



Governance, Risk & Compliance

# CRA Wiz and Fair Lending Wiz: 2021 Submission Guide

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# 1 Submission Overview

This chapter explains why institutions are required to submit their loan data to the government, what data is required, and what the Government does with the data after it is submitted.

If you are new to the submission process, please read the HMDA DF and CRA Submission Overview section.

If you have completed the submission process in previous years, please read the following sections for updated submission requirements:

2021 HMDA DF Submission Format 2021 CRA Submission Format

# 1.1 HMDA DF and CRA Submission Overview

<u>Submission Overview – CRA</u>
<u>Submission Overview – HMDA DF</u>
<u>Multi-Family Community Development Loans</u>

**Note**: The **Federal Financial Institutions Examination Council** (FFIEC) web site (<a href="http://www.ffiec.gov">http://www.ffiec.gov</a>), offers a wealth of information regarding submission for both CRA and HMDA DF data. This guide is intended to be a roadmap for submission, providing an overview of the process with supporting detailed information where appropriate. For all regulations, definitions, and very specific detailed requirements, we recommend referencing the FFIEC web site directly. Much of the information contained in this guide is taken directly from FFIEC sources.

Each year, financial institutions subject to reporting requirements of the **Community Reinvestment Act** (CRA), and the **Home Mortgage Disclosure Act** (HMDA), are required to submit the appropriate lending activity data to their regulatory agency by March 1st. There are published FFIEC guidelines which determine whether an institution is required to report, and what, how, when, and where the data is to be reported. The following information provides background, context, and explanation of the submission process for both CRA and HMDA DF.

After CRA and HMDA data is collected each March, the information is released to the public to provide insight into each institution's lending activity - individually as well as collectively and comparatively. Referred to as **peer data**, the aggregate CRA and HMDA data published each year enables evaluation of an institution's performance by the community, the regulatory agencies, and by the institutions themselves. To ensure the consistency and quality of the data being submitted, the FFIEC sets forth guidelines on what data to submit, how, in which format, and publishes edit checks to ensure the validity and quality of the data being submitted.

## 1.1.1 Submission Overview - CRA

You can download and install the latest software from the FFIEC's website:

## **CRA ENCRYPTION UTILITY**

The **Community Reinvestment Act** is intended to encourage depository institutions to meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound banking operations. It was enacted by the Congress in 1977. The CRA requires that each insured

depository institution's record is evaluated regularly to confirm that the institution is meeting the credit needs of the community. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions.

# 1.1.2 Who is Required to Submit CRA Data?

All institutions regulated by the Office of the Comptroller of the Currency, Federal Reserve System, and the Federal Deposit Insurance Corporation that meet the asset size threshold are subject to data collection and reporting requirements. The asset size threshold that triggers data collection and reporting for all agencies is \$1.226 billion as of December 31st of each of the prior two calendar years.

#### 1.1.3 What Data is Submitted?

Each institution subject to CRA data reporting requirements must, at a minimum, submit in electronic format:

- 1. Transmittal sheet
- 2. Definition of assessment area(s)
- 3. Record of Community Development (CD) loans

The following records should be included in the CRA file if they are applicable:

- Composite Small Business record(s)
- 2. Composite Small Farm record(s)
- 3. Record of Consortium/Third Party activity (optional)

#### 1.2 Submission Overview – HMDA DF

The **Home Mortgage Disclosure Act** was enacted by Congress in 1975 and is implemented by the Federal Reserve Board's Regulation C. This regulation provides the public loan data that can be used in determining whether financial institutions are serving the housing needs of their communities; engaging public officials to distribute public-sector investments so as to attract private investment to areas where it is needed; and for identifying possible discriminatory lending patterns. This regulation applies to certain financial institutions including banks, savings associations, credit unions, and other mortgage lending institutions.

## 1.2.1 Who is Required to Submit Data?

There are specific guidelines to determine whether an institution is required to report under HMDA DF. Primary factors include an institution's asset size, its geographic location and whether it is in the business of residential mortgage lending. To confirm the specific reporting requirements for institutions subject to HMDA DF, please refer to the FFIEC's guidelines on who reports HMDA DF data at:

https://www.consumerfinance.gov/compliance/compliance-resources/mortgage-resources/hmda-reporting-requirements/

## 1.2.2 What Data is Submitted?

Institutions required to report under HMDA DF must collect and submit information about applications, originations, and purchases of mortgage loans for the purpose of home purchase, home improvement, and refinance transactions.

Each institution subject to HMDA DF data reporting requirements must submit in electronic format:

- 1. Transmittal sheet
- 2. Appropriate loan/application records. For each application reported, information is captured about the loan (type, purpose, amount, etc.), the property (location and type), the disposition or outcome of the application (originated, denied, etc.), and the applicant(s) ethnicity, race, sex, etc.

# 1.3 Multi-Family Community Development Loans

Depository institutions that are required to submit small business/small farm loans under the Community Redevelopment Act (CRA) may have loans that qualify for submission in both their HMDA DF LAR and in their CRA submission as Community Development loans.

For information on who is required to submit for CRA, please see: <a href="http://www.ffiec.gov/cra/reporter.htm">http://www.ffiec.gov/cra/reporter.htm</a>.

CRA Wiz and Fair Lending Wiz allows users to include those loans that are both HMDA DF reportable and qualify as Community Development. You can include the loans in the **manual entry screen** as part of your total number and dollar amounts.

**Note**: For more information on manual entry and choosing a file, refer to the <u>Entering Consortium/Third</u> <u>Party Loan Data Manually</u> section.

# 2 2021 HMDA DF Submission Format

HMDA DF file submission will need to be in .txt pipe delimited format. Additional details as it relates to format, edits, and guidance from CFPB is outlined below for reference.

Beginning with the HMDA DF data collected in 2018, filers will submit their HMDA DF data to the Consumer Financial Protection Bureau (CFPB) using a web interface referred to as the <u>HMDA DF</u> Platform.

HMDA DF filers will interact directly with the HMDA DF Platform to file their HMDA DF data. The Data Entry Software currently provided by the FFIEC (DES) will no longer be available as a method of data entry or data submission.

#### 2.1 2021 HMDA DF Edits

An up-to-date list of 2021 HMDA DF edits can be found in Sections 5.2 and 5.3 in the following PDF:

https://s3.amazonaws.com/cfpb-hmda-public/prod/help/2021-hmda-fig.pdf

For any additional questions related to the submission platform or related to HMDA DF data, use the following emails listed in the **2021 HMDA DF Fig**:

- Technical questions about reporting HMDA DF data collected in or after 2018 should be directed to <a href="https://hmba.com/hmb
- Technical questions about reporting HMDA DF data collected in or before 2016 should be directed to <u>HMDADFhelp@frb.gov</u>

# 3 2021 - CRA Submission Format

No major changes or additions were released by the FFIEC for 2021 CRA Submission.

The 2021 CRA required data elements and submission format remain unchanged from previous years.

The complete 2021 CRA submission file format and information on submitting data via diskette, CD-ROM, email or via the Web, can be found at the following address on the FFIEC web site:

https://www.ffiec.gov/cra/pdf/2021Specs.pdf

# 3.1 2021 CRA Edits

An up-to-date list of 2021 CRA edits can be found here:

http://www.ffiec.gov/cra/pdf/edit2021.pdf

# 4 Introduction

Wolters Kluwer provides the **2021 Submission Guide** to help you prepare your institution's 2021 HMDA DF and CRA submission files.

Each chapter in the guide covers a different step in the submission process, from data collection through submission to your regulatory agency.

The Guide covers the following:

- Submission background and explanation
- Submission workflow checklist
- Procedures for using the CRA Wiz HMDA DF Submission Wizard
- Procedures for using the CRA Wiz CRA Submission Wizard
- Regulation C information

At the end of the Guide, you'll also find four appendices that contain a Q&A section that provides answers to frequently asked submission questions, a list of codes and required fields, edit codes, Regulation C data requirements, and important addresses.

For a complete listing of the chapters included in this Guide and their page numbers, refer to the **Table of Contents**.

# 5 Submission Workflow

This checklist provides the necessary steps to complete your HMDA DF and CRA submission. Use the list in conjunction with the other information contained in this **Submission Guide** to ensure that you complete all of the steps necessary for an accurate and valid submission.

#### PLEASE PRINT FOR REFERENCE

- ✓ Update your CRA Wiz and Fair Lending Wiz software to the following:
  - ✓ **HMDA Submission** 7.5 Submission Update
  - ✓ **CRA Submission** 7.5 Submission Update and FFIEC Encryption Utility Hotfix
- ✓ Install the latest versions of the **Geocoding Data** (either 2021-Q3 or 2021-Q4). If you do not have the latest version of the Geocoding Data, please contact the technical support team.
- ✓ Update calculated fields in File Management by right-clicking your file and choosing the Update Calculated Fields option.
- Run edit checks in File Management. Correct validity or syntactical edits and have a process in place to verify quality edits.
- ✓ Process your file using the HMDA DF and CRA Submission Wizards. For more information about using the Submission Wizards, refer to the <u>Creating a HMDA DF Submission File</u> and <u>Creating a CRA Submission File</u> section.
- ✓ **CRA SUBMISSION ONLY** Verify that your assessment areas are up-to-date and accurate.
- CRA SUBMISSION ONLY If you are submitting via email, encrypt your submission file using the 2021 version of the FFIEC encryption tool. When you submit your CRA file via the Internet, it must be encrypted using the latest FFIEC encryption utility.

You can download and install the latest software from the FFIEC's website:

# **CRA ENCRYPTION UTILITY**

For more information about using the encryption utility, refer to **Page 75** of the <u>Creating CRA Submission File</u> section of this Guide.

- ✓ Attach your encrypted file to an email and send the file(s) to the following address:
  - CRA: <a href="mailto:crasub@frb.gov">crasub@frb.gov</a>

**Note**: If you do not know how to attach a file to an email message, please contact your institution's **computer support staff**.

✓ HMDA DF SUBMISSION ONLY - After creating your HMDA DF.txt file with pipe delimited format, please follow the link to the CFPB HMDA DF submission portal to submit the HMDA DF.txt file for 2021 data submission: <a href="https://ffiec.cfpb.gov/">https://ffiec.cfpb.gov/</a>

**Note**: Details about submission platform provided by CFPB are on the main page of the link, including FAQs (frequently asked questions). In addition, the CFPB has provided a video which gives quick overview of their HMDA DF platform: <a href="https://youtu.be/C\_73Swgyc4g">https://youtu.be/C\_73Swgyc4g</a>

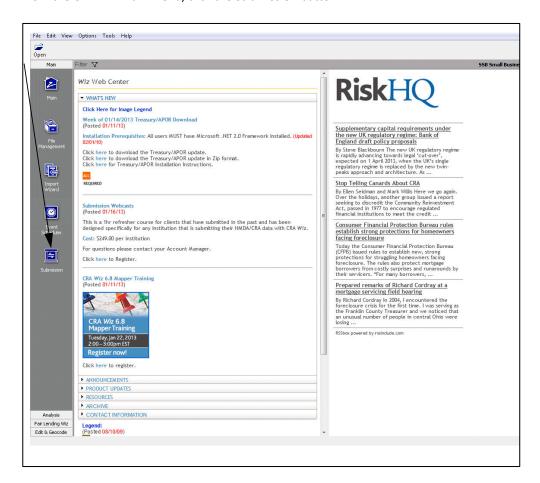
# 6 Creating HMDA DF Submission File

Refer to the following sections to prepare your HMDA DF data submission file:

Accessing HMDA DF Submission Wizard Procedures

To access the HMDA DF Submission Wizard, follow these steps:

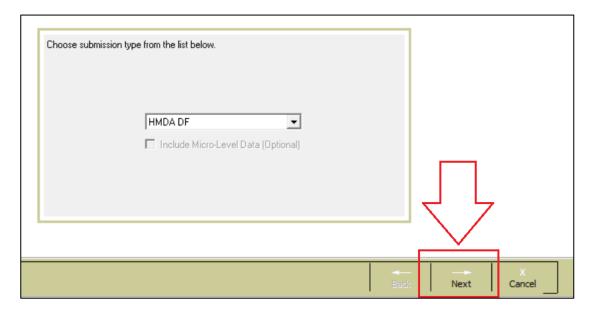
1. From the CRA Wiz main menu, click the **Submission** button:



The software displays the **Data Submission** wizard:



2. Accept the default menu selection, **HMDA DF**, by clicking the **Next** button:



The software displays the **Select Data Source** screen:



# 6.1 Procedures

To prepare a HMDA DF file for regulatory submission, refer to the following sections:

Selecting Your HMDA DF File

**Providing Transmittal Information** 

**Selecting Partial Exemptions** 

**Setting Institution and Date Filters** 

**Checking for Errors** 

Verifying Time and Date of your PC Clock

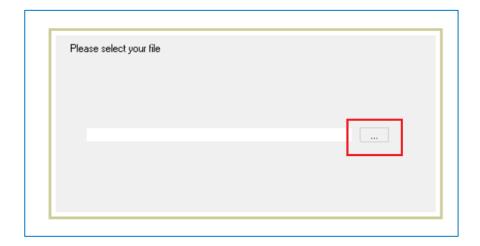
**Exporting HMDA DF Submission File** 

# 6.1.1 Selecting Your HMDA DF File

Please make sure you update the file before going through the following submission process. For information on how to update a file, please refer to the **CRA** *Wiz* **Basic Training Manual**.

