

HMDA 2023 Coverage Threshold Test

Closed-End Mortgage Loan-Volume Reporting Threshold Effective December 6, 2022

Purpose: To determine if the institution meets the revised HMDA reporting threshold of 25 closed-end loans announced by the CFPB on December 6, 2022.

Volume is based upon each of the two preceding calendar years (2021 & 2022).

Consumer Loans: Count all consumer purpose, **dwelling secured** loans: purchase, refinance, cash-out refinance, home improvement, and other.

Originated Loans	2021	2022
Mortgage Loans (Dwelling Secured)		
Consumer Loans (Ex. Home Equity Loan)		
Commercial <ul style="list-style-type: none"> • Must be dwelling secured, AND • Meet purpose test: <ul style="list-style-type: none"> ○ Purchase, ○ Refinance (cash out refis), or ○ Home Improvement 		
Total Closed-End Mortgage Loans		

Note:

- Do not include lines of credit (Lines of credit are a different threshold)
- Do not include applications that are not originated

Conclusion:

Did the institution originate fewer than 25 closed-end loans in 2021? Yes No

Did the institution originate fewer than 25 closed-end loans in 2022? Yes No

- **Note:** A “Yes” answer to either the 2021 or 2022 question, would exempt the institution from 2023 reporting based upon the revised threshold announced by the CFPB on December 6, 2022.

Is the institution required to collect HMDA data beginning 1/1/2023? Yes No

Worksheet Completed By: _____ Date: _____

Verified By: _____ Date: _____

For additional coverage criteria exclusions, see 1003.3(c).



Dwelling is a residential structure. There is no requirement that the structure be attached to real property or that it be the applicant's or borrower's residence. Examples of dwellings include:

- Principal residences;
- Second homes or vacation homes;
- Investment properties;
- Residential structures attached to real property;
- Detached residential structures;
- Individual condominium or cooperative units;
- Manufactured Homes (generally bear a HUD Certification Label and data plate) or other factory-built homes; and
- Multifamily residential structures or communities, such as apartment building, condominium complexes, cooperative buildings, or housing complexes.

Additional guidance:

- Regulation B, 1003 <https://www.consumerfinance.gov/rules-policy/regulations/1003/1/>
 - 1003.2(d) Closed-end mortgage loan definition
- Small Entity Compliance Guide https://files.consumerfinance.gov/f/documents/cfpb_hmda_small-entity-compliance-guide_2021-04.pdf
 - 2.1 Institutional coverage
 - 4.1.1.2 Secured by a lien on a dwelling
 - 4.1.2 Excluded transactions

Reminder of other criteria that must be satisfied to be a REQUIRED HMDA reporter.

- **MSA** – On the preceding December 31, did the institution have a home or branch office in a Metropolitan Statistical Area (MSA)?
- **Asset Size** as of December 31 must be greater than the following for both 2021 and 2022:
 - 2021 \$50,000
 - 2022 Not yet released as of December 8, 2022. Typically, this number is released around the 20th of December and is posted here: <https://www.consumerfinance.gov/rules-policy/final-rules/home-mortgage-disclosure-regulation-c-adjustment-asset-size-exemption-threshold/>