



**CPPB2017-13
 HOME MORTGAGE DISCLOSURE ACT
 (HMDA) DELIVERY REQUIREMENTS**

The HMDA collection and reporting requirements are changing in 2018. We are providing the following information to support your implementation of these changes.

The two specific changes in this final rule that impact how you deliver and sell loans to First Community Mortgage are:

- ❖ Universal loan identifier (ULI)
- ❖ Demographic information(DI) – f.k.a. Government monitoring information(GMI)

Please deliver your financial institution’s LEI to FCM by no later than 12/15/17 via email to heather.jones@fcmpartners.com


Below is a summary of FCM loan delivery requirements for the ULI and DI.

Universal loan identifier (ULI)

| | |
|------------------------------|--|
| <p>Delivery Requirements</p> | <ul style="list-style-type: none"> • For loans closed prior to 1/1/2018 and delivered for purchase on and after 12/1/2017, if a ULI was issued by the financial institution (FI) that made the credit decision, the seller must deliver the ULI to FCM. • For loans closed on and after 1/1/2018, the seller must deliver the ULI assigned by the FI that made the credit decision. |
| <p>Delivery Options</p> | <p>The ULI can be delivered on the following:</p> <ul style="list-style-type: none"> • On the application • On the DI addendum if used • On the DC submission sheet • In the ULDD <p>We will accept ULIs in advance of the required 1/1/2018 date.</p> |



by First Community Mortgage

 NMLS# 629700

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|---------------------------------|--|
| Other Important ULI information | <p>ULI must begin with financial institution’s legal entity identifier (LEI). Visit the Global LEI foundation website to obtain LEI.</p> <p>Provide Financial Institution LEI to FCM by no later than 12/15/17. Send to Heather Jones at heather.jones@fcmpartners.com</p> |
|---------------------------------|--|

Demographic Information:

| | |
|-----------------------|--|
| Delivery requirements | Sellers must deliver expanded DI on loans with application dates on and after 1/1/2018 |
| Delivery options | <p>The DI can be delivered on the following:</p> <p>URLA/1003</p> <p>DI addendum. Visit the DI addendum link below for this addendum.</p> <p>In the ULDD - we still require the DI addendum We will accept the addendum for the DI in advance of the required 1/1/2018 date.</p> |

FCM’s purchaser type will be 71 in the 2018 reporting year. Prior to the 1/1/2018 effective date of this change, FCM’s purchaser type was 7

For more information, please visit the websites below or contact your FCM account rep.:

CFPB website: <https://www.consumerfinance.gov/data-research/hmda/learn-more>

FFIEC website: <https://www.ffiec.gov/hmda/default.htm>

LEI website: <https://www.gleif.org/en/about-lei/how-to-get-an-lei-find-lei-issuing-organizations>

DI addendum: <http://myndm.com/wp-content/uploads/2017/10/urla-demographic-information-addendum.pdf>

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