

December 11, 2018

8584 Katy Freeway, Suite 420

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Partners

Thomas E. Black, Jr.¹ Gregory S. Graham² Shawn P. Black³ Regina M. Uhl⁴ ‡

Senior Lawyers

David F. Dulock Diane M. Gleason

Associates

Peter B. Idziak³ Daniel S. Engle³ Nick Stevens Syndy Davis Margaret Noles Dora Herran

<u>Of Counsel</u> David M. Tritter Calvin C. Mann, Jr.

Retired Partner(s)

Calvin C. Mann, Jr.

¹ Also Licensed in Iowa, New York, and Washington

² Also Licensed in Georgia

³ Also Licensed in New York

⁴ Also Licensed in Kentucky and Illinois

‡ Board Certified- Residential Real Estate Law- Texas Board of Legal Specialization **To:** Clients and Friends

From: David F. Dulock

Subject: CFPB Releases Beta Version of 2018 HMDA Data Platform

As a companion to the HMDA Examiner Transaction Testing Guidelines memorandum posted on our website yesterday, <u>www.bmandg.com/resources/</u>, this memorandum advises you that the CFPB has released a beta version of the 2018 HMDA data platform.

The beta release provides financial institutions an opportunity to become familiar with the 2018 HMDA Platform and determine whether their sample 2018 data comply with the reporting requirements for HMDA data collected in 2018.

According to the CFPB's release notification, the beta version "will allow financial institutions to establish log-in credentials, or use log-in credentials from the 2017 filing period; upload sample 2018 HMDA files and perform validation on their data; receive confirmation that their test data was submitted; and conclude the test HMDA filing process. ... During the beta period, reporting institutions may test and retest [their sample] data as often as desired. All test data uploaded during the beta period will be removed from the system when the [2018 HMDA] filing period opens in January 2019."

Also according to the CFPB's release notification, in order to use the beta version, and to file 2018 HMDA data starting in January 2019, "financial institutions must have a Legal Entity Identifier (LEI) which uniquely identifies the institution, and that LEI must be recognized by the HMDA Platform in order to create a new account or test data with an existing account. If your institution has an LEI, and that LEI is not currently recognized by the HMDA Platform, [the CFPB's release notification instructs you to] fill out and submit this form to have the information added to the HMDA Platform. If your institution has not registered for an LEI and intends to file HMDA data collected in 2018, [the CFPB's release notification refers you to] the Global LEI Foundation for information on obtaining an LEI."

In order to access the beta version of the HMDA Platform click on the following link: <u>https://ffiec.beta.cfpb.gov/filing/2018/</u>.

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone, but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.