

Default Question Block

1071 CFPB Survey Small Business Lending Data Collection Rulemaking **Respond by Monday, November 22**

Purpose/Background:

The Bureau of Consumer Financial Protection (Bureau) has published for public comment a proposed rule amending Regulation B to implement changes to the Equal Credit Opportunity Act (ECOA) made by section 1071 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). Consistent with section 1071, the Bureau is proposing to require covered financial institutions to collect and report to the Bureau data on applications for credit for small businesses, including those that are owned by women and/or minorities. The Bureau's proposal also addresses its approach to privacy interests and the publication of section 1071 data; shielding certain demographic data from underwriters and other persons; recordkeeping requirements; enforcement provisions; and the proposed rule's effective and compliance dates.

ABA is hosting an independent survey to compare the cost data provided in the in CFPB's 1071 proposal and to provide public comment.

Notes:

- See Full Document: [Small Business Lending Data Collection under the Equal Credit Opportunity Act Regulation B](#)
- See full copy of the survey for planning purposes only ([PDF Download](#)).
- All final responses must be submitted using this online form.

Demographic questions marked with an asterisk (*) are required for the purpose of deduplicating responses. Please do your best to answer as many questions as possible. Thank you.

1. What is the asset size of your institution, as of December 31, 2020?*

Less than \$500 million in assets

- \$500 million to \$999.9 million in assets
- \$1 billion to \$9.9 billion in assets
- \$10 billion to \$74.9 billion in assets
- \$75 billion or more in assets

2. Does your bank have a home or branch office located in a MSA?

- Yes
- No

3. In what state is your bank headquarters located?*

4. How many full-time equivalent (FTE) employees does your bank employ? (Do not include contractors or part-time employees)

FTEs

5. How many FTEs are dedicated to working on small business lending?

Include: Loan officers/lenders and their assistants/processors, underwriters, members of any committee that approve loans, such as a Senior Loan Committee or Executive Committee.

FTEs

6. Would your institution need to hire more Full Time Employees (FTEs) to comply with 1071 data collection and submission as well as fair lending analyses?

- Yes
- No

6a. If "Yes," how many FTEs do you anticipate you would need to hire?

FTEs

6b. In what areas would you need to hire FTEs (examples: IT, Risk, Compliance, Legal, Operations, Analysts, Loan Officers, Other)?

7. Would your institution need to add new duties/responsibilities to existing FTEs to comply with the 1071 data collection and submission as well as fair lending analyses?

- Yes
 No

7a. If "Yes," how many FTEs would have their job duties changed/expanded?

FTEs

7b. In what areas do these FTEs work (examples: IT, Risk, Compliance, Legal, Operations, Analysts, Loan Officers, Other)?

8. Is your institution a HMDA reporter?

- Yes
 No

9. Is your institution a CRA reporter?

- Yes
- No

10. In 2019, how many small business loans did your bank originate? (Include credit cards, lines of credit, term loans, agricultural loans, and both unsecured and secured loans.)

Call Report Codes:

- [Number of small business loans](#)
- [Dollar amount of small business loans](#)

Total number of small business loans:

Total dollar of amount small business loans:

11. In 2019, what was the total number of small business customers your bank served by originating a loan, line of credit, credit card or other credit product?

Customers:

12. In 2019, what percentage of your loan portfolio was made up of small business loans?



11. In what type of community are most of the businesses you help finance located? (provide the percentage breakout)

Urban (MSA)	0	%
Rural (Non-MSA)	0	%
Total	0	%

Impacts of Implementation

12. Please rank the potential impacts on your institution as a result of implementing section 1071.

Rank your top 3 choices (by magnitude of the impact). Rank in the context of short-term (12-18 months) and long-term (2-5 years) goals.

12a. Rank potential impacts as it applies to your short-term goals (12-18 months).
Rank your top three choices (drag and drop).

No longer offer loans under X amount of dollars

Raise rates or fees on small business products

Accept lower profits

No longer offer small business credit products

Raise rates/fees on other credit products

Tighten underwriting standards

Offer fewer or less complex products

Exit some geographic markets

12b. Please rank potential impacts as it applies to your long-term goals (2-5 years).
Rank your top three choices (drag and drop).

