile homes (whether or not attached to real property), condo units, and co-ops
    - Covered preapproval program: Comprehensive underwriting, written commitment, valid for designated period of time, up to specified amount, home purchase, subject to limited conditions
  - Includes non-originated applications
    (Denied, withdrawn, incomplete, approved but not accepted)
Why is HMDA Reporting a Challenge

- Difficult to get all data fields accurate
  - Data volume is large
    - Numerous data fields for numerous loans and applications
  - Expertise and significant time commitment required
  - Transactions can be complex
    - Multi-purpose: Report home purchase if also refinance or home improvement; report home improvement if also refinance
    - Multiple dwellings: Report property being improved if home improvement; report property securing loan if home purchase
- Data not always readily accessible

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Common HMDA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
</table>
| Failing to capture all HMDA reportable transactions | • Implement tracking procedures for denied, withdrawn and incomplete applications  
• Ensure automated systems identify HMDA transactions as appropriate  
• Compare new loan lists against the LAR loan entries  
• Enhance training regarding HMDA definitions |
| Borrower information incorrect or not collected    | • Ensure lenders collect monitoring information by visual observation when appropriate  
• Verify that reported borrower information reflects application and file data |
# Common HMDA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rate spread incorrect</td>
<td>• Verify that do not report rate spread if non-Regulation Z or non-dwelling secured home improvement loan</td>
</tr>
<tr>
<td></td>
<td>• Provide tools to limit rate spread calculation errors</td>
</tr>
<tr>
<td>Income inaccurate</td>
<td>• Ensure reporting and documenting gross annual income relied on if 1- to 4-family dwelling loan</td>
</tr>
<tr>
<td></td>
<td>• Report NA if corporate borrower or multifamily dwelling loan</td>
</tr>
</tbody>
</table>
## Common HMDA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loan amount incorrect</td>
<td>• Ensure system capturing or staff entering loan note amount on closed-end originated loans</td>
</tr>
<tr>
<td></td>
<td>• Watch for typographical errors/transposing numbers/rounding</td>
</tr>
<tr>
<td>Property location inaccurate</td>
<td>• Ensure using correct property and correct address, particularly if more than one dwelling involved</td>
</tr>
<tr>
<td></td>
<td>• Ensure geocoding system is up to date</td>
</tr>
<tr>
<td></td>
<td>• Create a reliable backup system if address not identified</td>
</tr>
</tbody>
</table>
Common HMDA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preapproval code incorrect</td>
<td>• Determine whether institution has covered preapproval program</td>
</tr>
<tr>
<td></td>
<td>• If no covered program, preapproval code should be 3 (NA)</td>
</tr>
<tr>
<td>Type of purchaser inaccurate</td>
<td>• Review contracts to confirm type of purchaser, watch for merger/acquisition changes</td>
</tr>
<tr>
<td></td>
<td>• After review, prepare cheat sheets to ensure consistent reporting</td>
</tr>
</tbody>
</table>
CRA Data Collection and Reporting
Community Reinvestment Act (CRA)
12 U.S.C. 2901

General purpose of CRA is to encourage banks, while operating safely and soundly, to help meet the credit needs of their communities.

Purpose of CRA data collection is to enable examiners and the public to judge whether the institution is helping to meet the credit needs of its communities.
CRA Data Collection:
Who is Required to Collect, Maintain, & Report CRA Data?

Large Banks
Currently ≥ $1.098 billion* for two consecutive year-ends
*Asset size determining large bank size may change annually
Not a special - purpose institution

State chartered member banks - FRS
Nonmember state chartered banks - FDIC
National banks - OCC
Savings associations - OTS

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CRA Data Collection – Required Data §.42(a)

Must Collect and Maintain Data for:

- Small Business Loans*
- Small Farm Loans*

*CRA provides specific definitions for these terms

- Loan Number
  - Unique number/alphanumeric

- Loan Amount at Origination

- Loan Location - Geocode

- Indicator whether the Loan was to a Business or Farm with gross annual revenues of $1 million or less

- File Specs – Add’l Data: Action Type, Action Date, Affiliate Flag, Activity Year, Agency Code, Record and Respondent IDs

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CRA Data Collection – Optional Data

At its option, a large bank may collect and report:

- Consumer loan data
  - Motor vehicle, credit card, home equity, other secured, or non-secured loans
- Other loan data
  - Small business real estate secured
- Affiliate lending
- Data on lending by a consortium or a third party

Optional data reporting fields are the same as for required loans – for business loans report gross annual revenues and for consumer loan types report gross annual income.
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What’s Difficult About Identifying CRA Reportable Loans?

