

Effective January 1, 2017

Collection and Reporting of HMDA Information about Ethnicity and Race

This chart summarizes the options available to financial institutions to collect and report HMDA race and ethnicity information.

[Current Regulation C](#), which implements HMDA, requires certain financial institutions to collect and report information about the ethnicity, race, and sex of applicants for mortgages. Regulation C, as amended by the [2015 HMDA Rule and the 2017 HMDA Rule](#), will generally require financial institutions to permit applicants to self-identify using disaggregated ethnicity and race categories* beginning January 1, 2018, but which provides a [transition rule](#) for applicant data collected prior to January 1, 2018 where final action is taken on or after January 1, 2018. However, because [Regulation B](#) generally prohibits creditors from asking for information about ethnicity and race unless authorized by law, including by Regulation C, the [Bureau Official Approval Notice](#) issued on September 23, 2016 allows creditors, at their option, at any time from January 1, 2017, through December 31, 2017, to permit applicants to self-identify using the disaggregated ethnicity and race categories* provided in appendix B to Regulation C, as amended by the 2015 HMDA final rule. Further, on September 20, 2017, the Bureau issued an [amendment to Regulation B](#) (2017 Regulation B Rule) to allow creditors flexibility concerning the collection of applicant ethnicity and race information in certain additional specified circumstances.

Application year	Final action year	Ethnicity and race collection and reporting requirements	Regulatory references
2017	2017	Collect aggregate and report aggregate, OR	Current Regulation C, effective January 1, 2017 (12 CFR part 1003, appendices A and B)
2017	2017	Collect disaggregated and report aggregate	Bureau Official Approval Notice (81 FR 66930)
2017	2018	Collect aggregate and report aggregate, OR	Current Regulation C, effective January 1, 2017 (12 CFR part 1003, appendices A and B) AND transition rule, effective January 1, 2018 (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
2017	2018	Collect disaggregated and report aggregate, OR	Bureau Official Approval Notice (81 FR 66930) AND transition rule, effective January 1, 2018 (2015 HMDA Final Rule, comment 4(a)(10)(i)-2)
2017	2018	Collect disaggregated and report disaggregated	Bureau Official Approval Notice (81 FR 66930)
2018 and beyond	2018 and beyond	Collect disaggregated and report disaggregated, AND	2015 HMDA Rule (80 FR 66127) AND 2017 HMDA Rule (82 FR 43088)
2018 and beyond	2018 and beyond	Report whether ethnicity, race, and sex were collected on the basis of visual observation or surname**	2015 HMDA Rule (80 FR 66127) AND 2017 HMDA Rule (82 FR 43088)

*Only an applicant may self-identify using the disaggregated ethnicity and race categories. When a financial institution collects ethnicity, race, and sex on the basis of visual observation or surname for an application taken in person because the applicant chose not to provide the information, the financial institution must select from the aggregate categories.

**Prior to the 2015 HMDA Rule, Regulation C required that the financial institution note the ethnicity, race, and sex on the basis of visual observation if the applicant chose not to furnish the information and the application was made in person, but the financial institution is not required to report that ethnicity, race, and sex were collected on the basis of visual observation. Additionally, the 2017 Regulation B Rule and the 2017 HMDA Rule permit certain creditors, at their option to voluntarily collect and report, respectively, certain ethnicity, race, and sex information about applications for certain mortgage loans.

This chart provides an overview of the ethnicity and race collection and reporting requirements under HMDA, Regulation C, the Bureau's Official Approval Notice, and certain aspects of Regulation B. It does not by itself establish any binding obligations. It is intended only to act as a reference and not as a substitute for the regulation or its official commentary. Always consult the regulation text and official commentary for a complete understanding of the law. Version 2.0, 10/16/2017