

# 2023 HMDA 101 Q&A

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**QUESTION 1:** Do you have a link to a standalone model demographic form?

**ANSWER 1:** Yes! <https://www.consumerfinance.gov/rules-policy/regulations/1003/b/>

**QUESTION 2:** If we initially complete a mortgage application by mail, phone or electronically, but later see the applicant(s) in person, are we required to collect demographic information?

**ANSWER 2:** Unfortunately, there is no official guidance on this one. Each credit union therefore, will need to make their own determination. Here is what [the instructions in the regulation](#) state:

*10. If the applicant chooses not to provide the information for an application taken in person, note this fact on the collection form and then collect the applicant's ethnicity, race, and sex on the basis of visual observation or surname. You must report whether the applicant's ethnicity, race, and sex was collected on the basis of visual observation or surname. When you collect an applicant's ethnicity, race, and sex on the basis of visual observation or surname, you must select from the following aggregate categories: Ethnicity (Hispanic or Latino; not Hispanic or Latino); race (American Indian or Alaska Native; Asian; Black or African American; Native Hawaiian or Other Pacific Islander; White); sex (male; female).*

The “application period” can sometimes be a long time if you are waiting on information. Some financial institutions choose to define the application period as “anytime prior to closing.” If you only see the applicants at closing, I would say the application was **not** taken in person. If you start the application process remotely and, for instance, the applicant brings requested documents in person, that would constitute an in person application.