**Based on Call Report/TFR Instructions Schedule RC-C (TFR – Schedule SB)**

**Small Business Loans**
- Loans with original amounts of $1 million or less
- Loans reported in Schedule RC-C in:
  - part I, item 1.e
    - Loans secured by nonfarm nonresidential properties (in domestic offices)
  - part I, item 4 or 4.a
    - Commercial and industrial loans to U.S. addresses

**Small Farm Loans**
- Loans with original amounts of $500,000 or less
- Loans reported in Schedule RC-C in:
  - part I, item 1.e
    - Loans secured by farmland (including farm residential and other improvements) (in domestic offices)
  - part I, item 3 or 4.a
    - Loans to finance agricultural production and other loans to farmers (in domestic offices)

**Community Development Loans**
- Loans with a primary purpose of Community Development defined as either:
  1) Affordable housing for low- and moderate-income individuals
  2) Community services targeted to low- or moderate-income individuals
  3) Activities promoting economic development by financing business or farms meeting the size eligibility standards
  4) Activities that revitalize or stabilize
    - (i) low- or moderate-income geographies
    - (ii) designated disaster areas, or
    - (iii) designated distressed or underserved nonmetropolitan middle-income geographies

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CRA Data Collection Resource:

A Quick Guide to CRA Loan Data Reporting Categories

Published by the Federal Reserve Bank of Dallas

http://dallasfed.org/ca/pubs/craloan.pdf

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http://dallasfed.org/ca/pubs/craloan.pdf
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# Common CRA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
</table>
| Reporting Non-Reportable Loans    | • Ensure loans reported meet the size and definition tests  
                                    | – check loans to non-profits, only some are reportable  
                                    | • Ensure you follow the rules for refinance/renewal loans  
                                    | • Run and review monthly loan lists to ensure all reportable loans are reported |
| Loan amount incorrect             | • Provide training on identifying the appropriate loan amount  
                                    | – refinances/renewals  
                                    | – credit line increases  
                                    | – credit cards  
                                    | • Watch for typographical errors/transposing numbers/rounding |
## Common CRA Reporting Errors

<table>
<thead>
<tr>
<th>Common Errors</th>
<th>Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Loan Location Incorrect</strong></td>
<td>• Ensure correct address is used; request street address</td>
</tr>
<tr>
<td></td>
<td>• Create a reliable backup system if address not identified</td>
</tr>
<tr>
<td></td>
<td>• Watch for typographical errors, transposing numbers, rounding</td>
</tr>
<tr>
<td></td>
<td>• Update systems with FFIEC Census file geographic changes</td>
</tr>
<tr>
<td></td>
<td>- Three MSA codes changed in 2010 (2 in FL and 1 in OH)</td>
</tr>
<tr>
<td><strong>Gross Annual Revenues/Income</strong></td>
<td>• Report gross annual revenues or income instead of net</td>
</tr>
<tr>
<td></td>
<td>• Provide training on when to aggregate revenues if the underwriting relies/considers additional entity revenues</td>
</tr>
<tr>
<td></td>
<td>• If file contains revenue information, it should be reported even if no reliance on revenue in underwriting</td>
</tr>
</tbody>
</table>
Rules for Reporting Refinances or Renewals

- May report only one origination (whether a refinance or renewal) per loan per year, unless an increase in the loan amount is granted.

- If the loan amount increases when extending the term of the loan, always report the amount of the increase as a small business or farm loan.

- Report only the amount of the increase if the original or remaining amount has already been reported.
## Indicator of Gross Annual Revenues: What to report?

