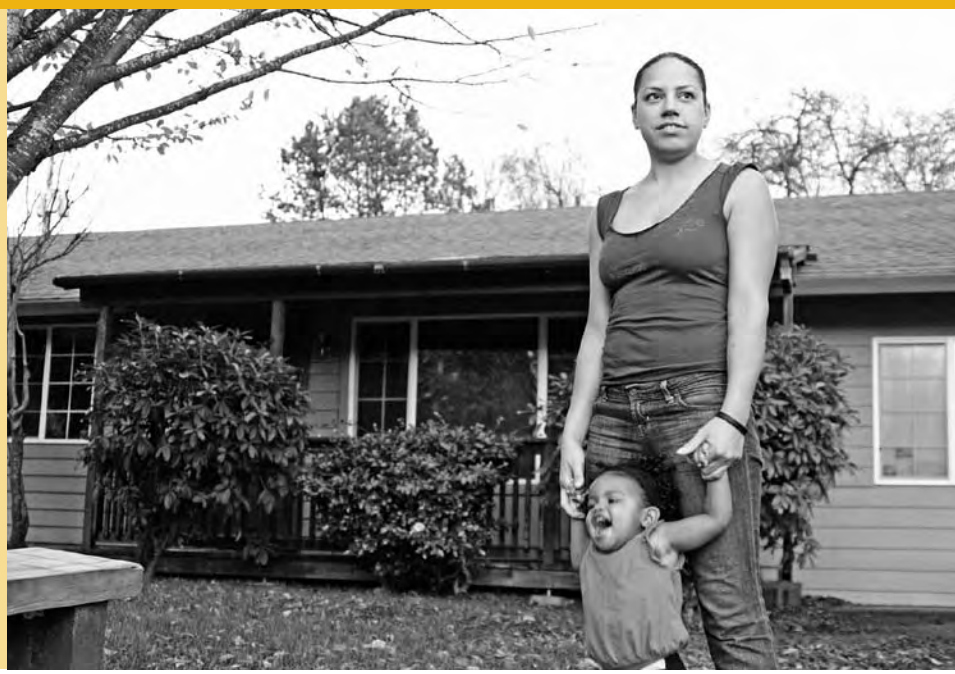
Income is No Shield, Part III

Assessing the Double Burden: Examining Racial and Gender Disparities in Mortgage Lending

National Council of Negro Women

June 2009



Report in partnership with the **National Community Reinvestment Coalition**

Assessing the Double Burden: Examining Racial and Gender Disparities in Mortgage Lending

Table of Contents

Preface from the National Council on Negro Women iv

Executive Summary 1

Literature Review 5

Data Analysis 10

- Methodology 10
- National Analysis of Lending 10
- Fair Lending Analysis by Metropolitan Area 14

Conclusion 23

Recommendations 25

Preface from the National Council of Negro Women

The National Council of Negro Women is proud to have partnered with the National Community Reinvestment Coalition to explore race and gender disparities in mortgage lending. We understand that this nation's economic crisis and the resulting decline in the global economy are the end-results of a foreclosure epidemic that had its roots in the targeting of communities of color for many years. While issues of race have long been examined in this realm, little is known about the interplay of both race and gender when it comes to the critical issues of financial access that is both fair and equal, and lending that is responsible and sustainable over the long-term. Are gender disparities in mortgage lending as stark as racial disparities have previously been shown to be? Do women of color have appreciably different experiences in mortgage lending than their white female counterparts? And in what ways do issues of class influence the experiences of borrowers across race and gender lines? This report answers these crucial questions and many more by examining the experiences of black, white, and Latino male and female borrowers in the 100 largest metropolitan areas in the United States.

Ultimately, this report finds that women's mortgage lending experiences are not monolithic. Instead, they are greatly determined by race, space, and class. A middle- to upper-income African-American woman in Raleigh, North Carolina, would most likely have a much different mortgage lending result than a similarly situated white woman in that same city or a Hispanic woman in Washington, DC. Yet, overall, this research uncovers an elevated risk of vulnerability to high-cost lending among women of color, with African-American women the most devastatingly impacted. Strikingly, this work finds that in more than four out of five metropolitan areas examined, middle- to upper-income African-American women were at least twice as likely to have received high-cost loans than their white female counterparts. Similarly, low- to moderate-income African-American women were at least twice as likely to have received high-cost loans in more than two-thirds of the metropolitan areas examined. The overwhelming pervasiveness of disparities in mortgage-lending outcomes meant that African-American women were the demographic group most likely to have received high-cost loans across both race and gender.

The story this report uncovers not only details issues surrounding women's experiences around loan costs but also provides data on women's representation among all mortgage

holders. The findings also tell an equally compelling story. Among low- to moderate-income women, both African-American women and white women are more likely than their male counterparts to have received a mortgage loan (65% and 52% respectively). However, among middle- to upper-income women, African-American women alone hold this distinction, representing just over half (52%) of all home loans received by middle- to upper-income African Americans. Thus, within the black community as a whole, women are more likely than men to be mortgage holders. The experiences of African-American women differ dramatically from that of middle- to upper-income white women and Hispanic women in this regard, both of whom hold less than two-fifths (and falling) of all mortgage loans within their respective communities. Both white women and Hispanic women have suffered a decline in their share of home loans in 2007 compared with 2006, while African-American women have held steady over the same time period.

Taken together, the findings shared throughout this report tell an intriguing and important story; one that details the linkages between gender and race, and class and space. The National Council of Negro Women believes that sharing this story contributes greatly to the literature on mortgage lending and racial/ethnic and gender disparities in the US financial system. This contribution comes at a time when recent events have significantly eroded the accumulation of wealth among many who have only in recent history been afforded the opportunity to forge their own paths towards the American dream. It is important to remember that just as communities of color had to fight discriminatory practices and policies over the course of much of this nation's history just to be afforded the opportunity of homeownership, so too have women, who only until about 40 years ago were legally barred from the right to purchase property in their own names exclusively. For these groups especially, the housing/foreclosure crisis has dealt a particularly stinging blow. In order to rebound, it is necessary to understand where we stand so that we can craft the most effective strategies to begin the task of moving forward in a way that does not recreate the mistakes of the past. This work plays a key role in underscoring disparities in lending in an effort to broaden the circle of opportunity for communities of color, and develop short-term and long-term strategies to close the racial/ethnic and gender gaps in financial inclusion, economic mobility, and wealth creation for women and families across this nation.

Avis Jones-DeWeever, Ph. D.
Director, Research, Public Policy and Information Center for African American Women
National Council of Negro Women

Executive Summary

The purpose of this study is to identify potential lending disparities in gender and race among African-American, Hispanic, and Caucasian borrowers. Credit Suisse recently released a report estimating 9 million foreclosures over the next four years assuming an 8 percent unemployment rate. With the national unemployment rate at an uncomfortable 9.4 percent—the highest rate in more than two decades—it now seems that the US economy can certainly expect millions more foreclosures given the continued rise in unemployment.[1] While this statistic suggests the spread of the foreclosure crisis across broad segments of the US population, this report finds that the first groups to disproportionately experience high rates of foreclosure are minorities. As the foreclosure crisis spreads to suburban areas, this study suggests that middle- and upper-income minorities will continue to experience a disproportionate impact, which is especially pronounced for African-American women in particular.

NCRC observed striking racial/ethnic disparities in high-cost lending practices. If a consumer is a minority, particularly an African American or a Hispanic, the consumer is most at risk for receiving a poorly underwritten high-cost loan. In addition, middle-class or upper-class status does not shield minorities from receiving problematic high-cost loans. In fact, NCRC observed that racial differences in lending increase as income levels increase. In other words, middle- and upper-income minorities are more likely than their middle- and upper-income white counterparts to receive high-cost loans. The same is also true for low- and moderate-income minorities compared with their low- and moderate-income white counterparts.

Using 2007 *Home Mortgage Disclosure Act* (HMDA) data (the most recent data available), NCRC found that middle- and upper-income African-American females were at least twice as likely to receive high-cost loans as middle- and upper-income white females in more

[1] Credit Suisse, Foreclosures Update: Over 8 Million Foreclosures Expected, December 4, 2008, Fixed Income Research, http://www.credit-suisse.com/researchandanalystics.

than 84 percent of the metropolitan areas examined. In addition, low- and moderate-income African-American females were at least twice as likely to receive high-cost loans as low- and moderate-income white females in 70 percent of the metropolitan areas examined.[2]

NCRC found that middle- and upper-income Hispanic females were at least twice as likely to receive high-cost loans as middle- and upper-income white females in almost 62 percent of the metropolitan areas examined. In addition, low- and moderate-income Hispanic females were at least twice as likely as low- and moderate-income white females to receive high-cost loans in 32 percent of the metropolitan areas examined. The trend of racial/ethnic disparities in lending as income levels increased was also observed when comparing African-American or Hispanic males with their white counterparts (see Figures 3 and 4).

This study has findings strikingly similar to the previous year's. Using 2006 HMDA data, NCRC's 2008 study "Income is No Shield Against Racial Differences in Lending II" found that middle- and upper-income African Americans were at least twice as likely as middle- and upper-income whites to receive high-cost loans in 71.4 percent of the metropolitan areas examined during 2006.[3] NCRC also found that low- and moderate-income African Americans were at least twice as likely as low- and moderate-income whites to receive high-cost loans in 47.3 percent of the metropolitan areas examined that same year.

NCRC did not observe noticeable differences in the percentage of high-cost loans to males and females. In 2007, for example, 34.8 percent of loans to middle- and upper-income African-American males were high-cost. That same year, 33.7 percent of loans to middle- and upper-income African-American females were high-cost. Yet, females were a larger portion of the African-American borrower pool than males. In 2007, middle- and upper-income African-American females received 39,115 high-cost loans compared with 37,698 high-cost loans to middle- and upper-income African-American males. The difference is even more striking for low- and moderate-income African-American borrowers. Low- and moderate-income African-American females received 43,051 high-cost loans—almost twice as many as the 24,512 high-cost loans that low- and moderate-income African-American males received.

NCRC ranked metropolitan areas on a series of fair lending indicators to assess differences in high-cost lending to minorities and whites while controlling for income level. A ranking score of 1 indicates the greatest racial/ethnic disparity in high-cost lending and higher ranking scores indicate fewer disparities.

The basic formula for calculating the high-cost disparity ratio in this report:

$$\textbf{High-Cost Disparity Ratio} = \frac{\textbf{\% of all loans received by minority borrowers that were high-cost}}{\textbf{\% of all loans received by white borrowers that were high-cost}}$$

[2] The year 2007 is the most recent year for which *Home Mortgage Disclosure Act* (HMDA) data is publicly available as of the release of this report. NCRC observed lending patterns in metropolitan statistical areas (MSAs) or metropolitan divisions (MD), using the boundaries provided in HMDA data issued by the Federal Financial Institutions Examination Council (FFIEC). Metropolitan areas in this report refer to MSAs and MDs.

[3] See http://www.ncrc.org/images/stories/pdf/research/income%20is%20no%20shield%20ii.pdf.

Of approximately 100 metropolitan areas examined nationwide, NCRC found that the top 10 metropolitan areas with the greatest racial/ethnic lending disparities are:

1. Raleigh-Cary, NC
2. Minneapolis-St. Paul-Bloomington, MN-WI
3. Milwaukee-Waukesha-West Allis, WI
4. Bridgeport-Stamford-Norwalk, CT
5. Washington-Arlington-Alexandria, DC-MD-VA-WV
6. Chicago-Naperville-Joliet, IL
7. Cleveland-Elyria-Mentor, OH
8. Hartford-West Hartford-East Hartford, CT
9. Oakland-Fremont-Hayward, CA
10. Philadelphia, PA

In theory, high-cost loans compensate lenders for the added risk of lending to borrowers with imperfect credit histories. However, racial/ethnic disparities in lending (even when controlling for gender and income levels) suggests that more minorities are receiving high-cost loans than is justified based on creditworthiness. Previous studies conducted by NCRC and others suggest that minorities are, in fact, receiving a disproportionately large amount of high-cost loans, after controlling for creditworthiness and other housing market factors.

When minorities receive a disproportionate amount of high-cost loans, they lose substantial amounts of equity through higher payments to their lenders. In addition, they are more exposed to irresponsibly underwritten Adjustable Rate Mortgages (ARM) loans that are likely to default and result in foreclosure. Since racial disparities have been persistent over several years, NCRC is working with Congress, the Obama Administration, and other stakeholders to enact bold programmatic and policy reforms. NCRC believes that community groups and financial institutions should engage in more partnerships to create counseling programs and lending products that are fairly priced and affordable for working Americans. Therefore, NCRC recommends that Congress and the Obama Administration work together to enact a broad-scale foreclosure prevention and loan modification program that protects low- and moderate-income and middle-income communities against widespread foreclosures. NCRC also recommends that Congress pass comprehensive anti-predatory lending legislation that prohibits steering or price discrimination and outlaws a wide range of equity-stripping and abusive practices. To encourage more prime or market-rate lending to working families and communities, NCRC recommends that Congress pass the *Community Reinvestment Modernization Act of* 2009 (H.R. 1479). After Congress enacts comprehensive anti-predatory lending legislation and CRA modernization, it is critical that federal and state regulatory agencies significantly strengthen the rigor of their anti-predatory and fair lending oversight and enforcement.

Figure 1

Metropolitan areas where **African-American females** are at least twice as likely to receive high-cost loans than **white females**

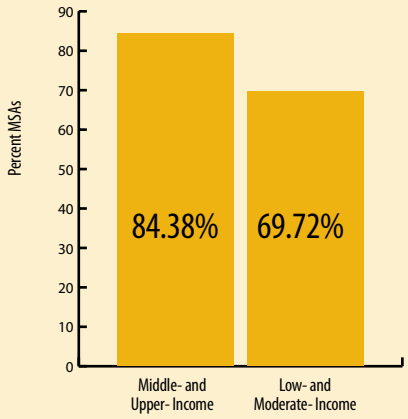
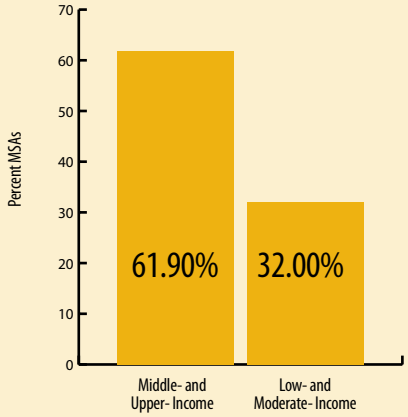


Figure 2

Metropolitan areas where **Hispanic females** are at least twice as likely to receive high-cost loans than **white females**



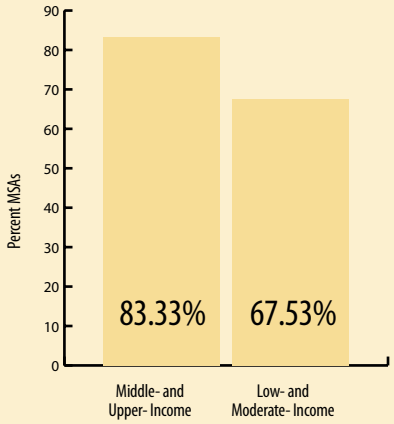


Figure 3

Metropolitan areas where **African-American males** are at least twice as likely to receive high-cost loans than **white males**

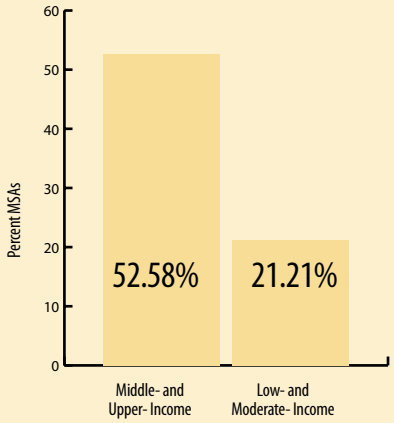


Figure 4

Metropolitan areas where **Hipanic males** are at least twice as likely to receive high-cost loans than **white males**

Literature Review

A substantial body of research documents significant disparities in loan-pricing based on the race/ethnicity and age of neighborhood residents. Less work has been conducted on disparities based on gender; some Federal Reserve studies suggest that disparities by gender are not substantial. Racial/ethnic disparities in lending are due to a combination of discrimination, market failure, and a variety of other factors.[4] This is problematic because discrimination and market failure impedes wealth-building and the creation of sustainable homeownership opportunities for residents in traditionally underserved neighborhoods.

Definition of Subprime and Predatory Lending

Significant disparities in loan-pricing reflect the growth of subprime lending. A subprime or high-cost loan has an interest rate higher than prevailing and competitive rates in order to compensate for the added risk of lending to a borrower with imperfect credit. NCRC defines a predatory loan as an unsuitable loan designed to exploit vulnerable and unsophisticated borrowers. Predatory loans are a subset of subprime and non-traditional prime loans.[5] A predatory loan has one or more of the following features: 1) charges more in interest and fees than is required to cover the added risk of lending to borrowers with imperfect credit; 2) contains abusive terms and conditions that trap borrowers and lead to increased indebtedness; 3) does not take into account the borrower's ability to repay the loan; and 4) violates fair lending laws by targeting women, minorities, and communities of color.

The Impacts of Steering

The steering of borrowers into high-cost loans results in lost home equity and has contributed to inequalities in wealth-building, which is especially pronounced in minority communities. In 2004, the Federal Reserve Survey of Consumer Finances reports that the median net worth of minorities was 17.6 percent of that for all other communities. It also reports that the median net worth for African Americans was nearly the same in 2004 at $20,400 as it was in 2001 at $20,300.[6] By 2007, the median net worth of African Americans had declined to $17,000.[7]

Since subprime loans often cost $50,000 to $100,000 more than comparable prime loans, a neighborhood that receives a disproportionate number of subprime loans will lose a significant amount of home equity and wealth. Using a mortgage calculator from

[4] The disparities discussed in this report reflect a number of factors including income, wealth, credit rating, and many others. Discrimination, of course, remains a significant factor. Several studies discussed below have found that even when controlling for credit-related factors, disparities still persist. The disparities in this report do not necessarily reveal levels of discrimination in the marketplace; but they do reveal the presence of ongoing barriers associated with socio-economic factors.

[5] A non-traditional loan is a loan that does not have a standard fixed interest rate and/or does not have a traditional 30-year term. An example of a non-traditional loan is an interest-only loan in which the borrower only has to make interest payments during a specified time period of the loan. An option ARM loan features a number of payment options; under one option the borrower does not even have to pay the monthly interest that is due. A substantial number of subprime loans are non-traditional loans but so are a significant number of prime loans. Option ARM loans, for example, are almost always prime loans.

[6] Brian K. Bucks, Arthur B. Kennickell, and Kevin B. Moore, *Recent Changes in U.S. Family Finances: Evidence from the 2001 and 2004 Survey of Consumer Finances*, Federal Reserve Bulletin, March 2006.

[7] Brian K. Bucks, Arthur B. Kennickell, Traci L. Mach, and Kevin B. Moore, *Changes in U.S. Family Finances from 2004 to 2007: Evidence from the Survey of Consumer Finances*, Federal Reserve Bulletin, February 2009.

Bankrate.com, a $140,000 30-year mortgage with a prime rate of 6.25% costs about $862 a month or about $310,320 over the life of the loan. In contrast, a 30-year subprime loan with an interest rate of 8.25% costs $1,052 a month or approximately $378,637 over the life of the loan (the interest rates in this example correspond approximately to the rates in 2007, the year for which the lending data are analyzed for this report). The difference in total costs between the 6.25% prime loan and the 8.25% subprime loan is $68,317. Finally, a 30-year subprime loan at 9.25% costs $1,152 per month and $414,630 over the life of the loan. The difference in total costs between a 6.25% prime loan and a 9.25% subprime loan is $104,310. For a borrower who is qualified for a prime loan but receives a subprime loan, the total loss in home equity can easily amount to $50,000-$100,000. This amount represents financial resources that were transferred to the lender, when they could have been used to support the financial needs of the borrower.

The home equity loss for an entire neighborhood can be tremendous in the context of the previous example. If 15 percent, or 300 families, in a predominantly minority census tract with 2,000 households receive subprime loans though they qualified for prime loans (15 percent of families that are inappropriately steered into subprime loans is a realistic figure based on existing research) pay $50,000 more over the life of the loan than they should have (the $50,000 figure is conservative based on the calculations immediately above), in total, the 300 families would have paid lenders $15 million more than they would have had they received prime loans. This $15 million in purchasing power could have supported economic development and wealth-building opportunities in their neighborhood. For even one neighborhood disproportionately laden with subprime loans, the magnitude of lost wealth due to racial/ethnic lending disparities and/or discrimination is stark; across the country, the lost wealth is staggering.

Larger payments to lenders and wealth losses associated with foreclosure are destructive outcomes of steering borrowers into subprime loans. Subprime loans, particularly adjustable rate mortgage (ARM) subprime loans, have significantly higher default and delinquency rates than prime loans. According to a recent Mortgage Bankers Association survey, the foreclosure start rates for prime fixed-rate, prime ARM, and subprime ARM loans were .34 percent, 1.77 percent, and 6.47 percent respectively.[8] The Federal Reserve Board estimated that 28 percent of ARM subprime loans were seriously delinquent by May of 2008, or five times the mid-2005 level.[9] Many of these subprime ARM loans are delinquent and/or in foreclosure because they were not underwritten carefully and contain several risk factors (39 percent have low or no income documentation, 74 percent of them have prepayment penalties, 79 percent were issued to borrowers with FICO scores below 660, and the median debt-to-income ratio was a high 41 percent).[10] The policy group United for a Fair Economy multiplies foreclosure estimates provided by the Center for Responsible Lending by subprime loan shares calculated by NCRC to estimate that people of color can expect to lose between $164 billion to $213 billion of dollars over an 8-year period.[11]

[8] Mortgage Bankers Association, Delinquencies Increase, Foreclosure Starts Flat in Latest MBA National Delinquency Survey, December 5, 2008, http://www.mbaa.org/NewsandMedia/PressCenter/66626.htm.

[9] Federal Reserve final HOEPA rule, p. 44524, via http://edocket.access.gpo.gov/2008/pdf/E8-16500.pdf, . Also, the OCC and OTS Mortgage Metrics Report of the Third Quarter 2008 reports that 13.5 percent, 7.1 percent, and 1.7 percent of subprime, ALT-A, and prime loans, respectively, were seriously delinquent, see http://www. http://www.occ.gov/ftp/release/2008-150a.pdf.

