

## **HMDA Rule Key Dates Timeline**

|  |                    | 2016   | 2017   | 2018  | 2019   | 2020  |
|--|--------------------|--|--|---|--|---|
|  | Effective<br>Dates | No new regulatory requirements go into effect  | 1/1 Effective date for excluding low volume depository institutions from coverage                | 1/1 Effective date for most provisions related to institutional and transactional coverage, and data collection, recording, reporting, and disclosure | 1/1 Effective date for changes to enforcement provisions and additional amendments to reporting provisions | 1/1 Effective date for quarterly reporting provisions   |
|  | چ                  | Q1 – Q4  | Q1 – Q4  | Q1 – Q4   | Q1 – Q4  | Q1 – Q4   |
|  | Data<br>Collection | Collect 2016 data as required under the <b>current rule</b> <sup>1</sup> (for reporting in 2017)   | Collect 2017 data as required under the <b>current rule</b> <sup>1</sup> (for reporting in 2018) | Collect 2018 data as required under the <b>new rule</b> <sup>2</sup> (for reporting in 2019)  | Collect 2019 data as required under the <b>new rule</b> <sup>2</sup> (for reporting in 2020)               | Collect 2020 data as required under the <b>new rule</b> <sup>2</sup> (for reporting in 2021 and, if FI is quarterly reporter, 2020) |
|  |                    | 1/1 – 3/1  | 1/1 – 3/1  | 1/1 – 3/1   | 1/1 – 3/1  | 1/1 – 3/1   |
|  | Data<br>Submission | Submit 2015 data as required under the <b>current rule</b> ,¹ and submit to the Federal Reserve Board  Submit 2016 data as required under the <b>current rule</b> ,¹ and submit to the Federal Reserve Board | Submit 2017 data as required under the current rule, and   | Submit 2018 data as required under the <b>new rule</b> , <sup>2</sup> and submit to the   | Submit 2019 data as required under the <b>new rule</b> , <sup>2</sup> and submit to the CFPB               |   |
|  | Data<br>miss       |  |  | submit to the CFPB  | CFPB   | 4/1 – 5/30  |
|  | I                  |  |  |   |  | Quarterly FI reporters report Q1, 2020 data as required under the <b>new rule</b> , <sup>2</sup> and submit to the CFPB             |

<sup>1 &</sup>quot;Data as required under the current rule" on this timeline is defined as the data required to be collected and reported under Regulation C, prior to amendments to § 1003.4 effective on January 1, 2018.

This chart summarizes requirements under HMDA and Regulation C, and does not itself establish any binding obligations. It is intended only to act as a quick reference and not as a substitute for the regulation or its commentary. Always consult the regulation text and official commentary for a complete understanding of the law. For more information on key HMDA dates and implementation, please refer to the HMDA Rule and additional resources provided at <a href="http://www.consumerfinance.gov/hmda">http://www.consumerfinance.gov/hmda</a> and <a href="http://www.consumerfinance.gov/hmda">http://www.consumerfinance.gov/hmda</a> and <a href="http://www.consumerfinance.gov/regulatory-implementation/hmda">http://www.consumerfinance.gov/hmda</a> and <a href="http://www.consumerfinance.gov/regulatory-implementation/hmda">http://www.consumerfinance.gov/regulatory-implementation/hmda</a>.

<sup>&</sup>lt;sup>2</sup> "Data as required under the new rule" on this timeline is defined as the data required to be collected and reported under Regulation C, as amended by the HMDA Rule issued on October 15, 2015.