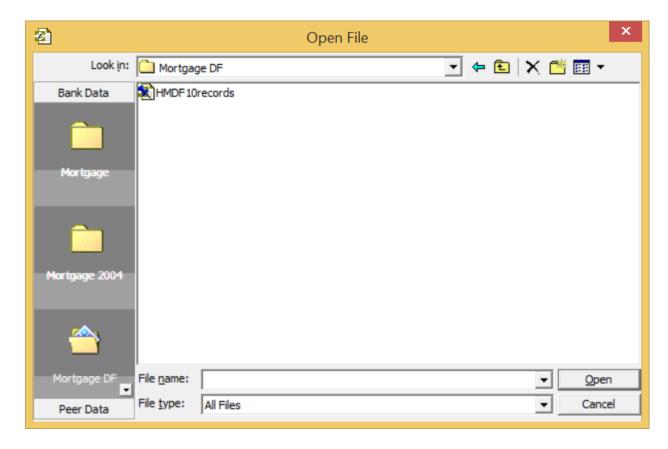
To select your HMDA DF file, follow these steps:

1. From the **Select Data Source** screen, click the ellipsis button to the right of the **Please Select Your File** field:



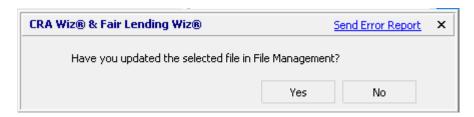
The software displays an Open File dialog box.

2. Select the file that contains the HMDA DF loans you want to include in your submission file:



# 3. Click the **Open** button.

The software displays a dialog box asking if you have updated your file:



# 4. Complete one of the following:

- If you have updated your file, click the **Yes** button, then click the **Next** button. The software displays the <u>Transmittal Record screen</u>.
- If you have not updated your file, click the **No** button. The software displays a second dialog box which asks you to update your file. Click **OK**.

You will not be able to proceed with submission process until you have updated your file using the **File Management** screen. Update your file and then repeat the previous Submission Wizard steps.

**Note**: For more information about using **File Management** to update files, refer to the <u>CRA Wiz Basic Training Manual</u>.

# 6.1.2 Providing Transmittal Information

To provide transmittal information, refer to the following sections:

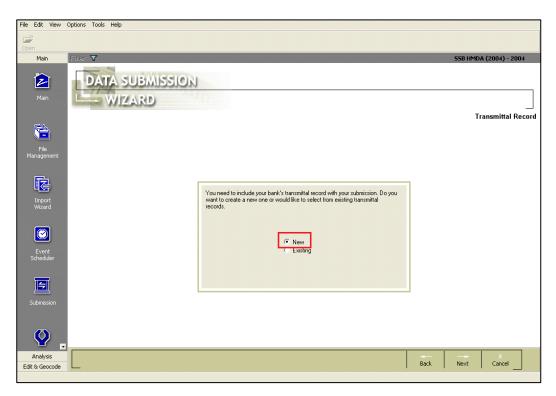
# **Creating New Transmittal Sheet**

# **Choosing Existing Transmittal Sheets**

# Creating New Transmittal Sheet

To create a new transmittal sheet, follow these steps:

1. From the **Transmittal Record** screen, click the **New** radio button.

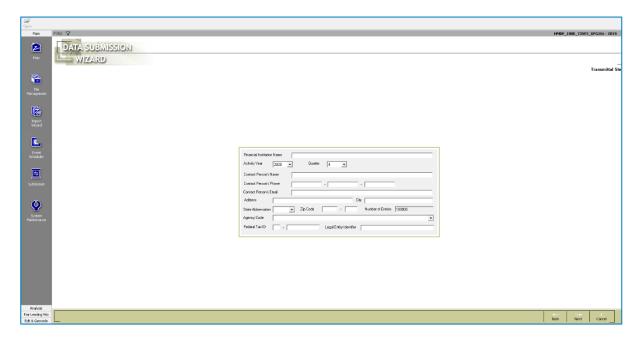


**Note**: If you have an existing transmittal sheet that you would like to use, please proceed to the <u>Choosing Existing Transmittal Sheets</u> section.

2. Click the **Next** button:



The software displays the **Transmittal Record** screen:



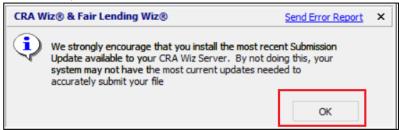
- 3. Enter the following information using the provided text boxes and drop-down menus:
  - Financial Institution Name
  - Activity Year
  - Quarter

**Important!** If your institution is subject to the quarterly filing rule, select the appropriate quarter. If you are submitting an annual file or are not subject to quarterly filing, select **Quarter 4**.

- Contact Person's Name
- Contact Person's Phone
- Contact Person's Email
- Address
- City
- State Abbreviation
- ZIP Code
- Number of entries
- Agency Code
- Federal Tax ID
- Legal Entity Identifier

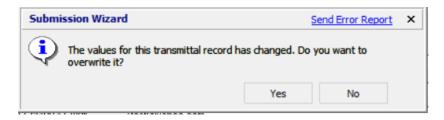
## 4. Click the Next button.

The software displays a dialog box confirming you have installed the most recent Submission update available on your CRA Wiz Server:



# 5. Click the **OK** button.

**Note**: If you modified any of your Transmittal information, the software also displays the following dialog box confirming your changes:



Click the Yes button.

The software displays the **Partial Exemption** screen:

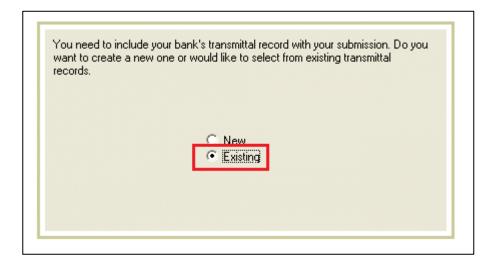


Proceed to the **Selecting Partial Exemptions** section.

# Choosing Existing Transmittal Sheets

To choose from existing transmittal sheets, follow these steps:

1. From the **Transmittal Record** screen, click the **Existing** radio button:

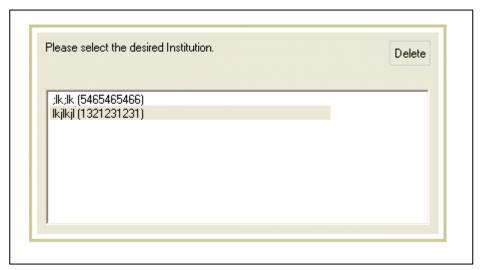


2. Click the **Next** button.

The software displays the **Transmittal Record** screen:



3. From the list box, select the institution whose transmittal information you want to use:

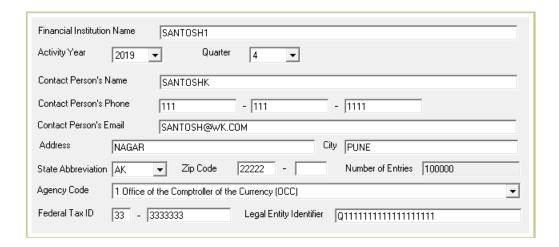


# 7ip

To delete an existing transmittal sheet, select the transmittal sheet, then click the **Delete** button.

4. Click the **Next** button.

The software displays the **Transmittal Record** screen:

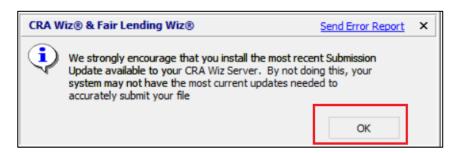


5. Verify all the information in this screen is correct.

**Note**: Even though you are required to upload your HMDA DF submission to the CPFB's submission portal that does not necessarily mean that your Agency Code should be set to the CFPB.

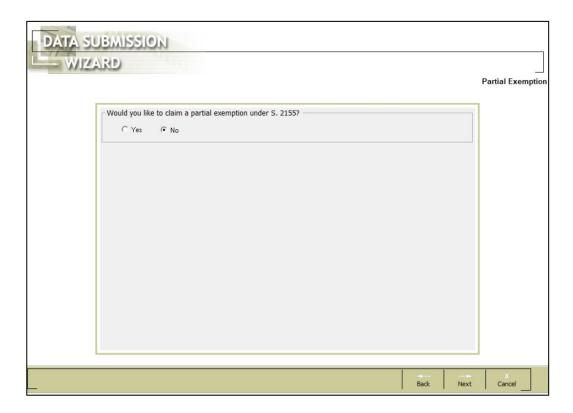
6. Click the **Next** button.

The software displays a dialog box confirming you have installed the most recent Submission update available on your CRA Wiz Server:



7. Click the **OK** button.

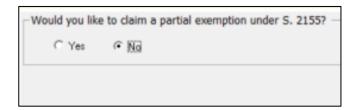
The software displays the **Partial Exemption** screen:



Proceed to the <u>Selecting Partial Exemptions</u> section.

# 6.1.3 Selecting Partial Exemptions

You use the **Select Partial Exemptions** screen to select whether your institution would like to take partial exemptions under S. 2155:



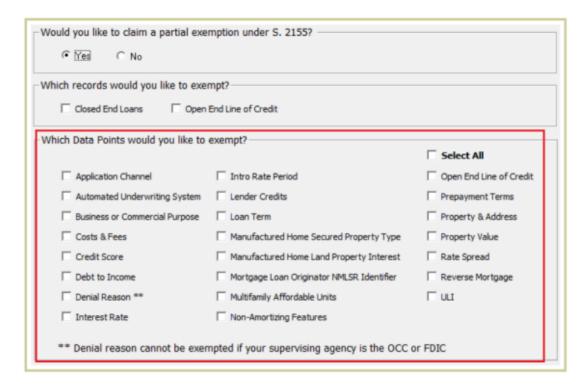
To select partial exemptions, follow these steps:

Do one of the following:

- Select the **Yes** option button and then select the type of loans you would like to exempt:
  - --Closed End Loans
  - --Open End Lines of Credit

hich records would you like to exe		
☐ Closed End Loans ☐ Open		
Vhich Data Points would you like to	exempt?	☐ Select All
Application Channel	☐ Intro Rate Period	Open End Line of Credit
Automated Underwriting System	Lender Credits	Prepayment Terms
☐ Business or Commercial Purpose	Loan Term	Property & Address
Costs & Fees	Manufactured Home Secured Property Type	Property Value
Credit Score	Manufactured Home Land Property Interest	Rate Spread
Debt to Income	Mortgage Loan Originator NMLSR Identifier	Reverse Mortgage
☐ Denial Reason ***	Multifamily Affordable Units	□ uti
Interest Rate	Non-Amortizing Features	

In the bottom pane, select the check box(es) of data point(s) you want to exempt:



**Note**: Some data points reference multiple fields within the LAR. In those cases, a tool tip is provided if you hover over the data point, which lists the fields as you will see them in **Edit**.

**Note**: When the submission file is created, data points that are checked on this screen will be created with the appropriate exempt value (**1111** or **Exempt**). Unchecked data points are handled normally. The software also creates a report of the selected partial exemption

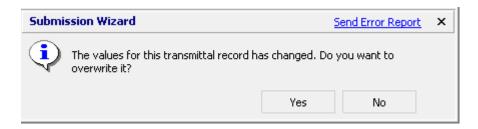
settings and is available in the same location as the final submission file, as selected in the last step of the Submission Wizard.

**Note**: If your institution is regulated by the FDIC or OCC, make sure to **uncheck Reasons for Denial**. They will need to be included in your submission.

--OR--

- Click the No option button.
- 2. Click the Next button.

Note: If you made any changes to this screen the software displays a confirmation dialog box:



3. Click the Yes button to proceed.

The software displays the **Institutions and Date Filter** screen.

# 6.1.4 Setting Institution and Date Filters

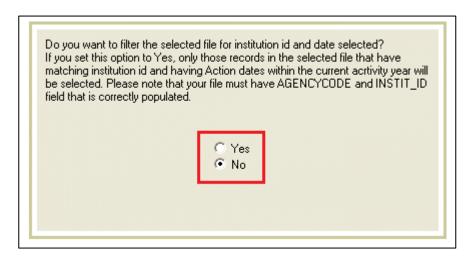
The **Institution and Date Filter** screen enables you to do the following:



- Filter a multi-year file for only the current submission year.
- Filter a multiple-institution file for only a specific lender.

To set institution and date filters, do the following:

- If your HMDA DF file contains records only for a single institution and for a single year, click the **No** radio button. Then, click the **Next** button.
- If your HMDA DF file contains records for multiple institutions or multiple years, click the **Yes** radio button. Then, click the **Next** button. Only those records for the year and institution you specified on your transmittal sheet will be included in your submission file.



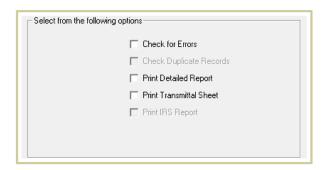
**Note**: To set institution and date filters your HMDA DF file must have fields named **INSTIT\_ID** and **AGENCYCODE**. Each field must contain valid values.

The software displays the **Create Export File** screen:



# 6.1.5 Checking for Errors

1. From the **Create Export File** screen, select the following:

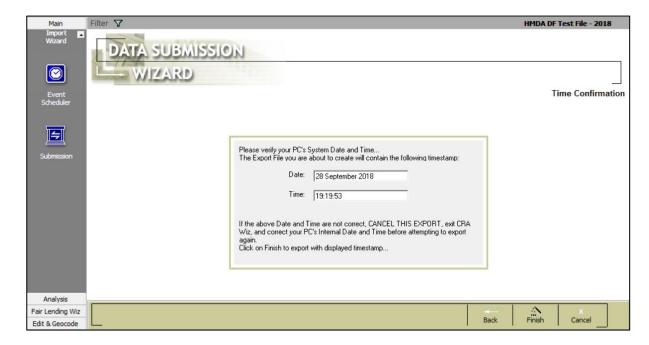


Select the Check for Errors checkbox if you want the software to check for validity, quality, and
syntactical errors. If validity or syntactical errors are detected, you should cancel the submission
procedure and correct them before continuing. If you have elected to take partial exemptions,
edits related to the data fields selected for partial exemption will be suppressed. The
software creates a final report of remaining edits on each record and is available in the same
location as the final submission file as selected in the next step.