[10] October 2008 data from Loan Performance ABS Loan Level Data Set via Federal Reserve Bank of New York web page, http://www.newyorkfed.org/regional/subprime.html.

[11] United for a Fair Economy, Foreclosed: State of the Dream 2008, January 15, 2008, available viahttp://www.faireconomy.org/issues/racial_wealth_divide/foreclosed_state_of_the_dream_2008_0.

Evidence of Steering

A considerable body of research demonstrates that the steering of minority borrowers into high-cost loans is widespread. More recent research demonstrates that concentrations of foreclosure in minority neighborhoods have followed concentrations of subprime loans in those neighborhoods.

In NCRC's 2004 study "Broken Credit System," NCRC selected 10 large metropolitan areas for analysis: Atlanta, Baltimore, Cleveland, Detroit, Houston, Los Angeles, Milwaukee, New York, St. Louis, and Washington, DC. NCRC obtained creditworthiness data on a one-time basis from a large credit bureau. As expected, the number of subprime loans increased as the amount of neighborhood residents in higher credit-risk categories increased. After controlling for risk and housing market conditions, however, the race and age composition of a neighborhood had an independent and strong effect. In particular:

- The level of refinance subprime lending increased as the portion of African Americans in a neighborhood increased in 9 of the 10 metropolitan areas. In the case of home purchase subprime lending, the African-American composition of a neighborhood raised lending in 6 metropolitan areas.

- The impact of the age of borrowers was strong in refinance lending. In 7 metropolitan areas, the portion of subprime refinance lending increased solely when the number of neighborhood residents over the age of 65 increased.

In another study conducted in 2006, "Homeownership and Wealth Building Impeded," NCRC found that racial/ethnic disparities in high-cost lending were greater for upper-income borrowers than lower-income borrowers across the country. High-cost loans constituted a high 41.9 percent of all refinance loans to low- and moderate-income African Americans. In contrast, subprime loans were 19.2 percent of refinance loans to low- and moderate-income whites in 2004. Low- and moderate-income African Americans were 2.2 times more likely than low- and moderate-income whites to receive high-cost loans. Even for middle- and upper-income African Americans, high-cost loans constituted a large percentage (30.2 percent) of all refinance loans. Moreover, the subprime share of loans to middle- and upper-income African Americans was 2.7 times larger than the subprime share of loans to middle- and upper-income whites.

NCRC's findings are consistent with a wide variety of research on subprime lending. A study conducted by Freddie Mac analysts finds that two-thirds of subprime borrowers were not satisfied with their loans, while three-quarters of prime borrowers believed they had received fair rates and terms.[12] In previous years, Freddie Mac and Fannie Mae reported that approximately one-third to one-half of borrowers who qualify for low-cost loans receive subprime loans.[13] The Federal Reserve also released analyses of the 2004 and 2005 HMDA data that revealed racial/ethnic disparities in lending, even after

[12] Freddie Mac analysts Marsha J. Courchane, Brian J. Surette, Peter M. Zorn, *Subprime Borrowers: Mortgage Transitions and Outcomes*, September 2002, prepared for Credit Research Center, Subprime Lending Symposium in McLean, VA.

[13] "Fannie Mae Vows More Minority Lending," in the Washington Post, March 16, 2000, page E01. Freddie Mac Web page, http://www.freddiemac.com/corporate/reports/moseley/chap5.htm.

controlling for income levels, loan types, and geographical areas.[14] Dan Immergluck, a senior consultant at the Woodstock Institute, is one of the first researchers to document the "hypersegmentation" of lending by race/ethnicity of neighborhood.[15]

Paul Calem of the Federal Reserve, and Kevin Gillen and Susan Wachter of the Wharton School also use credit-scoring data to conduct econometric analysis scrutinizing the influence of credit scores, demographic characteristics, and economic conditions on the level of subprime lending. Their study found that after controlling for creditworthiness and housing market conditions, the level of subprime refinance and home purchase loans increased in a statistically significant manner as the portion of African Americans increased on a census tract level in Philadelphia and Chicago.[16] The Center for Responsible Lending also used the 2004 HMDA data with pricing information to reach the same troubling conclusions that racial disparities remain after controlling for creditworthiness.[17]

A second wave of studies uses foreclosure and HMDA data on a neighborhood level to demonstrate that concentrations of foreclosures have followed concentrations of subprime loans in minority communities. The Reinvestment Fund, for instance, shows that in 2006, minority neighborhoods in Philadelphia received the greatest percentages of subprime loans: 57.7 percent of the loans were subprime for communities with over 80 percent minorities. Predictably, the Reinvestment Fund found that African-American neighborhoods (with over 80 percent African-American households) had 29.6 percent of Philadelphia's housing stock but 38.7 percent of the city's foreclosures. In contrast, foreclosures in white neighborhoods are more in line with their share of the city's housing units.[18]

Kristopher Gerardi and Paul S. Willen of the Boston Federal Reserve show that the gains in homeownership among minorities, particularly African Americans, due to increased subprime loans are offset by increasing foreclosures of subprime loans in Boston. They report that subprime loans held by African Americans and Hispanics have riskier attributes than those held by whites, such as higher loan-to-value ratios and debt-to-income ratios. Approximately 15 percent of African-American subprime loans issued in 2005 ended in foreclosure in 2007, compared with 10 percent for Hispanics, and 6.5 percent for whites. Gerardi and Willen also found that homeowners who take out a subprime loan are approximately five times more likely to lose their homes to foreclosure.[19]

---

[14] Avery, Robert B., Glenn B. Canner, and Robert E. Cook, "New Information Reported under HMDA and Its Application in Fair Lending Enforcement." *Federal Reserve Bulletin*, Summer 2005. Avery, Robert B., Kenneth P. Brevoot, and Glenn B. Canner, "Higher-Priced Home Lending and the 2005 HMDA Data," *Federal Reserve Bulletin*, September 2006.

[15] Dan Immergluck, *Two Steps Back: The Dual Mortgage Market, Predatory Lending, and the Undoing of Community Development*, the Woodstock Institute, November 1999.

[16] Paul S. Calem, Kevin Gillen, and Susan Wachter, *The Neighborhood Distribution of Subprime Mortgage Lending*, October 30, 2002. Available via pcalem@frb.gov. also Paul S. Calem, Jonathan E. Hershaff, and Susan M. Wachter, *Neighborhood Patterns of Subprime Lending: Evidence from Disparate Cities*, in Fannie Mae Foundation's Housing Policy Debate, Volume 15, Issue 3, 2004 pp. 603-622.

[17] Center for Responsible Lending, *Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages,* see http://www.responsiblelending.org/issues/mortgage/reports/page.jsp?itemID=29371010. Also see Steered Wrong: Brokers, Borrowers, and Subprime Loans, April 2008, http://www.responsiblelending.org/pdfs/steered-wrong-brokers-borrowers-and-subprime-loans.pdf.

[18] Ira Goldstein and Dan Urevick-Ackelsberg, the Reinvestment Fund, Subprime Lending, Mortgage Foreclosures, and Race: How Far Have We Come and How Far Have We to Go? Produced for the Kirwan Institute for the Study of Race and Ethnicity, October 2008, accessed via http://kirwaninstitute.org/events/archive/subprime-convening/index.php.

[19] Kristopher S. Gerardi and Paul S. Willen, *Subprime Mortgages, Foreclosures, and Urban Neighborhoods, Public Discussion Papers*, Federal Reserve Bank of Boston, December 22, 2008.

The Cleveland Federal Reserve Bank has also found a strong correlation among race of neighborhood, subprime lending, and foreclosures. Examining Cuyahoga County, Lisa Nelson of the Cleveland Federal Reserve Bank documents that the quartile of neighborhoods with the highest foreclosure rate (19 percent) also had the highest percentage of high-cost loans (63 percent), as well as the highest percentage of African Americans (73.7 percent).[20]

While minority communities were probably the epicenter of the foreclosure crisis, evidence suggests that the crisis is spreading from inner-core minority neighborhoods towards suburban communities. The Cleveland Federal Reserve indicates that a comparison of 2007 with 2006 foreclosure filings in Cuyahoga County shows that the fastest growth in foreclosures occurred in upper-income neighborhoods (mostly suburban census tracts). In a recent paper on real estate-owned properties (REOs or foreclosed properties owned by lending institutions), Immergluck comments that the fastest growth in REOs are those associated with prime loans, meaning that it is possible that the spatial patterns of REOs are spreading towards the suburbs of metropolitan areas.[21]

Even if the foreclosure crisis spreads from inner-city minority areas to more suburban areas, those who suffer most in the wake of the crisis may still be disproportionately from minority communities. As this report illustrates, middle- and upper-income African Americans and Hispanics remain much more likely to receive high-cost loans than middle- and upper-income whites. In addition, NCRC's report from the summer of 2008 "Income is No Shield against Racial Differences in Lending II" reveals that middle- and upper-income borrowers in minority neighborhoods are considerably more likely than middle- and upper-income borrowers in white neighborhoods to receive high-cost loans. This suggests that as the crisis spreads towards suburban areas, suburban minority communities, including middle- and upper-income ones, appear to be the next in line for rising rates of mortgage default and foreclosure.

A majority of previous studies have focused on race and income but not gender. The relatively sparse work devoted to gender usually does not show significant disparities, such as the most recent review of HMDA data conducted by Federal Reserve economists Robert Avery and Glenn Canner.[22] As detailed below, this study shows relatively few disparities when considering the percentages of loans received by females and males. Yet, for African-American females, the foreclosure crisis will continue to have a disproportionate impact since African-American females are a larger portion of the African-American borrower pool than African-American males.

[20] Lisa Nelson, *Foreclosure Filings in Cuyahoga County* in A Look Behind the Numbers, Fall 2008, published by the Federal Reserve Bank of Cleveland, via http://www.clevelandfed.org/Our_Region/Community_Development/Publications/Behind_the_Numbers/2008/0908/BTN_20080929.cfm.

[21] Dan Immergluck, The Accumulation of Foreclosed Properties: Trajectories of Metropolitan REO Inventories during the 2007-2008 Mortgage Crisis, Federal Reserve Bank of Atlanta, Community Affairs Discussion Paper, No. 02-08, December 15, 2008, accessed via http://www.frbatlanta.org/filelegacydocs/dp_0208.pdf.

[22] Robert B. Avery, Kenneth P. Brevoort, and Glenn B. Canner, *the 2007 HMDA Data,* the Federal Reserve Bulletin, December 23, 2008, via http://www.federalreserve.gov/pubs/bulletin/2008/pdf/hmda07final.pdf.

Data Analysis

Methodology

NCRC analyzed the 2007 *Home Mortgage Disclosure Act* (HMDA) data for metropolitan areas across the country. The 2007 HMDA data are the most recent publicly available data on an industry-wide basis. Furthermore, a section of this report reviewed national lending trends comparing 2006 and 2007 HMDA data. NCRC considered loans for traditional single-family homes occupied by the borrowers of the loans (investor-owned properties were not considered). The home loan data used were for home purchase, refinance, and home improvement lending (only first liens). HMDA data include pricing information for high-cost loans, thereby making it possible to differentiate between prime and high-cost loans. (The HMDA definition for high-cost loans are first-lien loans with an interest rate three percentage points or higher than the Treasury rate.)

NCRC controlled for income levels to minimize their effects on lending outcomes.[23] While persistent racial/ethnic disparities across all income levels do not prove discrimination, it would appear that policymakers and stakeholders could take action to narrow particularly large disparities between middle- and upper-income minorities and whites. Large disparities at all income levels, particularly middle- and upper-income levels, suggest a lack of competition among lenders and other market barriers that can be reduced through concerted action. Therefore, NCRC believes that it is important that policymakers and stakeholders carefully consider any differences by race/ethnicity or gender that persist for middle- and upper-income borrowers.

National Analysis of Lending

As gender-based disparities in lending were not readily observable, NCRC focused its analysis on racial and ethnic disparities in lending experienced by low- and moderate-

[23] Income levels correspond to CRA-defined income levels. Low- and moderate-income are income levels up to 80 percent of area median income; middle- and upper-income are 80 percent and higher of area median-income.

income borrowers separately from middle- and upper-income borrowers. Both 2006 and 2007 HMDA data revealed a fairly equal pattern of both prime and high-cost lending across genders. Namely, when keeping the racial and ethnic background constant (that is, comparing males and females from the same race or ethnicity), there were no significant disparities in prime and high-cost lending patterns.

This is illustrated in Tables 1, 2, 3, and 4 (see Appendix) where the gender disparity ratio (the percentage of loans to females divided by the percentage of loans to males) is close to 1, indicating that females have received roughly the same proportion of prime and high-cost loans as males. For example, in 2006, 49.4 percent of the loans received by African-American middle- and upper-income females were high-cost; in the same year, 51.3 percent of the loans received by African-American middle- and upper-income males were high-cost. Our findings reveal that African-American middle- and upper-income females were .96 times as likely to receive high-cost loans as African-American middle- and upper-income males.

Comparing lending patterns among different races and ethnicities, however, revealed a different outcome. Racial/ethnic disparities in lending were much more pronounced regardless of the income level of the borrower. In 2007, low- and moderate-income African-American females were more than twice as likely to receive high-cost loans as were low- and moderate-income white females. Moreover, disparities became more pronounced as

Figure 5

High-cost disparity ratio: African-American females were more than twice as likely to receive high-cost loans as white females

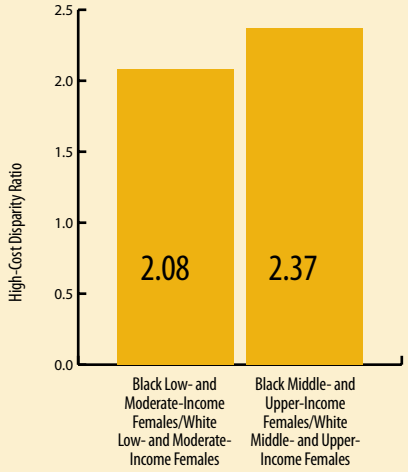
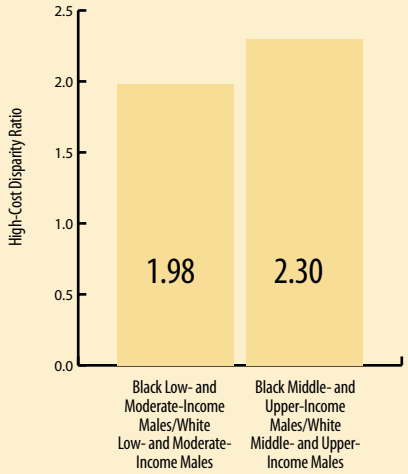


Figure 6

High-cost disparity ratio: African-American males were more than twice as likely to receive high-cost loans as white males



income levels increased, with middle- and upper-income African-American females being approximately 2.4 times more likely to receive high-cost loans than middle- and upper-income white females. In other words, 33.7 percent of the loans received by middle- and upper-income African-American females were high-cost, while only 14.3 percent of the loans to middle- and upper-income white females were high-cost. NCRC observed similar trends in male borrowers. Middle- and upper-income African-American males were 2.3 times more likely to receive a high-cost loan than middle- and upper-income white males (see Appendix Table 5). In addition, low- and moderate-income African-American males were twice as likely to receive high-cost loans as their low- and moderate-income white counterparts.

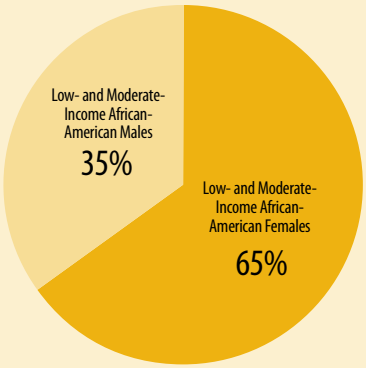
There were observable disparities in lending between low- and moderate-income Hispanics and low- and moderate-income whites (see Appendix Table 5). Disparities in home lending were more striking as income levels increased. In 2007, middle- and upper-income Hispanic females were more than twice as likely to receive high-cost loans as middle- and upper-income white females. In that same year, low- and moderate-income Hispanic females were 1.5 times more likely than low- and moderate-income white females to receive high-cost loans (see Appendix Table 5).

Racial and ethnic disparities in home lending slightly increased from 2006 to 2007 (see Appendix Tables 5 and 6). That is, the high-cost disparity ratio between middle- and upper-income African-American females vs. middle- and upper-income white females slightly increased; the high-cost disparity ratio between middle- and upper-income African-American males vs. middle- and upper-income white males slightly increased; the high-cost disparity ratio between middle- and upper-income Hispanic males vs. middle- and upper-income white males slightly increased; and the high-cost disparity ratio between middle- and upper-income Hispanic females vs. middle- and upper-income white females slightly increased.

As Appendix Tables 7 and 8 reveal, the current mortgage crisis is affecting low- and moderate-income African-American females more than low- and moderate-income African-American males because low- and moderate-income African-American females are a larger portion of the borrower pool (see Figure 7). Low- and moderate-income African-American females received approximately 65 percent of all loans to low- and moderate-income African-American borrowers in 2007, which caused African-American females to suffer financial losses disproportionately as a result of the foreclosure crisis.

Figure 7

Home loans to low- and moderate-income African-American borrowers, 2007



During 2007, African-American low- and moderate-income females and males received 43,051 and 24,512 high-cost loans, respectively (see Appendix Table 1). While the percentage of high-cost loans received by both groups of borrowers did not differ significantly, the sheer number of high-cost loans received by both groups was quite different.

Interestingly, Hispanic borrowers showed an opposite trend. Middle- and upper-income Hispanic male borrowers comprised a larger portion of the borrower pool for middle- and upper-income Hispanics (see Appendix Tables 7 and 8). The same trend applies to low- and moderate-income Hispanic males, who comprise a larger portion of the borrower pool for low- and moderate-income Hispanics.

Fair Lending Analysis by Metropolitan Area

In 2007, NCRC examined lending disparities between minorities and whites, while controlling for income and gender, across various metropolitan areas. NCRC developed eight fair lending indicators which assess the extent of differences in the percentage of high-cost loans to whites and males vs. minorities and females. Metropolitan areas with fewer than 50 prime loans or 50 high-cost loans for any group of borrowers were excluded from one or more of the eight fair lending indicators because of insufficient data from which to draw meaningful conclusions. For each of the fair lending indicators, the metropolitan areas were ranked for lending disparities (see page 2). A final ranking table averages the ranks each metropolitan area received for the fair lending indicators. (**Note**: A metropolitan area received a final ranking only if it could be ranked on five of the eight fair lending indicators. For example, if a metropolitan area could be ranked on fair lending indicators 1-5, then it would receive a final ranking.)

NCRC considered the following fair lending indicators:

1. **Low- and moderate-income African-American females vs. Low- and moderate-income white females** (109 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 109 indicates the least racial/ethnic disparity in lending).

2. **Low- and moderate-income Hispanic females vs. Low- and moderate-income white females** (50 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 50 indicates the least racial/ethnic disparity in lending).

3. **Middle- and upper-income African-American females vs. Middle- and upper-income white females** (96 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 96 indicates the least racial/ethnic disparity in lending).

4. **Middle- and upper-income Hispanic females vs. Middle- and upper-income white females** (63 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 63 indicates the least racial/ethnic disparity in lending).

5. **Low- and moderate-income African-American males vs. Low- and moderate-income white males** (77 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 77 indicates the least racial/ethnic disparity in lending).

6. **Low- and moderate-income Hispanic males vs. Low- and moderate-income white males** (61 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 61 indicates the least racial/ethnic disparity in lending).

7. **Middle- and upper-income African-American males vs. Middle- and upper-income white males** (96 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 96 indicates the least racial/ethnic disparity in lending).

8. **Middle- and upper-income Hispanic males vs. Middle- and upper-income white males** (97 metropolitan areas examined; a score of 1 indicates the greatest racial/ethnic disparity in lending and a score of 97 indicates the least racial/ethnic disparity in lending).

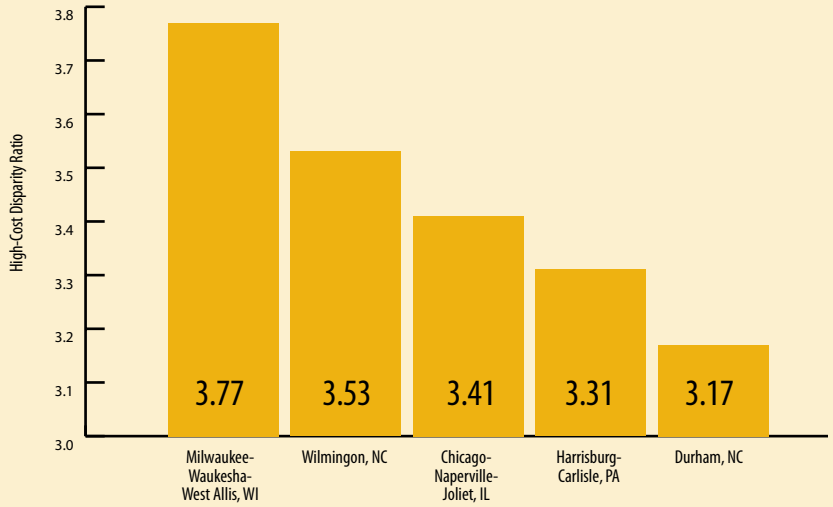
Lending to Low- and Moderate-Income African-American Females vs. Low- and Moderate-Income White Females

The lending analysis of low- and moderate-income African-American females vs. white females reveals significant disparities in lending (see Appendix Table 9). All 109 metropolitan areas that had enough observations in order to be ranked in our analysis had a high-cost disparity ratio greater than 1. Almost 70 percent of all metropolitan areas included in this analysis (76 out of 109) had a high-cost disparity ratio of two or above. This indicates that low- and moderate-income African-American females were more than twice as likely to receive high-cost loans than low- and moderate-income white females in the majority of metropolitan areas examined. In 2007, low- and moderate-income African-American females were more than three times as likely to receive high-cost loans compared with low- and moderate-income white females in the following 10 metropolitan areas:

1. Milwaukee-Waukesha-West Allis, WI
2. Wilmington, NC
3. Chicago-Naperville-Joliet, IL
4. Harrisburg-Carlisle, PA
5. Durham, NC
6. Raleigh-Cary, NC
7. Charleston-North Charleston, SC
8. Sarasota-Bradenton-Venice, FL
9. Hartford-West Hartford-East Hartford, CT
10. Lafayette, LA

Figure 8

Five MSAs with largest disparities in high-cost lending to Low- and moderate-income African-American vs. Low- and moderate-income White Females



Disparity Ratio is % African-American High Cost Loans / % White High Cost Loans

Note: LMI here stand for Low- and Moderate-Income

Almost 52 percent of all the loans received by low- and moderate-income African-American females in Milwaukee-Waukesha-West Allis, Wisconsin, were high-cost, compared with only 14 percent of loans received by low- and moderate-income white females. The high-cost lending disparity ratio for low- and moderate-income African-American females vs. low- and moderate-income white females was 3.8, indicating that low- and moderate-income African-American females were more than three times as likely to receive high-cost loans than their low- and moderate-income white counterparts.

