



2015 HMDA RULE REPORTING NOT APPLICABLE (“NA”)

EFFECTIVE JANUARY 1, 2018

Data	Report “NA” for...	Reg C Citation
Application Date	<ul style="list-style-type: none"> • Purchased covered loans 	§ 1003.4(a)(1)(ii)
Property Address	<ul style="list-style-type: none"> • Covered loans or applications if the property address of the property securing the covered loan is not known (e.g., the property address was not provided to the institution before the application was denied, withdrawn, or closed for incompleteness) 	Comment 4(a)(9)(i)-3
	<ul style="list-style-type: none"> • Covered loans or applications if a site of a manufactured home has not been identified 	Comment 4(a)(9)-5
State	<ul style="list-style-type: none"> • Covered loans or applications if the property is not located in a Metropolitan Statistical Area (MSA) or Metropolitan Division (MD) in which the institution has a home or branch office and the institution is not required to report data on small business, small farm, and community development lending under regulations that implement the Community Reinvestment Act of 1977 	§ 1003.4(a)(9)(ii)(A) and § 1003.4(e)
	<ul style="list-style-type: none"> • Covered loans or applications if the site of a manufactured home has not been identified 	Comment 4(a)(9)-5
County	<ul style="list-style-type: none"> • Covered loans or applications if the property is not located in a Metropolitan Statistical Area (MSA) or Metropolitan Division (MD) in which the institution has a home or branch office and the institution is not required to report data on small business, small farm, and community development lending under regulations that implement the Community Reinvestment Act of 1977 	§ 1003.4(a)(9)(ii)(B) and § 1003.4(e)
	<ul style="list-style-type: none"> • Covered loans or applications if the site of a manufactured home has not been identified 	Comment 4(a)(9)-5
Census Tract	<ul style="list-style-type: none"> • Covered loans or applications if the property is not located in an MSA or MD in which the institution has a home or branch office and the 	§ 1003.4(a)(9)(ii)(C) and § 1003.4(e)

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	<p>institution is not required to report data on small business, small farm, and community development lending under regulations that implement the Community Reinvestment Act of 1977</p> <ul style="list-style-type: none"> • Covered loans or applications if the property is located in a county with a population of 30,000 or less according to the most recent decennial census conducted by the U.S. Census Bureau • Covered loans or applications if the site of a manufactured home has not been identified 	<p>§ 1003.4(a)(9)(ii)(C)</p> <p>Comment 4(a)(9)-5</p>
<p>Ethnicity, Race, and Sex of Applicant or Borrower, and/or CoApplicant or CoBorrower, and Whether Collected on the Basis of Visual Observation or Surname</p>	<ul style="list-style-type: none"> • Purchased covered loans for which the financial institution chooses not to report the applicant’s or co-applicant’s ethnicity, race, and sex • Covered loans or applications when applicant or co-applicant is not a natural person 	<p>Appendix B</p> <p>Appendix B</p>
<p>Age</p>	<ul style="list-style-type: none"> • Purchased covered loans for which the financial institution chooses not to report the applicant’s or co-applicant’s age • Covered loans or applications when applicant or co-applicant is not a natural person 	<p>Comment 4(a)(10)(ii)-3</p> <p>Comment 4(a)(10)(ii)-4</p>
<p>Income</p>	<ul style="list-style-type: none"> • Covered loans or applications for which the credit decision did not consider, or would not have considered income • Covered loans or applications when applicant or co-applicant is not a natural person • Covered loan is secured by, or application is proposed to be secured by, a multifamily dwelling • Purchased covered loans for which the financial institution chooses not to report the income • Covered loan to, or an application from, the institution’s employees to protect their privacy, 	<p>§ 1003.4(a)(10)(iii); Comment 4(a)(10)(iii)-6</p> <p>Comment 4(a)(10)(iii)-7</p> <p>Comment 4(a)(10)(iii)-8</p> <p>Comment 4(a)(10)(iii)-9</p> <p>Comment 4(a)(10)(iii)-3</p>