Note: The software will let you submit a file with validity errors.

- Print Detailed Report prints a detailed HMDA LAR report in the standard regulatory format.
- Print Transmittal Sheet enables you to print a transmittal sheet for your submission file.
- 2. Click the **Next** button.

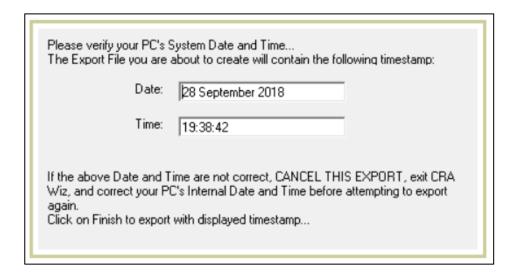
The software displays the **Time Confirmation** screen:



# 6.1.6 Verifying the Time and Date of Your PC Clock

To verify the time and date of your PC clock, do the following:

From the **Time Confirmation** screen, confirm that the time and date are correct:

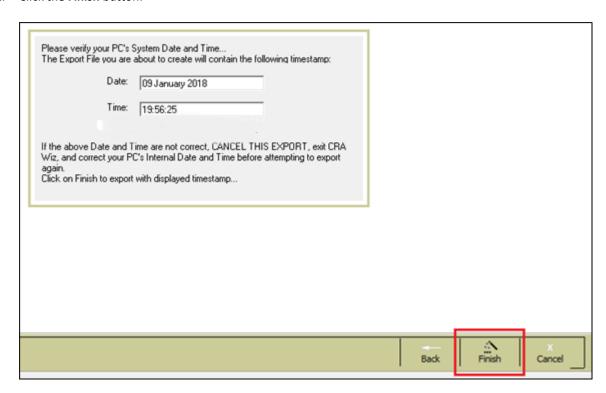


**Note**: If the time and/or date is incorrect, click the **Cancel** button. Then reset your computer's clock and start the **Submission Wizard** again.

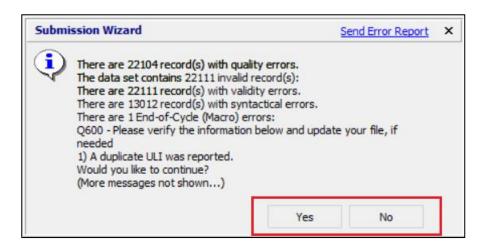
# 6.1.7 Exporting HMDA DF Submission File

To export your file for submission, follow these steps:

# 1. Click the **Finish** button:



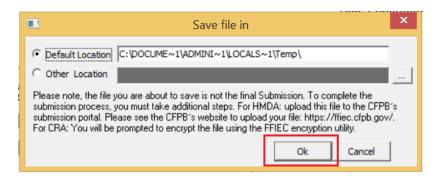
• If you selected the **Check for Errors** check box on the **HMDA DF Submission Wizard - Create Export File** screen, the software displays a message telling you the total number of validity and quality errors in the file:



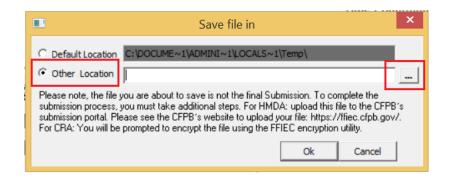
- ✓ If your file has validity errors, click the **No** button and correct them before continuing. You should verify that the number is correct. You can do this by comparing this number to the final **Summary Exception Report** you printed after you corrected all your errors. For additional information about printing reports, refer to the <u>CRA Wiz Basic Training Manual</u>.
- ✓ If your file does not have errors and/or you want to continue with the export, click the **Yes** button. The software displays the **Save File In** dialog box. Proceed to **Step 2**.
- If you did **not** select the **Check for Errors** check box on the **HMDA DF Submission Wizard Create Export File** screen, the software displays the **Save File In** dialog box. Proceed to **Step 2**.

# 2. Do one of the following:

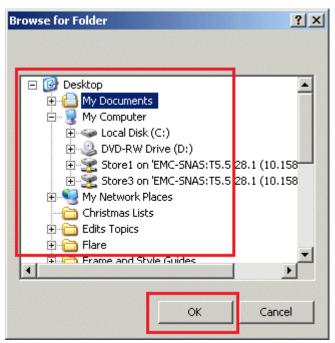
To accept the default export location, click the OK button:



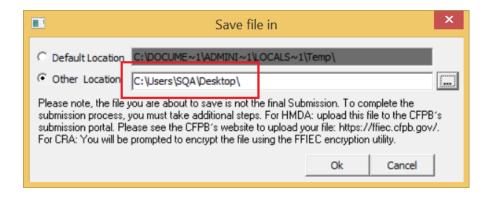
• To choose a location for the exported file, click the **Other Location** option button, then click the ellipses button located at the end of the Other Location field:



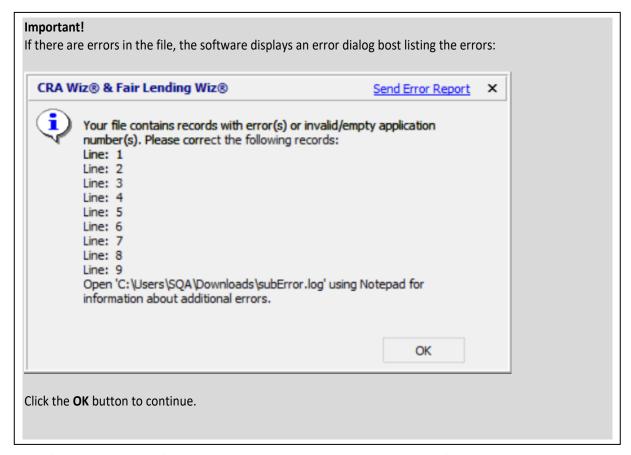
In the resultant **Browse for Folder** dialog box, select the file destination and then click the **OK** button:



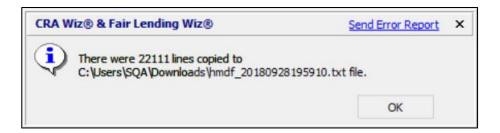
The software displays the file path in the **Other Location** field:



3. Click the **OK** button.



The software displays a confirmation dialog box which indicates where the data file was saved:



4. Click the **OK** button.

Procedure is complete.

# 7 Creating CRA Submission File

Refer to the following sections to prepare your CRA data submission file using the **CRA Submission Wizard**. You use the wizard to create a CRA submission file that conforms to the Community Reinvestment Act's data reporting requirements.

Accessing CRA Submission Wizard Procedures

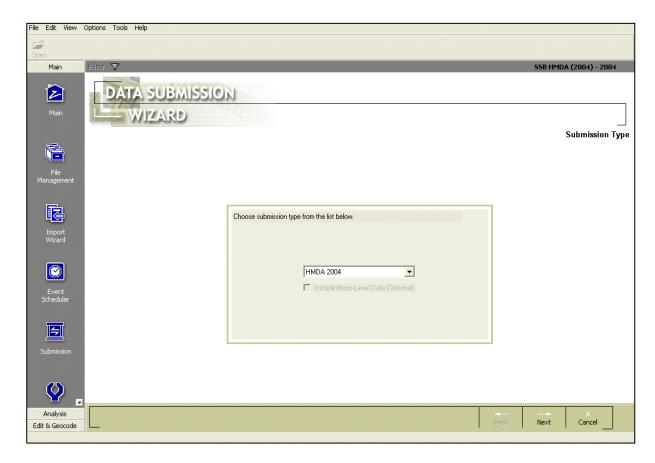
# 7.1 Accessing the CRA Submission Wizard

To access the CRA **Submission Wizard**, follow these steps:

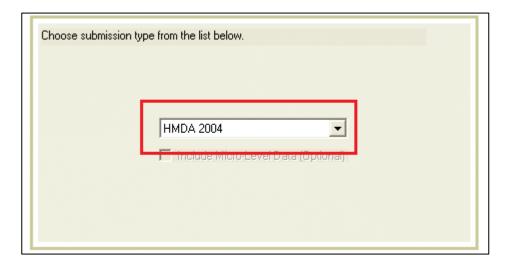
1. From the CRA Wiz main menu, click the **Submission** button:



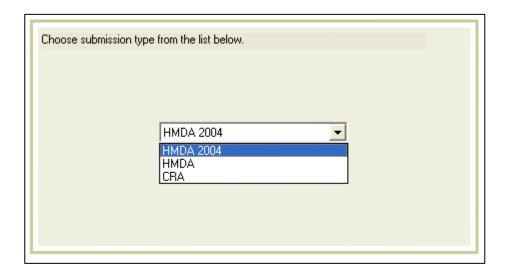
The software displays the **Data Submission** wizard:



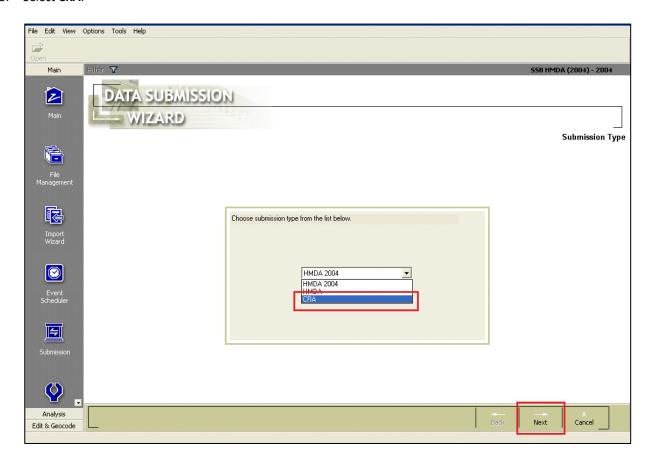
2. Click the drop-down menu:



3. The software displays a drop-down list:



## Select CRA:



**Important Note**: When you select CRA, the software enables the **Include Mirco-Level Data (Optional)** check box. Select this option if you want to include micro data in your CRA submission.

# 5. Click the **Next** button.

The software displays the **Select Data Source** screen:



# 7.2 Procedures

To create a CRA submission file, refer to the following sections:

Selecting Small Business and Farm File

**Selecting Assessment Area** 

**Reporting Community Development Loans** 

Reporting Consortium/Third Party Loans

Selecting Multifamily Community Development Loans

**Providing Transmittal Information** 

**Using Institution and Date Filters** 

**Selecting Printing and Error Checking Options** 

Verifying the Time and Date of Your PC Clock

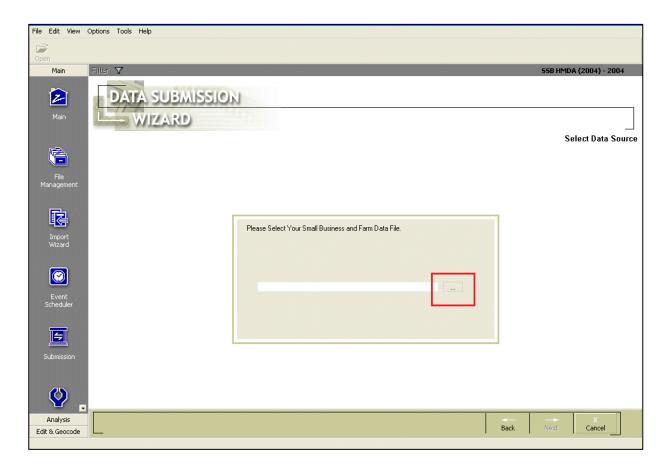
**Exporting CRA Submission File** 

# 7.2.1 Selecting a Small Business and Farm File

**Note**: Update your file before following the submission process. For information on how to update a file, please refer to the <u>CRA Wiz Basic Training Manual</u>.

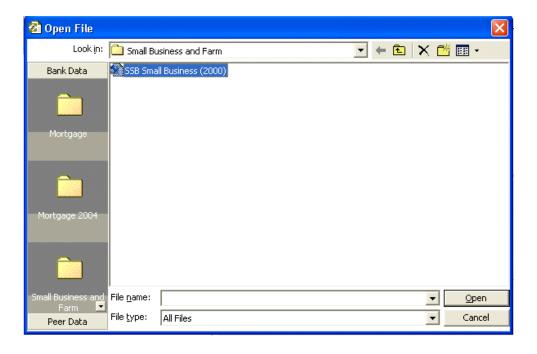
To select your Small Business and Farm file or your Small Business Farm and Consumer file, follow these steps:

1. From the **Select Data Source** screen, click the ellipsis button to the right of the **Please Select Your Small Business and Farm Data File** field:



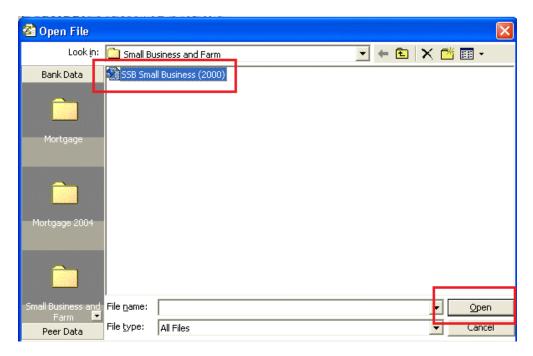
**Note**: For additional information on accessing this screen, refer to the <u>Accessing CRA Submission</u> <u>Wizard</u> section.

The software displays an **Open File** dialog box:



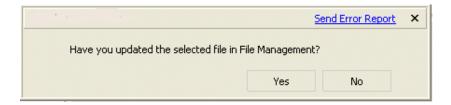
**Note**: If you want to select a Small Business Farm and Consumer File, navigate to the appropriate directory first.

2. Select the file that contains the CRA loans you want to include in your submission file:



3. Click the **Open** button.

The software displays a dialog box asking if you have updated your file:



- 4. Complete one of the following:
  - If you have updated your file, click the **Yes** button, then click the **Next** button.