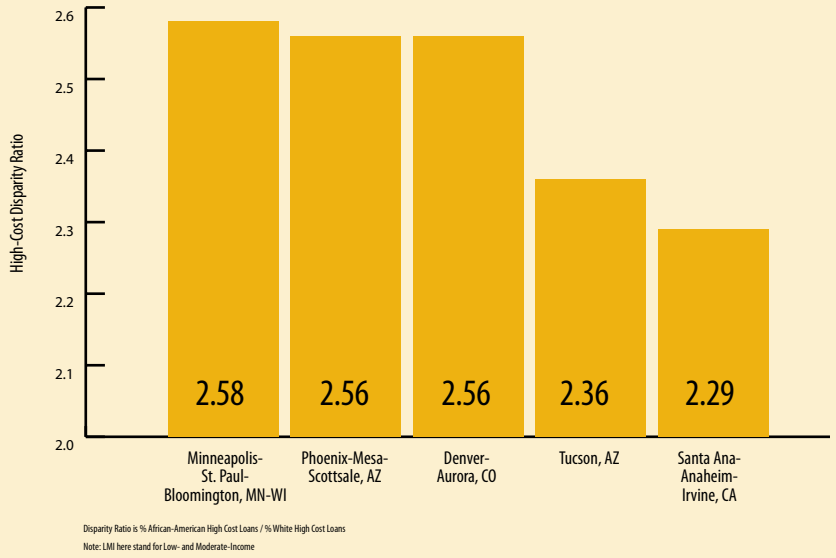
In Wilmington, North Carolina, low- and moderate-income African-American females were more than 3.5 times as likely to receive high-cost loans as were low- and moderate-income white females (almost 40 percent of the loans to African-American females were high-cost vs. only 11.2 percent of high-cost loans to low- and moderate-income white females). In addition, 38 metropolitan areas had a high-cost disparity ratio of 2.5 or above, indicating that low- and moderate-income African-American females in these metropolitan areas were more than 2.5 times as likely to receive high-cost loans than their low- and moderate-income white counterparts (see Appendix Table 9).

Lending to Low- and Moderate-Income Hispanic Females vs. Low- and Moderate-Income White Females

Similar trends were observed when examining racial/ethnic lending disparities between low- and moderate-income Hispanic females vs. white females. All 50 metropolitan areas that had enough observations in order to be ranked in our analysis had a high-cost disparity ratio greater than one, indicating an increased likelihood of low- and moderate-income Hispanic females receiving high-cost loans compared with their white low- and moderate-income counterparts (see Appendix Table 10). In addition, low- and moderate-income Hispanic

Figure 9

Five MSAs with largest disparities in high-cost lending to Low- and moderate-income Hispanic vs. Low- and moderate-income White Females



females were at least twice as likely to receive high-cost loans than their low- and moderate-income white counterparts in 16 metropolitan areas.

Figure 9 illustrates the five metropolitan areas with the greatest disparities in racial/ethnic high-cost lending to low- and moderate-income Hispanic females vs. low- and moderate-income white females.

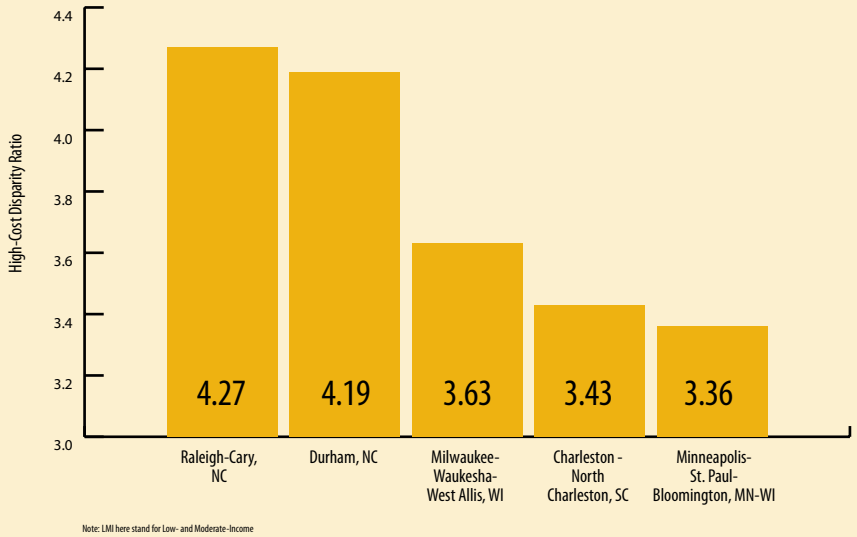
Lending to Middle- and Upper-Income African-American Females vs. Middle- and Upper-Income White Females

Two of the metropolitan areas (Raleigh-Cary, NC, and Durham, NC) examined had a high-cost disparity ratio greater than four between middle- and upper-income African-American females and middle- and upper-income white females. This indicates that middle- and upper-income African-American females were more than four times as likely to receive high-cost loans as were middle- and upper-income white females. Most metropolitan areas examined (84 percent) had a high-cost disparity ratio of two or above, indicating that middle- and upper-income African-American females were more than twice as likely to receive high-cost loans compared with their middle- and upper-income white counterparts (see Appendix Table 11). Our findings also suggest that racial/ethnic disparities in lending grew larger as income levels increased. (As previously discussed, a lower percentage of metropolitan areas [70 percent] had a high-cost disparity ratio of two or above when comparing low- and moderate-income African-American and white females.)

Figure 10 illustrates the five metropolitan areas with the greatest racial/ethnic disparities in high-cost lending to middle- and upper-income African-American and white females.

Figure 10

Five MSAs with largest disparities in high-cost lending to Middle- and upper-income African-American vs. Middle- and upper-income White Females



Lending to Middle- and Upper-Income Hispanic Females vs. Middle- and Upper-Income White Females

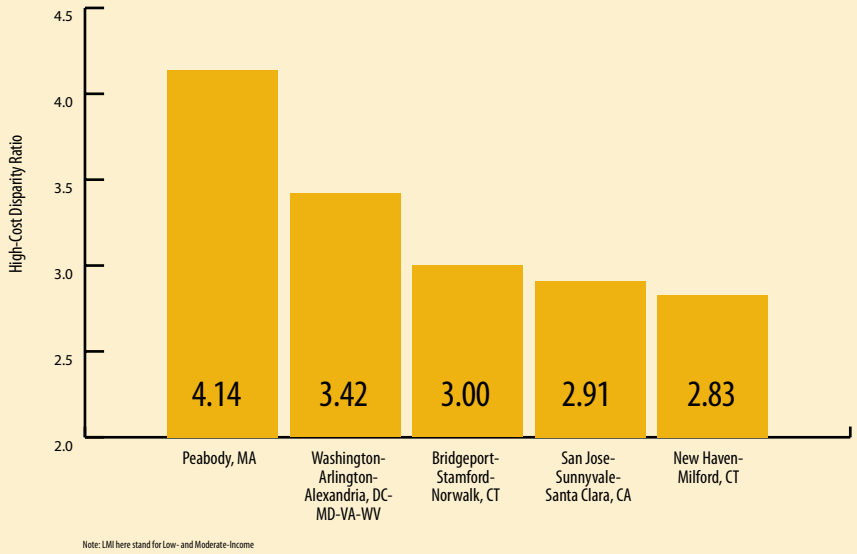
In 2007, almost 40 percent of the loans received by middle- and upper-income Hispanic females in Peabody, Massachusetts, were high-cost. In comparison, a little more than 9 percent of the loans received by middle- and upper-income white females in Peabody were high-cost. This indicates that middle- and upper-income Hispanic females were more than four times as likely to receive high-cost loans compared with their middle- and upper-income white counterparts (see Appendix Table 12).

Figure 11 illustrates the five metropolitan areas with the greatest racial/ethnic disparities in high-cost lending for middle- and upper-income Hispanic females vs. middle- and upper-income white females.

Sixty-two percent of all metropolitan areas examined had a high-cost disparity ratio of two or above for middle- and upper-income Hispanic females vs. middle- and upper-income white females. This indicates that middle- and upper-income Hispanic females were twice as likely to receive high-cost loans compared with their middle- and upper-income white counterparts. Similar to our findings for racial/ethnic disparities in lending to African Americans compared with whites, racial/ethnic disparities in lending increased as the income levels of Hispanic female borrowers increased (see Appendix Tables 2 and 4).

Figure 11

Five MSAs with largest disparities in high-cost lending to Middle- and upper-income Hispanic vs. Middle- and upper-income White Females



Lending to Low- and Moderate-Income African-American Males vs. Low- and Moderate-Income White Males

Racial/ethnic disparities in lending can also be observed for male borrowers. For low- and moderate-income African-American males, 67.5 percent of the metropolitan areas included in the analysis had a high-cost lending disparity ratio of two or above. This indicates that low- and moderate-income African-American male borrowers were twice as likely to receive high-cost loans compared with their low- and moderate-income white counterparts (see Appendix Table 13).

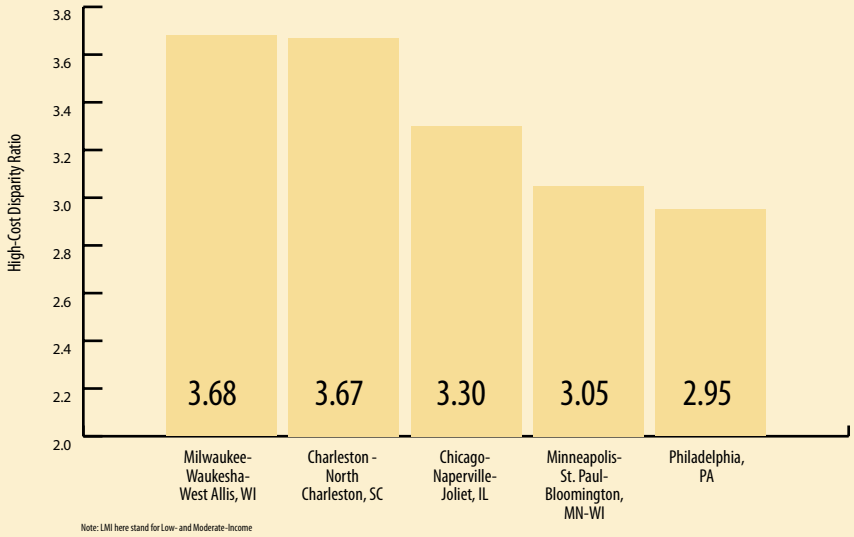
Four metropolitan areas had a high-cost disparity ratio greater than three. This indicates that low- and moderate-income African-American males were three times as likely to receive high-cost loans as their low- and moderate-income white counterparts.

The four metropolitan areas with a high-cost disparity ratio greater than three are:

1. Milwaukee-Waukesh-West Allis, WI
2. Charleston - North Charleston, SC
3. Chicago-Naperville-Joliet, IL
4. Minneapolis-St. Paul-Bloomington, MN-WI

Figure 12

Five MSAs with largest disparities in high-cost lending to Low- and moderate-income African American vs. Low- and moderate-income White Males



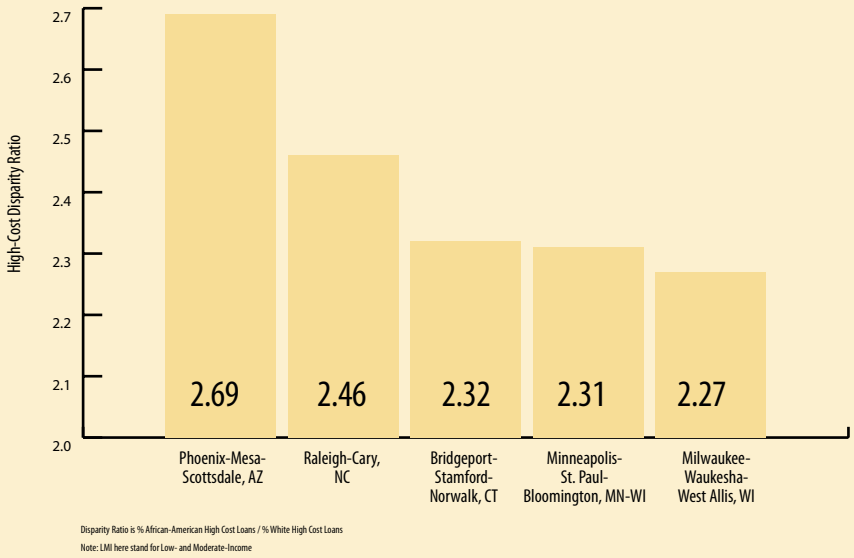
Lending to Low- and Moderate-Income Hispanic Males vs. Low- and Moderate-Income White Males

Racial/ethnic disparities in high-cost lending were slightly less pronounced in low- and moderate-income Hispanic males. In 14 out of 61 metropolitan areas examined, low- and moderate-income Hispanic males were twice as likely to receive high-cost loans compared with their low- and moderate-income white counterparts (see Appendix Table 14). Still, low- and moderate-income Hispanic males were between 1.5 to 2 times more likely to receive high-cost loans than their low- and moderate-income white counterparts in an additional 25 metropolitan areas.

Figure 13 illustrates the five metropolitan areas with the greatest racial/ethnic disparities in high-cost lending for low- and moderate-income Hispanic males vs. low- and moderate-income white males.

Figure 13

Five MSAs with largest disparities in high-cost lending to Low- and moderate-income Hispanic vs. Low- and moderate-income White Males



Lending to Middle- and Upper-Income African-American Males vs. Middle- and Upper-Income White Males

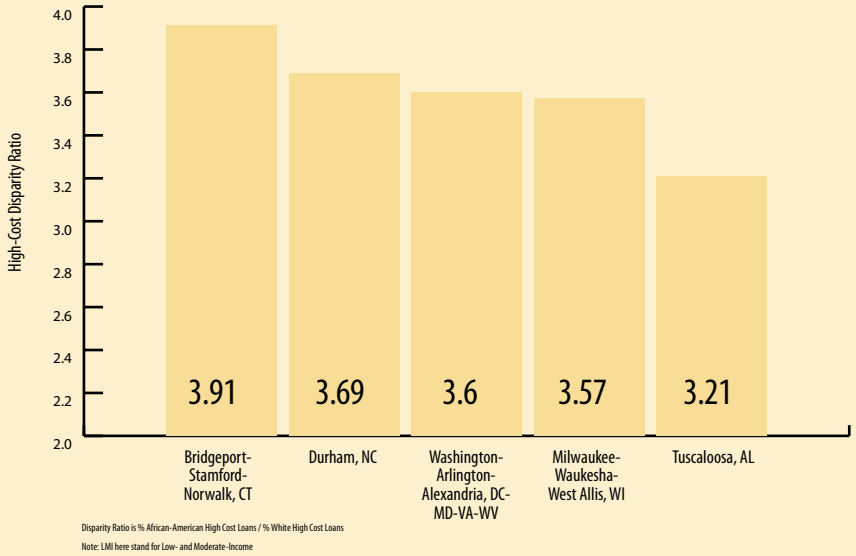
Eight of the metropolitan areas included in this analysis had a high-cost disparity ratio greater than three for middle- and upper-income African-American males vs. middle- and upper-income white males. This indicates that middle- and upper-income African-American males were more than three times as likely to receive high-cost loans as their middle- and upper-income white counterparts.

The majority of metropolitan areas examined (83.3 percent) had a high-cost disparity ratio of two or above. This indicates that middle- and upper-income African-American males were at least twice as likely to receive high-cost loans as their middle- and upper-income white counterparts (see Appendix Table 15). Low- and moderate-income African-American males were at least twice as likely to receive high-cost loans in 67.5 percent of the metropolitan areas examined as their low- and moderate-income white counterparts (see Appendix Table 15).

Figure 14 illustrates the five metropolitan areas with the greatest racial/ethnic disparities in lending for middle- and upper-income African-American males vs. middle- and upper-income white males.

Figure 14

Five MSAs with largest disparities in high-cost lending to Middle- and upper-income African-American vs. Middle- and upper-income White Males



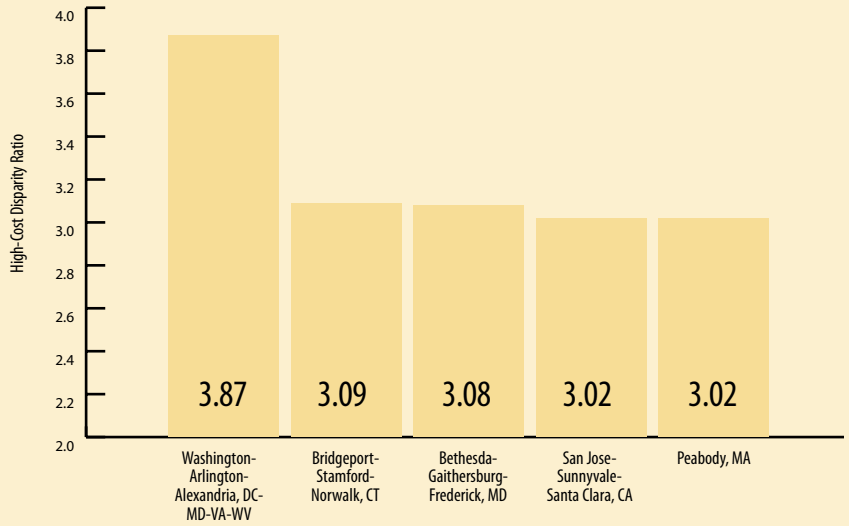
Lending to Middle- and Upper-Income Hispanic Males vs. Middle- and Upper-Income White Males

Racial/ethnic disparities in high-cost lending persisted as income levels increased for Hispanic males. Middle- and upper-income Hispanic males were at least twice as likely to receive high-cost loans as their middle- and upper-income white counterparts in 53 percent of the metropolitan areas examined (see Appendix Table 16). Low- and moderate-income Hispanic males were more likely to receive high-cost loans in just 23 percent of the metropolitan areas examined as their low- and moderate-income white counterparts.

Figure 15 illustrates the five metropolitan areas with the greatest racial/ethnic disparities in high-cost lending for middle- and upper-income Hispanic males vs. middle- and upper-income white males.

Figure 15

Five MSAs with largest disparities in high-cost lending to Middle- and upper-income Hispanic vs. Middle- and upper-income White Males



Disparity Ratio is % African-American High Cost Loans / % White High Cost Loans

Note: LMI here stand for Low- and Moderate-Income

Metropolitan Areas with the Greatest Racial/Ethnic Disparities in Lending

Each metropolitan area's final rank is based on an averaged score from the ranks that the metropolitan areas received when comparing groups of borrowers (see Appendix Table 17).

NCRC found that the top 10 metropolitan areas with the greatest racial/ethnic disparities in high-cost lending were:

1. Raleigh-Cary, NC
2. Minneapolis-St. Paul-Bloomington, MN-WI
3. Milwaukee-Waukesha-West Allis, WI
4. Bridgeport-Stamford-Norwalk, CT
5. Washington-Arlington-Alexandria, DC-MD-VA-WV
6. Chicago-Naperville-Joliet, IL
7. Cleveland-Elyria-Mentor, OH
8. Hartford-West Hartford-East Hartford, CT
9. Oakland-Fremont-Hayward, CA
10. Philadelphia, PA

Conclusion

This study demonstrates that high-cost lending is disproportionately targeted to minorities, and is especially pronounced as minorities earn higher incomes. Standard anti-trust theory suggests that when relatively few companies serve any group of consumers, that group of consumers is more likely to suffer abuses. Because minorities, regardless of income levels, receive a disproportionate amount of high-cost loans, NCRC offers the following programmatic and policy recommendations to combat predatory and abusive lending practices in minority communities.

Recommendations

Programmatic Partnerships

Counseling and foreclosure prevention programs must be increased to serve at-risk minorities, women, low- and moderate-income, and middle-income borrowers. Banks, community organizations, and public agencies should work together to establish programs for refinancing high-cost loans, non-traditional adjustable rate mortgages (ARM), and other problematic loans into lower-cost fixed-rate loans. Public agencies and the Federal Home Loan Banks can provide grants and low interest rate loans, when necessary, to assist borrowers with temporary cash shortfalls. The federal banking agencies reiterated in their recent revisions to the Interagency Questions and Answers regarding CRA that banks can earn points on their CRA exams when they engage in loan modifications and refinance borrowers into lower-cost loans.[24]

National Foreclosure Prevention

Stemming millions of additional foreclosures is an especially urgent need to restore the health of the financial markets and overall economy. To date, the industry-led voluntary

[24] See http://www.federalreserve.gov/BoardDocs/Press/bcreg/2007/20070417/default.htm, also see "The Community Reinvestment Act: Interagency Questions and Answers Regarding Community Reinvestment," Federal Register, Vol. 74, No. 3, Tuesday, January 6, 2009, pp. 498-542.

programs to prevent foreclosures have not kept pace with the increase in foreclosures across the country.

In order to overcome the barriers to large-scale loan modifications, NCRC proposed a program called Homeowners Emergency Loan Program or HELP Now in January 2008, under which the federal government would use its authority to purchase troubled assets at a steep discount (equal to roughly the current market rate) from investors. Working with the Federal Housing Authority, the Federal Home Loan Banks, Fannie Mae, and Freddie Mac, the government would facilitate modification of the problem loans and the selling of the loans back to the private sector. Updating on its HELP Now model, NCRC has also proposed that the federal government use the power of eminent domain and other viable options to purchase large volumes of distressed mortgages.[25]

The Obama Administration has enacted a large-scale economic recovery and reinvestment program to address the current economic crisis and jumpstart the economy. The Administration's new Home Affordable Modifications Program (HAMP) is the most comprehensive approach thus far, but it remains a voluntary program that provides monetary incentives to lenders, servicers, and borrowers to encourage financial institutions to modify mortgages and make them affordable for struggling borrowers. Congress passed the *Helping Families Save their Homes Act of 2009* (S. 896) that includes a retooling of the major federal government loan modification program HOPE for Homeowners. NCRC recommends that Congress and the Obama Administration work together to update their in-place strategies/programs to stem foreclosures and craft a more comprehensive foreclosure prevention program that incorporates the elements of NCRC's 2009 HELP Now proposal.