<table>
<thead>
<tr>
<th>Revenues Considered/Relied On</th>
<th>Gross Annual Revenues to Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entity Only</td>
<td>Only entity gross annual revenues</td>
</tr>
<tr>
<td>Entity + Parent or Subsidiary</td>
<td>Aggregate the revenues of the entity and the parent or subsidiary</td>
</tr>
<tr>
<td>Entity + Co-Signor or guarantor ≠ affiliate of borrower (i.e., a sole proprietor)</td>
<td>Only entity revenues – do not combine</td>
</tr>
<tr>
<td>Start-up business</td>
<td>Actual revenue to date, including $0 if the business has no revenue to date</td>
</tr>
</tbody>
</table>

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HMDA and CRA Data: Maintaining Compliance

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HMDA and CRA Data: Maintaining Compliance

- Why data accuracy is very important
  - Public availability of data increases reputation risk
    - Data errors may result in the appearance of discriminatory lending
  - Necessary for accurate and meaningful internal fair lending and CRA reviews
  - Validity of aggregate data depends on accurate data
  - Data resubmission, examination delays, and potential penalties – all costly options
Effectively managing HMDA and CRA data collection risk

- Determining the bank’s data collection risk profile
  - How many business lines affected?
  - Are processes centralized or decentralized?
  - Does the institution evaluate data collection audit and exam findings and identify processes needing improvement?
  - Does the institution monitor changes in bank structure, staff, software systems, and regulations that can increase risk of data collection errors?
Effectively managing HMDA and CRA data collection risk (continued)

- Has the bank implemented appropriate processes for controlling identified data collection-related risks?
  - Clearly identified data collection processes
  - Appropriate software coding
  - Well-trained, detail-oriented staff
  - Standardized forms and job aids
  - Effective internal controls, such as second reviews, new loan reviews
  - Thorough data audits (compare to source documents, not collection forms)
Using HMDA and CRA Data in Internal Reviews
Using HMDA and CRA Data for Internal Fair Lending Reviews

- **Using HMDA Data**
  - Think like an examiner!
  - Evaluate risk of potential difference in treatment based on race, ethnicity, and/or gender
    - Lending and denial rates
    - Amount and frequency of rate spreads
    - Application processing times
  - Evaluate potential redlining risk
    - Difference in application levels and lending and denial rates based on census tract’s racial and/or ethnicity characteristics

- **Using CRA Data**
  - Evaluate potential redlining risk for small business and small farm lending

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Using HMDA and CRA Data for Internal CRA Reviews

- **Why Conduct Internal CRA Analyses?**
  - Assists in determining risk of noncompliance
  - Identify CRA performance issues/weaknesses so can correct or make modifications before CRA evaluation
  - Minimize risk of poor CRA rating

- **Evaluations of CRA performance using HMDA/CRA data**
  - Designation of assessment area territory
  - Lending performance by geography
  - Lending performance by borrower revenue/income
  - Community development lending performance
Dodd-Frank Wall Street Reform and Consumer Protection Act

July 21, 2010
### New HMDA Data Fields

<table>
<thead>
<tr>
<th>Age</th>
<th>Loan term</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total points and fees</td>
<td>Application channel (i.e., broker)</td>
</tr>
<tr>
<td>Rate spread for all loans</td>
<td>Credit score</td>
</tr>
<tr>
<td>Prepayment penalty term</td>
<td>Loan originator identifier (SAFE Act)*</td>
</tr>
<tr>
<td>Property value</td>
<td>Universal loan identifier*</td>
</tr>
<tr>
<td>Term of introductory rate period</td>
<td>Property’s parcel number*</td>
</tr>
<tr>
<td>Negative amortization</td>
<td>(*As Bureau may determine to be appropriate)</td>
</tr>
</tbody>
</table>

- Bureau may require reporting of additional information
- Privacy interests of applicants to be considered during rulemaking
- Bureau to consult with other agencies before issuing regulations

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Dodd-Frank Act: HMDA Changes

When will lenders be required to report the new HMDA data fields?