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	even if the institution relied on their income in making the credit decision	
Type of Purchaser	<ul style="list-style-type: none"> • Applications that were denied, withdrawn, closed for incompleteness, or approved but not accepted by the applicant 	Comment 4(a)(11)-10
	<ul style="list-style-type: none"> • Preapproval requests that were denied or approved but not accepted by the applicant 	Comment 4(a)(11)-10
	<ul style="list-style-type: none"> • Originated or purchased covered loans that the financial institution did not sell during that same calendar year 	Comment 4(a)(11)-10
Rate Spread	<ul style="list-style-type: none"> • Covered loans that are assumptions, reverse mortgages, purchased loans, or are not subject to Regulation Z 	§ 1003.4(a)(12)(i); Comment 4(a)(12)-7
	<ul style="list-style-type: none"> • Applications that did not result in an origination other than approved but not accepted 	Comment 4(a)(12)-7
HOEPA Status	<ul style="list-style-type: none"> • Covered loans not subject to the Home Ownership and Equity Protection Act (HOEPA) of 1994, as implemented in Regulation Z 	§ 1026.32(a), § 1003.4(a)(13); Comment 4(a)(13)-1
	<ul style="list-style-type: none"> • Applications that did not result in originations 	Comment 4(a)(13)-1
Credit Score for Applicant or Borrower and/or Co-Applicant or Co-Borrower and Name and Version of Scoring Model	<ul style="list-style-type: none"> • Purchased covered loans 	§ 1003.4(a)(15)(i); Comment 4(a)(15)-6;
	<ul style="list-style-type: none"> • Transactions for which no credit decision was made (e.g., files closed for incompleteness, or if an application was withdrawn before a credit decision was made) 	Comment 4(a)(15)-4
	<ul style="list-style-type: none"> • Transactions for which the credit decision was made without relying on a credit score • Covered loans or applications when applicant and co-applicant are not natural persons 	Comment 4(a)(15)-5 Comment 4(a)(15)-7
Reason for Denial	<ul style="list-style-type: none"> • Applications that were not denied 	Comment 4(a)(16)-4
Total Loan Costs	<ul style="list-style-type: none"> • Applications • Covered loans that are not subject to Regulation Z 	Comment 4(a)(17)(i)-1 § 1026.43(c), § 1003.4(a)(17)

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	<ul style="list-style-type: none"> • Covered loans subject to Regulation Z § 1026.43(c) for which a disclosure is not provided pursuant to § 1026.19(f) • Purchased covered loans for which applications were received by the selling entity prior to the effective date of Regulation Z 	§ 1003.4(a)(17) § 1026.19(f), Comment 4(a)(17)(i)-2
Total Points and Fees	<ul style="list-style-type: none"> • Applications • Covered loans that are not subject to Regulation Z • Covered loans subject to Regulation Z, § 1026.43(c) for which a disclosure is provided pursuant to Regulation Z • Purchased covered loans 	Comment 4(a)(17)(ii)-1 § 1026.43(c), Comment 4(a)(17)(ii)-1 § 1026.19(f), § 1003.4(a)(17)(ii) Comment 4(a)(17)(ii)-1
Origination Charges	<ul style="list-style-type: none"> • Applications • Covered loans not subject to Regulation Z • Purchased covered loans with applications that were received by the selling entity prior to the effective date of Regulation Z 	Comment 4(a)(18)-1 § 1026.19(f), § 1003.4(a)(18); Comment 4(a)(18)-1 § 1026.19(f), Comment 4(a)(18)-2
Discount Points	<ul style="list-style-type: none"> • Applications • Covered loans not subject to Regulation Z • Purchased covered loans with applications that were received by the selling entity prior to the effective date of Regulation Z 	Comment 4(a)(19)-1 § 1026.19(f), § 1003.4(a)(19); Comment 4(a)(19)-1 § 1026.19(f), Comment 4(a)(19)-2
Lender Credits	<ul style="list-style-type: none"> • Applications • Covered loans not subject to Regulation Z • Purchased covered loans with applications that were received by the selling entity prior to the effective date of Regulation Z 	Comment 4(a)(20)-1 § 1026.19(f), § 1003.4(a)(20); Comment 4(a)(20)-1 § 1026.19(f), Comment 4(a)(20)-2
Interest Rate	<ul style="list-style-type: none"> • Applications that have been denied, withdrawn, or closed for incompleteness 	Comment 4(a)(21)-2
Prepayment Penalty Term	<ul style="list-style-type: none"> • Covered loans or applications that are not subject to Regulation Z 	§ 1026, § 1003.4(a)(22); Comment 4(a)(22)-1