Comprehensive Anti-Predatory Lending Legislation

Since our analysis revealed a disproportionate amount of high-cost lending targeted to vulnerable borrowers and communities, Congress must respond by enacting comprehensive anti-predatory lending legislation. Comprehensive anti-predatory lending legislation would also strengthen CRA if regulatory agencies severely penalized lenders by assigning them failing CRA ratings when lenders violated the federal anti-predatory lending law.

In late 2007, Senator Dodd, the Chairman of the Senate Banking Committee, introduced S. 2452, the *Homeownership Preservation and Protection Act of 2007*. Senator Dodd's bill would prohibit steering or the practice of placing borrowers into high-cost loans when borrowers qualify for lower-cost loans. This report has demonstrated that steering likely occurs at a significant level in the marketplace. Senator Dodd's bill would also eliminate prepayment penalties and yield spread premiums on subprime loans and would require escrows for subprime loans. The bill would require prudent underwriting that would eliminate the dangerous practice of qualifying borrowers based on the initial low teaser rate on adjustable rate loans.

Rep. Barney Frank, Chairman of the House Financial Services Committee, Rep. Melvin Watt, and Rep. Brad Miller have introduced H.R. 1728 (*the Mortgage Reform and Anti-*

[25] See http://www.ncrc.org/images/stories/pdf/testimonies/tarp%20testimony.pdf.

Predatory Lending Act) that contain similar protections to Senator Dodd's bill but with limited liability for investors and other secondary market institutions. NCRC has been recommending ways to strengthen H.R. 1728, which was just passed by the U.S. House of Representatives. NCRC strongly recommends that Congress immediately pass S. 2452, a strengthened H.R. 1728, or a similar bill to prevent future foreclosure crises.

Regulatory Restructuring to Prevent Future Regulatory Failure

Predatory lending in the subprime market has been widely documented for more than a decade. Although hundreds of studies, policy papers, legislative testimony, refereed research articles, and print news stories documented the abusive lending practices, nothing was done to purge these practices from the housing and credit markets. Rather than purge predatory lending, federal regulatory policy made unfair and deceptive lending practices more harmful and prevalent in communities, especially communities of color. In response to a robust anti-predatory lending law enacted in Georgia in 2002, the Office of the Comptroller of the Currency ruled in 2004 that federal regulations preempted state law for nationally chartered banks in its entirety. This ruling undermined actions of dozens of states that attempted to protect the financial interest of their residents.

Despite widespread reports and documentation of unfair and deceptive lending practices, the Federal Reserve refused to tighten regulations under the *Homeownership and Protection Act* (HOEPA) until July 2008, when more than 2 million borrowers had already lost their homes, more than $400 billion in losses had been claimed by financial institutions, and the economy was heading into a recession. Even now, the revised rules leave many critical issues inadequately addressed.

NCRC believes the regulatory agencies must be held more accountable to Congress and the public at-large to avoid such glaring lax regulation and oversight in the future. Regulatory agencies must report annually to Congress on their enforcement actions and must hold annual public hearings in order to receive suggestions for enhancing oversight of financial institutions. Regulatory agencies must also be retooled so that they can effectively oversee all financial entities, including banks, investment banks, appraisal companies, servicers, rating agencies, and independent mortgage companies.

Fair Lending Enforcement Must Be Increased

In September of 2005, the Federal Reserve Board stated that it referred approximately 200 lending institutions to their primary federal regulatory agency for further investigations based upon the Federal Reserve's identification of significant pricing disparities in HMDA data.[26] An industry publication subsequently quoted a Federal Reserve official as stating that these lenders accounted for almost 50 percent of the HMDA-reportable loans issued in 2004.[27] In September of 2006, the Federal Reserve Board referred a larger number of lenders (270) to their primary regulatory agency for further investigations.[28]

[26] Robert B. Avery, Glenn B. Canner, and Robert E. Cook, "New Information Reported under HMDA and Its Application in Fair Lending Enforcement." Federal Reserve Bulletin, Summer 2005. http://www.federalreserve.gov/pubs/bulletin/2005/05summerbulletin.htm.

[27] Inside Regulatory Strategies, November 14, 2005, p.2.

[28] Adler, J. "Big Increase in Lenders with Suspect HMDA Data." *American Banker*, September 11, 2006.

After the initial excitement, the public has not heard about the outcomes of the Federal Reserve Board's referrals. Not a single case of discrimination or civil rights violations have arisen from the Federal Reserve Board's referrals. Given the large share of lending represented by the financial institutions under investigation, the general public should receive an update of the status of these fair lending investigations from all the regulatory agencies. In addition, the federal agencies should annually report to Congress how many fair lending investigations they conducted, the types of fair lending investigations, and the outcomes of these investigations. Since the pricing disparities remain stubborn and persistent, fair lending investigations and enforcement must be strengthened.

Enhance the Quality of HMDA Data

NCRC believes that Congress and the Federal Reserve Board (which implements the HMDA regulations) must enhance HMDA data so that regular and comprehensive studies can scrutinize fairness in lending. More information in HMDA data is critical to fully explore the intersection of price, race, gender, age, and income.

The first area in which HMDA data must be enhanced is pricing information for *all* loans, not just high-cost loans. The interest rate movements in 2005 demonstrate the confusion associated with classifying the loans that currently have price information reported. Economists as well as the general public do not know whether to call the loans with price reporting, "subprime," "high-cost," or something else. If price were reported for all loans, the classification problems would be reduced. All stakeholders could review the number and percentages of loans in all the price-spread categories. The most significant areas of pricing disparities could be identified with greater precision.

HMDA data must contain credit score information similar to the data used in NCRC's "Broken Credit System" report released in the winter of 2003. For each HMDA reportable loan, a financial institution must indicate whether it used a credit score system and whether the system was their own or one of the widely used systems such as the Fair Isaac Corporation (a new data field in HMDA could contain 3 to 5 categories with the names of widely used systems). The HMDA data also would contain an additional field indicating in which quintile of risk the credit score system placed the borrower.

Another option is to attach credit score information in the form of quintiles to each census tract in the nation. That way, enhanced analyses can be done on a census tract level to illustrate whether pricing disparities still remain after controlling for creditworthiness. This was the approach adopted in NCRC's "Broken Credit System" and in studies conducted by Federal Reserve economists. Finally, HMDA data must contain information on other key underwriting variables including the loan-to-value and debt-to-income ratios as proposed by the *Community Reinvestment Modernization Act of 2009 (H.R. 1479)*. H.R. 1479 would also create a database on foreclosures and delinquencies that would be linked with HMDA data. This would be an important data enhancement resource that would help policymakers understand which loan terms and conditions (such as specific loan-to-value ratios and fixed or ARM loans) are more likely to be associated with delinquencies and foreclosures.

Strengthen CRA by Applying It to Minority Neighborhoods and All Geographical Areas Lenders Serve

In order to increase prime lending for minority borrowers and reduce lending disparities, CRA exams must evaluate the banks' records of lending to minority borrowers and neighborhoods, as well as scrutinizing banks' performance in reaching low- and moderate-income borrowers and neighborhoods. If CRA exams covered minority neighborhoods, pricing disparities in these neighborhoods would be reduced. The Federal Reserve Board, in its review of HMDA data, found that bank lending exhibited fewer disparities in geographical areas covered by their CRA exams than in areas not covered by their exams.[29] CRA's mandate of affirmatively meeting credit needs is currently incomplete as it is now applied only to low- and moderate-income neighborhoods, not minority communities.

CRA must also be strengthened so that depository institutions undergo CRA examinations in all geographical areas in which they make a significant number of loans. Currently, CRA exams assess lending primarily in geographical areas in which banks have their branches. But the overlap between branching and lending is eroding with each passing year as lending through brokers and correspondents continues to increase. NCRC strongly endorses the *Community Reinvestment Modernization Act of 2009*. This bill mandates that banks undergo CRA exams in geographical areas in which their market share of loans exceeds one-half of one percent in addition to areas in which their branches are located.

Short of statutory changes to CRA, NCRC believes that the regulatory agencies have the authority to extend CRA examinations and scrutiny to geographical areas beyond narrow "assessment" areas in which branches are located. Currently, the federal banking agencies will consider lending activity beyond assessment areas if the activity will enhance CRA performance. Likewise, the CRA rating must be downgraded if the lending performance in reaching low- and moderate-income borrowers is worse outside of the assessment areas.

CRA Must Be Expanded to Non-Bank Lending Institutions

Large credit unions and independent mortgage companies do not abide by CRA requirements. NCRC and Government Accountability Office (GAO) research concludes that large credit unions lag CRA-covered banks in their lending and service to categories of consumers including minorities, women, and low- and moderate-income borrowers and communities.[30] Unlike their counterparts, credit unions in Massachusetts are covered by a state CRA law. NCRC has also found that CRA-covered credit unions in Massachusetts issue a higher percentage of their loans to low- and moderate-income borrowers and communities than credit unions not covered by CRA. Therefore, NCRC believes that applying CRA to both large credit unions and independent mortgage companies using

[29] Avery and Canner, op. cit.

[30] NCRC, *Credit Unions: True to their Mission?*, 2005, http://www.ncrc.org; and Government Accountability Office, *Credit Unions: Greater Transparency Needed on Who Credit Unions Serve and on Senior Executive Compensation Arrangements*, November 2006.

the approach in the *Community Reinvestment Modernization Act of 2009* will increase their market-rate lending to low- and moderate-income borrowers.

CRA Exams Must Scrutinize Subprime and Non-Traditional Lending More Rigorously

Currently, CRA exams are not adequately assessing the CRA performance of subprime lenders. For example, the CRA exam of the subprime lender, Superior Bank, FSB, called its lending innovative and flexible before that thrift's spectacular collapse.[31] Previous NCRC comment letters to regulators have documented cursory fair lending reviews for the great majority of banks and thrifts involved in subprime lending.[32] If CRA exams continue to mechanistically consider subprime and non-traditional lending, lenders specializing in these types of loans will earn good ratings (since they tend to offer a larger portion of their loans to low- and moderate-income borrowers and communities than prime lenders).

To date, the federal regulatory agencies have amended CRA regulation to penalize banks if their lending violates federal anti-predatory law. However, NCRC has not seen rigorous and consistent action to implement this aspect of CRA regulation. Fair lending reviews that accompany CRA exams do not usually scrutinize subprime lending for compliance with anti-predatory law, for possible pricing discrimination, or whether abusive loans are exceeding borrower ability to repay. NCRC recommends that all CRA exams of subprime and non-traditional lenders must be accompanied by a comprehensive fair lending and anti-predatory lending audit. In addition, CRA exams must ensure that prime lenders are not financing predatory lending through their secondary market activity or servicing abusive loans.

Government Sponsored Enterprises (GSEs) Must Abide by Anti-Predatory Lending Safeguards

The Government-Sponsored Enterprises (GSEs) including Fannie Mae, Freddie Mac, and the Federal Home Loan Banks purchase more than half of the home loans extended on an annual basis. Therefore, it is vitally important that the GSEs adopt adequate protections against purchasing predatory loans. Fannie Mae and Freddie Mac have voluntarily adopted significant protections such as purchasing no loans with fees exceeding five percent of the loan amount, no loans involving price discrimination or steering, no loans with prepayment penalties beyond three years, and no loans with mandatory arbitration. The Department of Housing and Urban Development (HUD) has ruled that Fannie Mae and Freddie Mac will not receive credit towards their Affordable Housing Goals for any loans that contain certain abusive features such as loans with fees that are 5 percent or more of the loan amount.

HUD's ruling is an important step, but it needs to be enhanced. For example, HUD's ruling does not include disqualify loans with mandatory arbitration from counting towards the goals. The Federal Housing Finance Board, as the former regulator for the Federal Home Loan Banks, did not formally apply protections against abusive loans to the Home Loan Banks. The Federal Housing Finance Agency, the new regulator of the GSEs, must update the anti-predatory lending safeguards applied to GSEs.

[31] Office of Thrift Supervision Central Region's CRA Evaluation of Superior Bank, FSB, Docket #: 08566, September 1999. Available via http://www.ots.treas.gov, go to the CRA search engine and select "inactive" for the status of the institution being searched.

[32] NCRC comment letter to federal banking agencies on joint CRA proposal, April 2, 2004. Available from NCRC.

Appendix

29

Table 1. Single-family Loans by Gender, Race, and Ethnicity, 2007

Borrower Characteristics	Number of Prime Loans	% Prime Loans	Number of High-Cost Loans	% High-Cost Loans	Total Loans
White LMI Females	370,598	83.10%	75,355	16.90%	445,953
Black LMI Females	79,453	64.86%	43,051	35.14%	122,504
Hispanic LMI Females	44,415	75.25%	14,610	24.75%	59,025
White MUI Females	466,729	85.75%	77,544	14.25%	544,273
Black MUI Females	76,872	66.28%	39,115	33.72%	115,987
Hispanic MUI Females	88,178	70.57%	36,771	29.43%	124,949
White LMI Males	336,721	81.62%	75,812	18.38%	412,533
Black LMI Males	42,955	63.67%	24,512	36.33%	67,467
Hispanic LMI Males	60,170	73.99%	21,157	26.01%	81,327
White MUI Males	799,148	84.88%	142,362	15.12%	941,510
Black MUI Males	70,829	65.26%	37,698	34.74%	108,527
Hispanic MUI Males	150,763	70.64%	62,665	29.36%	213,428

Table 2. Single-family Loans by Gender, Race, and Ethnicity, 2006

Borrower Characteristics	Number of Prime Loans	% Prime Loans	Number of High-Cost Loans	% High-Cost Loans	Total Loans
White LMI Females	398,220	75.10%	132,014	24.90%	530,234
Black LMI Females	80,394	48.16%	86,529	51.84%	166,923
Hispanic LMI Females	46,830	59.71%	31,602	40.29%	78,432
White MUI Females	509,752	77.32%	149,492	22.68%	659,244
Black MUI Females	86,994	50.60%	84,930	49.40%	171,924
Hispanic MUI Females	119,934	55.00%	98,139	45.00%	218,073
White LMI Males	360,088	72.79%	134,638	27.21%	494,726
Black LMI Males	43,477	46.66%	49,701	53.34%	93,178
Hispanic LMI Males	62,666	58.40%	44,631	41.60%	107,297
White MUI Males	851,304	76.05%	268,113	23.95%	1,119,417
Black MUI Males	80,011	48.70%	84,281	51.30%	164,292
Hispanic MUI Males	197,779	54.56%	164,723	45.44%	362,502

Table 3. Gender Disparity Ratio, 2007

	Prime	Subprime
White LMI Females/ White LMI Males	1.02	0.92
Black LMI Females/ Black LMI Males	1.02	0.97
Hispanic LMI Females/ Hispanic LMI Males	1.02	0.95
White MUI Females/ White MUI Males	1.01	0.94
Black MUI Females/ Black MUI Males	1.02	0.97
Hispanic MUI Females/ Hispanic MUI Males	1.00	1.00

Table 4. Gender Disparity Ratio, 2006

	Prime	Subprime
White LMI Females/ White LMI Males	1.03	0.91
Black LMI Females/ Black LMI Males	1.03	0.97
Hispanic LMI Females/ Hispanic LMI Males	1.02	0.97
White MUI Females/ White MUI Males	1.02	0.95
Black MUI Females/ Black MUI Males	1.04	0.96
Hispanic MUI Females/ Hispanic MUI Males	1.01	0.99

Table 5. Race Disparity Ratio, 2007

	Prime	Subprime
Black LMI Females/ White LMI Females	0.78	2.08
Hispanic LMI Females/ White LMI Females	0.91	1.46
Black MUI Females/ White MUI Females	0.77	2.37
Hispanic MUI Females/ White MUI Females	0.82	2.07
Black LMI Males/ White LMI Males	0.78	1.98
Hispanic LMI Males/ White LMI Males	0.91	1.42
Black MUI Males/ White MUI Males	0.77	2.30
Hispanic MUI Males/ White MUI Males	0.83	1.94

Table 6. Race Disparity Ratio, 2006

	Prime	Subprime
Black LMI Females/ White LMI Females	0.64	2.08
Hispanic LMI Females/ White LMI Females	0.80	1.62
Black MUI Females/ White MUI Females	0.65	2.18
Hispanic MUI Females/ White MUI Females	0.71	1.98
Black LMI Males/ White LMI Males	0.64	1.96
Hispanic LMI Males/ White LMI Males	0.80	1.53
Black MUI Males/ White MUI Males	0.64	2.14
Hispanic MUI Males/ White MUI Males	0.72	1.90

Table 7. Share of Loans by Gender, 2007

Borrower	Females	Males
LMI Black	64.91%	35.09%
LMI Hispanic	42.47%	57.53%
LMI White	52.39%	47.61%
MUI Black	52.05%	47.95%
MUI Hispanic	36.90%	63.10%
MUI White	36.87%	63.13%

Table 8. Share of Loans by Gender, 2006

Borrower	Females	Males
LMI Black	64.90%	35.10%
LMI Hispanic	42.77%	57.23%
LMI White	52.51%	47.49%
MUI Black	52.09%	47.91%
MUI Hispanic	37.75%	62.25%
MUI White	37.45%	62.55%

LMI=Low- and Moderate-Income and MUI=Middle- and Upper-Income

Table 9. Loans to Low- and Moderate-Income Females by Race of Borrower

State	MSA	Name	Prime Loans to LMI African-American Females	High-Cost Loans to LMI African-American Females	Total Loans to LMI African-American Females	Percent High-Cost Loans to LMI African-American Females	Prime Loans to LMI White Females	High-Cost Loans to LMI White Females	Total Loans to LMI White Females	Percent High-Cost Loans to LMI White Females	High-Cost Disparity Ratio	Rank
WI	33340	Milwaukee-Waukesha-West Allis, WI	667	720	1,387	51.91%	2,605	416	3,021	13.77%	3.77	1
NC	48900	Wilmington, NC	87	57	144	39.58%	555	70	625	11.20%	3.53	2
IL	16974	Chicago-Naperville-Joliet, IL	4,040	2,847	6,887	41.34%	10,749	1,483	12,232	12.12%	3.41	3
PA	25420	Harrisburg-Carlisle, PA	89	68	157	43.31%	1,350	203	1,553	13.07%	3.31	4
NC	20500	Durham, NC	388	135	523	25.81%	723	64	787	8.13%	3.17	5
NC	39580	Raleigh-Cary, NC	788	254	1,042	24.38%	2,623	220	2,843	7.74%	3.15	6
SC	16700	Charleston-North Charleston, SC	373	219	592	36.99%	1,049	141	1,190	11.85%	3.12	7
FL	42260	Sarasota-Bradenton-Venice, FL	90	53	143	37.06%	965	131	1,096	11.95%	3.10	8
CT	25540	Hartford-West Hartford-East Hartford, CT	388	204	592	34.46%	2,718	344	3,062	11.23%	3.07	9
LA	29180	Lafayette, LA	77	116	193	60.10%	315	77	392	19.64%	3.06	10
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	423	198	621	31.88%	7,727	930	8,657	10.74%	2.97	11
IN	23844	Gary, IN	218	228	446	51.12%	1,086	239	1,325	18.04%	2.83	12
FL	45220	Tallahassee, FL	280	120	400	30.00%	529	63	592	10.64%	2.82	13
NJ-PA	35084	Newark-Union, NJ-PA	754	389	1,143	34.03%	1,649	231	1,880	12.29%	2.77	14
SC	24860	Greenville, SC	183	126	309	40.78%	980	175	1,155	15.15%	2.69	15
LA	12940	Baton Rouge, LA	540	453	993	45.62%	931	191	1,122	17.02%	2.68	16
OH	17460	Cleveland-Elyria-Mentor, OH	927	560	1,487	37.66%	3,278	541	3,819	14.17%	2.66	17
PA	37964	Philadelphia, PA	2,609	1,710	4,319	39.59%	5,012	878	5,890	14.91%	2.66	18
CA	36084	Oakland-Fremont-Hayward, CA	491	98	589	16.64%	1,440	97	1,537	6.31%	2.64	19
MD	12580	Baltimore-Towson, MD	3,787	2,126	5,913	35.95%	4,883	773	5,656	13.67%	2.63	20
MO-IL	41180	St. Louis, MO-IL	1,597	1,643	3,240	50.71%	6,787	1,639	8,426	19.45%	2.61	21
WA	42644	Seattle-Bellevue-Everett, WA	264	83	347	23.92%	4,721	477	5,198	9.18%	2.61	22
SC	17900	Columbia, SC	638	332	970	34.23%	1,329	201	1,530	13.14%	2.61	23
NJ	45940	Trenton-Ewing, NJ	254	144	398	36.18%	508	83	591	14.04%	2.58	24
TX	12420	Austin-Round Rock, TX	206	82	288	28.47%	2,139	266	2,405	11.06%	2.57	25
MI	24340	Grand Rapids-Wyoming, MI	114	77	191	40.31%	1,540	286	1,826	15.66%	2.57	26
VA	40220	Roanoke, VA	108	61	169	36.09%	753	124	877	14.14%	2.55	27
MA	44140	Springfield, MA	108	52	160	32.50%	1,163	174	1,337	13.01%	2.50	28
GA	42340	Savannah, GA	297	111	408	27.21%	479	59	538	10.97%	2.48	29
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	7,711	2,279	9,990	22.81%	5,518	565	6,083	9.29%	2.46	30
MO-KS	28140	Kansas City, MO-KS	618	500	1,118	44.72%	4,708	1,052	5,760	18.26%	2.45	31
NE-IA	36540	Omaha-Council Bluffs, NE-IA	165	124	289	42.91%	2,014	428	2,442	17.53%	2.45	32
VA	31340	Lynchburg, VA	81	56	137	40.88%	424	85	509	16.70%	2.45	33
VA	40060	Richmond, VA	1,656	903	2,559	35.29%	2,702	457	3,159	14.47%	2.44	34
FL	38940	Port St. Lucie-Fort Pierce, FL	104	59	163	36.20%	439	77	516	14.92%	2.43	35
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	1,973	1,052	3,025	34.78%	2,567	435	3,002	14.49%	2.40	36
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	97	59	156	37.82%	720	135	855	15.79%	2.40	37
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	407	180	587	30.66%	1,245	184	1,429	12.88%	2.38	38
AR	30780	Little Rock-North Little Rock, AR	501	196	697	28.12%	1,096	147	1,243	11.83%	2.38	39
MI	19804	Detroit-Livonia-Dearborn, MI	903	1,411	2,314	60.98%	1,649	572	2,221	25.75%	2.37	40
FL	15980	Cape Coral-Fort Myers, FL	85	54	139	38.85%	650	128	778	16.45%	2.36	41
TN-MS-AR	32820	Memphis, TN-MS-AR	1,098	1,116	2,214	50.41%	1,172	321	1,493	21.50%	2.34	42
FL	45300	Tampa-St. Petersburg-Clearwater, FL	666	447	1,113	40.16%	3,663	775	4,438	17.46%	2.30	43
NY	15380	Buffalo-Niagara Falls, NY	155	91	246	36.99%	1,838	353	2,191	16.11%	2.30	44
FL	36740	Orlando-Kissimmee, FL	657	344	1,001	34.37%	1,914	340	2,254	15.08%	2.28	45
CA	31084	Los Angeles-Long Beach-Glendale, CA	589	137	726	18.87%	1,098	100	1,198	8.35%	2.26	46
NY	40380	Rochester, NY	215	103	318	32.39%	1,885	316	2,201	14.36%	2.26	47
NY	35004	Nassau-Suffolk, NY	430	152	582	26.12%	2,437	320	2,757	11.61%	2.25	48
MS	27140	Jackson, MS	378	307	685	44.82%	434	108	542	19.93%	2.25	49
MI	47644	Warren-Troy-Farmington Hills, MI	562	324	886	36.57%	5,770	1,121	6,891	16.27%	2.25	50
GA	31420	Macon, GA	188	143	331	43.20%	218	52	270	19.26%	2.24	51
AL	33860	Montgomery, AL	419	222	641	34.63%	483	89	572	15.56%	2.23	52
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	728	205	933	21.97%	1,271	140	1,411	9.92%	2.21	53
GA-SC	12260	Augusta-Richmond County, GA-SC	310	184	494	37.25%	651	132	783	16.86%	2.21	54
FL	27260	Jacksonville, FL	899	519	1,418	36.60%	2,187	435	2,622	16.59%	2.21	55
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	391	141	532	26.50%	6,130	852	6,982	12.20%	2.17	56
NJ	15804	Caen, NJ	765	350	1,115	31.39%	2,497	422	2,919	14.46%	2.17	57