The software displays the **Select Assessment Area** screen.

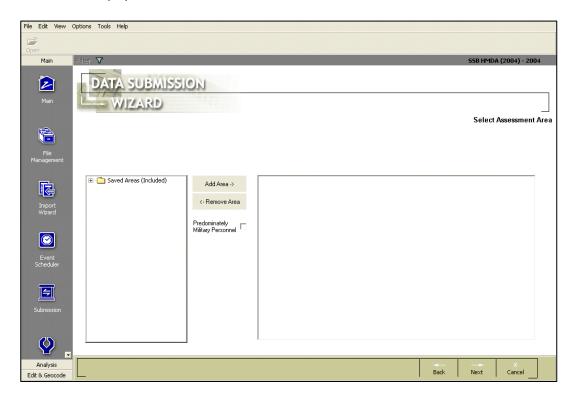
**Note**: If you have not created assessment areas, the software will display a warning dialog box.

• If you have not updated your file, click the **No** button. The software displays a second dialog box which asks you to update your file. Click **OK**.

You will not be able to proceed with the submission process until you have updated your file using the **File Management** screen. Update your file and then repeat the previous Submission Wizard steps.

**Note**: For more information about using **File Management** to update files, refer to the <u>CRA Wiz Basic</u> Training Manual.

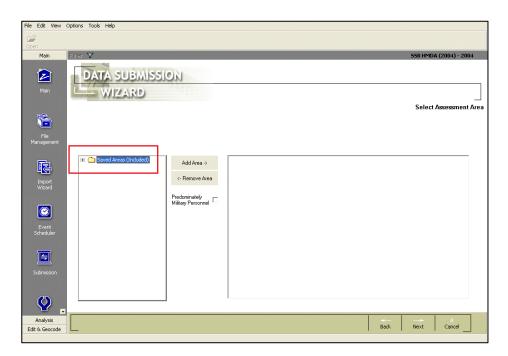
The software displays the **Select Assessment Area** screen:



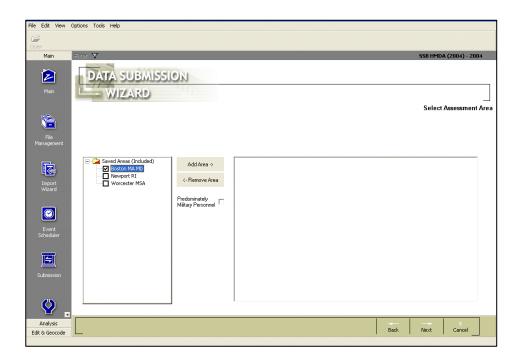
# 7.2.2 Selecting Your Assessment Area

To select an assessment area, follow these steps:

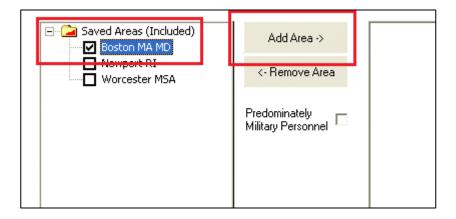
1. From the **Select Assessment Area** screen, double-click the **Saved Areas** folder:



The software displays the saved assessment areas:



2. Select your assessment area(s) by double-clicking the areas one at a time:



3. After you have selected your assessment area(s), click the **Add Area** button. **Note:** Do not use combined assessment areas for submission. When submitting multiple

**Note**: Do not use combined assessment areas for submission. When submitting multiple assessment areas, choose each required area in the **Select Assessment Area** screen.

**Note**: If an assessment area(s) contains loans primarily to military personnel, select the **Predominately Military Personnel** checkbox.

The software displays the selected assessment areas in the right list box:



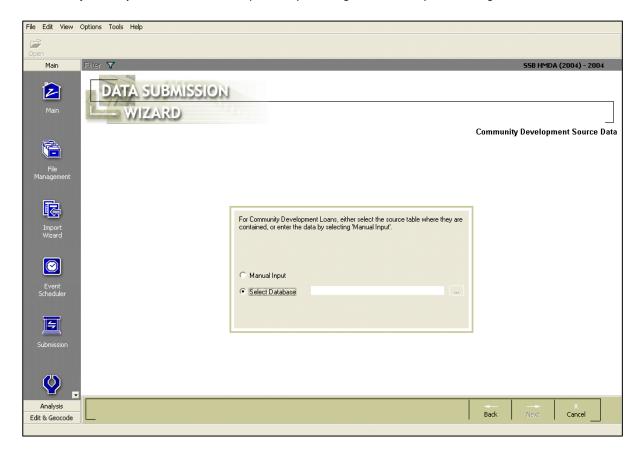
#### 5. Click the **Next** button.

The software displays the **Community Development Source Data** screen:



#### 7.2.3 Reporting Community Development Loans

**Community Development Loans** can be reported by entering data manually or selecting a file:



**Note**: In order for the submission file to be formatted correctly, you must follow one of these procedures even if your institution did not make any community development loans. If you did not make any community development loans, follow the procedure for entering data manually and enter zeros in all fields.

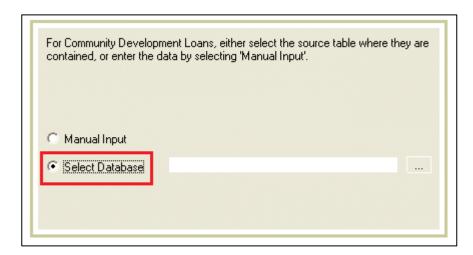
To report your institution's community development loans, use one of the following procedures:

<u>Selecting Community Development Loan File</u> <u>Entering Data Manually</u>

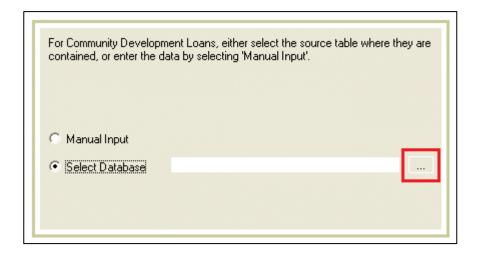
# Selecting Community Development Loan File

To select a Community Development loan file, follow these steps:

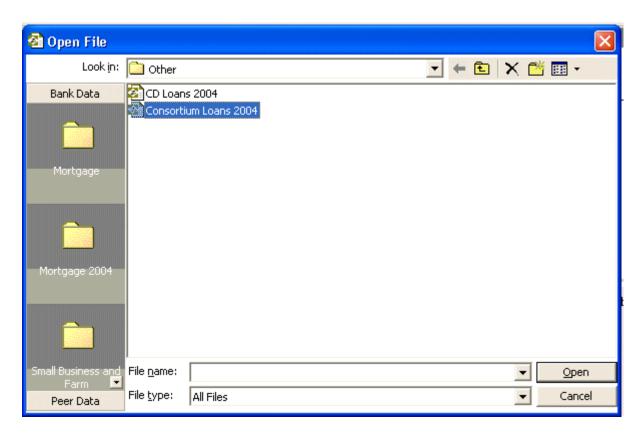
1. From the **Community Development Source Data** screen, select the **Select Database** option:



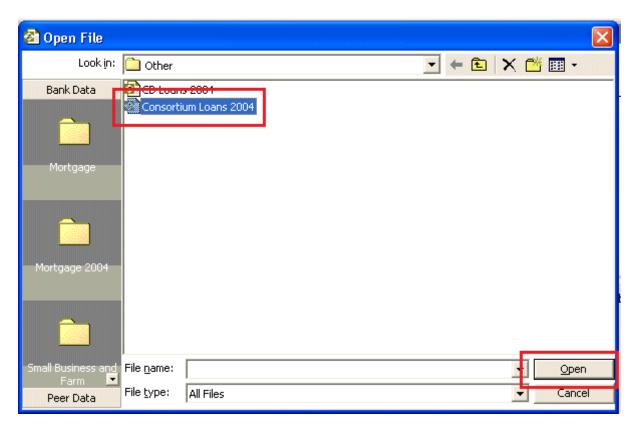
2. Click the ellipsis button to the right of the **Select Database** field:



The software displays the **Open File** dialog box:

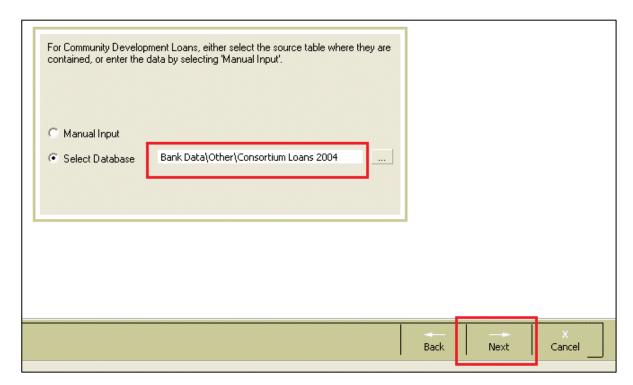


3. Select the file you want to include in the submission:



6. Click the **Open** button.

The software displays the file name in the **Select Database** field:



Note: Click the Next button.

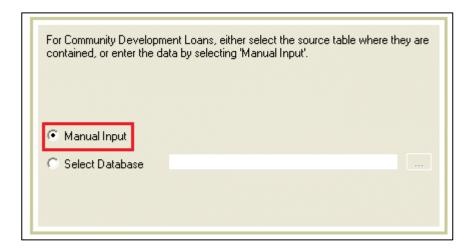
The software displays the **Consortium/Third Party Source Data** screen:



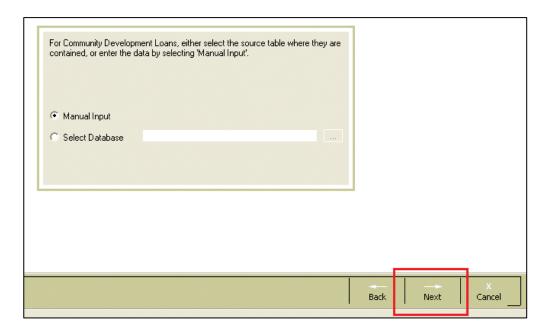
# Entering Data Manually

To manually enter community development data, follow these steps:

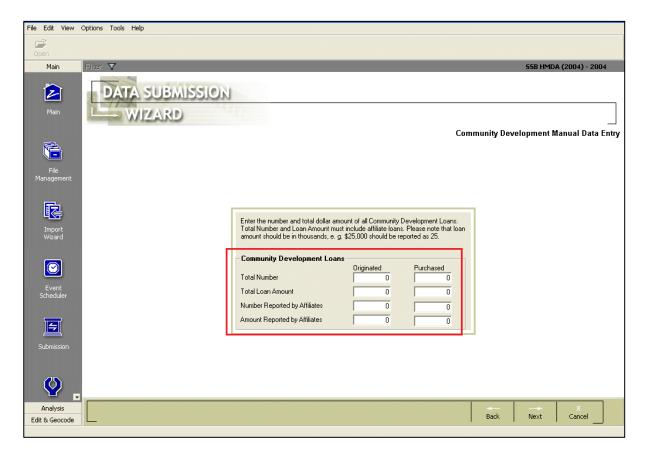
1. From the **Community Development Source Data** screen, select the **Manual Input** option:



2. Click the **Next** button:



The software displays the **Community Development Manual Data Entry** screen:



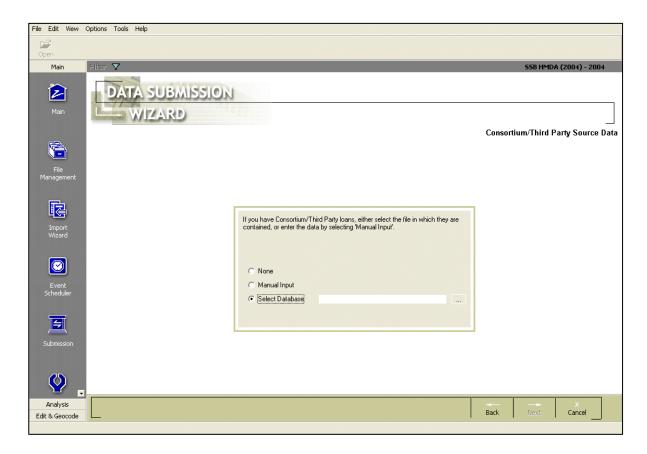
3. Type in the total number and dollar amount of community development loans originated or purchased by your institution and your affiliates. Loan amounts **must** be entered in thousands (000s).

**Note**: The Total Originated and Purchased includes the Affiliate Originated and Purchased. The top four numbers are an aggregate of all loans. The bottom four numbers are a subset of the total.

**Note**: If you or your affiliates made no community development loans, enter '0' (zero) in the appropriate spaces.

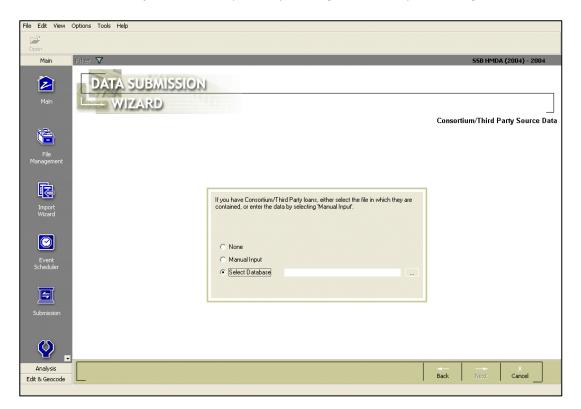
7. When you have finished entering data, click the **Next** button.

The software displays the **Consortium/Third Party Source Data** screen:



# 7.2.4 Reporting Consortium/Third Party Loans

Consortium/Third Party loans can be reported by entering data manually or selecting a file:



**Note**: You are not required to submit Consortium/Third Party loans. If you choose not to report them, skip this screen by clicking the **Next** button.

