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A GUIDE FOR BANK COMPLIANCE TEAMS

How AI Agents Check Your HMDA Data Against Every Loan File

Every file instead of a sample. Your team reviews only the exceptions.

EXCEPTION REPORT FROM AN AI AGENT

FIELD	LAR	FILE	SOURCE
Application date	03/14/2026	**03/04/2026**	URLA, p. 1
Action taken date	11/02/2026	**11/04/2026**	Closing Disclosure, p. 1
Income	$148,000	**$132,400**	Underwriting findings, p. 3
Property value	$515,000	**$498,000**	Appraisal, p. 2

How AI Agents Check Your HMDA Data Against Every Loan File

What changes when an AI agent does your LAR review, what it checks, and how to get it done before March 1

Your HMDA software's edit checks tell you whether your 2026 data is valid. They can't tell you whether it matches the loan file, and that is what examiners test when they pull a sample of your LAR. Until now, checking the LAR against the files meant people reading files one at a time, so most teams check a sample and hope the rest is right.

AI agents change that. An agent can read every loan file the way an analyst does, pull each HMDA field from the documents, compare it with your LAR, and show you every mismatch with the page it came from. Your team reviews the exceptions instead of every field. This guide explains how that works, what the agent checks, what you get back, and how to judge whether it's accurate and safe enough for your bank.

> **The 2026 LAR Check, at a glance.** Kolena's AI agents compare up to 300 loan files from your 2026 LAR with the documents in each file and deliver an exception report, with the page cited for every value, within three weeks. Fixed scope and price, credited toward an annual agreement if you continue. Last start date for completion before March 1: January 22, 2027. Request a LAR Check

What changes when an AI agent does the check

	Checking by hand	With an AI agent
Coverage	A sample, because people can only read so many files	Every file you send, at the same speed
What your team does	Opens each file, finds each field, compares it with the LAR	Reviews the exceptions the agent flags
Evidence	Notes, if someone had time to write them	The document and page behind every value, for every file
Consistency	Varies with the reviewer and the week	The same checks applied the same way to every file

	Checking by hand	With an AI agent
Timing	Squeezed into the weeks before March 1	An exception report within three weeks of sending the files
Who decides	Your team	Still your team: the agent flags, people correct and file

How it works

1. **You send the 2026 LAR and the loan files,** as an export and a folder of documents, or through read access to your document system.
2. **The agent reads each file** (the application, the note, the closing disclosure, the appraisal, the underwriting findings, the demographic addendum) and extracts every HMDA field it can verify, recording the document and page behind each value.
3. **It compares each value with your LAR row** and runs the reportability, action-taken and edit-style checks at the same time.
4. **Anything it can't read or isn't sure of is flagged for a person,** not guessed.
5. **You get an exception report:** every mismatch, the LAR value, the file value, and where the file value came from.
6. **Your team reviews the exceptions, corrects the LAR and files.** The agent never changes your data.

This is the same check examiners perform in transaction testing, done on every file you send instead of a sample. See it run on a loan file in 20 minutes

What the agent checks, field by field

The agent reads the value the bank actually relied on, from the final version of each document, and compares it with the LAR. These are the fields it verifies against a typical residential loan file, and the mismatches it is built to catch:

LAR field	Where the agent finds it	The mismatch it catches
Application date	The application (URLA) and intake records	A later date, such as a credit pull or system entry, recorded instead of the application date