State	MSA	Name	Prime Loans to LMI African-American Females	High-Cost Loans to LMI African-American Females	Total Loans to LMI African-American Females	Percent High-Cost Loans to LMI African-American Females	Prime Loans to LMI White Females	High-Cost Loans to LMI White Females	Total Loans to LMI White Females	Percent High-Cost Loans to LMI White Females	High-Cost Disparity Ratio	Rank
AL	13820	Birmingham-Hoover, AL	832	679	1,511	44.94%	1,742	455	2,197	20.71%	2.17	58
MI	34740	Muskegon-Norton Shores, MI	51	53	104	50.96%	409	127	536	23.69%	2.15	59
OH	10420	Akron, OH	144	98	242	40.50%	1,291	300	1,591	18.86%	2.15	60
LA	43340	Shreveport-Bossier City, LA	191	222	413	53.75%	350	117	467	25.05%	2.15	61
MD	13644	Bethesda-Gaithersburg-Frederick, MD	812	180	992	18.15%	1,990	184	2,174	8.46%	2.14	62
OH	19380	Dayton, OH	265	157	422	37.20%	1,571	334	1,905	17.53%	2.12	63
CO	19740	Denver-Aurora, CO	349	77	426	18.08%	5,554	519	6,073	8.55%	2.12	64
IN	26900	Indianapolis-Carmel, IN	827	422	1,249	33.79%	4,187	803	4,990	16.09%	2.10	65
CT	14860	Bridgeport-Stamford-Norwalk, CT	315	105	420	25.00%	1,160	157	1,317	11.92%	2.10	66
NV	29820	Las Vegas-Paradise, NV	275	92	367	25.07%	1,701	231	1,932	11.96%	2.10	67
OH	45780	Toledo, OH	168	109	277	39.35%	1,176	272	1,448	18.78%	2.09	68
NJ	20764	Edison, NJ	404	121	525	23.05%	3,621	448	4,069	11.01%	2.09	69
DE-MD-NJ	48864	Wilmington, DE-MD-NJ	575	275	850	32.35%	1,405	258	1,663	15.51%	2.09	70
SC	43900	Spartanburg, SC	105	76	181	41.99%	432	110	542	20.30%	2.07	71
CT	35300	New Haven-Milford, CT	308	146	454	32.16%	1,497	276	1,773	15.57%	2.07	72
MI	40980	Saginaw-Saginaw Township North, MI	56	52	108	48.15%	306	95	401	23.69%	2.03	73
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	1,579	500	2,079	24.05%	3,427	461	3,888	11.86%	2.03	74
OH-PA	49660	Youngstown-Warren-Boardman, OH-PA	64	72	136	52.94%	925	333	1,258	26.47%	2.00	75
FL	37340	Palm Bay-Melbourne-Titusville, FL	143	71	214	33.18%	839	167	1,006	16.60%	2.00	76
NC	49180	Winston-Salem, NC	293	103	396	26.01%	867	130	997	13.04%	1.99	77
OH-KY-IN	17140	Cincinnati-Middletown, OH-KY-IN	644	285	929	30.68%	4,653	862	5,515	15.63%	1.96	78
TN	34980	Nashville-Davidson--Murfreesboro, TN	796	419	1,215	34.49%	3,734	796	4,530	17.57%	1.96	79
FL	29460	Lakeland, FL	130	102	232	43.97%	509	149	658	22.64%	1.94	80
IN-MI	43780	South Bend-Mishawaka, IN-MI	65	50	115	43.48%	645	187	832	22.48%	1.93	81
NC	22180	Fayetteville, NC	179	90	269	33.46%	243	51	294	17.35%	1.93	82
KY-IN	31140	Louisville-Jefferson County, KY-IN	372	199	571	34.85%	2,724	610	3,334	18.30%	1.90	83
OK	36420	Oklahoma City, OK	219	144	363	39.67%	1,989	525	2,514	20.88%	1.90	84
AL	26620	Huntsville, AL	343	118	461	25.60%	988	154	1,142	13.49%	1.90	85
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	887	375	1,262	29.71%	1,220	227	1,447	15.69%	1.89	86
AL	33660	Mobile, AL	216	200	416	48.08%	371	127	498	25.50%	1.89	87
PA	38300	Pittsburgh, PA	227	170	397	42.82%	3,716	1,099	4,815	22.82%	1.88	88
TX	13140	Beaumont-Port Arthur, TX	66	73	139	52.52%	221	86	307	28.01%	1.87	89
OH	18140	Columbus, OH	676	261	937	27.85%	3,481	612	4,093	14.95%	1.86	90
FL	37860	Pensacola-Ferry Pass-Brent, FL	161	77	238	32.35%	630	133	763	17.43%	1.86	91
TN	28940	Knoxville, TN	116	71	187	37.97%	1,591	410	2,001	20.49%	1.85	92
IL	40420	Rockford, IL	71	58	129	44.96%	688	221	909	24.31%	1.85	93
OK	46140	Tulsa, OK	119	91	210	43.33%	1,299	413	1,712	24.12%	1.80	94
MI	22420	Flint, MI	148	156	304	51.32%	702	288	990	29.09%	1.76	95
LA	35380	New Orleans-Metairie-Kenner, LA	504	240	744	32.26%	941	211	1,152	18.32%	1.76	96
TX	19124	Dallas-Plano-Irving, TX	1,242	559	1,801	31.04%	3,325	716	4,041	17.72%	1.75	97
NC	24660	Greensboro-High Point, NC	570	184	754	24.40%	1,048	170	1,218	13.96%	1.75	98
IN	23060	Fort Wayne, IN	101	63	164	38.41%	980	280	1,260	22.22%	1.73	99
GA-AL	17980	Columbus, GA-AL	209	106	315	33.65%	222	54	276	19.57%	1.72	100
MA	14484	Boston-Quincy, MA	455	71	526	13.50%	2,455	210	2,665	7.88%	1.71	101
TX	26420	Houston-Sugar Land-Baytown, TX	1,061	769	1,830	42.02%	2,551	832	3,383	24.59%	1.71	102
GA	10500	Albany, GA	72	91	163	55.83%	107	53	160	33.13%	1.69	103
GA	12060	Atlanta-Sandy Springs-Marietta, GA	7,336	2,206	9,542	23.12%	7,419	1,190	8,609	13.82%	1.67	104
MS	25060	Gulfport-Biloxi, MS	77	57	134	42.54%	203	71	274	25.91%	1.64	105
TX	41700	San Antonio, TX	119	51	170	30.00%	931	209	1,140	18.33%	1.64	106
CA	40140	Riverside-San Bernardino-Ontario, CA	237	71	308	23.05%	1,460	241	1,701	14.17%	1.63	107
TX	23104	Fort Worth-Arlington, TX	425	198	623	31.78%	1,977	498	2,475	20.12%	1.58	108
TN-GA	16860	Chattanooga, TN-GA	186	111	297	37.37%	976	308	1,284	23.99%	1.56	109

Table 10. Loans to Low- and Moderate-Income Females by Ethnicity of Borrower

State	MSA	Name	Prime Loans to LMI Hispanic Females	High-Cost Loans to LMI Hispanic Females	Total Loans to LMI Hispanic Females	Percent High-Cost Loans to LMI Hispanic Females	Prime Loans to LMI White Females	High-Cost Loans to LMI White Females	Total Loans to LMI White Females	Percent High-Cost Loans to LMI White Females	High-Cost Disparity Ratio	Rank
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	250	96	346	27.75%	7,727	930	8,657	10.74%	2.58	1
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	2,057	937	2,994	31.30%	6,130	852	6,982	12.20%	2.56	2
CO	19740	Denver-Aurora, CO	973	272	1,245	21.85%	5,554	519	6,073	8.55%	2.56	3
AZ	46060	Tucson, AZ	511	187	698	26.79%	899	115	1,014	11.34%	2.36	4
CA	42044	Santa Ana-Anaheim-Irvine, CA	410	62	472	13.14%	1,316	80	1,396	5.73%	2.29	5
PA	37964	Philadelphia, PA	658	341	999	34.13%	5,012	878	5,890	14.91%	2.29	6
IL-WI	29404	Lake County-Kenosha County, IL-WI	244	100	344	29.07%	1,645	242	1,887	12.82%	2.27	7
CA	40900	Sacramento-Arden-Arcade-Roseville, CA	330	64	394	16.24%	1,820	143	1,963	7.28%	2.23	8
UT	41620	Salt Lake City, UT	271	133	404	32.92%	2,295	401	2,696	14.87%	2.21	9
NV	29820	Las Vegas-Paradise, NV	712	248	960	25.83%	1,701	231	1,932	11.96%	2.16	10
TX	12420	Austin-Round Rock, TX	602	187	789	23.70%	2,139	266	2,405	11.06%	2.14	11
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	228	58	286	20.28%	4,064	425	4,489	9.47%	2.14	12
IN	26900	Indianapolis-Carmel, IN	122	64	186	34.41%	4,187	803	4,990	16.09%	2.14	13
WA	42644	Seattle-Bellevue-Everett, WA	231	56	287	19.51%	4,721	477	5,198	9.18%	2.13	14
WI	33340	Milwaukee-Waukesha-West Allis, WI	248	101	349	28.94%	2,605	416	3,021	13.77%	2.10	15
CT	14860	Bridgeport-Stamford-Norwalk, CT	205	64	269	23.79%	1,160	157	1,317	11.92%	2.00	16
IL	16974	Chicago-Naperville-Joliet, IL	2,475	774	3,249	23.82%	10,749	1,483	12,232	12.12%	1.96	17
MD	13644	Bethesda-Gaithersburg-Frederick, MD	524	99	623	15.89%	1,990	184	2,174	8.46%	1.88	18
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-VA-WV	1,229	255	1,484	17.18%	5,518	565	6,083	9.29%	1.85	19
MA	44140	Springfield, MA	183	58	241	24.07%	1,163	174	1,337	13.01%	1.85	20
MD	12580	Baltimore-Towson, MD	213	71	284	25.00%	4,883	773	5,656	13.67%	1.83	21
PA-NJ	10900	Allentown-Bethlehem-Easton, PA-NJ	280	110	390	28.21%	1,461	270	1,731	15.60%	1.81	22
NJ	15804	Caen, NJ	252	89	341	26.10%	2,497	422	2,919	14.46%	1.81	23
TX	19124	Dallas-Plano-Irving, TX	1,239	580	1,819	31.89%	3,325	716	4,041	17.72%	1.80	24
TX	41700	San Antonio, TX	1,115	518	1,633	31.72%	931	209	1,140	18.33%	1.73	25
CA	41740	San Diego-Carlsbad-San Marcos, CA	400	52	452	11.50%	1,274	92	1,366	6.73%	1.71	26
MI	19804	Detroit-Livonia-Dearborn, MI	93	73	166	43.98%	1,649	572	2,221	25.75%	1.71	27
CA	31084	Los Angeles-Long Beach-Glendale, CA	1,029	170	1,199	14.18%	1,098	100	1,198	8.35%	1.70	28
NJ-PA	35084	Newark-Union, NJ-PA	307	80	387	20.67%	1,649	231	1,880	12.29%	1.68	29
NY	35004	Nassau-Suffolk, NY	278	67	345	19.42%	2,437	320	2,757	11.61%	1.67	30
CT	25540	Hartford-West Hartford-East Hartford, CT	307	71	378	18.78%	2,718	344	3,062	11.23%	1.67	31
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	343	93	436	21.33%	1,245	184	1,429	12.88%	1.66	32
PA	39740	Reading, PA	161	59	220	26.82%	672	132	804	16.42%	1.63	33
CT	35300	New Haven-Milford, CT	208	66	274	24.09%	1,497	276	1,773	15.57%	1.55	34
FL	36740	Orlando-Kissimmee, FL	826	248	1,074	23.09%	1,914	340	2,254	15.08%	1.53	35
IN	23844	Gary, IN	165	62	227	27.31%	1,086	239	1,325	18.04%	1.51	36
TX	26420	Houston-Sugar Land-Baytown, TX	1,867	1,042	2,909	35.82%	2,551	832	3,383	24.59%	1.46	37
MO-KS	28140	Kansas City, MO-KS	283	102	385	26.49%	4,708	1,052	5,760	18.26%	1.45	38
NJ	20764	Edison, NJ	411	78	489	15.95%	3,621	448	4,069	11.01%	1.45	39
CA	40140	Riverside-San Bernardino-Ontario, CA	1,022	255	1,277	19.97%	1,460	241	1,701	14.17%	1.41	40
CA	12540	Bakersfield, CA	267	78	345	22.61%	287	56	343	16.33%	1.38	41
TX	23104	Fort Worth-Arlington, TX	649	250	899	27.81%	1,977	498	2,475	20.12%	1.38	42
NM	10740	Albuquerque, NM	1,098	237	1,335	17.75%	1,125	170	1,295	13.13%	1.35	43
OK	36420	Oklahoma City, OK	171	66	237	27.85%	1,989	525	2,514	20.88%	1.33	44
GA	12060	Atlanta-Sandy Springs-Marietta, GA	1,134	254	1,388	18.30%	7,419	1,190	8,609	13.82%	1.32	45
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	589	153	742	20.62%	1,220	227	1,447	15.69%	1.31	46
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	441	65	506	12.85%	1,271	140	1,411	9.92%	1.29	47
FL	45300	Tampa-St. Petersburg-Clearwater, FL	683	193	876	22.03%	3,663	775	4,438	17.46%	1.26	48
FL	27260	Jacksonville, FL	197	50	247	20.24%	2,187	435	2,622	16.59%	1.22	49
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	399	62	461	13.45%	3,427	461	3,888	11.86%	1.13	50

Table 11. Loans to Middle- and Upper-Income Females by Race of Borrower

State	MSA	Name	Prime Loans to MUI African-American Females	High-Cost Loans to MUI African-American Females	Total Loans to MUI African-American Females	Percent High-Cost Loans to MUI African-American Females	Prime Loans to MUI White Females	High-Cost Loans to MUI White Females	Total Loans to MUI White Females	Percent High-Cost Loans to MUI White Females	High-Cost Disparity Ratio	Rank
NC	39580	Raleigh-Cary, NC	403	168	571	29.42%	2,120	157	2,277	6.90%	4.27	1
NC	20500	Durham, NC	316	124	440	28.18%	943	68	1,011	6.73%	4.19	2
WI	33340	Milwaukee-Waukesha-West Allis, WI	280	211	491	42.97%	2,279	306	2,585	11.84%	3.63	3
SC	16700	Charleston-North Charleston, SC	239	133	372	35.75%	1,790	208	1,998	10.41%	3.43	4
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	190	135	325	41.54%	4,211	594	4,805	12.36%	3.36	5
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	5,266	1,884	7,150	26.35%	6,269	536	6,805	7.88%	3.35	6
CA	41884	San Francisco-San Mateo-Redwood City, CA	178	54	232	23.28%	3,509	267	3,776	7.07%	3.29	7
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	4,902	2,371	7,273	32.60%	12,673	1,432	14,105	10.15%	3.21	8
OH	17460	Cleveland-Elyria-Mentor, OH	444	249	693	35.93%	2,695	351	3,046	11.52%	3.12	9
CT	14860	Bridgeport-Stamford-Norwalk, CT	150	73	223	32.74%	1,695	204	1,899	10.74%	3.05	10
PA	37964	Philadelphia, PA	1,054	545	1,599	34.08%	6,112	772	6,884	11.21%	3.04	11
GA	42340	Savannah, GA	173	79	252	31.35%	657	78	735	10.61%	2.95	12
IL	16974	Chicago-Naperville-Joliet, IL	4,123	2,788	6,911	40.34%	17,516	2,772	20,288	13.66%	2.95	13
MA	14484	Boston-Quincy, MA	465	200	665	30.08%	3,636	413	4,049	10.20%	2.95	14
FL	45220	Tallahassee, FL	202	84	286	29.37%	605	71	676	10.50%	2.80	15
MO-IL	41180	St. Louis, MO-IL	732	522	1,254	41.63%	4,721	837	5,558	15.06%	2.76	16
LA	12940	Baton Rouge, LA	369	229	598	38.29%	1,176	191	1,367	13.97%	2.74	17
CT	25540	Hartford-West Hartford-East Hartford, CT	207	96	303	31.68%	1,688	224	1,912	11.72%	2.70	18
CA	41740	San Diego-Carlsbad-San Marcos, CA	324	113	437	25.86%	6,192	656	6,848	9.58%	2.70	19
VA	40060	Richmond, VA	731	389	1,120	34.73%	1,966	291	2,257	12.89%	2.69	20
OH	18140	Columbus, OH	315	123	438	28.08%	2,821	329	3,150	10.44%	2.69	21
CA	36084	Oakland-Fremont-Hayward, CA	1,202	434	1,636	26.53%	4,765	522	5,287	9.87%	2.69	22
MD	13644	Bethesda-Gaithersburg-Frederick, MD	504	181	685	26.42%	1,547	170	1,717	9.90%	2.67	23
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	556	429	985	43.55%	3,094	604	3,698	16.33%	2.67	24
SC	22500	Florence, SC	81	67	148	45.27%	252	52	304	17.11%	2.65	25
FL	15980	Cape Coral-Fort Myers, FL	94	81	175	46.29%	1,524	324	1,848	17.53%	2.64	26
AL	26620	Huntsville, AL	219	75	294	25.51%	663	71	734	9.67%	2.64	27
AL	13820	Birmingham-Hoover, AL	626	346	972	35.60%	2,051	325	2,376	13.68%	2.60	28
TX	19124	Dallas-Plano-Irving, TX	1,166	554	1,720	32.21%	5,991	847	6,838	12.39%	2.60	29
CT	35300	New Haven-Milford, CT	223	114	337	33.83%	1,531	229	1,760	13.01%	2.60	30
KY-IN	31140	Louisville-Jefferson County, KY-IN	197	97	294	32.99%	2,174	316	2,490	12.69%	2.60	31
NC	22180	Fayetteville, NC	330	111	441	25.17%	485	52	537	9.68%	2.60	32
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	97	84	181	46.41%	1,188	260	1,448	17.96%	2.58	33
NJ-PA	35084	Newark-Union, NJ-PA	1,052	614	1,666	36.85%	2,998	500	3,498	14.29%	2.58	34
TX	26420	Houston-Sugar Land-Baytown, TX	1,925	1,168	3,093	37.76%	6,944	1,192	8,136	14.65%	2.58	35
IN	26900	Indianapolis-Carmel, IN	323	150	473	31.71%	2,759	392	3,151	12.44%	2.55	36
CO	19740	Denver-Aurora, CO	220	62	282	21.99%	5,976	568	6,544	8.68%	2.53	37
AL	33660	Mobile, AL	227	153	380	40.26%	671	127	798	15.91%	2.53	38
MI	19804	Detroit-Livonia-Dearborn, MI	903	1,038	1,941	53.48%	2,260	608	2,868	21.20%	2.52	39
MD	12580	Baltimore-Towson, MD	2,332	1,007	3,339	30.16%	4,776	652	5,428	12.01%	2.51	40
GA	12060	Atlanta-Sandy Springs-Marietta, GA	5,507	2,019	7,526	26.83%	8,412	1,008	9,420	10.70%	2.51	41
TN-MS-AR	32820	Memphis, TN-MS-AR	925	745	1,670	44.61%	1,633	356	1,989	17.90%	2.49	42
MO-KS	28140	Kansas City, MO-KS	287	150	437	34.32%	3,134	508	3,642	13.95%	2.46	43
NJ	12100	Atlantic City, NJ	104	68	172	39.53%	595	114	709	16.08%	2.46	44
PA	38300	Pittsburgh, PA	126	73	199	36.68%	2,999	527	3,526	14.95%	2.45	45
FL	27260	Jacksonville, FL	627	328	955	34.35%	2,765	451	3,216	14.02%	2.45	46
SC	24860	Greenville, SC	148	63	211	29.86%	1,168	164	1,332	12.31%	2.43	47
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	1,100	553	1,653	33.45%	2,347	377	2,724	13.84%	2.42	48
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	1,071	351	1,422	24.68%	4,009	456	4,465	10.21%	2.42	49
WA	42644	Seattle-Bellevue-Everett, WA	305	121	426	28.40%	6,836	919	7,755	11.85%	2.40	50
GA-SC	12260	Augusta-Richmond County, GA-SC	290	114	404	28.22%	756	101	857	11.79%	2.39	51