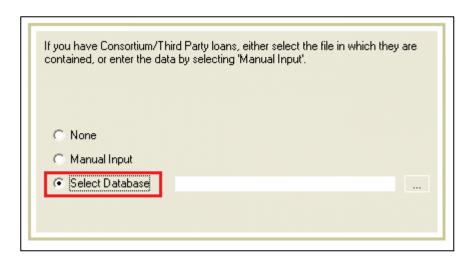
To report your institution's Consortium/Third Party loans, refer to the following sections:

<u>Selecting Consortium/Third Party Loan File</u> Entering Consortium/Third Party Loan Data Manually

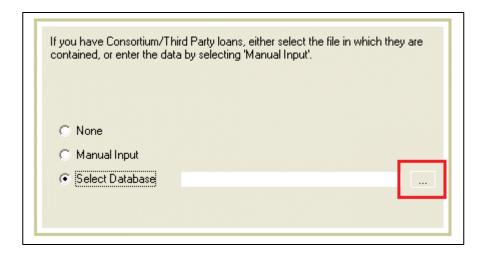
#### Selecting Consortium/Third Party Loan File

To select a Consortium/Third Party loan file, follow these steps:

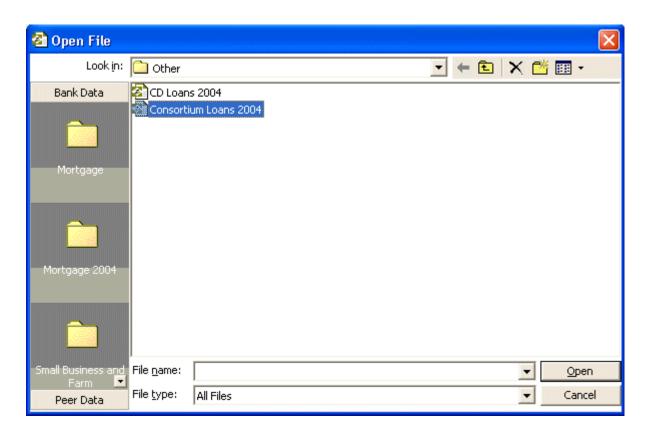
1. From the Consortium/Third Party Source Data screen, select the Select Database option:



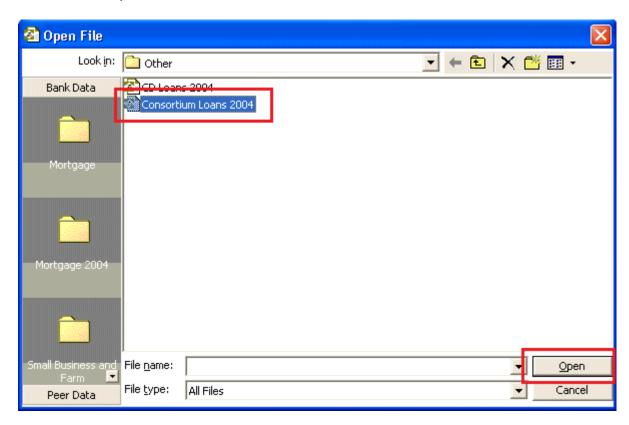
2. Click the ellipsis button to the right of the **Select Database** field:



The software displays the **Open File** dialog box:

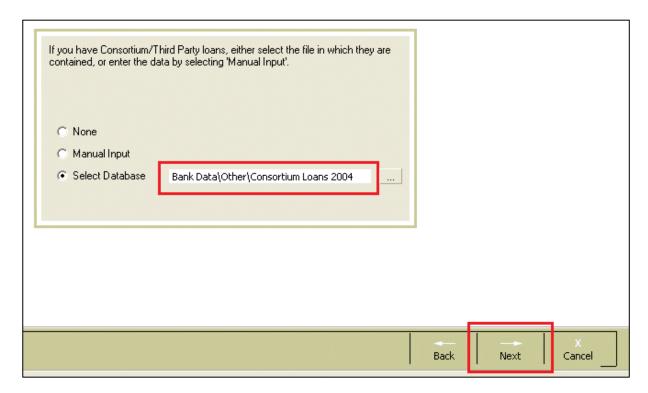


3. Select the file that you want to include in the submission:



8. Click the **Open** button.

The software displays the file name in the **Select Database** field:



Note: Click the Next button.

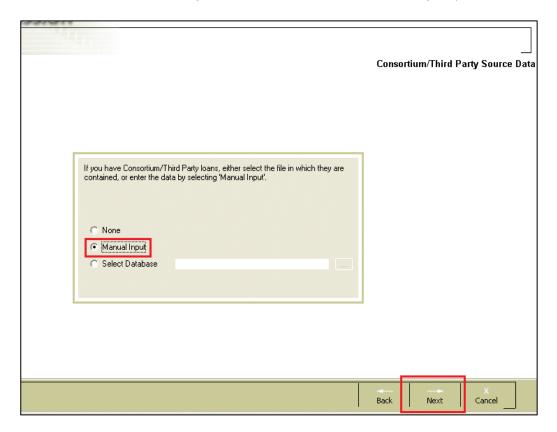
The software displays the **Multi-Family Data Source** screen:



# Entering Consortium/Third Party Loan Data Manually

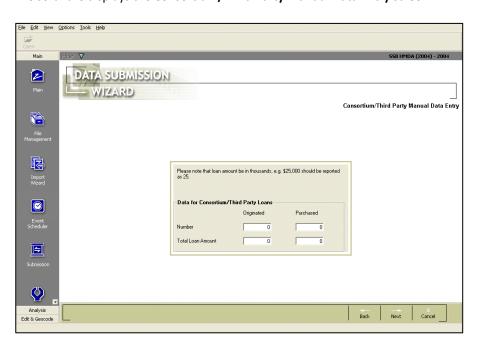
To enter consortium or third-party loans manually, follow these steps:

1. From the Consortium/Third Party Source Data screen, select the Manual Input option:

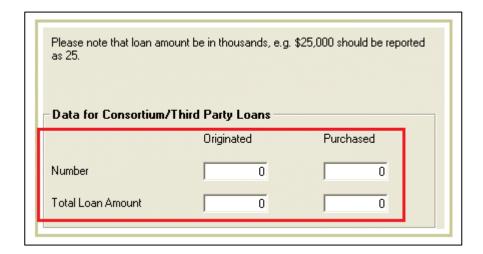


2. Click the **Next** button.

The software displays the **Consortium/Third Party Manual Data Entry** screen:



3. Type in the total number and dollar amount of consortium/third party loans originated and purchased:



Note: Loan amounts should be entered in thousands.

4. Click the **Next** button.

The software displays the **Multi-Family Data Source** screen:



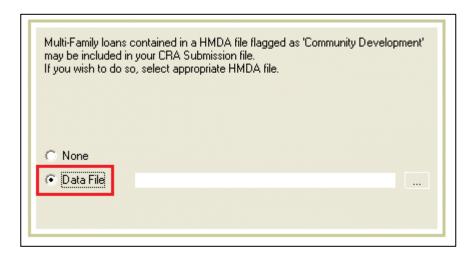
#### 7.2.5 Selecting Multifamily Community Development Loans



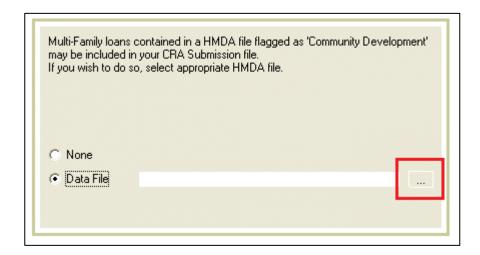
If you have a HMDA DF file that contains CRA-reportable community development loans, you can include the community development loans in the submission.

If you do not have a HMDA DF file that contains CRA-reportable community development loans, you may skip this screen by clicking the **Next** button.

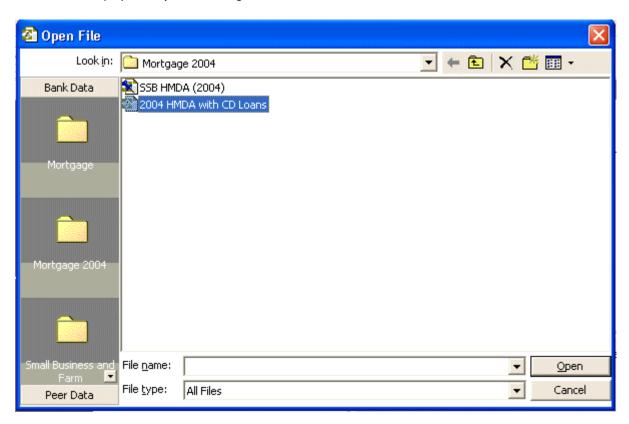
1. From the **Multi-Family Data Source** screen, select the **Data File** option:



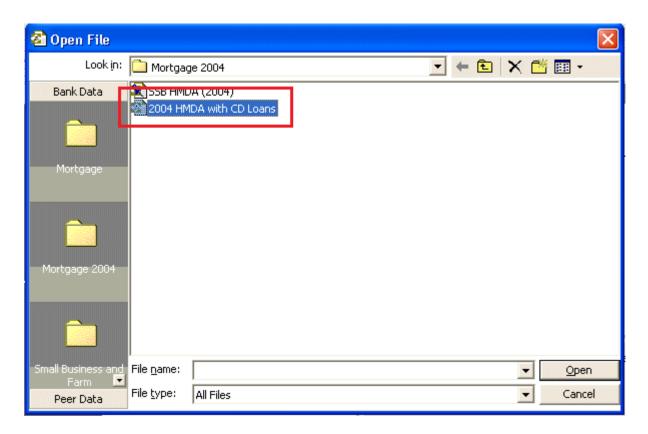
2. Click the ellipsis button to the right of the **Data File** field:



The software displays the **Open File** dialog box:

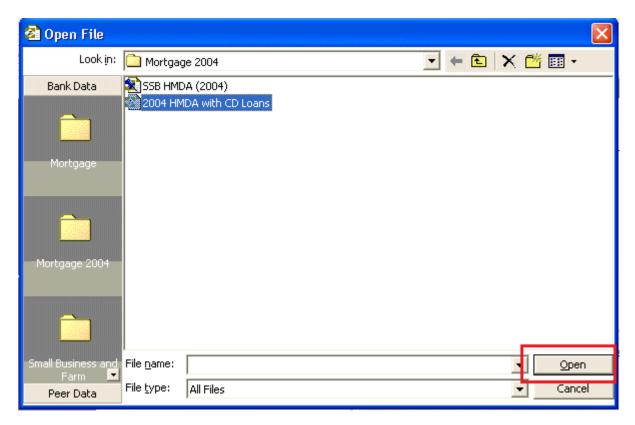


3. Select the file you want to include in the submission:

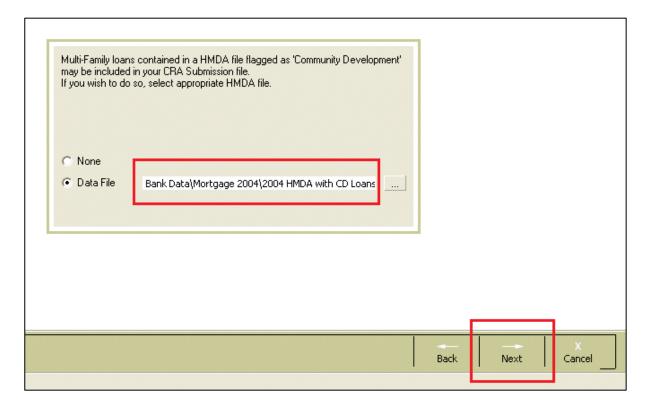


**Note**: Only the community development loans will be included in the submission file.

4. Click the **Open** button:



The software displays the file name in the **Data File** field:



Note: Click the Next button.

The software displays the **Transmittal Record** screen:



# 7.2.6 Providing Transmittal Information



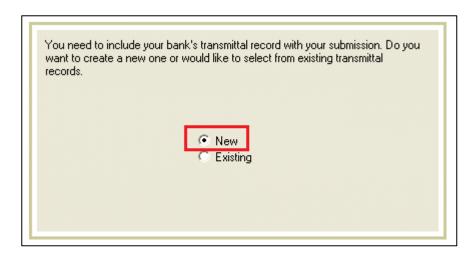
To provide transmittal information, refer to the following sections:

<u>Creating New Transmittal Sheet</u> <u>Choosing Existing Transmittal Sheet</u>

#### Creating New Transmittal Sheet

To create a new transmittal sheet, follow these steps:

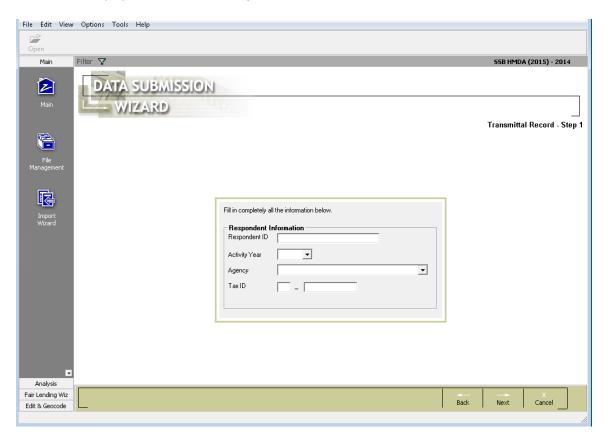
1. From the **Transmittal Record** screen, click the **New** option button:



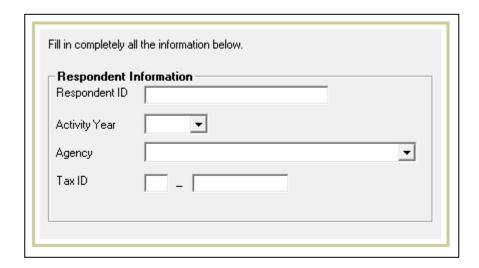
**Note**: If you have an existing transmittal sheet that you would like to use, refer to the <u>Choosing Existing Transmittal Sheet</u> section.

