

Entity Compliance

(Completed by Lender, Processor to review & verify information is correct)

*****Remember – HMDA Information must be completed for Originated and Non-Originated Loans, when applicable.***

*****Collateral must always be pledged even if loan does not originate.*****

A separate HMDA Entity Compliance record will be completed for each Borrower/Applicant.

When applicable for Government Monitoring selections, be sure to choose the appropriate Applicant or Co-Applicant option, depending on the Entity Compliance record that is completed.

HMDA Applicant

- Borrower is Applicant, but only one borrower can be selected as Applicant.
- Additional borrowers are considered Co-Applicants for HMDA reporting.
- Each Borrower will have a separate HMDA Entity Compliance Record.
- Do not complete a HMDA Entity Compliance Record on Guarantors.

Age of the Borrower or Co-Borrower

- Individual – Enter as numerical value, as of the application date.
- Non-Individual Entity – Enter **8888**

Income of Applicant (and/or Co-Applicant)

- Individual Borrower – Enter income in thousands, rounded to the nearest thousand (\$500 rounds up to the next \$1,000). For example, \$35,500 is reported as 36000.

Enter **NA** if any of the following apply:

- Borrower is a Non-Individual Entity
- Borrower is a Bank Employee
- Collateral is Multifamily dwelling* (5 + attached dwellings)

**Multifamily dwellings have five or more individual units attached with shared walls. If units are not attached with shared walls, it is not considered multifamily.*

Sex of the Borrower or Co-Borrower

- Individual Borrower (Telephone Application) – Lender Must Ask Applicant during telephone application to provide information. If applicant *does not* provide information, choose option, **Information not provided by applicant in mail, internet, or telephone application.**
- Individual Borrower (In-Person Application) – Lender Must Ask Applicant during in-person application to provide information.
 - If customer *does not* provide information, lender must choose an option for applicant (**Male or Female**).
- Non-Individual Entity Borrower – Choose **Not Applicable**

Sex Collection Method of Borrower or Co-Borrower

- Individual Borrower (Telephone Application) – choose **Not collected on the basis of visual observation or surname.** (**Note, lender cannot see applicant during a telephone application*).
- Individual Borrower (In-Person Application)
 - If Applicant provided sex information, choose **Not collected on the basis of visual observation or surname.**
 - If Lender chose Applicant sex option choose **Collected on the basis of visual observation or surname**
- Non-Individual Entity Borrower – Choose **Not Applicable**

Ethnicity (may select up to 5)

Report each aggregate ethnicity category and each ethnicity subcategory the applicant selected.

- Hispanic or Latino
 - Mexican
 - Puerto Rican
 - Cuban
 - Other Hispanic or Latino
- Not Hispanic or Latino
- Information not provided by applicant in mail, internet, or telephone application
- Individual Borrower (Telephone Application) – Lender Must Ask Applicant during telephone application to provide information, up to 5 options may be selected. If applicant *does not* provide information, choose option, **Information not provided by applicant in mail, internet, or telephone application.**
- Individual Borrower (In-Person Application) – Lender Must Ask Applicant during in-person application to provide information. Up to 5 options may be selected by Applicant.
 - If customer *does not* provide information, lender must choose option(s) for applicant, from main category only – lender cannot choose from subcategory options.
- Non-Individual Entity Borrower – Choose **Not Applicable**

Hispanic or Latino Ethnicity(ies) Desc

This field is only completed if the Other Hispanic or Latino ethnicity subcategory was selected, and the information is provided by the Applicant.

Ethnicity Collection Method

- Individual Borrower (Telephone Application) – choose **Not collected on the basis of visual observation or surname.** (**Note, lender cannot see applicant during a telephone application*).
- Individual Borrower (In-Person Application)
 - If Applicant provided ethnicity information, choose **Not collected on the basis of visual observation or surname.**
 - If Lender chose Ethnicity option(s) choose **Collected on the basis of visual observation or surname**
- Non-Individual Entity Borrower – Choose **Not Applicable**

Race (may select up to 5)

Report each aggregate race category and each subcategory the applicant selects, up to a combined total of five (5) aggregate race categories and race subcategories.

- American Indian or Alaska Native
- Asian
 - Asian Indian
 - Chinese
 - Filipino
 - Japanese
 - Korean
 - Vietnamese
 - Other Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
 - Native Hawaiian
 - Guamanian or Chamorro
 - Samoan
 - Other Pacific Islander
- White
- Information not provided by applicant in mail, internet, or telephone application
- Individual Borrower (Telephone Application) – Lender Must Ask Applicant during telephone application to provide information, up to 5 options may be selected. If applicant *does not* provide information, choose option, **Information not provided by applicant in mail, internet, or telephone application**.
- Individual Borrower (In-Person Application) – Lender Must Ask Applicant during in-person application to provide information, up to 5 options may be selected by Applicant.
 - If customer *does not* provide information, lender must choose option(s) for applicant, from main category only – lender cannot choose from subcategory options.
- Non-Individual Entity Borrower – Choose **Not Applicable**

American Indian or Alaska Native tribe

This field is only completed if the American Indian or Alaska Native Tribe race category was selected, and the information is provided by the Applicant.

Other Asian race(s)

This field is only completed if the Other Asian race subcategory was selected, and the information is provided by the Applicant.

Other Pacific Islander race(s)

This field is only completed if the Other Pacific Islander race subcategory was selected, and the information is provided by the Applicant.