State	MSA	Name	Prime Loans to MUI African-American Females	High-Cost Loans to MUI African-American Females	Total Loans to MUI African-American Females	Percent High-Cost Loans to MUI African-American Females	Prime Loans to MUI White Females	High-Cost Loans to MUI White Females	Total Loans to MUI White Females	Percent High-Cost Loans to MUI White Females	High-Cost Disparity Ratio	Rank
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	521	252	773	32.60%	11,789	1,880	13,669	13.75%	2.37	52
NY	35004	Nassau-Suffolk, NY	755	503	1,258	39.98%	3,724	758	4,482	16.91%	2.36	53
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	111	56	167	33.53%	2,824	467	3,291	14.19%	2.36	54
IN	23844	Gary, IN	208	139	347	40.06%	840	172	1,012	17.00%	2.36	55
LA	35380	New Orleans-Metairie-Kenner, LA	638	356	994	35.81%	1,914	343	2,257	15.20%	2.36	56
MI	47644	Warren-Troy-Farmington Hills, MI	414	209	623	33.55%	3,446	578	4,024	14.36%	2.34	57
DE-MD-NJ	48864	Wilmington, DE-MD-NJ	297	121	418	28.95%	1,037	147	1,184	12.42%	2.33	58
OH	19380	Dayton, OH	144	59	203	29.06%	1,144	163	1,307	12.47%	2.33	59
AR	30780	Little Rock-North Little Rock, AR	239	85	324	26.23%	1,010	132	1,142	11.56%	2.27	60
TN-GA	16860	Chattanooga, TN-GA	75	54	129	41.86%	799	181	980	18.47%	2.27	61
FL	36740	Orlando-Kissimmee, FL	902	536	1,438	37.27%	4,430	872	5,302	16.45%	2.27	62
MS	27140	Jackson, MS	308	179	487	36.76%	586	114	700	16.29%	2.26	63
FL	37340	Palm Bay-Melbourne-Titusville, FL	130	64	194	32.99%	1,160	200	1,360	14.71%	2.24	64
CA	23420	Fresno, CA	116	62	178	34.83%	1,256	231	1,487	15.53%	2.24	65
CA	40900	Sacramento-Arden-Arcade-Roseville, CA	402	146	548	26.64%	4,481	606	5,087	11.91%	2.24	66
OK	46140	Tulsa, OK	84	50	134	37.31%	1,362	273	1,635	16.70%	2.23	67
TN	34980	Nashville-Davidson--Murfreesboro, TN	456	168	624	26.92%	3,284	453	3,737	12.12%	2.22	68
CA	31084	Los Angeles-Long Beach-Glendale, CA	4,370	1,955	6,325	30.91%	13,898	2,260	16,158	13.99%	2.21	69
CA	12540	Bakersfield, CA	123	69	192	35.94%	1,180	230	1,410	16.31%	2.20	70
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	143	51	194	26.29%	6,052	826	6,878	12.01%	2.19	71
TX	23104	Fort Worth-Arlington, TX	468	214	682	31.38%	2,701	453	3,154	14.36%	2.18	72
CA	46700	Vallejo-Fairfield, CA	230	108	338	31.95%	588	101	689	14.66%	2.18	73
LA	43340	Shreveport-Bossier City, LA	207	124	331	37.46%	561	121	682	17.74%	2.11	74
FL	38940	Port St. Lucie-Fort Pierce, FL	166	114	280	40.71%	858	208	1,066	19.51%	2.09	75
FL	33124	Miami-Miami Beach-Kendall, FL	1,747	1,433	3,180	45.06%	1,909	531	2,440	21.76%	2.07	76
OH-KY-IN	17140	Cincinnati-Middletown, OH-KY-IN	314	110	424	25.94%	3,189	466	3,655	12.75%	2.03	77
NY	39100	Poughkeepsie-Newburgh-Middletown, NY	170	81	251	32.27%	820	156	976	15.98%	2.02	78
SC	17900	Columbia, SC	418	167	585	28.55%	1,070	178	1,248	14.26%	2.00	79
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	2,006	1,514	3,520	43.01%	3,463	950	4,413	21.53%	2.00	80
MI	22420	Flint, MI	92	68	160	42.50%	577	156	733	21.28%	2.00	81
AL	33860	Montgomery, AL	316	113	429	26.34%	519	79	598	13.21%	1.99	82
FL	45300	Tampa-St. Petersburg-Clearwater, FL	785	420	1,205	34.85%	6,233	1,361	7,594	17.92%	1.94	83
CA	40140	Riverside-San Bernardino-Ontario, CA	1,418	738	2,156	34.23%	6,639	1,464	8,103	18.07%	1.89	84
OK	36420	Oklahoma City, OK	152	73	225	32.44%	1,823	377	2,200	17.14%	1.89	85
NC	24660	Greensboro-High Point, NC	410	120	530	22.64%	1,101	150	1,251	11.99%	1.89	86
FL	29460	Lakeland, FL	189	114	303	37.62%	1,044	262	1,306	20.06%	1.88	87
FL	36100	Ocala, FL	103	59	162	36.42%	685	166	851	19.51%	1.87	88
NJ	20764	Edison, NJ	446	167	613	27.24%	3,680	645	4,325	14.91%	1.83	89
NJ	15804	Caen, NJ	512	217	729	29.77%	1,891	384	2,275	16.88%	1.76	90
GA-AL	17980	Columbus, GA-AL	227	109	336	32.44%	385	87	472	18.43%	1.76	91
WA	45104	Tacoma, WA	168	75	243	30.86%	2,075	455	2,530	17.98%	1.72	92
NV	29820	Las Vegas-Paradise, NV	529	220	749	29.37%	4,380	919	5,299	17.34%	1.69	93
CA	44700	Stockton, CA	219	91	310	29.35%	859	192	1,051	18.27%	1.61	94
TX	41700	San Antonio, TX	296	62	358	17.32%	2,359	301	2,660	11.32%	1.53	95
GA	31420	Macon, GA	135	56	191	29.32%	294	74	368	20.11%	1.46	96

Table 12. Loans to Middle- and Upper-Income Females by Ethnicity of Borrower

State	MSA	Name	Prime Loans to MUI Hispanic Females	High-Cost Loans to MUI Hispanic Females	Total Loans to MUI Hispanic Females	Percent High-Cost Loans to MUI Hispanic Females	Prime Loans to MUI White Females	High-Cost Loans to MUI White Females	Total Loans to MUI White Females	Percent High-Cost Loans to MUI White Females	High-Cost Disparity Ratio	Rank
MA	37764	Peabody, MA	100	66	166	39.76%	1439	153	1592	9.61%	4.14	1
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	1205	445	1650	26.97%	6269	536	6805	7.88%	3.42	2
CT	14860	Bridgeport-Stamford-Norwalk, CT	200	95	295	32.20%	1695	204	1899	10.74%	3.00	3
CA	41940	San Jose-Sunnyvale-Santa Clara, CA	1172	355	1527	23.25%	2465	214	2679	7.99%	2.91	4
CT	35300	New Haven-Milford, CT	122	71	193	36.79%	1531	229	1760	13.01%	2.83	5
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	1928	1205	3133	38.46%	11789	1880	13669	13.75%	2.80	6
CA	42220	Santa Rosa-Petaluma, CA	210	56	266	21.05%	1248	103	1351	7.62%	2.76	7
FL	34940	Naples-Marco Island, FL	184	145	329	44.07%	710	136	846	16.08%	2.74	8
UT	41620	Salt Lake City, UT	251	154	405	38.02%	3076	499	3575	13.96%	2.72	9
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	166	102	268	38.06%	2824	467	3291	14.19%	2.68	10
FL	15980	Cape Coral-Fort Myers, FL	371	309	680	45.44%	1524	324	1848	17.53%	2.59	11
CO	19740	Denver-Aurora, CO	441	126	567	22.22%	5976	568	6544	8.68%	2.56	12
AZ	46060	Tucson, AZ	524	205	729	28.12%	2106	263	2369	11.10%	2.53	13
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	3711	1281	4992	25.66%	12673	1432	14105	10.15%	2.53	14
WA	42644	Seattle-Bellevue-Everett, WA	353	150	503	29.82%	6836	919	7755	11.85%	2.52	15
MD	13644	Bethesda-Gaithersburg-Frederick, MD	386	128	514	24.90%	1547	170	1717	9.90%	2.52	16
MA	14484	Boston-Quincy, MA	207	70	277	25.27%	3636	413	4049	10.20%	2.48	17
NJ-PA	35084	Newark-Union, NJ-PA	732	395	1127	35.05%	2998	500	3498	14.29%	2.45	18
IL	16974	Chicago-Naperville-Joliet, IL	2809	1415	4224	33.50%	17516	2772	20288	13.66%	2.45	19
FL	42260	Sarasota-Bradenton-Venice, FL	130	77	207	37.20%	1676	310	1986	15.61%	2.38	20
GA	12060	Atlanta-Sandy Springs-Marietta, GA	720	240	960	25.00%	8412	1008	9420	10.70%	2.34	21
MD	12580	Baltimore-Towson, MD	213	83	296	28.04%	4776	652	5428	12.01%	2.33	22
CA	42044	Santa Ana-Anaheim-Irvine, CA	1880	643	2523	25.49%	5433	667	6100	10.93%	2.33	23
CA	36084	Oakland-Fremont-Hayward, CA	1535	453	1988	22.79%	4765	522	5287	9.87%	2.31	24
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	185	57	242	23.55%	4009	456	4465	10.21%	2.31	25
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	256	98	354	27.68%	6052	826	6878	12.01%	2.31	26
TX	26420	Houston-Sugar Land-Baytown, TX	1808	917	2725	33.65%	6944	1192	8136	14.65%	2.30	27
FL	38940	Port St. Lucie-Fort Pierce, FL	142	113	255	44.31%	858	208	1066	19.51%	2.27	28
TX	19124	Dallas-Plano-Irving, TX	619	242	861	28.11%	5991	847	6838	12.39%	2.27	29
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	718	421	1139	36.96%	3094	604	3698	16.33%	2.26	30
FL	36740	Orlando-Kissimmee, FL	1873	1101	2974	37.02%	4430	872	5302	16.45%	2.25	31
PA-NJ	10900	Allentown-Bethlehem-Easton, PA-NJ	134	55	189	29.10%	1292	194	1486	13.06%	2.23	32
CA	47300	Visalia-Porterville, CA	420	242	662	36.56%	507	100	607	16.47%	2.22	33
CA	23420	Fresno, CA	772	394	1166	33.79%	1256	231	1487	15.53%	2.18	34
CA	41740	San Diego-Carlsbad-San Marcos, CA	1939	487	2426	20.07%	6192	656	6848	9.58%	2.10	35
CA	41884	San Francisco-San Mateo-Redwood City, CA	709	122	831	14.68%	3509	267	3776	7.07%	2.08	36
CA	40900	Sacramento--Arden-Arcade--Roseville, CA	675	220	895	24.58%	4481	606	5087	11.91%	2.06	37
TX	41700	San Antonio, TX	1315	386	1701	22.69%	2359	301	2660	11.32%	2.01	38
CA	41500	Salinas, CA	429	123	552	22.28%	541	68	609	11.17%	2.00	39
FL	45300	Tampa-St. Petersburg-Clearwater, FL	1058	588	1646	35.72%	6233	1361	7594	17.92%	1.99	40
FL	36100	Ocala, FL	84	53	137	38.69%	685	166	851	19.51%	1.98	41
CA	31084	Los Angeles-Long Beach-Glendale, CA	11456	4370	15826	27.61%	13898	2260	16158	13.99%	1.97	42
TX	12420	Austin-Round Rock, TX	361	72	433	16.63%	2619	241	2860	8.43%	1.97	43
CA	12540	Bakersfield, CA	870	412	1282	32.14%	1180	230	1410	16.31%	1.97	44
CA	40140	Riverside-San Bernardino-Ontario, CA	5113	2748	7861	34.96%	6639	1464	8103	18.07%	1.93	45
NY	35004	Nassau-Suffolk, NY	766	366	1132	32.33%	3724	758	4482	16.91%	1.91	46
FL	27260	Jacksonville, FL	172	62	234	26.50%	2765	451	3216	14.02%	1.89	47
FL	29460	Lakeland, FL	205	125	330	37.88%	1044	262	1306	20.06%	1.89	48

State	MSA	Name	Prime Loans to MUI Hispanic Females	High-Cost Loans to MUI Hispanic Females	Total Loans to MUI Hispanic Females	Percent High-Cost Loans to MUI Hispanic Females	Prime Loans to MUI White Females	High-Cost Loans to MUI White Females	Total Loans to MUI White Females	Percent High-Cost Loans to MUI White Females	High-Cost Disparity Ratio	Rank
NV	29820	Las Vegas-Paradise, NV	1105	534	1639	32.58%	4380	919	5299	17.34%	1.88	49
NJ	20764	Edison, NJ	441	169	610	27.70%	3680	645	4325	14.91%	1.86	50
CA	46700	Vallejo-Fairfield, CA	218	81	299	27.09%	588	101	689	14.66%	1.85	51
CA	33700	Modesto, CA	448	231	679	34.02%	735	177	912	19.41%	1.75	52
TX	18580	Corpus Christi, TX	193	94	287	32.75%	388	90	478	18.83%	1.74	53
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	115	52	167	31.14%	1188	260	1448	17.96%	1.73	54
CA	32900	Merced, CA	239	134	373	35.92%	244	64	308	20.78%	1.73	55
CA	44700	Stockton, CA	518	233	751	31.03%	859	192	1051	18.27%	1.70	56
TX	21340	El Paso, TX	1118	593	1711	34.66%	342	89	431	20.65%	1.68	57
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	2318	1297	3615	35.88%	3463	950	4413	21.53%	1.67	58
PA	37964	Philadelphia, PA	224	51	275	18.55%	6112	772	6884	11.21%	1.65	59
FL	33124	Miami-Miami Beach-Kendall, FL	9071	5029	14100	35.67%	1909	531	2440	21.76%	1.64	60
CA	37100	Oxnard-Thousand Oaks-Ventura, CA	655	150	805	18.63%	1751	227	1978	11.48%	1.62	61
NM	10740	Albuquerque, NM	875	208	1083	19.21%	1840	267	2107	12.67%	1.52	62
TX	23104	Fort Worth-Arlington, TX	303	82	385	21.30%	2701	453	3154	14.36%	1.48	63

Table 13. Loans to Low- and Moderate-Income Males by Race of Borrower

State	MSA	Name	Prime Loans to LMI African-American Males	High-Cost Loans to LMI African-American Males	Total Loans to LMI African-American Males	Percent High-Cost Loans to LMI African-American Males	Prime Loans to LMI White Males	High-Cost Loans to LMI White Males	Total Loans to LMI White Males	Percent High-Cost Loans to LMI White Males	High-Cost Disparity Ratio	Rank
WI	33340	Milwaukee-Waukesha-West Allis, WI	260	326	586	55.63%	2,247	400	2,647	15.11%	3.68	1
SC	16700	Charleston-North Charleston, SC	173	131	304	43.09%	924	123	1,047	11.75%	3.67	2
IL	16974	Chicago-Naperville-Joliet, IL	1,937	1,499	3,436	43.63%	8,742	1,331	10,073	13.21%	3.30	3
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	326	160	486	32.92%	7,757	937	8,694	10.78%	3.05	4
PA	37964	Philadelphia, PA	1,298	983	2,281	43.10%	4,424	758	5,182	14.63%	2.95	5
CT	14860	Bridgeport-Stamford-Norwalk, CT	167	59	226	26.11%	942	92	1,034	8.90%	2.93	6
NC	39580	Raleigh-Cary, NC	427	160	587	27.26%	2,137	236	2,373	9.95%	2.74	7
OH	17460	Cleveland-Elyria-Mentor, OH	413	336	749	44.86%	3,040	608	3,648	16.67%	2.69	8
OH	19380	Dayton, OH	133	120	253	47.43%	1,591	341	1,932	17.65%	2.69	9
NC	20500	Durham, NC	215	70	285	24.56%	497	51	548	9.31%	2.64	10
SC	17900	Columbia, SC	316	204	520	39.23%	1,146	211	1,357	15.55%	2.52	11
NY	35004	Nassau-Suffolk, NY	246	79	325	24.31%	2,105	225	2,330	9.66%	2.52	12
LA	12940	Baton Rouge, LA	281	262	543	48.25%	803	201	1,004	20.02%	2.41	13
MD	12580	Baltimore-Towson, MD	1,806	976	2,782	35.08%	4,223	721	4,944	14.58%	2.41	14
LA	29180	Lafayette, LA	71	82	153	53.59%	232	67	299	22.41%	2.39	15
NE-IA	36540	Omaha-Council Bluffs, NE-IA	88	57	145	39.31%	1,902	375	2,277	16.47%	2.39	16
MO-IL	41180	St. Louis, MO-IL	759	840	1,599	52.53%	6,340	1,805	8,145	22.16%	2.37	17
NC	22180	Fayetteville, NC	94	54	148	36.49%	278	51	329	15.50%	2.35	18
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	3,683	1,082	4,765	22.71%	4,985	535	5,520	9.69%	2.34	19
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	1,339	622	1,961	31.72%	2,825	446	3,271	13.63%	2.33	20
TN-MS-AR	32820	Memphis, TN-MS-AR	617	651	1,268	51.34%	1,066	302	1,368	22.08%	2.33	21
CT	25540	Hartford-West Hartford-East Hartford, CT	253	88	341	25.81%	2,287	288	2,575	11.18%	2.31	22
MI	47644	Warren-Troy-Farmington Hills, MI	281	199	480	41.46%	6,268	1,374	7,642	17.98%	2.31	23
VA	40060	Richmond, VA	821	503	1,324	37.99%	2,240	443	2,683	16.51%	2.30	24
IN	23844	Gary, IN	137	161	298	54.03%	1,055	324	1,379	23.50%	2.30	25
IN	23060	Fort Wayne, IN	60	53	113	46.90%	1,122	288	1,410	20.43%	2.30	26
NC	49180	Winston-Salem, NC	166	74	240	30.83%	717	112	829	13.51%	2.28	27
MI	19804	Detroit-Livonia-Dearborn, MI	509	1,015	1,524	66.60%	1,620	674	2,294	29.38%	2.27	28
MS	27140	Jackson, MS	226	199	425	46.82%	360	94	454	20.70%	2.26	29
TX	12420	Austin-Round Rock, TX	125	53	178	29.78%	1,776	270	2,046	13.20%	2.26	30
GA	42340	Savannah, GA	194	59	253	23.32%	494	57	551	10.34%	2.25	31
GA-SC	12260	Augusta-Richmond County, GA-SC	206	122	328	37.20%	667	132	799	16.52%	2.25	32
MO-KS	28140	Kansas City, MO-KS	375	321	696	46.12%	4,401	1,134	5,535	20.49%	2.25	33
AL	26620	Huntsville, AL	233	105	338	31.07%	1,003	166	1,169	14.20%	2.19	34
CT	35300	New Haven-Milford, CT	138	64	202	31.68%	1,201	205	1,406	14.58%	2.17	35
FL	27260	Jacksonville, FL	459	274	733	37.38%	1,855	387	2,242	17.26%	2.17	36
DE-MD-NJ	48864	Wilmington, DE-MD-NJ	290	131	421	31.12%	1,454	244	1,698	14.37%	2.17	37
AL	13820	Birmingham-Hoover, AL	443	387	830	46.63%	1,682	463	2,145	21.59%	2.16	38
NJ-PA	35084	Newark-Union, NJ-PA	437	194	631	30.74%	1,506	250	1,756	14.24%	2.16	39
KY-IN	31140	Louisville-Jefferson County, KY-IN	210	139	349	39.83%	2,403	552	2,955	18.68%	2.13	40
AL	33860	Montgomery, AL	230	115	345	33.33%	446	83	529	15.69%	2.12	41
SC	24860	Greenville, SC	120	74	194	38.14%	917	202	1,119	18.05%	2.11	42
OK	36420	Oklahoma City, OK	140	94	234	40.17%	1,759	413	2,172	19.01%	2.11	43
OH	45780	Toledo, OH	86	64	150	42.67%	1,172	298	1,470	20.27%	2.10	44
PA	38300	Pittsburgh, PA	124	124	248	50.00%	3,551	1,110	4,661	23.81%	2.10	45
NJ	20764	Edison, NJ	193	61	254	24.02%	2,967	391	3,358	11.64%	2.06	46
NJ	15804	Caen, NJ	369	200	569	35.15%	2,306	475	2,781	17.08%	2.06	47
MD	13644	Bethesda-Gaithersburg-Frederick, MD	459	104	563	18.47%	1,540	154	1,694	9.09%	2.03	48
MI	22420	Flint, MI	73	99	172	57.56%	683	273	956	28.56%	2.02	49
CO	19740	Denver-Aurora, CO	277	70	347	20.17%	4,755	530	5,285	10.03%	2.01	50
LA	43340	Shreveport-Bossier City, LA	102	101	203	49.75%	279	92	371	24.80%	2.01	51
NV	29820	Las Vegas-Paradise, NV	179	51	230	22.17%	1,380	172	1,552	11.08%	2.00	52
NY	40380	Rochester, NY	116	62	178	34.83%	1,725	365	2,090	17.46%	1.99	53