2. Click the Next button.

The software displays the **Transmittal - Step 1** screen:



3. Enter the following information:

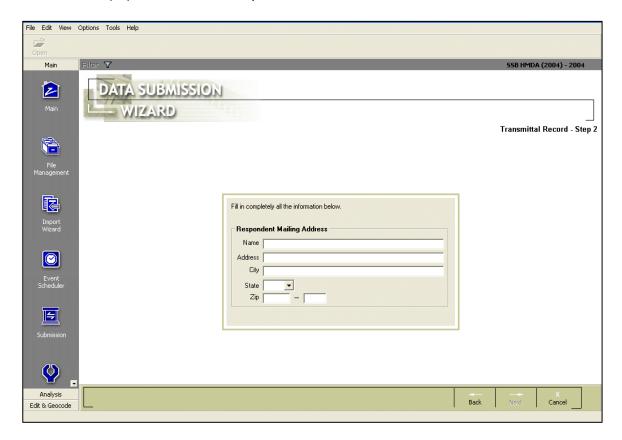


In the Respondent ID text box, type in your Respondent ID.

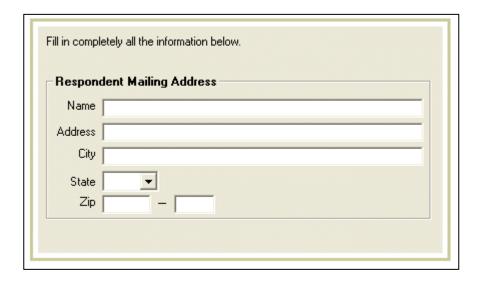
**Note**: The Respondent ID field can hold up to ten digits. If your institution's ID is less than ten digits, pad the ID by entering leading zeros.

- From the Activity Year drop-down list box, select 2021.
- From the **Agency** drop-down list box, select your reporting agency.
- In the **Tax ID** text box, type in your institution's tax identification number.
- 5. Click the **Next** button.

The software displays the **Transmittal - Step 2** screen:



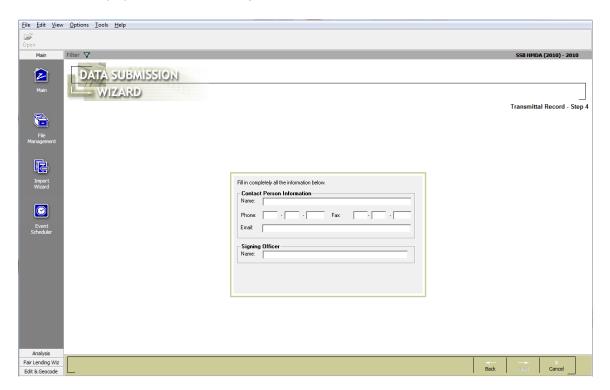
5. Enter the following information:



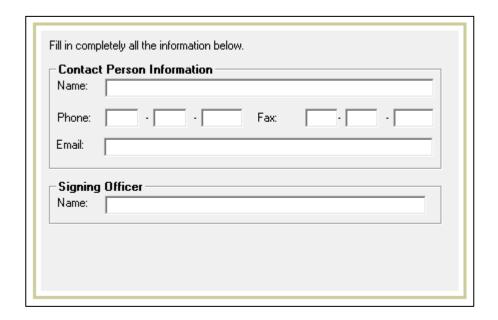
- In the Name, Address, and City text boxes, enter your mailing address.
- From the **State** drop-down list box, select your state.
- In the **ZIP** text box, enter your ZIP code.

#### 6. Click the Next button.

The software displays the **Transmittal - Step 3** screen:



7. Enter the following information:



- Under the **Contact Person Information** section, enter the **Name**, **Phone number**, and **Fax** number of the contact person at your institution.
- Under the **Signing Officer** section, enter the name of your institution's signing officer.
- 8. Click the **Next** button.

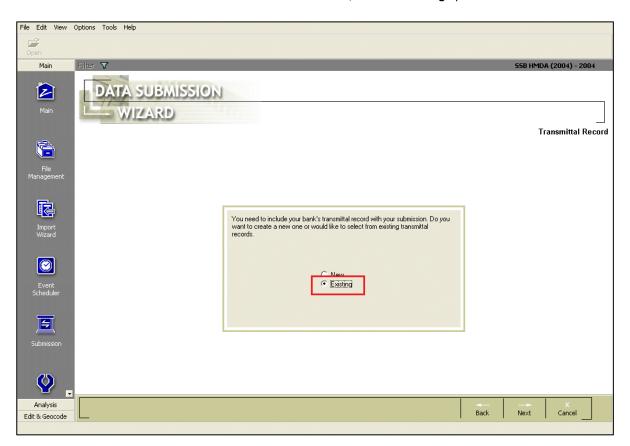
The software displays the **Institution and Date Filter** screen:



# Choosing Existing Transmittal Sheets

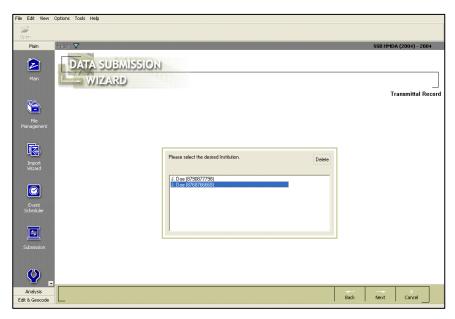
To choose from existing transmittal sheets, follow these steps:

1. From the **CRA Submission Wizard - Transmittal Record** screen, click the **Existing** option button:

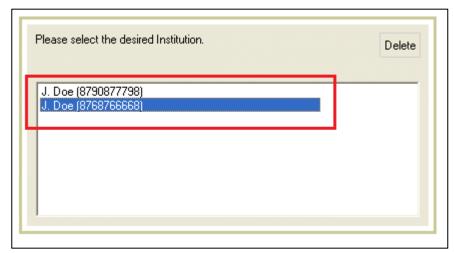


2. Click the Next button.

The software displays the **Transmittal Record Selection** screen:



3. From the list box, select the institution whose transmittal information you want to use:

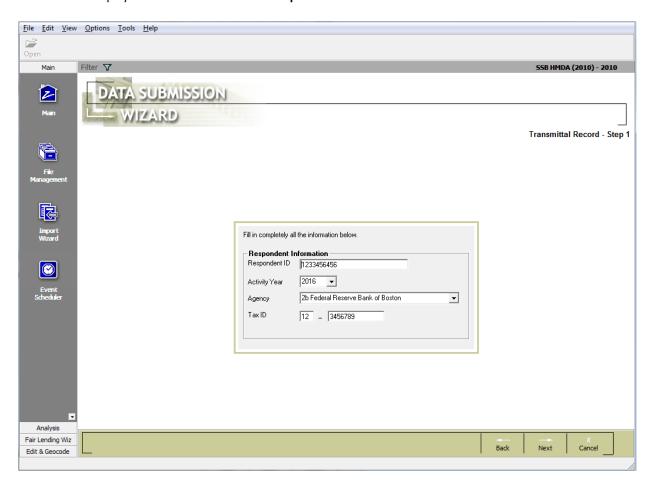


# 7ip

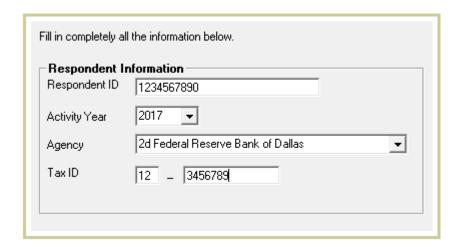
To delete an existing transmittal sheet, select the transmittal sheet, then click the **Delete** button.

4. Click the Next button.

The software displays the **Transmittal Record - Step 1** screen:



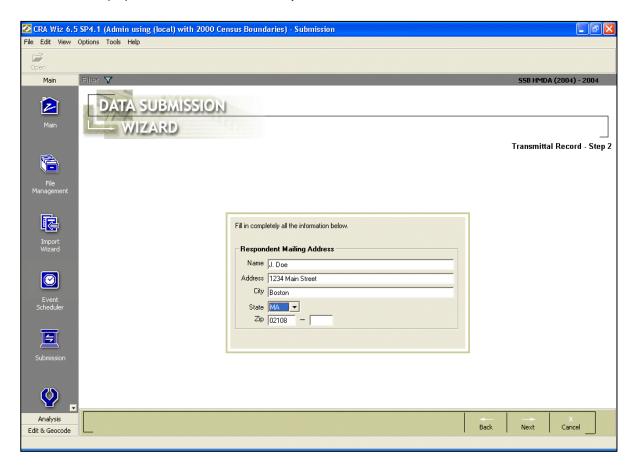
5. Verify that the **Respondent ID**, **Activity Year**, **Agency Code**, and **Tax ID** information are correct:



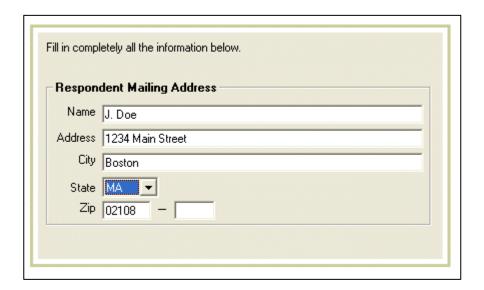
**Note**: If you are using a transmittal sheet you created in a previous year, make sure you choose **2021** from the **Activity Year** dropdown list box.

6. Click the **Next** button.

The software displays the **Transmittal Record - Step 2** screen:

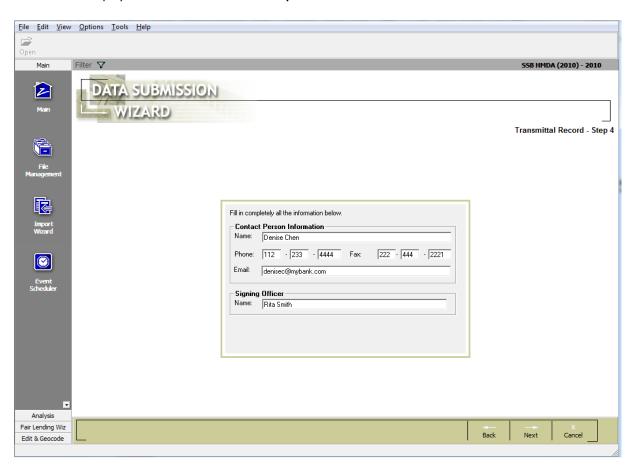


7. Verify that the **Name**, **Address**, **City**, **State**, and **ZIP** information are correct:

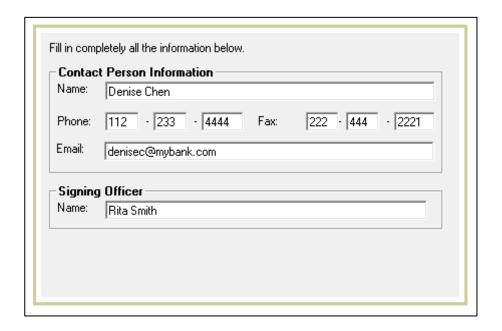


8. Click the **Next** button.

The software displays the **Transmittal Record - Step 3** screen:



9. Verify that the information in the **Contact Person Information**, and **Signing Officer** sections is correct:



#### 10. Click the **Next** button.

**Note**: If you update any of the transmittal information the software displays a confirming dialog box. Click **Yes** or **No**.

The software displays the **Institution and Date Filter** screen:

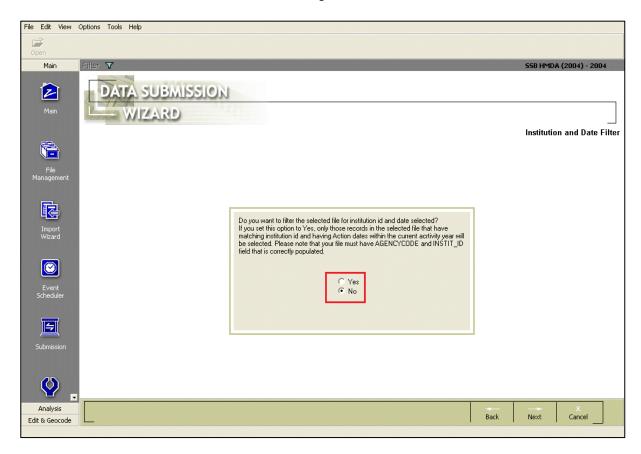


#### 7.2.7 Using Institution and Date Filters

The **Institution and Date Filter** screen enables you to do the following:

- Filter a multi-year file for only the current submission year.
- Filter a multiple-institution file for only a specific lender.

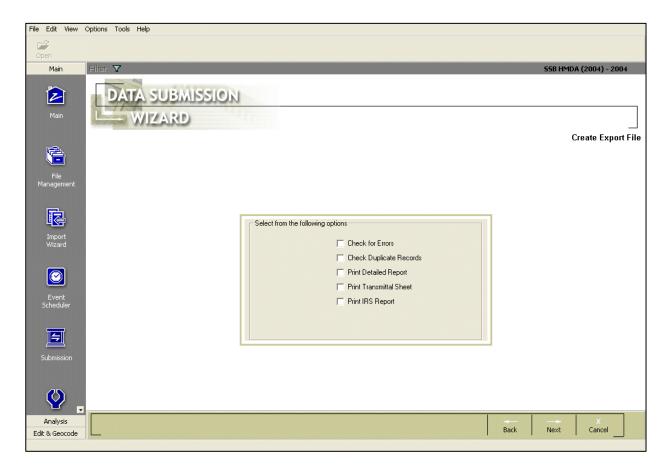
To set institution and date filters, do one of the following:



- If your CRA file contains records only for a single institution and for a single year, click the **No** option button, then click the **Next** button.
- If your CRA file contains records for multiple institutions or multiple years, click the **Yes** option button, then click the **Next** button.