LAR field	Where the agent finds it	The mismatch it catches
Loan amount	The note, or the amount applied for if not originated	A requested amount that changed, or rounding
Action taken and date	Closing documents, the adverse action notice, withdrawal records	Closing, disbursement and funding dates confused; dates entered before the final decision
Loan purpose and lien status	The application, closing documents, security instrument and title	Refinance versus cash-out refinance; a second lien recorded as a first
Occupancy	The application's declarations and occupancy certification	Investment property recorded as a principal residence, or the reverse
Property value	The appraisal or valuation relied on	The purchase price or a different valuation reported
Income, debt-to-income and combined loan-to-value	Underwriting findings	Application figures or an earlier underwriting run reported instead of what was relied on
Credit score and model	The credit report used in the decision	A score from another report or borrower
Interest rate and rate spread	The note; the closing disclosure's APR and the rate-set date	A rate from an earlier disclosure; the wrong rate-set date
Loan costs, points and lender credits	The final closing disclosure	Figures from the loan estimate or an earlier disclosure
Ethnicity, race, sex and collection method	The demographic information addendum	"Not provided" recorded when it was provided; collection method miscoded
Property address, census tract, construction method	The note and the appraisal	A typo that moves the tract; manufactured homes recorded as site-built

Where your procedures differ (an intake system that records the application date, for example), the agent is set up to read from your source, not a generic one.

What you get back

An exception report your team can work from directly. An illustrative excerpt:

Loan	Field	LAR value	File value	Source
2026-0418	Application date	03/14/2026	03/04/2026	URLA, p. 1
2026-0418	Income	$148,000	$132,400	Underwriting findings, p. 3
2026-0533	Action taken date	11/02/2026	11/04/2026	Closing disclosure, p. 1
2026-0611	Property value	$515,000	$498,000	Appraisal, p. 2
2026-0702	Ethnicity	Not provided	Provided	Demographic addendum, p. 1

Alongside it: a summary by field, so you can see where errors cluster (one field, one branch, one step in the process); the list of fields the agent flagged for a person; and the source citation for every value checked, matched or not, to keep as evidence of your review.

The time math, with your numbers

	Your numbers
A. Loans on your 2026 LAR	____
B. Minutes to check one file by hand	____
C. Hours to check every file by hand (A × B ÷ 60)	____
D. Files you actually check today	____
E. Files left unchecked (A − D)	____

With an AI agent, C becomes the time to review only the exceptions, and E becomes zero. For most community banks, C is the number that makes a full check impossible by hand. Request a LAR Check

Is it accurate and safe enough for your bank?

The four questions compliance teams ask first:

"Our HMDA software already checks the data." It runs edits, which test the data against rules: valid formats, allowed codes, unusual values. It can't open the loan file. The agent checks the data against the documents, which is the review examiners do.

"How accurate is it?" Set the bar before you start, the way you would for a new analyst, and measure the agent against it on your own files, including faxed and scanned pages. The agent flags any field it can't read or isn't sure of, rather than guessing. Kolena's HMDA review agent already runs in production at a residential mortgage operations provider. One private lender's COO described his approach on a public podcast: he required 98% accuracy, the standard he holds his human processors to, before putting a Kolena agent into production.

"What happens to our borrower data?" Kolena runs in a PCI DSS and SOC 2 Type II environment with zero data retention across the stack, including the AI model providers, and customer data is never used to train models. Files are purged when the check is done, while the findings and citations are delivered to you as evidence of the review.

"Will examiners accept it?" The agent doesn't file anything or decide anything. It gives your team a documented review, with the source behind every value, and your team makes and records the corrections, as it does today.

Get it done before March 1

When	What happens
Week 1	A 30-minute kickoff; you send the 2026 LAR export and the loan files
Weeks 1 to 3	Kolena's AI agents check every file you sent; you see progress as it runs

When	What happens
End of week 3	You receive the exception report, with the source cited for every value
Before March 1	Your team reviews the exceptions, corrects the LAR, re-runs your edits and files

The 2026 LAR Check covers up to 300 loan files for a fixed price, credited toward an annual agreement if you continue with quarterly HMDA reviews or your other file reviews. Checks must start by January 22, 2027 to finish before the filing deadline.

> **Request a LAR Check, or see an AI agent run on a loan file in a 20-minute walkthrough:** kolena.com/lp/hmda-guide

This guide is general information for bank compliance teams, not legal or regulatory advice. Check Regulation C, the FFIEC's Filing Instructions Guide for the current year and your examiner guidance for the rules that apply to your institution.