

# Ask IBAT Anything

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## HMDA And Multiple Properties – What To Report?

**Question:** We have a HMDA covered loan that will be secured by multiple properties. How do we report the various fields on the HMDA LAR?

**Answer:** Community bankers have had questions about this because when more than one property is taken, the bank reports the covered loan as a single entry on the LAR. That gets confusing because some fields are reported based upon the transaction and others are reported based on the specific property reported on the HMDA LAR.

The bank must decide which property to report on the HMDA LAR as a single-entry LAR. Remember: the property being reported must be a dwelling.

Six reported fields will be based on the property the bank has selected to report: and 35 fields based on the commentary in §1003.4(a)(1) through (4), (7), (8), (10) through (13), (15) through (28), and (31) through (38) will be reported based on the entire collateral pool or the transaction as a whole.

*2. Multiple properties with more than one property taken as security. If more than one property is taken or, in the case of an application, proposed to be taken as security for a single covered loan, a financial institution reports the covered loan or application in a single entry on its loan/application register and provides the information required by § 1003.4(a)(9) for one of the properties taken as security that contains a dwelling. A financial institution does not report information about the other properties taken as security. If an institution is required to report specific information about the property identified in § 1003.4(a)(9), the institution reports the information that relates to the property identified in § 1003.4(a)(9) (or, if the transaction is partially exempt under § 1003.3(d) and no data are reported pursuant to § 1003.4(a)(9), the property that the institution would have identified in § 1003.4(a)(9) if the transaction were not partially exempt). For example, Financial Institution A originated a covered loan that is secured by both property A and property B, each of which contains a dwelling. Financial Institution A reports the loan as one entry on its loan/application register, reporting the information required by § 1003.4(a)(9) for either property A or property B. If Financial Institution A elects to report the information required by § 1003.4(a)(9) about property A, Financial Institution A also reports the information required by § 1003.4(a)(5), (6), (14), (29), and (30) related to property A. For aspects of the entries that do not refer to the property identified in § 1003.4(a)(9) (i.e., § 1003.4(a)(1) through (4), (7), (8), (10) through (13), (15) through (28), (31) through (38)), Financial Institution A reports the information applicable to the covered loan or application and not information that relates only to the property identified in § 1003.4(a)(9).*

Source [link](#).

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Publish 07/2021