**Note**: Only those records for the year and institution you specified on your transmittal sheet will be included in your submission file.

The software displays the **Create Export File** screen:

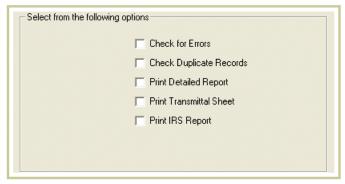


**Note**: To set institution and date filters your CRA file must have fields named **INSTIT\_ID** and **AGENCYCODE**. Each field must contain valid values.

# 7.2.8 Selecting Printing and Error Checking Options

To select printing and error checking options, follow these steps:

1. From the **Create Export File** screen, select one or more of the following error checking and printing options:



 Check for errors - the software checks for validity, quality, and syntactical errors. If validity or synctactical errors are found, you should cancel the submission procedure and correct them before continuing.

**Note**: The software will let you submit a file with validity errors.

- Check Duplicate Records the software checks your file for duplicate application numbers. If duplicates
  are found, the software displays a message listing the number of duplicate records. The software will
  not allow you to proceed until you have removed duplicate records. If no duplicate records are found,
  you receive a message telling you there are no duplicates.
- Print Detailed Report prints a breakdown of your small business and small farm lending according to
  the size, action, and revenue breakdowns listed in the CRA File Specifications for aggregate small
  business and small farm lending.

**Note**: To print this report, you will need to have legal-size (8 1/2" by 14") paper in your printer.

- Print Transmittal Sheet enables you to print a transmittal sheet for your submission file.
- IRS Report enables you to print an Institution Register Summary report for your submission file.
- 2. Click the Next button.

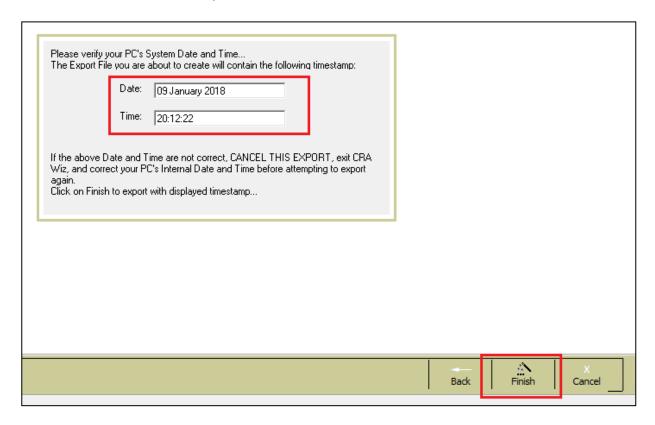
The software displays the **Time Confirmation** screen:



# 7.2.9 Verifying the Time and Date of Your PC Clock

To verify the time and date of your PC clock, do the following:

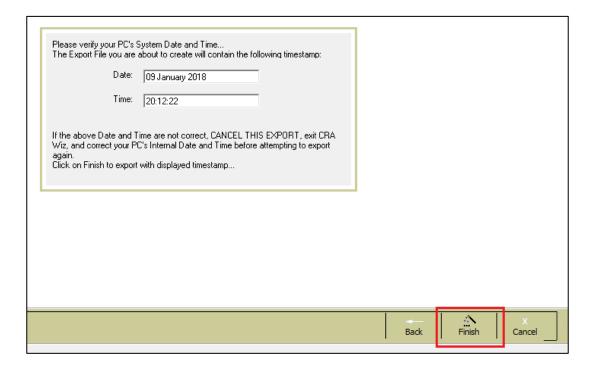
From the **Time Confirmation** screen, confirm that the time and date are correct:



**Note**: If the time and/or date is incorrect, click the **Cancel** button. Then reset your computer's clock and start the **Submission Wizard** again. Exporting the CRA Submission File

7.2.10 To export the CRA submission file, follow these steps:

1. From the **Time Confirmation** screen, click the **Finish** button:



• If you selected the **Check for Errors** check box on the **CRA Submission Wizard - Create Export File** screen, the software displays a message telling you the total number of validity and quality errors in the file:

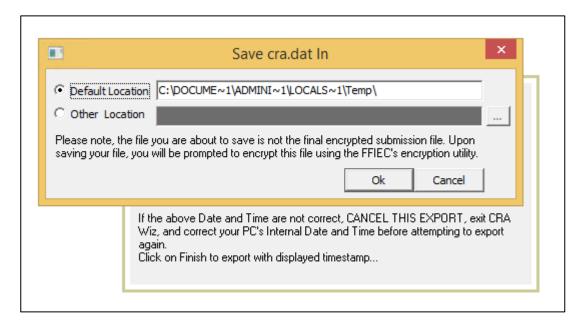


- ✓ If your file has validity errors, click the **No** button and correct them before continuing.
- ✓ If your file has quality errors, you should verify that the number is correct. You can do this is by comparing this number to the **Summary Exception Report**. For additional information about printing reports, refer to the **CRA** *Wiz* **Basic Traning Manual**.
- If you selected the Check for Duplicate Records check box on the Create Export File screen, the
  software checks for duplicate records. If duplicates are found, the software displays a message
  indicating how many duplicate records were found. You must delete or correct duplicate records
  before continuing:

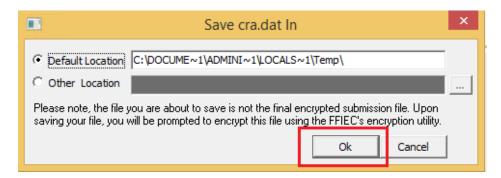


2. If no duplicate records are found, click the **OK** button.

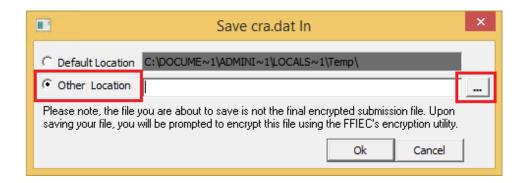
The software displays the Save cra.dat in dialog box:



- 3. Do one of the following:
  - To accept the default export location, click the **OK** button:



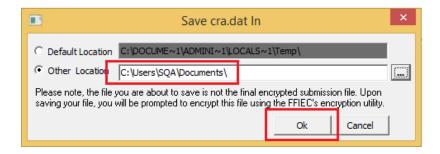
• To choose a location for the exported file, click the **Other Location** option button, then click the ellipses button located at the end of the Other Location field:



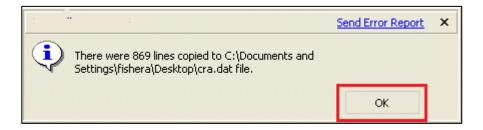
4. In the resultant **Browse for Folder** dialog box, select the file destination, and then click the **OK** button:



The software displays the file path in the Other Location field. Click the **OK** button:



When the submission file has been created, the software displays a confirming dialog box:



5. Click the **OK** button.

The software displays the FFIEC Encryption Utility:



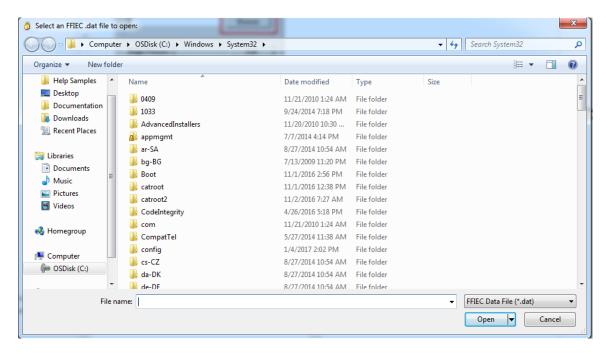
The following procedures describe how to use the Federal Reserve issued CRA Internet Submission Software. You use this software to encrypt your submission files for transmission via electronic mail (e-mail).

**Note**: When launched, the software displays a warning dialog box. Click the **OK** button on the dialog box.

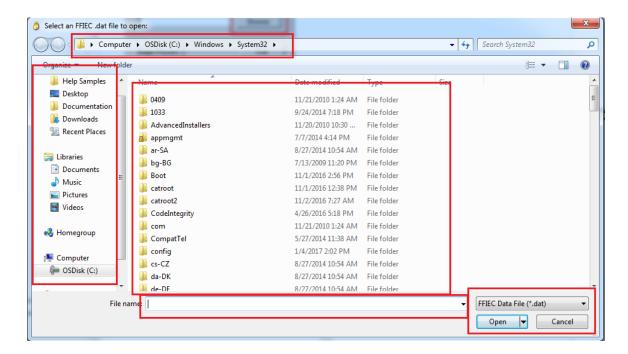
6. Click the **Browse** button:



The software displays the **Select an FFIEC** .dat file to open dialog box:



7. Use the dialog box controls to navigate to the location of your submission file (CRA.dat file):



**Note**: The software requires that your submission file contains a transmittal sheet, community development records, and assessment area records. The software displays an error dialog box if any of this data is missing.

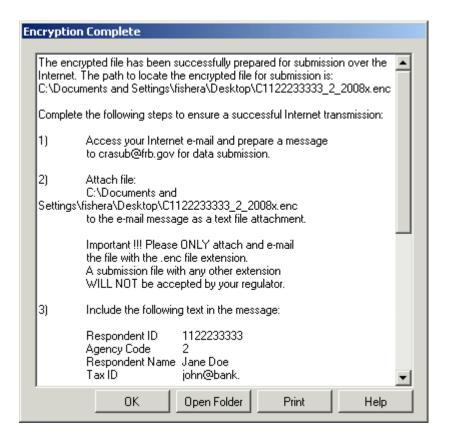
8. Click the Open button.

The software displays the submission file name in the **CRA input file name** text box:

9. Click the **Begin Process** button:



The software encrypts your file and displays the **Prepare for Internet Submission** dialog box:



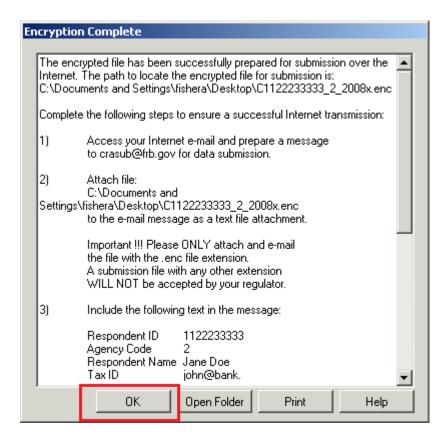
10. To transmit your encrypted file, follow the procedures in this dialog box.

**Note**: To print a copy of the instructions, click the **Printer Setup** button to select your printer, then click the **Print Message** button.

**Note**: Your encrypted file is exported to the location where you selected to save the CRA.dat file.

The **CRA Wiz and Fair Lending Wiz 7.x** folder may have a slightly different name on your system, depending on which CRA *Wiz* updates you have installed.

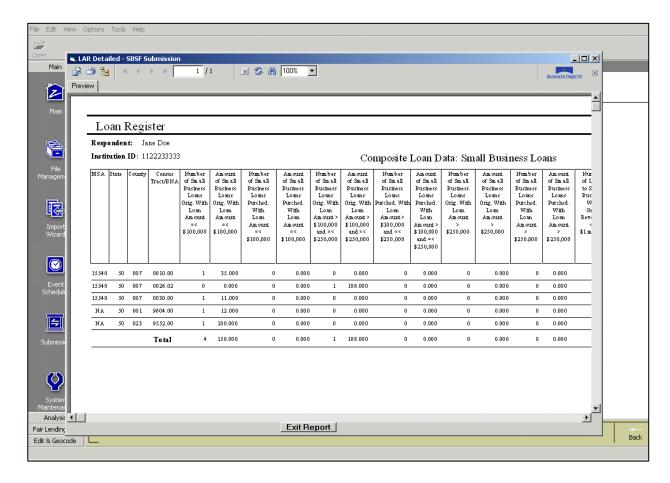
11. Click the **OK** button:



12. To close the submission software, click the **Exit** button located at the top right corner of the utility screen.

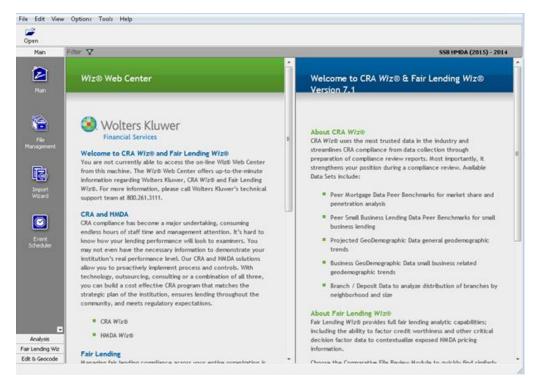


If you selected any of the print options in the **Create Export File** screen, the software generates and displays the report(s):



13. When you are done reviewing and printing report(s), close the report window then click the **Cancel** button.

The software displays the CRA Wiz Main screen:



# 8 Appendix 1: Frequently Asked Questions

This Appendix includes the questions and answers that may provide helpful information about your HMDA DF and CRA submissions. For more information, refer to the following sections:

**General Submission Questions** 

**HMDA DF Submission** 

**CRA Submission** 

**Loan Purpose Changes** 

**Temporary Financing** 

**Reverse Mortgage** 

Community Development & Consortium/Third-Party Loans

**Data Editing and Scrubbing** 

## 8.1 General Submission Questions

- **Q** What are the submission deadlines?
- A The deadline for both HMDA DF and CRA submission is March 1st, 2021. In years when March 1st is not a business day, the deadline will be the first business day after March 1st.
- **Q** Can I submit my CRA file by e-mail?
- A Yes. You will need to use the **2021 version of the FFIEC encryption utility** for CRA submission to encrypt the file. The encryption utility is normally updated and embedded into the CRA *Wiz* and Fair Lending *Wiz* application each year. You can download and install the latest software from the **FFIEC's website**:

### CRA ENCRYPTION UTILITY

Once you have encrypted your file(s), you can email them to your regulator.