– Regulations will set reporting date; however, no deadline for issuing final regulations

– *One limitation:* No data reporting required before first January 1 that occurs after the end of 9-month period that begins on date final regulations issued

<table>
<thead>
<tr>
<th>No reporting of new data BEFORE:</th>
<th>A Timing Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date final regulations issued</td>
<td>July 1, 2000</td>
</tr>
<tr>
<td>End of 9-month period following final regulation date</td>
<td>April 1, 2001</td>
</tr>
<tr>
<td>First January after the end of 9-month period</td>
<td>January 1, 2002</td>
</tr>
</tbody>
</table>

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Dodd-Frank Act: New Data Collection Requirements for Small Business Loans

- **Equal Credit Opportunity Act Amendments – Section 704B**
  - Requires the collection of data for certain small business loan applicants
    - Disclosure of data to be balanced against privacy concerns

- **Bureau Action – Section 704B(g)**
  - The Bureau is to issue rules and guidance to carry out, enforce, and compile data pursuant to this section
  - The Bureau may adopt exceptions to any requirement of this section

- **Effective Date**
  - Bureau must issue rules. No deadline for doing so.
<table>
<thead>
<tr>
<th>Dodd-Frank Act Small Business Data Collection</th>
<th>CRA</th>
</tr>
</thead>
<tbody>
<tr>
<td>▪ Facilitate enforcement of fair lending laws</td>
<td>▪ Encourage banks, while operating safely and soundly, to help meet the credit needs of their communities</td>
</tr>
<tr>
<td>▪ Enables communities, government entities, and creditors to identify business and community development needs and opportunities of women-owned, minority-owned, and small businesses</td>
<td></td>
</tr>
</tbody>
</table>
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Additional Small Business Data Collection Requirements

Statutory requirements – prior to Bureau rule making and guidance:

- Applicant may refuse to provide requested information
- Must maintain collected data records separate from application
- No access to collected information by loan underwriters, officers, employees, or affiliates involved in the underwriting decision
- If underwriter or those involved in underwriting process gains, or will gain access to collected information:
  - Must notify applicant
  - Include notice that the financial institution may not discriminate on the basis of the information
# Data Collection Comparison

<table>
<thead>
<tr>
<th>Collected Data Fields</th>
<th>Dodd-Frank Act §1071(a)</th>
<th>ECOA §704B(e)(2)</th>
<th>CRA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Number, Application Date, Loan Type, Loan Amount</td>
<td>Y</td>
<td></td>
<td>Y</td>
</tr>
<tr>
<td>Loan Purpose</td>
<td>Y</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>Amount of Credit/Credit Limit Applied For</td>
<td>Y</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>Race, Gender, and Ethnicity of the Principal Owners of the Business</td>
<td>Y</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>Action Taken, Action Date</td>
<td>Y</td>
<td></td>
<td>Y</td>
</tr>
</tbody>
</table>

Only report originated or purchased loans

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### Data Collection Comparison

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<th>Dodd-Frank Act § 1071(a) ECOA § 704B(e)(2)</th>
<th>CRA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Location: Census Tract</strong></td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>Location of principal place of business</td>
<td>Location = business headquarters</td>
</tr>
<tr>
<td></td>
<td></td>
<td>or majority of loan proceeds used</td>
</tr>
<tr>
<td><strong>Location: State, MSA, County Codes</strong></td>
<td>Y*</td>
<td>Y</td>
</tr>
<tr>
<td><strong>Gross Annual Revenue</strong></td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>Revenues in last fiscal year</td>
<td>Generally the revenues relied on</td>
</tr>
<tr>
<td></td>
<td>preceding the application date</td>
<td>If not relied on, not required to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not required to request or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>consider but if collect expected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>to report</td>
</tr>
</tbody>
</table>

*Not specified in Dodd-Frank Act but census tract would be meaningless without additional location information

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FFIEC Resources

- HMDA Resources
  http://www.ffiec.gov/hmda/default.htm

- HMDA Analysis Reports
  http://www.ffiec.gov/reports.htm

- CRA Materials – General
  http://www.ffiec.gov/cra/default.htm

- Call Report and RC-C Instructions
  http://www.ffiec.gov/forms041.htm

- Interagency Fair Lending Examination Procedures

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