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## eNews Headline: Please Clarify What the Address Reporting Fields are for HMDA?

**Question:** We are confused on the “address” portion of HMDA data fields. We understand that if you voluntarily report the state, you are required to report the street, city and zip and county and census tract. But the FIG does not say that the state field is exempt, nor are the County and Census Tract fields exempt (still required). Can you please provide us with clarification on this?

**Answer:** YES, if your bank qualifies for the S.2155 Exemptions ([IBAT Overview: Economic Growth, Regulatory Relief, and Consumer Protection Act \(S. 2155\)](#)), the data for the “address” can be reported as “Exempt”. However, the “State code(s)” data is required to be reported THREE times whether you qualify for the exemption or not. At recently attended BOL Annual Lending Triage Conference, the compliance panel discussed this issue, and one of the panelist disclosed that she contacted the Bureau regarding this issue. The Bureau confirmed that yes, this does mean that the state code is ultimately reported THREE times.

These fields are defined as “State Code” (requiring a two-letter code), the “County Code” (Enter the five-digit Federal Information Processing Standards (FIPS) numerical code for the county), and the “Census Tract” (Enter the 11-digit census tract number as defined by the U.S. Census Bureau).

### RESOURCES:

- Page 6 & 7 of the [CFPB: Reportable HMDA Data: A Regulatory and Reporting Overview Reference Chart\(a\)](#)
- CFPB: Loan/Application Register (LAR) Formatting Tool. The [LAR Formatting Tool](#) is intended to help financial institutions, typically those with small volumes of covered loans and applications, to create an electronic file that can be submitted to the HMDA Platform.
- Finally the FIG: [For data collected in or after 2018 incorporating the 2018 HMDA Rule](#) defines these fields as 15, 17, & 18 on page 24.

For the IBAT Legal Ease archive, click [here](#).

**Compliance Tip:** Best practice suggestion: Collect all of the Data Fields, BUT only report what is required. Your bank may find this data helpful in your own auditing process/program. In

addition, if examiners have fair lending questions, this information will be readily available to support any defense explanations.

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