



January 21, 2022

Submitted Electronically

Comment Intake—HMDA Assessment,
Bureau of Consumer Financial Protection,
1700 G Street NW,
Washington, DC 20552

Re: Request for Information Regarding the HMDA Rule Assessment; Docket No. CFPB–2021– 0018

Dear Ladies and Gentlemen,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing over 200 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB) assessment of the 2015 Home Mortgage Disclosure Act (HMDA) Rule and related amendments in accordance with section 1022(d) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).

WBA appreciates CFPB's efforts to conduct a voluntary assessment of the final rule on HMDA in order to evaluate its effectiveness in meeting its stated goals and the purposes and objectives of the Dodd-Frank Act. Since passage of the Dodd-Frank Act's amendments to HMDA, CFPB has issued a series of HMDA rules including an expansion to the types of data reported by lenders, increases to temporary open-end coverage thresholds, the addition of partial exemptions from certain reporting requirements for smaller institutions, and amendments to transaction reporting thresholds for open-end lines of credit. WBA supports CFPB's efforts to evaluate the effectiveness of the HMDA rule and encourages an assessment which focuses on reduction of unnecessary burden on financial institutions, streamlining and modernizing collection and reporting of data, and an overall evaluation of the effectiveness of the data.

HMDA-covered financial institutions face significant systems and operational challenges. As such, WBA appreciates CFPB's preparation of an assessment report through the comment process of gathering metrics and data.

We appreciate your consideration of these comments.

Thank you,

A handwritten signature in black ink that reads "Rose Oswald Poels". The signature is written in a cursive, flowing style.

Rose Oswald Poels
President/CEO