**Note**: CRA Wiz & Fair Lending Wiz does not contain functionality to email them for you.

**Note**: Effective for submission of 2018 data, HMDA DF data can no longer be submitted by email. It must be uploaded to the CFPB's HMDA DF portal for submission.

- **Q** Does the government require me to send a printed copy of my LAR?
- A No, you do not need to include this with your submission file.
- **Q** My file is missing some required fields the government requires for submission. Can I add them after I import the file?
- A Yes. Please contact **Wolters Kluwer Financial Services Technical Support** at **(800) 261-3111** for assistance in adding fields to your file.
- Q Does CRA Wiz contain functionality that will allow CRA submission via the Web?
- **A** CRA *Wiz* does not contain this functionality.

### 8.2 HMDA DF Submission

- **Q** How do I claim partial exemptions under S. 2155?
- A S. 2155 will be supported through the submission wizard in CRA Wiz and Fair Lending Wiz where you will be able to select which loans, if any, and which data points to which exemption values will be applied during the creation of your submission package. CRA Wiz and Fair Lending Wiz will automatically use the exemption values for the selected loans and data points while allowing you to retain the original data for other analysis and reporting activities. See HMDA DF Submission Wizard Overview for details of the workflow to claim partial exemptions.
- **Q** What is the date format for submission?
- A You don't have to provide a date format. The **Submission Wizard** automatically uses the correct date format in the submission file.

## 8.3 QCRA Submission

- **Q** Do I have to submit community development loans?
- A This depends on whether you made any community development loans:

  If you have made community development loans, you are required to submit them.

  If you do not have any community development loans to submit, input the data manually and enter a value of zero in all fields.
- **Q** How do I submit my community development loans?
- A The following list provides additional information about submitting community development loans:
  - On the **Select Files for Submission** screen you can take the information from a file or input the data manually.
  - If you use a file, it must be a file of type **Other** and must include the fields **applnumb**, **size**, **action**, and **affiliate**

Note: You cannot include the loans in this file in your Small Business and Small Farm file, Consumer file, or Small Business, Small Farm, and Consumer file.

You may include multifamily loans (Property\_Type = 3) you submit in your HMDA DF file if they also
meet the criteria for community development loans.

Note: If you need assistance, please contact Wolters Kluwer Technical Support at (800) 261-3111.

**Note**: This is the only case in which you can double-count loans (submitting them once as HMDA DF loans, and once as CRA community development loans).

To submit these loans, your HMDA DF file must include a **comdevelop** field, and for the records that contain community development loans, the field's value must be **Y**.

**Note**: The **Y** is case sensitive, so make sure you type an uppercase **Y**, not **y**.

There is an option in the **Export for Submission** screen in the software that allows you to choose a HMDA DF file that contains community development loans. For additional information, refer to <u>Creating a HMDA DF Submission File</u> and <u>Creating a CRA Submission File</u> for further details.

- **Q** What if I don't have any community development loans to submit?
- A Choose to input data manually and enter all zeroes.
- **Q** Why doesn't the number of records (lines) in my export file match my loan total?
- A HMDA DF file contains one record for each application in your LAR, plus one record for your transmittal sheet. In CRA reporting, you do not submit that application detail level (known as Micro Level Data) unless requested to do so by your regulator's office. Instead, you submit data aggregated to the census tract level. There are several different kinds of records in the CRA submission file, as described below:
  - One transmittal sheet (Record ID = 3) containing information about your institution.
  - One record for each census tract in which you had small business lending activity (Record ID = 4). Each line includes the number and total dollar amount of the loans you made in that census tract. This information is broken into ranges: number and total dollar amount of loans less than or equal to \$100,000; number and total dollar amount of loans greater than \$100,000 and less than or equal to \$250,000; number and total dollar amount of loans greater than \$250,000 and less than or equal to \$1 million. Each record also contains the number and dollar amount of loans made to businesses with gross annual revenues less than or equal to \$1 million. (Refer to the FFIEC's 2006 CRA File Specifications for additional information.)
  - One record for each census tract in which you had small farm lending activity (**Record ID = 5**). Each line includes the number and total dollar amount of the loans you made in that census tract. This information is broken into ranges: number and total dollar amount of loans less than or equal to \$100,000; number and total dollar amount of loans greater than \$100,000 and less than or equal to \$250,000; number and total dollar amount of loans greater than \$250,000 and less than or equal to \$500,000. Each record also contains the number and dollar amount of loans made to farms with gross annual revenues less than or equal to \$1 million (Refer to the FFIEC's 2008 CRA File Specifications for additional information).
  - One record (Record ID = 6) for all community development loans that includes the number and dollar amount of community development originations and purchases made by your institution and your affiliates.
  - One record for Consortium/Third Party Loans, if any. (Record ID = 7).
  - One record for each census tract in your assessment area. (Record ID = 8).

The software can create the following record types:

**Note**: Because these records are never submitted on March 1st, the **Submission Wizard** will not include them in your submission files. If you need to export these records to fill a request from an examiner, please call Wolters Kluwer Financial Services Technical Support at (800) 261-3111 for assistance.

One record for each consumer loan originated or purchased (Record ID = 9).

- One record for each small business or small farm loan originated or purchased (Record ID = 9).
- **Q** Can I review the information I submit?
- A Yes. Use the **Print Detailed Report** option in the **Create Export File** window of the **Submission Wizard**.
  - HMDA DF files print in the standard LAR format.
  - CRA files print in the size and revenue category breakdowns as specified in the regulation.
- **Q** Does the software filter out CRA loans greater than \$1 million?
- A Yes. This is done to comply with the FFIEC specifications for CRA submission.
- **Q** Does the software filter out consumer loans during CRA submission?
- A Yes. If you are using a **Small Business, Small Farm, and Consumer** file, the software will not include consumer loans, as specified by the FFIEC.
- Q My institution does not make small business loans (or is not required to submit them), but I do have to submit our assessment areas or community development loans. How do I create a submission file?
- A You will have to create a shell (empty) small business file in order to access the CRA Submission Wizard. Use the **New File** contextual menu command in the **File Management** screen to create the shell file in the **Small Business and Farm** folder. When prompted, set the file to be **ungeocodable**. For additional information, refer to <a href="Creating a CRA Submission File">Creating a CRA Submission File</a>. For additional information about using the File Management screen, refer to the **CRA Wiz Basic Training Manual**.

## 8.4 Loan Purpose Changes

### 8.4.1 Refinancing --- Loan Purpose

- Q If an obligation satisfies and replaces another obligation, is the purpose of the replaced obligation relevant to whether the new obligation is a reportable "refinancing" under Regulation C?
- A No. The new definition of a reportable refinancing looks only to whether (1) an obligation satisfies and replaces another obligation and (2) each obligation is secured by a dwelling (See 203.2(k)(2)). Thus, for example, a satisfaction and replacement of a loan made for a business purpose is a reportable refinancing if both the new loan and the replaced loan are secured by a dwelling.

## 8.4.2 Refinancing --- Line of Credit

- **Q** If a dwelling-secured line of credit satisfies and replaces another dwelling-secured obligation, is the line required to be reported as a "refinancing?"
- A No. A dwelling-secured line of credit that satisfies and replaces another dwelling-secured obligation is not required to be reported as a "refinancing," regardless of whether the line is for consumer or business purposes.

### 8.4.3 Refinancing --- Guaranty Secured by Dwelling

- Q If an obligation secured by a dwelling is satisfied and replaced by an obligation in which a guaranty of the credit obligation is secured by a dwelling but the new credit obligation is not secured by a dwelling, is the transaction reportable under HMDA DF?
- A No, a transaction is not reportable as a home purchase loan or refinancing unless the credit obligation, itself, is secured by a dwelling (See 203.2(h), 203.2(k)(2)). An obligation not secured by a dwelling is reportable as a home improvement loan only if classified by the lender as a home improvement loan (See 203.2(g)(2)).

## 8.4.4 Refinancing --- Satisfaction of Lien

- Q Is the satisfaction of a lien (mortgage) relevant to determining whether an obligation is a reportable refinancing?
- A No, the satisfaction of a lien is neither necessary nor sufficient to create a reportable refinancing. The credit obligation must be satisfied and replaced; it is not relevant whether the lien is satisfied and replaced (See 203.2(k)(2)).

## 8.4.5 Refinancing --- Cash Out for Home Improvement

- Q How should a lender code a dwelling-secured loan when the borrower uses the funds both to pay off an existing dwelling-secured loan and to make improvements to a dwelling?
- A dwelling-secured loan that meets the definitions of both "home improvement loan" and "refinancing" should be coded as a "home improvement loan" (See comment 203.2(g)-5). The lender must code the loan as a "home improvement loan" even if the lender does not classify it in the lender's own records as a "home improvement loan" (See 203.2(g)(1)).

### 8.4.6 MECAs

- Q Should MECAs (Modification, Extension and Consolidation Agreements) be reported under HMDA DF as refinancings?
- A No. The rule is unchanged: MECAs are not reportable as refinancings under Regulation C (See 67 Fed. Reg. 7221, 7227 (Feb. 15, 2002)). The applicable comment was inadvertently omitted when the Commentary was revised in 2002; the comment will be restored when the Commentary is next revised.

## 8.5 Temporary Financing

- **Q** When is a loan "temporary financing" such that it is exempt from reporting?
- A The regulation lists as examples of temporary financing construction loans and bridge loans. See 203.4(d)(3). Construction and bridge loans are illustrative, not exclusive, examples of temporary financing. The examples indicate that financing is temporary if it is designed to be replaced by permanent financing of a much longer term. A loan is not temporary financing merely because its term is short. For example, a lender may make a loan with a 1-year term to enable an investor to purchase a home, renovate it, and re-sell it before the term expires. Such a loan must be reported as a home purchase loan. See 203.2(h).

# 8.6 Reverse Mortgage

- Q Does a lender have to report information on applications and loans involving reverse mortgages?
- A Reverse mortgages are subject to the general rule that lenders must report applications or loans that meet the definition of a home purchase loan, home improvement loan, or refinancing (see 12 C.F.R. § 203.2(g)-(h), (k)).
  - Note, however, that reporting is optional if the reverse mortgage (in addition to qualifying as a home purchase loan, home improvement loan, or refinancing) is also a home equity line of credit (HELOC). See 12 C.F.R. § 203.4(c)(3). The official staff commentary to Regulation C states that a lender who opts to report a HELOC should report in the loan amount field only the portion of the line intended for home improvement or home purchase. See comment 4(a)(7)-3.

## 8.7 Community Development & Consortium/Third Party Loans

- Q Can community development loans or consortium/third party loans be in the same file as my small business and farm loans?
- A No. Community development loans or consortium/third party loans must be in separate files from small business and farm loans.

- Q What should I do if I have community development loans or consortium/third party loans in the same file as my small business and farm loans?
- A You must copy the community development and consortium/third party loans to a new file and then delete them from the original file.

To copy these loans to a new file, you must identify these loans as community development or consortium/third party loans. For example, if your **Type** field for these loans is equal to **09**, or if you have a user-defined field that flags those records, you can use the copy command in File Management to make a file that contains only those loans.

**Note**: For more information about how to copy a file, contact Wolters Kluwer Technical Support at **1-800-261-3111**.

# 8.8 Data Editing and Scrubbing

- Q When I do a global replace to correct a validity error, why does the software still display the error code?
- A When you use a global replace to correct errors, the software does not automatically check your records for errors. You must update the file in **File Management** to run the edit checks and resolve any errors.
- **Q** Can I use more than one field to check for duplicate records?
- A You can, but Wolters Kluwer Financial Services recommends you not use this process, because the CRA and HMDA DF regulations specify that each application should have a unique identifier.

# 9 Appendix 3: Additional Information

### 9.1 Web Sites

The following government agencies and banking trade organizations have web sites where you may find helpful information:

- CFPB HMDA DF Platform: <a href="https://ffiec.cfpb.gov/">https://ffiec.cfpb.gov/</a>
   Note: Site is accessible only to institutions that are subject to HMDA DF regulation.
- The Federal Financial Institutions Examination Council (FFIEC) publishes a variety of useful material on www.ffiec.gov/cra

### 9.2 Useful Publications to Download from the Web

All of the following documents are published by the FFIEC, unless otherwise noted:

- A Guide to HMDA DF Reporting: Getting It Right http://www.ffiec.gov/HMDA DF/guide.htm
- CFPB HMDA FAQ:

https://www.consumerfinance.gov/documents/9642/cfpb hmda frequently-asked-questions-v6 2021-11.pdf

- File instructions guide for HMDA DF data collected in 2021 https://s3.amazonaws.com/cfpb-hmda-public/prod/help/2021-hmda-fig.pdf
- 2021 HMDA DF Edits Sections 5.2 and 5.3 https://s3.amazonaws.com/cfpb-hmda-public/prod/help/2021-hmda-fig.pdf
- A Guide to CRA Data Collection & Reporting http://www.ffiec.gov/cra/guide.htm
- Interagency Questions and Answers Regarding Community Reinvestment http://www.ffiec.gov/cra/qnadoc.htm
- 2021 CRA File Specifications -http://www.ffiec.gov/cra/fileformats.htm
- 2021 CRA Edits http://www.ffiec.gov/cra/edits.htm

## 9.3 Phone Numbers, Online Help, and Email

• HMDA DF Assistance -

Email - HMDA DFhelp@cfpb.gov

Online Help: https://HMDA DFhelp.consumerfinance.gov/

CRA Assistance Line - 202-872-7584
 Email - crahelp@frb.gov

Online Help: <a href="https://www.ffiec.gov/contact/">https://www.ffiec.gov/contact/</a>