Raise rates/fees on other credit products

No longer offer small business credit products

Exit some geographic markets

Raise rates or fees on small business products

Tighten underwriting standards

No longer offer loans under X amount of dollars

Accept lower profits

Offer fewer or less complex products

13a. To comply with the proposed 1071 data collection and reporting requirements, our bank will need to:

	Select		If "Yes", provide cost estimate:
	Yes	No	
Purchase commercial loan origination software (LOS)	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Update commercial loan origination software (LOS)	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Purchase software to assist with data submission <i>(For example: RiskExec, CRA Wiz®, CenTrax Next, and QuestSoft)</i>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>

13b. Are there are vendor solutions or software you would have to purchase or update?

Ongoing & One-Time Costs of Implementation of the Proposed Rule

The Bureau has estimated the ongoing annual cost of compliance with section 1071, based on its understanding of how institutions comply with requirements to report data under the Home Mortgage Disclosure Act (Regulation C). Note that the Bureau estimates costs for three tiers of institutions. (Tiers are based on “the overall level of complexity of compliance operations.” A = low complexity, C = highly complex institution), We are providing the Bureau's estimates by tier for your reference only.

[Estimated ongoing costs by cost category and FI Type, pg. 729](#)

The highlighted columns are the Bureau’s estimates. They provided 3 estimates based on the “complexity” of the institution (A = low complexity, C = highly complex institution).

14a. Please provide an estimated annual average dollar amount your institution would need to spend on following items:

ONGOING COSTS
Annual Average Dollar Amount

Transcribing data	\$	<input type="text" value="0"/>
Resolving reportability questions	\$	<input type="text" value="0"/>
Transferring to 1071 data management software	\$	<input type="text" value="0"/>
Geocoding data	\$	<input type="text" value="0"/>
Standard annual edit and internal checks	\$	<input type="text" value="0"/>
Researching questions	\$	<input type="text" value="0"/>
Resolving question responses	\$	<input type="text" value="0"/>
Checking post-submission edits	\$	<input type="text" value="0"/>
Filing post-submission documents	\$	<input type="text" value="0"/>
Small business data reporting/geocoding software	\$	<input type="text" value="0"/>
Training	\$	<input type="text" value="0"/>
Internal audit	\$	<input type="text" value="0"/>
External audit	\$	<input type="text" value="0"/>
Exam preparation	\$	<input type="text" value="0"/>
Exam assistance	\$	<input type="text" value="0"/>
Total	\$	<input type="text" value="0"/>

In 2020, the CFPB surveyed bank and nonbank covered institutions to estimate their “one-time” costs of compliance by providing estimates of their costs for each of the tasks listed in the chart below. The highlighted column shows the CFPB’s estimates of average ongoing costs for three tiers of bank and nonbank covered financial institutions. (Tiers are based on “the overall level of complexity of compliance operations.” A = low complexity, C = highly complex institution) We have provided this information for your reference as you estimate your bank’s ongoing annual costs based on the additional information available in the proposal.

[Estimated one-time costs by cost category and FI Type, pg. 723.](#) The highlighted columns are the Bureau’s estimates. They provided 3 estimates based on the “complexity” of the institution (A = low complexity, C = highly complex institution).

14b. Please provide an estimated annual average dollar amount your institution would need to spend on following items:

ONE-TIME COSTS

Dollar Amount

Preparing/planning	\$ <input type="text" value="0"/>
Updating computer systems	\$ <input type="text" value="0"/>
Testing/validating systems	\$ <input type="text" value="0"/>
Developing forms/applications	\$ <input type="text" value="0"/>
Training staff and third parties	\$ <input type="text" value="0"/>
Developing policies/procedures	\$ <input type="text" value="0"/>
Legal/compliance review	\$ <input type="text" value="0"/>
Post-implementation review	\$ <input type="text" value="0"/>
Total	\$ <input type="text" value="0"/>

End of Survey

Bank Name*

Additional Comments:

Thank you for your participation
Click "Submit" button.

