

Buffalo Community Federal Credit Union

HOME MORTGAGE DISCLOSURE ACT POLICY

Purpose

The Home Mortgage Disclosure Act (HMDA), implemented by Regulation C, became effective in 1975. This regulation requires disclosure of information that the credit union is otherwise prohibited from collecting, in order to verify that the credit union is meeting the lending needs of all members who are seeking residential mortgage-related credit.

Information Collected and Reported

Requires that certain information will be noted on the Home Mortgage Disclosure Act loan application register (LAR) for loans originated or purchased by the credit union. Loans for unimproved land, construction or bridge loans used for interim financing in constructing a dwelling, or purchases of an interest in a pool of loans are excluded from this requirement. The required information to be collected is:

- an identifying application or loan number and the date the application was received;
- the loan type, property type, and purpose of the loan;
- whether the property is owner occupied;
- the loan amount;
- whether the loan was a preapproval and the action taken on the preapproval;
- the location of the property by metropolitan statistical area (MSA), state, county and census tract;
- applicant information such as ethnicity, race, sex, and gross annual income;
- the type of entity that purchased the loan (if the credit union sold it within the calendar year);
- the reason the loan application was denied, if applicable;
- the rate spread (if the difference between the APR on the loan and yield on treasury security with comparable maturity exceeds a certain threshold);
- HOEPA status (if applicable);
- whether the loan is secured by a first lien, subordinate lien, or not secured by a lien.

Disclosure Requirements

By March 1, Buffalo Community Federal Credit Union's complete loan application register for the preceding calendar year will be submitted to NCUA, along with the required transmittal documentation in an automated machine-readable format.

Within three business days after receipt of the mortgage loan disclosure statement from the FFIEC, prepared on the basis of the credit union's register pages, Buffalo Community Federal Credit Union will make the disclosure statement available to the public at each branch office.

Buffalo Community Federal Credit Union will make modified HMDA-LARs for the previous year available to the public by March 31 of each year and will provide the previous year's modified LARs within 30 days of receipt of a request received after March 1.

The credit union will display in the lobby of each branch location a notice stating that the credit union's HMDA data is available for inspection and copying.

Record Retention Requirements

Buffalo Community Federal Credit Union will retain a copy of the HMDA-LAR pages submitted to the federal regulators for compilation for at least three years. The credit union will retain copies of the disclosure statement and make them available for a period of no less than five years.