

November 24, 2017

Ms. Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

**Re: Proposed Policy Guidance on the Disclosure of Loan-Level HMDA Data;
Docket No. CFPB-2017-0025**

Dear Ms. Jackson:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB or Bureau) proposed Policy Guidance on the Disclosure of Loan-Level Home Mortgage Disclosure Act (HMDA) Data.

The CFPB is proposing to not publicly disclose several data points over concerns of consumer identity protection. As proposed, the public loan-level HMDA data would be modified to exclude: (1) the universal loan identifier; (2) the date the application was received or the date shown on the application form; (3) the date of action taken by the financial institution on a covered loan or application; (4) the address of the property securing the loan or, in the case of an application, proposed to secure the loan; (5) the credit score or scores relied on in making the credit decision; (6) the unique identifier assigned by the Nationwide Mortgage Licensing System and Registry for the mortgage loan originator; and (7) the result generated by the automated underwriting system used by the financial institution to evaluate the application.

The Bureau's approach in the 2015 HMDA Final rule requires credit unions to report numerous additional data points beyond those mandated by the Dodd-Frank Act. Though we appreciate the Bureau's proposed modification of certain reportable loan-level data, HCUA is concerned about the large amount of publicly-disclosed, sensitive information that is now required. Even with the proposed modifications, the public disclosure of much of the data poses significant privacy concerns.

Due to the increase in HMDA data collected and the increase in the amount of confidential consumer information that the CFPB will maintain, HCUA has concerns of safeguarding credit union members' person identifiable information. HCUA agrees with the Bureau that public disclosure of the unmodified loan-level dataset would create risks to applicant and borrower privacy interests under the HMDA balancing test. However, even with the proposed changes, information included in the individual data fields that will be disclosed creates re-identification risk and other risk of harm to consumers. HCUA urges the Bureau to further explore modifications to reduce the risks to applicant and borrower privacy and carefully balance them with the benefits of disclosure for HMDA's purposes.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Bradley D. Douglas". The signature is written in a cursive style with a large, prominent initial "B".

Brad Douglas
President/CEO