State	MSA	Name	Prime Loans to LMI African-American Males	High-Cost Loans to LMI African-American Males	Total Loans to LMI African-American Males	Percent High-Cost Loans to LMI African-American Males	Prime Loans to LMI White Males	High-Cost Loans to LMI White Males	Total Loans to LMI White Males	Percent High-Cost Loans to LMI White Males	High-Cost Disparity Ratio	Rank
AL	33660	Mobile, AL	136	122	258	47.29%	389	121	510	23.73%	1.99	54
OH	10420	Akron, OH	90	58	148	39.19%	1,355	332	1,687	19.68%	1.99	55
AR	30780	Little Rock-North Little Rock, AR	255	91	346	26.30%	1,096	169	1,265	13.36%	1.97	56
FL	45300	Tampa-St. Petersburg-Clearwater, FL	330	181	511	35.42%	2,614	589	3,203	18.39%	1.93	57
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	827	298	1,125	26.49%	3,126	503	3,629	13.86%	1.91	58
IN	26900	Indianapolis-Carmel, IN	411	235	646	36.38%	3,975	937	4,912	19.08%	1.91	59
OH-KY-IN	17140	Cincinnati-Middletown, OH-KY-IN	333	157	490	32.04%	4,447	902	5,349	16.86%	1.90	60
TN	34980	Nashville-Davidson--Murfreesboro, TN	396	199	595	33.45%	3,423	737	4,160	17.72%	1.89	61
TX	26420	Houston-Sugar Land-Baytown, TX	569	477	1,046	45.60%	2,181	697	2,878	24.22%	1.88	62
OH	18140	Columbus, OH	374	168	542	31.00%	3,318	659	3,977	16.57%	1.87	63
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	312	64	376	17.02%	801	82	883	9.29%	1.83	64
GA	31420	Macon, GA	110	89	199	44.72%	163	53	216	24.54%	1.82	65
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	288	135	423	31.91%	792	171	963	17.76%	1.80	66
LA	35380	New Orleans-Metairie-Kenner, LA	293	173	466	37.12%	728	191	919	20.78%	1.79	67
GA-AL	17980	Columbus, GA-AL	126	74	200	37.00%	216	58	274	21.17%	1.75	68
NJ	45940	Trenton-Ewing, NJ	138	59	197	29.95%	394	82	476	17.23%	1.74	69
GA	12060	Atlanta-Sandy Springs-Marietta, GA	4,105	1,476	5,581	26.45%	7,178	1,306	8,484	15.39%	1.72	70
NC	24660	Greensboro-High Point, NC	271	99	370	26.76%	899	168	1,067	15.75%	1.70	71
TX	19124	Dallas-Plano-Irving, TX	658	325	983	33.06%	2,687	650	3,337	19.48%	1.70	72
FL	36740	Orlando-Kissimmee, FL	359	159	518	30.69%	1,399	320	1,719	18.62%	1.65	73
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	246	71	317	22.40%	4,501	728	5,229	13.92%	1.61	74
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	513	205	718	28.55%	807	178	985	18.07%	1.58	75
TN-GA	16860	Chattanooga, TN-GA	109	59	168	35.12%	927	324	1,251	25.90%	1.36	76
TX	23104	Fort Worth-Arlington, TX	244	97	341	28.45%	1,773	509	2,282	22.30%	1.28	77

Table 14. Loans to Low- and Moderate-Income Males by Ethnicity of Borrower

State	MSA	Name	Prime Loans to LMI Hispanic Males	High-Cost Loans to LMI Hispanic Males	Total Loans to LMI Hispanic Males	Percent High-Cost Loans to LMI Hispanic Males	Prime Loans to LMI White Males	High-Cost Loans to LMI White Males	Total Loans to LMI White Males	Percent High-Cost Loans to LMI White Males	High-Cost Disparity Ratio	Rank
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	3,349	2,010	5,359	37.51%	4,501	728	5,229	13.92%	2.69	1
NC	39580	Raleigh-Cary, NC	281	91	372	24.46%	2,137	236	2,373	9.95%	2.46	2
CT	14860	Bridgeport-Stamford-Norwalk, CT	265	69	334	20.66%	942	92	1,034	8.90%	2.32	3
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	514	170	684	24.85%	7,757	937	8,694	10.78%	2.31	4
WI	33340	Milwaukee-Waukesha-West Allis, WI	367	192	559	34.35%	2,247	400	2,647	15.11%	2.27	5
CO	19740	Denver-Aurora, CO	1,557	459	2,016	22.77%	4,755	530	5,285	10.03%	2.27	6
IN	26900	Indianapolis-Carmel, IN	217	165	382	43.19%	3,975	937	4,912	19.08%	2.26	7
NV	29820	Las Vegas-Paradise, NV	941	315	1,256	25.08%	1,380	172	1,552	11.08%	2.26	8
IL-WI	29404	Lake County-Kenosha County, IL-WI	586	289	875	33.03%	1,469	252	1,721	14.64%	2.26	9
UT	41620	Salt Lake City, UT	602	332	934	35.55%	2,181	412	2,593	15.89%	2.24	10
IL	40420	Rockford, IL	146	110	256	42.97%	696	177	873	20.27%	2.12	11
CT	25540	Hartford-West Hartford-East Hartford, CT	278	85	363	23.42%	2,287	288	2,575	11.18%	2.09	12
PA	37964	Philadelphia, PA	628	276	904	30.53%	4,424	758	5,182	14.63%	2.09	13
WA	42644	Seattle-Bellevue-Everett, WA	420	117	537	21.79%	3,727	447	4,174	10.71%	2.03	14
ID	14260	Boise City-Nampa, ID	187	71	258	27.52%	1,278	210	1,488	14.11%	1.95	15
TX	19124	Dallas-Plano-Irving, TX	2,124	1,261	3,385	37.25%	2,687	650	3,337	19.48%	1.91	16
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	415	112	527	21.25%	3,076	385	3,461	11.12%	1.91	17
IL	16974	Chicago-Naperville-Joliet, IL	4,527	1,514	6,041	25.06%	8,742	1,331	10,073	13.21%	1.90	18
UT	36260	Ogden-Clearfield, UT	218	74	292	25.34%	1,526	240	1,766	13.59%	1.86	19
TX	12420	Austin-Round Rock, TX	841	273	1,114	24.51%	1,776	270	2,046	13.20%	1.86	20
AZ	46060	Tucson, AZ	467	145	612	23.69%	679	100	779	12.84%	1.85	21
PA-NJ	10900	Allentown-Bethlehem-Easton, PA-NJ	383	187	570	32.81%	1,530	336	1,866	18.01%	1.82	22
PA	39740	Reading, PA	251	102	353	28.90%	742	140	882	15.87%	1.82	23
MA	44140	Springfield, MA	146	52	198	26.26%	1,020	175	1,195	14.64%	1.79	24
TX	41700	San Antonio, TX	1,165	611	1,776	34.40%	683	167	850	19.65%	1.75	25
NY	35004	Nassau-Suffolk, NY	371	75	446	16.82%	2,105	225	2,330	9.66%	1.74	26
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	1,775	351	2,126	16.51%	4,985	535	5,520	9.69%	1.70	27
MD	13644	Bethesda-Gaithersburg-Frederick, MD	655	120	775	15.48%	1,540	154	1,694	9.09%	1.70	28
MI	19804	Detroit-Livonia-Dearborn, MI	114	114	228	50.00%	1,620	674	2,294	29.38%	1.70	29
CA	40900	Sacramento--Arden-Arcade--Roseville, CA	380	68	448	15.18%	1,120	110	1,230	8.94%	1.70	30
NJ	15804	Caen, NJ	288	115	403	28.54%	2,306	475	2,781	17.08%	1.67	31
NJ-PA	35084	Newark-Union, NJ-PA	343	105	448	23.44%	1,506	250	1,756	14.24%	1.65	32
TN	34980	Nashville-Davidson--Murfreesboro, TN	231	95	326	29.14%	3,423	737	4,160	17.72%	1.64	33
FL	15980	Cape Coral-Fort Myers, FL	161	65	226	28.76%	476	103	579	17.79%	1.62	34
NE-IA	36540	Omaha-Council Bluffs, NE-IA	263	93	356	26.12%	1,902	375	2,277	16.47%	1.59	35
OH	17460	Cleveland-Elyria-Mentor, OH	161	57	218	26.15%	3,040	608	3,648	16.67%	1.57	36
MI	24340	Grand Rapids-Wyoming, MI	215	88	303	29.04%	1,672	383	2,055	18.64%	1.56	37
OK	36420	Oklahoma City, OK	319	132	451	29.27%	1,759	413	2,172	19.01%	1.54	38
CT	35300	New Haven-Milford, CT	263	74	337	21.96%	1,201	205	1,406	14.58%	1.51	39
IN	23844	Gary, IN	279	143	422	33.89%	1,055	324	1,379	23.50%	1.44	40
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	581	143	724	19.75%	3,126	503	3,629	13.86%	1.43	41
NM	10740	Albuquerque, NM	1,084	252	1,336	18.86%	774	120	894	13.42%	1.41	42
NJ	20764	Edison, NJ	412	80	492	16.26%	2,967	391	3,358	11.64%	1.40	43
TX	26420	Houston-Sugar Land-Baytown, TX	3,462	1,754	5,216	33.63%	2,181	697	2,878	24.22%	1.39	44
PA	42540	Scranton--Wilkes-Barre, PA	112	66	178	37.08%	800	300	1,100	27.27%	1.36	45
MD	12580	Baltimore-Towson, MD	391	95	486	19.55%	4,223	721	4,944	14.58%	1.34	46
MO-KS	28140	Kansas City, MO-KS	411	155	566	27.39%	4,401	1,134	5,535	20.49%	1.34	47
VA	40060	Richmond, VA	199	55	254	21.65%	2,240	443	2,683	16.51%	1.31	48
TX	23104	Fort Worth-Arlington, TX	1,368	540	1,908	28.30%	1,773	509	2,282	22.30%	1.27	49
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	325	93	418	22.25%	792	171	963	17.76%	1.25	50
OK	46140	Tulsa, OK	115	56	171	32.75%	1,082	386	1,468	26.29%	1.25	51
FL	36740	Orlando-Kissimmee, FL	755	225	980	22.96%	1,399	320	1,719	18.62%	1.23	52
CA	40140	Riverside-San Bernardino-Ontario, CA	1,306	281	1,587	17.71%	1,062	179	1,241	14.42%	1.23	53

State	MSA	Name	Prime Loans to LMI Hispanic Males	High-Cost Loans to LMI Hispanic Males	Total Loans to LMI Hispanic Males	Percent High-Cost Loans to LMI Hispanic Males	Prime Loans to LMI White Males	High-Cost Loans to LMI White Males	Total Loans to LMI White Males	Percent High-Cost Loans to LMI White Males	High-Cost Disparity Ratio	Rank
FL	45300	Tampa-St. Petersburg-Clearwater, FL	666	193	859	22.47%	2,614	589	3,203	18.39%	1.22	54
GA	12060	Atlanta-Sandy Springs-Marietta, GA	1,509	349	1,858	18.78%	7,178	1,306	8,484	15.39%	1.22	55
FL	29460	Lakeland, FL	130	60	190	31.58%	354	127	481	26.40%	1.20	56
TN-MS-AR	32820	Memphis, TN-MS-AR	183	60	243	24.69%	1,066	302	1,368	22.08%	1.12	57
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	317	52	369	14.09%	2,087	304	2,391	12.71%	1.11	58
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	424	105	529	19.85%	807	178	985	18.07%	1.10	59
KS	48620	Wichita, KS	255	68	323	21.05%	1,345	332	1,677	19.80%	1.06	60
AR-MO	22220	Fayetteville-Springdale-Rogers, AR-MO	412	79	491	16.09%	699	171	870	19.66%	0.82	61

Table 15. Loans to Middle- and Upper-Income Males by Race of Borrower

State	MSA	Name	Prime Loans to MUI African-American Males	High-Cost Loans to MUI African-American Males	Total Loans to MUI African-American Males	Percent High-Cost Loans to MUI African-American Males	Prime Loans to MUI White Males	High-Cost Loans to MUI White Males	Total Loans to MUI White Males	Percent High-Cost Loans to MUI White Males	High-Cost Disparity Ratio	Rank
CT	14860	Bridgeport-Stamford-Norwalk, CT	137	89	226	39.38%	3,036	340	3,376	10.07%	3.91	1
NC	20500	Durham, NC	195	86	281	30.60%	1,173	106	1,279	8.29%	3.69	2
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	3,773	1,445	5,218	27.69%	10,542	879	11,421	7.70%	3.60	3
WI	33340	Milwaukee-Waukesha-West Allis, WI	210	193	403	47.89%	3,384	525	3,909	13.43%	3.57	4
AL	46220	Tuscaloosa, AL	116	66	182	36.26%	747	95	842	11.28%	3.21	5
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	3,527	1,927	5,454	35.33%	18,695	2,331	21,026	11.09%	3.19	6
NC	39580	Raleigh-Cary, NC	373	128	501	25.55%	4,192	371	4,563	8.13%	3.14	7
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	296	183	479	38.20%	7,659	1,091	8,750	12.47%	3.06	8
GA	12060	Atlanta-Sandy Springs-Marietta, GA	4,643	2,158	6,801	31.73%	16,566	1,977	18,543	10.66%	2.98	9
IL	16974	Chicago-Naperville-Joliet, IL	3,266	2,532	5,798	43.67%	29,251	5,106	34,357	14.86%	2.94	10
SC	16700	Charleston-North Charleston, SC	314	168	482	34.85%	3,285	443	3,728	11.88%	2.93	11
OH	17460	Cleveland-Elyria-Mentor, OH	348	233	581	40.10%	4,558	726	5,284	13.74%	2.92	12
CA	36084	Oakland-Fremont-Hayward, CA	766	318	1,084	29.34%	5,657	633	6,290	10.06%	2.92	13
OH	18140	Columbus, OH	286	145	431	33.64%	4,472	603	5,075	11.88%	2.83	14
PA	37964	Philadelphia, PA	875	461	1,336	34.51%	9,190	1,280	10,470	12.23%	2.82	15
VA	40060	Richmond, VA	714	360	1,074	33.52%	3,477	469	3,946	11.89%	2.82	16
SC	22500	Florence, SC	65	70	135	51.85%	483	109	592	18.41%	2.82	17
MA	14484	Boston-Quincy, MA	436	207	643	32.19%	5,495	711	6,206	11.46%	2.81	18
TX	19124	Dallas-Plano-Irving, TX	1,119	588	1,707	34.45%	10,862	1,523	12,385	12.30%	2.80	19
MD	13644	Bethesda-Gaithersburg-Frederick, MD	436	142	578	24.57%	2,361	227	2,588	8.77%	2.80	20
MI	47644	Warren-Troy-Farmington Hills, MI	405	239	644	37.11%	7,950	1,215	9,165	13.26%	2.80	21
GA-AL	17980	Columbus, GA-AL	262	134	396	33.84%	811	112	923	12.13%	2.79	22
OH	19380	Dayton, OH	108	60	168	35.71%	1,962	292	2,254	12.95%	2.76	23
MI	19804	Detroit-Livonia-Dearborn, MI	777	1,061	1,838	57.73%	4,199	1,131	5,330	21.22%	2.72	24
MS	27140	Jackson, MS	293	202	495	40.81%	1,144	202	1,346	15.01%	2.72	25
CO	19740	Denver-Aurora, CO	261	97	358	27.09%	9,290	1,030	10,320	9.98%	2.71	26
TX	26420	Houston-Sugar Land-Baytown, TX	1,758	1,173	2,931	40.02%	13,810	2,414	16,224	14.88%	2.69	27
CT	25540	Hartford-West Hartford-East Hartford, CT	165	79	244	32.38%	2,644	366	3,010	12.16%	2.66	28
TN-MS-AR	32820	Memphis, TN-MS-AR	811	689	1,500	45.93%	3,038	634	3,672	17.27%	2.66	29
SC	17900	Columbia, SC	404	194	598	32.44%	2,236	315	2,551	12.35%	2.63	30
NY	35004	Nassau-Suffolk, NY	626	414	1,040	39.81%	6,748	1,214	7,962	15.25%	2.61	31
CA	40900	Sacramento--Arden-Arcade--Roseville, CA	329	170	499	34.07%	5,311	810	6,121	13.23%	2.57	32
LA	12940	Baton Rouge, LA	393	318	711	44.73%	2,252	478	2,730	17.51%	2.55	33
MD	12580	Baltimore-Towson, MD	1,714	838	2,552	32.84%	7,332	1,083	8,415	12.87%	2.55	34
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	579	439	1,018	43.12%	4,670	953	5,623	16.95%	2.54	35
NC	49180	Winston-Salem, NC	145	58	203	28.57%	1,205	154	1,359	11.33%	2.52	36
CT	35300	New Haven-Milford, CT	203	111	314	35.35%	2,226	364	2,590	14.05%	2.52	37
NJ-PA	35084	Newark-Union, NJ-PA	913	614	1,527	40.21%	4,966	945	5,911	15.99%	2.52	38
IN	26900	Indianapolis-Carmel, IN	312	160	472	33.90%	4,650	725	5,375	13.49%	2.51	39
NC	22180	Fayetteville, NC	581	132	713	18.51%	1,358	108	1,466	7.37%	2.51	40
TX	12420	Austin-Round Rock, TX	176	52	228	22.81%	4,802	487	5,289	9.21%	2.48	41
MO-IL	41180	St. Louis, MO-IL	667	493	1,160	42.50%	8,151	1,689	9,840	17.16%	2.48	42
LA	43340	Shreveport-Bossier City, LA	158	113	271	41.70%	938	190	1,128	16.84%	2.48	43
LA	29180	Lafayette, LA	96	69	165	41.82%	906	185	1,091	16.96%	2.47	44
CA	31084	Los Angeles-Long Beach-Glendale, CA	2,623	1,277	3,900	32.74%	18,428	2,824	21,252	13.29%	2.46	45
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	927	322	1,249	25.78%	7,248	847	8,095	10.46%	2.46	46
NC	24660	Greensboro-High Point, NC	311	116	427	27.17%	1,797	223	2,020	11.04%	2.46	47
AL	13820	Birmingham-Hoover, AL	623	335	958	34.97%	3,906	653	4,559	14.32%	2.44	48
FL	37340	Palm Bay-Melbourne-Titusville, FL	136	73	209	34.93%	2,073	347	2,420	14.34%	2.44	49
OK	36420	Oklahoma City, OK	159	106	265	40.00%	3,310	653	3,963	16.48%	2.43	50
MO-KS	28140	Kansas City, MO-KS	292	163	455	35.82%	5,589	984	6,573	14.97%	2.39	51
MI	22420	Flint, MI	87	81	168	48.21%	1,050	265	1,315	20.15%	2.39	52
AL	33660	Mobile, AL	240	160	400	40.00%	1,442	292	1,734	16.84%	2.38	53
FL	27260	Jacksonville, FL	631	320	951	33.65%	4,929	814	5,743	14.17%	2.37	54

State	MSA	Name	Prime Loans to MUI African-American Males	High-Cost Loans to MUI African-American Males	Total Loans to MUI African-American Males	Percent High-Cost Loans to MUI African-American Males	Prime Loans to MUI White Males	High-Cost Loans to MUI White Males	Total Loans to MUI White Males	Percent High-Cost Loans to MUI White Males	High-Cost Disparity Ratio	Rank
GA	31420	Macon, GA	109	72	181	39.78%	494	100	594	16.84%	2.36	55
TN	34980	Nashville-Davidson--Murfreesboro, TN	417	177	594	29.80%	5,922	863	6,785	12.72%	2.34	56
PA	38300	Pittsburgh, PA	142	80	222	36.04%	5,235	958	6,193	15.47%	2.33	57
SC	24860	Greenville, SC	178	75	253	29.64%	2,370	347	2,717	12.77%	2.32	58
AL	26620	Huntsville, AL	233	63	296	21.28%	1,708	173	1,881	9.20%	2.31	59
FL	38940	Port St. Lucie-Fort Pierce, FL	142	123	265	46.42%	1,536	393	1,929	20.37%	2.28	60
FL	15980	Cape Coral-Fort Myers, FL	125	108	233	46.35%	2,389	611	3,000	20.37%	2.28	61
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	1,677	1,378	3,055	45.11%	5,766	1,430	7,196	19.87%	2.27	62
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	1,491	595	2,086	28.52%	5,487	791	6,278	12.60%	2.26	63
AL	33860	Montgomery, AL	295	125	420	29.76%	1,012	154	1,166	13.21%	2.25	64
IN	23844	Gary, IN	235	164	399	41.10%	2,106	477	2,583	18.47%	2.23	65
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	156	77	233	33.05%	4,474	781	5,255	14.86%	2.22	66
GA	42340	Savannah, GA	276	100	376	26.60%	1,235	168	1,403	11.97%	2.22	67
LA	35380	New Orleans-Metairie-Kenner, LA	691	420	1,111	37.80%	3,151	653	3,804	17.17%	2.20	68
CA	44700	Stockton, CA	147	81	228	35.53%	1,245	240	1,485	16.16%	2.20	69
FL	33124	Miami-Miami Beach-Kendall, FL	1,361	1,082	2,443	44.29%	2,991	757	3,748	20.20%	2.19	70
FL	36740	Orlando-Kissimmee, FL	882	491	1,373	35.76%	7,138	1,470	8,608	17.08%	2.09	71
KY-IN	31140	Louisville-Jefferson County, KY-IN	237	88	325	27.08%	3,515	528	4,043	13.06%	2.07	72
OH-KY-IN	17140	Cincinnati-Middletown, OH-KY-IN	324	114	438	26.03%	5,562	799	6,361	12.56%	2.07	73
FL	36100	Ocala, FL	77	68	145	46.90%	916	268	1,184	22.64%	2.07	74
FL	45220	Tallahassee, FL	141	54	195	27.69%	897	139	1,036	13.42%	2.06	75
FL	45300	Tampa-St. Petersburg-Clearwater, FL	710	433	1,143	37.88%	9,554	2,160	11,714	18.44%	2.05	76
WA	45104	Tacoma, WA	208	113	321	35.20%	3,429	720	4,149	17.35%	2.03	77
AR	30780	Little Rock-North Little Rock, AR	193	60	253	23.72%	1,637	218	1,855	11.75%	2.02	78
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	94	55	149	36.91%	1,950	439	2,389	18.38%	2.01	79
CA	41740	San Diego-Carlsbad-San Marcos, CA	373	92	465	19.78%	8,642	945	9,587	9.86%	2.01	80
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	602	250	852	29.34%	16,961	2,982	19,943	14.95%	1.96	81
CA	40140	Riverside-San Bernardino-Ontario, CA	1,150	600	1,750	34.29%	10,113	2,151	12,264	17.54%	1.95	82
NJ	20764	Edison, NJ	403	172	575	29.91%	6,479	1,184	7,663	15.45%	1.94	83
NJ	15804	Caen, NJ	408	202	610	33.11%	3,229	669	3,898	17.16%	1.93	84
WA	42644	Seattle-Bellevue-Everett, WA	484	141	625	22.56%	10,929	1,460	12,389	11.78%	1.91	85
CA	46700	Vallejo-Fairfield, CA	197	60	257	23.35%	840	117	957	12.23%	1.91	86
CA	12540	Bakersfield, CA	128	58	186	31.18%	1,877	371	2,248	16.50%	1.89	87
GA-SC	12260	Augusta-Richmond County, GA-SC	390	119	509	23.38%	1,560	223	1,783	12.51%	1.87	88
TX	23104	Fort Worth-Arlington, TX	500	200	700	28.57%	5,130	928	6,058	15.32%	1.87	89
NY	39100	Poughkeepsie-Newburgh-Middletown, NY	160	66	226	29.20%	1,619	308	1,927	15.98%	1.83	90
GA	10500	Albany, GA	120	64	184	34.78%	319	76	395	19.24%	1.81	91
TX	13140	Beaumont-Port Arthur, TX	100	58	158	36.71%	753	200	953	20.99%	1.75	92
DE-MD-NJ	48864	Wilmington, DE-MD-NJ	278	107	385	27.79%	1,635	310	1,945	15.94%	1.74	93
NV	29820	Las Vegas-Paradise, NV	563	235	798	29.45%	6,866	1,427	8,293	17.21%	1.71	94
FL	29460	Lakeland, FL	180	100	280	35.71%	1,697	464	2,161	21.47%	1.66	95
TX	41700	San Antonio, TX	322	72	394	18.27%	3,487	491	3,978	12.34%	1.48	96