Race Collection Method of Borrower or Co-Borrower

- Individual Borrower (Telephone Application) – choose **Not collected on the basis of visual observation or surname**. (**Note, lender cannot see applicant during a telephone application*).
- Individual Borrower (In-Person Application)
 - If Applicant provided race information, choose **Not collected on the basis of visual observation or surname**.
 - If Lender chose race option(s) choose **Collected on the basis of visual observation or surname**
- Non-Individual Entity Borrower – Choose **Not Applicable**

HMDA Compliance

(Completed by Processor)

****Remember – HMDA Information must be completed for Originated and Non-Originated Loans, when applicable.****

Universal Loan Identifier

Automatically generates after the record is created and saved the first time.

Loan Amount

Enter full loan amount with cents. Loan amount from loan wall DOES NOT flow to the HMDA Compliance section.

- Originated – Enter final loan amount from Note.
- Non-Originated – Enter the full loan amount applied for.

Date Application Received

Enter the date the application was received, per loan wall. The Application Date from loan wall DOES NOT flow to the HMDA Compliance section.

- Originated – Enter the application date from loan wall.
- Non-Originated – Enter the application date from loan wall.

Type of Loan

- Originated – Always select Conventional (not insured or guaranteed by FHA, VA, RHS, or FSA).
- Non-Originated – Always select Conventional (not insured or guaranteed by FHA, VA, RHS, or FSA).

Purpose of Loan

Only options that should be selected:

- Home Purchase
- Home Improvement
- Refinancing
- Originated – Select option that matches purpose on loan wall.
- Non-Originated – Select option that matches purpose on loan wall.

Home Purchase – if any loan proceeds will be used to purchase a dwelling.

Home Improvement – if any loan proceeds will be used to improve a dwelling.

Refinancing – if any of the loan proceeds are used to pay off debt where a dwelling is collateral and at least 1 borrower is the same.

****If more than one purpose applies, see chart below from reference guide for more information:**

| Multiple Purposes | Reportable Purpose |
|---|--------------------|
| Home Purchase Loan and Home Improvement Loan | Home Purchase Loan |
| Home Purchase Loan and Refinancing | Home Purchase Loan |
| Home Improvement Loan and Refinancing | Refinancing |
| Home Purchase Loan, Refinancing, and Home Improvement | Home Purchase Loan |

Type of Purchase (typo in nCino - should be Type of Purchaser)

- Originated – Always select Not Applicable.
- Non-Originated – Always select Not Applicable.

HOEPA Status

- Originated – Always select Not Applicable.
- Non-Originated – Always select Not Applicable.

Lien Status

****Collateral must be pledged even if loan does not originate**

- Originated – Select option that matches lien information shown on Title Work.
- Non-Originated:
 - If Title Work obtained, select option that matches lien information shown on Title Work.
 - If no Title Work obtained, select option that matches the lien position in nCino Collateral Record.

Request for Preapproval

- Originated – Always select Preapproval was not requested.
- Non-Originated – Always select Preapproval was not requested.

Action Taken

- Originated – Always select Loan Originated.
- Non-Originated – Always select option that matches information shown in nCino Adverse Actions route:
 - Application approved but not accepted.
 - Application denied.
 - Application withdrawn by applicant.
 - File closed for incompleteness.

Date Action Taken

- Originated – Enter the closing date from the Note.
- Non-Originated – Enter the date shown in nCino Adverse Actions route:
 - Denied – “Last Modified By” date.
 - Withdrawn/Approved not Accepted/File closed for Incompleteness – “Created By” date.

Property Securing Construction Method

****Collateral must be pledged even if loan does not originate**

- Site-built
- Manufactured Home
- Originated – Select the option that matches the construction method shown in the Collateral Valuation.
- Non-Originated:
 - If Collateral Valuation in file, select the option that matches the construction method shown.
 - If No Collateral Valuation in file, select the option that matches the nCino Collateral Record Collateral Type code.

Property Securing Address

****Collateral must be pledged even if loan does not originate**

- Originated – Enter the Street Address that is also listed on the Deed
 - For multiple addresses, only list one.
- Non-Originated – Enter the Street Address that is listed in the nCino Collateral Record.

Property Securing City

****Collateral must be pledged even if loan does not originate**

- Originated – Enter the City that is also listed on the Deed
 - For multiple addresses, only list one.
- Non-Originated – Enter the City that is listed in the nCino Collateral Record.

Property Securing State

****Collateral must be pledged even if loan does not originate**

- Originated – Select the State that is also listed on the Deed
 - For multiple addresses, only list one.
- Non-Originated – Select the State that is listed in the nCino Collateral Record.

Property Securing Zip

****Collateral must be pledged even if loan does not originate**

- Originated – Enter the Zip Code that is also listed on the Deed
 - For multiple addresses, only list one.
- Non-Originated – Enter the Zip Code that is listed in the nCino Collateral Record.

Property Securing Total Units

****Collateral must be pledged even if loan does not originate**

***Add up total number of dwelling front doors that are collateral for loan (Ex. we hold a duplex and a mobile home, answer is 3 units).**

****If collateral is a mobile home park, then see reference guide for additional information.***

- Originated – Enter the total number of units that are collateral, shown in the Collateral Valuation.
- Non-Originated – Enter the total number of units shown in the nCino Collateral Record or Collateral Valuation.

Property Securing Occupancy Type

****Collateral must be pledged even if loan does not originate**

- Principal residence
- Second residence
- Investment Property
- Originated – Select the option that matches the nCino Collateral Record, Collateral Code.
- Non-Originated – Select the option that matches the nCino Collateral Record, Collateral Code.

****If borrower is a Non-Individual Entity, occupancy type will always be Investment property. An entity cannot occupy a dwelling. Even if the collateral is a guarantor's principal residence, we code according to the borrower.***