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	<ul style="list-style-type: none"> Covered loans or applications that have no prepayment penalty 	Comment 4(a)(22)-2
Debt-to-Income Ratio	<ul style="list-style-type: none"> Purchased covered loans Transactions for which no credit decision was made (e.g., files closed for incompleteness, or if an application was withdrawn before a credit decision was made) Transactions for which the credit decision was made without relying on debt-to-income ratio Covered loans or applications when applicant and co-applicant are not natural persons Covered loan secured by, or an application proposed to be secured by, a multifamily dwelling 	§ 1003.4(a)(23); Comment 4(a)(23)-7 Comment 4(a)(23)-3 Comment 4(a)(23)-4 Comment 4(a)(23)-5 Comment 4(a)(23)- 6
Combined Loan-to-Value Ratio	<ul style="list-style-type: none"> Purchased covered loans Transactions for which no credit decision was made (e.g., files closed for incompleteness, or if an application was withdrawn before a credit decision was made) Transactions for which the credit decision was made without relying on combined loan-to-value ratio 	§ 1003.4(a)(24); Comment 4(a)(24)-5 Comment 4(a)(24)-3 Comment 4(a)(24)-4
Loan Term	<ul style="list-style-type: none"> Covered loan or application without a definite term, such as a reverse mortgage 	Comment 4(a)(25)-5
Introductory Rate Period	<ul style="list-style-type: none"> Covered loan or application with a fixed rate Purchased covered loan with a fixed rate 	Comment 4(a)(26)-3 Comment 4(a)(26)-4
Property Value	<ul style="list-style-type: none"> Transactions for which no credit decision was made (e.g., files closed for incompleteness, or if an application was withdrawn before a credit decision was made) Transactions for which the credit decision was made without relying on property value 	Comment 4(a)(28)-3 Comment 4(a)(28)-4
Manufactured Home Secured Property Type	<ul style="list-style-type: none"> The dwelling related to the property identified is not a manufactured home 	§ 1003.4(a)(29); Comment 4(a)(29)-4

Data	Report “NA” for...	Reg C Citation
	<ul style="list-style-type: none"> The dwelling related to the property identified is a manufactured home community that is a multifamily dwelling 	Comment 4(a)(29)-2; Comment 4(a)(29)-4
Manufactured Home Land Property Interest	<ul style="list-style-type: none"> The dwelling related to the property identified is not a manufactured home The dwelling related to the property identified is a manufactured home community that is a multifamily dwelling A location for the manufactured home related to a covered loan or application has not been identified 	§ 1003.4(a)(30); Comment 4(a)(30)-6 Comment 4(a)(30)-4; Comment 4(a)(30)-6 § 1003.4(a)(30); Comment 4(a)(9)-5
Multifamily Affordable Units	<ul style="list-style-type: none"> Covered loans or applications where the property securing the covered loan or, in the case of an application, proposed to secure the covered loan is not a multifamily dwelling 	§ 1003.4(a)(32); Comment 4(a)(32)-6
Submission of Application	<ul style="list-style-type: none"> Purchased covered loans 	§ 1003.4(a)(33)
Initially Payable to Your Institution	<ul style="list-style-type: none"> Purchased covered loans Applications that were withdrawn, denied, or closed for incompleteness, if the institution had not determined whether the covered loans would have been initially payable to the institution reporting the applications 	§ 1003.4(a)(33) Comment 4(a)(33)(ii)-2
Mortgage Loan Originator NMLSR Identifier	<ul style="list-style-type: none"> Covered loans or applications in which the mortgage loan originator is not required to obtain and has not been assigned an NMLSR identifier 	Comment 4(a)(34)-2
Automated Underwriting System (AUS)	<ul style="list-style-type: none"> Purchased covered loans Transactions for which an AUS was not used to evaluate the application Covered loans or applications when applicant and co-applicant are not natural persons 	§ 1003.4(a)(35); Comment 4(a)(35)-5 Comment 4(a)(35)-4 Comment 4(a)(35)-6

Note: The content in this chart is intended to provide guidance concerning when certain information is reported as not applicable under Regulation C, as amended by the HMDA Rule. Additionally, how to

report “not applicable” may vary depending on the data point. For example, a financial institution may be instructed to enter “NA”, or enter a specific number value.

The following data points should always be reported (i.e., items in this list should never be reported as “Not Applicable”):

- Universal Loan Identifier,
- Loan Type, Loan Purpose,
- Preapproval,
- Construction Method, Occupancy Type,
- Loan Amount,
- Action Taken,
- Action Taken Date,
- Lien Status,
- Balloon Payment,
- Interest-Only Payments,
- Negative Amortization,
- Other Non-Amortizing Features,
- Total Units,
- Reverse Mortgage,
- Open-End Line of Credit, and
- Business or Commercial Purpose.

This chart summarizes requirements under HMDA and Regulation C, and does not itself establish any binding obligations. It is intended only to act as a reference and not as a substitute for the regulation or its official commentary. Always consult the regulation text and official commentary for a complete understanding of the law.

Update: This chart does not consider the CFPB’s April 2017 proposed amendment to clarify and facilitate compliance with the 2015 updates to the Home Mortgage Disclosure Act (HMDA) rule. Once the proposed amendment is finalized, certain information in this chart may change.