

# 15-RA-01 Submission of 2014 HMDA Data

## Summary

*Prepared by NASCUS Legislative & Regulatory Affairs Department  
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NCUA has published [Regulatory Alert 15-RA-01](#) to advise credit unions subject to the HMDA requirements in 2014 to submit loan/application register (LAR) data to the Federal Reserve Board (FRB) **no later than March 2, 2015**. The filing is mandated by the Consumer Financial Protection Bureau's Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). The 2015 filing is governed by the 2014 asset threshold (\$43million) and mortgage origination guidelines (credit union located in an MSA and originated or refinanced a home mortgage) as discussed NCUA's 2014 Regulatory Alert 14-RA-06, "[Home Mortgage Disclosure Act \(HMDA\) Data Collection Asset Threshold for Calendar Year 2014](#)".

### Filing Options

Credit unions with 25 or fewer entries on their LAR may report and submit the data in paper form. However, credit unions with more than 25 entries on their LAR must submit their reports in an automated form under one of the methods discussed on [NCUA's HMDA page within the FFIEC website](#). To submit via web, credit unions must use the FFIEC software available through the [HMDA software download webpage](#).

Credit union may also file LAR data by e-mail sent to [hmdasub@frb.gov](mailto:hmdasub@frb.gov), after encrypting the data file using the [FFIEC Data Entry Software encryption](#) utility. The [HMDA Data Entry Software](#) is free on the FFIEC website. The software automates the filing of HMDA data and includes editing features to help credit unions verify and analyze the accuracy of your data.

After a credit union submits their LAR data, the FRB will confirm receipt of the file by e-mailing an Edit Report listing potential data errors. Credit unions can expect to receive notice from the FRB in 2-10 business days depending on the method by which the credit union submitted the data. Credit unions should retain a dated copy of the Edit Report in their files. Credit unions submitting their data by e-mail should be careful not to confuse a FRB e-mail confirmation of submission with the official Edit Report from the FRB. FRB only considers the data as being received when it issues the Edit Report.

It is the responsibility of the credit union to follow up with the FRB if the credit union does not receive an Edit Report from the FRB after submitting its data.

Credit unions failing to meet the March 2, 2015 filing deadline could be subject to a civil money penalty (CMP) imposed by NCUA.

Additional information is available at the [FFIEC's HMDA website](#).