Table 16. Loans to Middle- and Upper-Income Males by Ethnicity of Borrower

State	MSA	Name	Prime Loans to MUI Hispanic Males	High-Cost Loans to MUI Hispanic Males	Total Loans to MUI Hispanic Males	Percent High-Cost Loans to MUI Hispanic Males	Prime Loans to MUI White Males	High-Cost Loans to MUI White Males	Total Loans to MUI White Males	Percent High-Cost Loans to MUI White Males	High-Cost Disparity Ratio	Rank
DC-MD-VA-WV	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	2,280	968	3,248	29.80%	10,542	879	11,421	7.70%	3.87	1
CT	14860	Bridgeport-Stamford-Norwalk, CT	366	165	531	31.07%	3,036	340	3,376	10.07%	3.09	2
MD	13644	Bethesda-Gaithersburg-Frederick, MD	650	241	891	27.05%	2,361	227	2,588	8.77%	3.08	3
WA	42644	Seattle-Bellevue-Everett, WA	760	421	1,181	35.65%	10,929	1,460	12,389	11.78%	3.02	4
MA	37764	Peabody, MA	190	88	278	31.65%	2,194	257	2,451	10.49%	3.02	5
MA	15764	Cambridge-Newton-Framingham, MA	224	78	302	25.83%	3,679	367	4,046	9.07%	2.85	6
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	4,060	2,929	6,989	41.91%	16,961	2,982	19,943	14.95%	2.80	7
CA	41884	San Francisco-San Mateo-Redwood City, CA	944	208	1,152	18.06%	4,674	326	5,000	6.52%	2.77	8
CA	41940	San Jose-Sunnyvale-Santa Clara, CA	1,996	527	2,523	20.89%	3,726	307	4,033	7.61%	2.74	9
NC	39580	Raleigh-Cary, NC	215	61	276	22.10%	4,192	371	4,563	8.13%	2.72	10
MA	44140	Springfield, MA	107	66	173	38.15%	1,586	261	1,847	14.13%	2.70	11
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	317	205	522	39.27%	4,474	781	5,255	14.86%	2.64	12
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	207	98	305	32.13%	7,659	1,091	8,750	12.47%	2.58	13
FL	34940	Naples-Marco Island, FL	363	286	649	44.07%	1,106	234	1,340	17.46%	2.52	14
CA	42044	Santa Ana-Anaheim-Irvine, CA	3,017	1,021	4,038	25.28%	7,263	826	8,089	10.21%	2.48	15
AZ	46060	Tucson, AZ	868	312	1,180	26.44%	2,715	327	3,042	10.75%	2.46	16
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	568	263	831	31.65%	8,786	1,308	10,094	12.96%	2.44	17
FL	15980	Cape Coral-Fort Myers, FL	673	633	1,306	48.47%	2,389	611	3,000	20.37%	2.38	18
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	1,146	759	1,905	39.84%	4,670	953	5,623	16.95%	2.35	19
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	496	161	657	24.51%	7,248	847	8,095	10.46%	2.34	20
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	5,276	1,831	7,107	25.76%	18,695	2,331	21,026	11.09%	2.32	21
CT	35300	New Haven-Milford, CT	222	107	329	32.52%	2,226	364	2,590	14.05%	2.31	22
CO	19740	Denver-Aurora, CO	888	266	1,154	23.05%	9,290	1,030	10,320	9.98%	2.31	23
WI	33340	Milwaukee-Waukesha-West Allis, WI	176	79	255	30.98%	3,384	525	3,909	13.43%	2.31	24
CT	25540	Hartford-West Hartford-East Hartford, CT	190	74	264	28.03%	2,644	366	3,010	12.16%	2.31	25
TX	19124	Dallas-Plano-Irving, TX	1,565	616	2,181	28.24%	10,862	1,523	12,385	12.30%	2.30	26
FL	42260	Sarasota-Bradenton-Venice, FL	231	141	372	37.90%	2,411	485	2,896	16.75%	2.26	27
TX	32580	McAllen-Edinburg-Mission, TX	1,314	963	2,277	42.29%	230	53	283	18.73%	2.26	28
IL-WI	29404	Lake County-Kenosha County, IL-WI	279	131	410	31.95%	3,102	516	3,618	14.26%	2.24	29
MA	14484	Boston-Quincy, MA	406	138	544	25.37%	5,495	711	6,206	11.46%	2.21	30
TN	34980	Nashville-Davidson--Murfreesboro, TN	161	63	224	28.13%	5,922	863	6,785	12.72%	2.21	31
CA	36084	Oakland-Fremont-Hayward, CA	2,725	777	3,502	22.19%	5,657	633	6,290	10.06%	2.20	32
CA	42060	Santa Barbara-Santa Maria, CA	445	84	529	15.88%	886	69	955	7.23%	2.20	33
IL	16974	Chicago-Naperville-Joliet, IL	6,251	3,014	9,265	32.53%	29,251	5,106	34,357	14.86%	2.19	34
NY	35004	Nassau-Suffolk, NY	1,421	708	2,129	33.26%	6,748	1,214	7,962	15.25%	2.18	35
GA	12060	Atlanta-Sandy Springs-Marietta, GA	1,385	419	1,804	23.23%	16,566	1,977	18,543	10.66%	2.18	36
FL	36740	Orlando-Kissimmee, FL	2,735	1,610	4,345	37.05%	7,138	1,470	8,608	17.08%	2.17	37
UT	41620	Salt Lake City, UT	625	335	960	34.90%	5,820	1,117	6,937	16.10%	2.17	38
TX	13140	Beaumont-Port Arthur, TX	72	58	130	44.62%	753	200	953	20.99%	2.13	39
TX	41700	San Antonio, TX	2,053	730	2,783	26.23%	3,487	491	3,978	12.34%	2.13	40
NJ-PA	35084	Newark-Union, NJ-PA	1,418	729	2,147	33.95%	4,966	945	5,911	15.99%	2.12	41
NV	39900	Reno-Sparks, NV	198	54	252	21.43%	1,343	151	1,494	10.11%	2.12	42
NM	42140	Santa Fe, NM	209	61	270	22.59%	465	56	521	10.75%	2.10	43
TX	26420	Houston-Sugar Land-Baytown, TX	4,935	2,232	7,167	31.14%	13,810	2,414	16,224	14.88%	2.09	44
TX	12420	Austin-Round Rock, TX	768	181	949	19.07%	4,802	487	5,289	9.21%	2.07	45
VA	40060	Richmond, VA	188	61	249	24.50%	3,477	469	3,946	11.89%	2.06	46
CA	41740	San Diego-Carlsbad-San Marcos, CA	3,133	792	3,925	20.18%	8,642	945	9,587	9.86%	2.05	47
CA	46700	Vallejo-Fairfield, CA	452	149	601	24.79%	840	117	957	12.23%	2.03	48
NY	39100	Poughkeepsie-Newburgh-Middletown, NY	230	110	340	32.35%	1,619	308	1,927	15.98%	2.02	49
CA	40900	Sacramento--Arden-Arcade--Roseville, CA	1,223	444	1,667	26.63%	5,311	810	6,121	13.23%	2.01	50
CA	31084	Los Angeles-Long Beach-Glendale, CA	17,256	6,276	23,532	26.67%	18,428	2,824	21,252	13.29%	2.01	51
LA	35380	New Orleans-Metairie-Kenner, LA	232	120	352	34.09%	3,151	653	3,804	17.17%	1.99	52
MD	12580	Baltimore-Towson, MD	446	152	598	25.42%	7,332	1,083	8,415	12.87%	1.98	53
CA	47300	Visalia-Porterville, CA	828	390	1,218	32.02%	665	129	794	16.25%	1.97	54
CA	23420	Fresno, CA	1,348	616	1,964	31.36%	1,494	284	1,778	15.97%	1.96	55

State	MSA	Name	Prime Loans to MUI Hispanic Males	High-Cost Loans to MUI Hispanic Males	Total Loans to MUI Hispanic Males	Percent High-Cost Loans to MUI Hispanic Males	Prime Loans to MUI White Males	High-Cost Loans to MUI White Males	Total Loans to MUI White Males	Percent High-Cost Loans to MUI White Males	High-Cost Disparity Ratio	Rank
TX	33260	Midland, TX	96	52	148	35.14%	470	103	573	17.98%	1.95	56
FL	45300	Tampa-St. Petersburg-Clearwater, FL	1,665	925	2,590	35.71%	9,554	2,160	11,714	18.44%	1.94	57
NJ	20764	Edison, NJ	820	349	1,169	29.85%	6,479	1,184	7,663	15.45%	1.93	58
TX	21340	El Paso, TX	1,794	829	2,623	31.61%	695	136	831	16.37%	1.93	59
NV	29820	Las Vegas-Paradise, NV	2,281	1,134	3,415	33.21%	6,866	1,427	8,293	17.21%	1.93	60
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	223	122	345	35.36%	1,950	439	2,389	18.38%	1.92	61
UT	36260	Ogden-Clearfield, UT	143	57	200	28.50%	2,481	440	2,921	15.06%	1.89	62
FL	38940	Port St. Lucie-Fort Pierce, FL	337	206	543	37.94%	1,536	393	1,929	20.37%	1.86	63
UT	39340	Provo-Orem, UT	254	114	368	30.98%	2,940	588	3,528	16.67%	1.86	64
WA	49420	Yakima, WA	134	50	184	27.17%	401	69	470	14.68%	1.85	65
FL	29460	Lakeland, FL	409	269	678	39.68%	1,697	464	2,161	21.47%	1.85	66
FL	37340	Palm Bay-Melbourne-Titusville, FL	189	68	257	26.46%	2,073	347	2,420	14.34%	1.85	67
PA	37964	Philadelphia, PA	410	119	529	22.50%	9,190	1,280	10,470	12.23%	1.84	68
CA	44700	Stockton, CA	1,042	441	1,483	29.74%	1,245	240	1,485	16.16%	1.84	69
PA-NJ	10900	Allentown-Bethlehem-Easton, PA-NJ	263	93	356	26.12%	2,366	393	2,759	14.24%	1.83	70
CA	12540	Bakersfield, CA	1,866	803	2,669	30.09%	1,877	371	2,248	16.50%	1.82	71
NM	29740	Las Cruces, NM	319	91	410	22.20%	370	52	422	12.32%	1.80	72
FL	27260	Jacksonville, FL	392	133	525	25.33%	4,929	814	5,743	14.17%	1.79	73
CA	40140	Riverside-San Bernardino-Ontario, CA	10,196	4,643	14,839	31.29%	10,113	2,151	12,264	17.54%	1.78	74
CA	31460	Madera, CA	302	147	449	32.74%	259	60	319	18.81%	1.74	75
TX	18580	Corpus Christi, TX	462	201	663	30.32%	776	165	941	17.53%	1.73	76
FL	33124	Miami-Miami Beach-Kendall, FL	11,273	5,987	17,260	34.69%	2,991	757	3,748	20.20%	1.72	77
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	3,407	1,741	5,148	33.82%	5,766	1,430	7,196	19.87%	1.70	78
WA	45104	Tacoma, WA	244	101	345	29.28%	3,429	720	4,149	17.35%	1.69	79
MO-KS	28140	Kansas City, MO-KS	222	75	297	25.25%	5,589	984	6,573	14.97%	1.69	80
MI	19804	Detroit-Livonia-Dearborn, MI	153	85	238	35.71%	4,199	1,131	5,330	21.22%	1.68	81
IL	40420	Rockford, IL	110	56	166	33.73%	990	249	1,239	20.10%	1.68	82
CA	42220	Santa Rosa-Petaluma, CA	390	66	456	14.47%	1,431	137	1,568	8.74%	1.66	83
CA	37100	Oxnard-Thousand Oaks-Ventura, CA	1,217	246	1,463	16.81%	2,316	262	2,578	10.16%	1.65	84
OK	36420	Oklahoma City, OK	173	63	236	26.69%	3,310	653	3,963	16.48%	1.62	85
NM	10740	Albuquerque, NM	1,364	366	1,730	21.16%	2,237	340	2,577	13.19%	1.60	86
CA	41500	Salinas, CA	761	171	932	18.35%	587	76	663	11.46%	1.60	87
FL	36100	Ocala, FL	141	79	220	35.91%	916	268	1,184	22.64%	1.59	88
TX	23104	Fort Worth-Arlington, TX	846	258	1,104	23.37%	5,130	928	6,058	15.32%	1.53	89
CA	32900	Merced, CA	563	247	810	30.49%	344	86	430	20.00%	1.52	90
NJ	12100	Atlantic City, NJ	145	53	198	26.77%	952	207	1,159	17.86%	1.50	91
OR	41420	Salem, OR	222	72	294	24.49%	1,025	205	1,230	16.67%	1.47	92
CA	33700	Modesto, CA	987	391	1,378	28.37%	1,082	259	1,341	19.31%	1.47	93
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	281	63	344	18.31%	5,487	791	6,278	12.60%	1.45	94
NJ	15804	Caen, NJ	195	63	258	24.42%	3,229	669	3,898	17.16%	1.42	95
IN	23844	Gary, IN	304	105	409	25.67%	2,106	477	2,583	18.47%	1.39	96
T	36220	Odessa, TX	120	125	245	51.02%	185	120	305	39.34%	1.30	97

Table 17. Final Ranking Table

State	MSA	MSA Name	High-Cost Disparity Rank of LMI African-American Females	High-Cost Disparity Rank of LMI African-American Males	High-Cost Disparity Rank of LMI Hispanic Females	High-Cost Disparity Rank of LMI Hispanic Males	High-Cost Disparity Rank of MUI African-American Females	High-Cost Disparity Rank of MUI African-American Males	High-Cost Disparity Rank of MUI Hispanic Females	High-Cost Disparity Rank of MUI Hispanic Males	Average Score	Final Rank
NC	39580	Raleigh-Cary, NC	6	7	n/a	2	1	7	n/a	10	5.50	1
MN-WI	33460	Minneapolis-St. Paul-Bloomington, MN-WI	11	4	1	4	5	8	n/a	13	6.57	2
WI	33340	Milwaukee-Waukesha-West Allis, WI	1	1	15	5	3	4	n/a	24	7.57	3
CT	14860	Bridgeport-Stamford-Norwalk, CT	66	6	16	3	10	1	3	2	13.38	4
DC-MD-	47894	Washington-Arlington-Alexandria, DC-MD-VA-WV	30	19	19	27	6	3	2	1	13.38	4
IL	16974	Chicago-Naperville-Joliet, IL	3	3	17	18	13	10	19	34	14.63	6
OH	17460	Cleveland-Elyria-Mentor, OH	17	8	n/a	36	9	12	n/a	n/a	16.40	7
CT	25540	Hartford-West Hartford-East Hartford, CT	9	22	31	12	18	28	n/a	25	20.71	8
CA	36084	Oakland-Fremont-Hayward, CA	19	n/a	n/a	n/a	22	13	24	32	22.00	9
PA	37964	Philadelphia, PA	18	5	6	13	11	15	59	68	24.38	10
MD	13644	Bethesda-Gaithersburg-Frederick, MD	62	48	18	28	23	20	16	3	27.25	11
CO	19740	Denver-Aurora, CO	64	50	3	6	37	26	12	23	27.63	12
OR-WA	38900	Portland-Vancouver-Beaverton, OR-WA	n/a	n/a	12	17	71	n/a	26	17	28.60	13
WA	42644	Seattle-Bellevue-Everett, WA	22	n/a	14	14	50	85	15	4	29.14	14
NY-NJ	35644	New York-White Plains-Wayne, NY-NJ	53	64	47	n/a	8	6	14	21	30.43	15
NJ-PA	35084	Newark-Union, NJ-PA	14	39	29	32	34	38	18	41	30.63	16
TX	12420	Austin-Round Rock, TX	25	30	11	20	n/a	41	43	45	30.71	17
MD	12580	Baltimore-Towson, MD	20	14	21	46	40	34	22	53	31.25	18
VA	40060	Richmond, VA	34	24	n/a	48	20	16	n/a	46	31.33	19
FL	15980	Cape Coral-Fort Myers, FL	41	n/a	n/a	34	26	61	11	18	31.83	20
CT	35300	New Haven-Milford, CT	72	35	34	39	30	37	5	22	34.25	21
AZ	38060	Phoenix-Mesa-Scottsdale, AZ	56	74	2	1	52	81	6	7	34.88	22
NY	35004	Nassau-Suffolk, NY	48	12	30	26	53	31	46	35	35.13	23
MA	14484	Boston-Quincy, MA	101	n/a	n/a	n/a	14	18	17	30	36.00	24
IN	26900	Indianapolis-Carmel, IN	65	59	13	7	36	39	n/a	n/a	36.50	25
FL	48424	West Palm Beach-Boca Raton-Boynton Beach, FL	38	66	32	50	24	35	30	19	36.75	26
CA	40900	Sacramento--Arden-Arcade--Roseville, CA	n/a	n/a	8	30	66	32	37	50	37.17	27
TN-MS-	32820	Memphis, TN-MS-AR	42	21	n/a	57	42	29	n/a	n/a	38.20	28
MI	19804	Detroit-Livonia-Dearborn, MI	40	28	27	29	39	24	n/a	81	38.29	29
TX	19124	Dallas-Plano-Irving, TX	97	72	24	16	29	19	29	26	39.00	30
RI-MA	39300	Providence-New Bedford-Fall River, RI-MA	n/a	n/a	n/a	58	54	66	10	12	40.00	31
CA	41740	San Diego-Carlsbad-San Marcos, CA	n/a	n/a	26	n/a	19	80	35	47	41.40	32
NC-SC	16740	Charlotte-Gastonia-Concord, NC-SC	74	58	50	41	49	46	25	20	45.38	33
MO-KS	28140	Kansas City, MO-KS	31	33	38	47	43	51	n/a	80	46.14	34
CA	31084	Los Angeles-Long Beach-Glendale, CA	46	n/a	28	n/a	69	45	42	51	46.83	35
IN	23844	Gary, IN	12	25	36	40	55	65	n/a	96	47.00	36
TX	26420	Houston-Sugar Land-Baytown, TX	102	62	37	44	35	27	27	44	47.25	37
GA	12060	Atlanta-Sandy Springs-Marietta, GA	104	70	45	55	41	9	21	36	47.63	38
FL	36740	Orlando-Kissimmee, FL	45	73	35	52	62	71	31	37	50.75	39
FL	27260	Jacksonville, FL	55	36	49	n/a	46	54	47	73	51.43	40
FL	38940	Port St. Lucie-Fort Pierce, FL	35	n/a	n/a	n/a	75	60	28	63	52.20	41
VA-NC	47260	Virginia Beach-Norfolk-Newport News, VA-NC	36	20	n/a	n/a	48	63	n/a	94	52.20	41
FL	19660	Deltona-Daytona Beach-Ormond Beach, FL	37	n/a	n/a	n/a	33	79	54	61	52.80	43
NJ	15804	Caen, NJ	57	47	23	31	90	84	n/a	95	53.38	44
NV	29820	Las Vegas-Paradise, NV	67	52	10	8	93	94	49	60	54.13	45
TN	34980	Nashville-Davidson--Murfreesboro, TN	79	61	n/a	33	68	56	n/a	31	54.67	46
FL	45300	Tampa-St. Petersburg-Clearwater, FL	43	57	48	54	83	76	40	57	57.25	47
NJ	20764	Edison, NJ	69	46	39	43	89	83	50	58	59.63	48
TX	41700	San Antonio, TX	106	n/a	25	25	95	96	38	40	60.71	49
OK	36420	Oklahoma City, OK	84	43	44	38	85	50	n/a	85	61.29	50
CA	12540	Bakersfield, CA	n/a	n/a	41	n/a	70	87	44	71	62.60	51
LA	35380	New Orleans-Metairie-Kenner, LA	96	67	n/a	n/a	56	68	n/a	52	67.80	52
FL	22744	Fort Lauderdale-Pompano Beach-Deerfield, FL	86	75	46	59	80	62	58	78	68.00	53
CA	40140	Riverside-San Bernardino-Ontario, CA	107	n/a	40	53	84	82	45	74	69.29	54
FL	29460	Lakeland, FL	80	n/a	n/a	56	87	95	48	66	72.00	55
TX	23104	Fort Worth-Arlington, TX	108	77	42	49	72	89	63	89	73.625	56

The National Council of Negro Women

The National Council of Negro Women (NCNW) is a council of national African-American women's organizations and community-based sections. Founded in 1935 by esteemed educator and Presidential Advisor, Mary McLeod Bethune, the NCNW mission is to lead, develop, and advocate for women of African descent as they support their families and communities. NCNW fulfills this purpose through research, advocacy, and national and community-based services and programs on issues of health, education, and economic empowerment in the United States and Africa. With its 39 national affiliates and more than 200 sections, NCNW is a 501(c) 3 organization with an outreach to nearly four million women. Under the unwavering leadership of civil rights and women's rights icon Dr. Dorothy I. Height, NCNW continues to fulfill its mission as it swiftly approaches three quarters of a century of leadership and service.

The National Community Reinvestment Coalition

The National Community Reinvestment Coalition is an association of more than 600 community-based organizations that promote access to basic banking services, including credit and savings, to create and sustain affordable housing, job development, and vibrant communities for America's working families. Our members include community reinvestment organizations, community development corporations, local and state government agencies, faith-based institutions, community organizing and civil rights groups, minority- and women-owned business associations, and social service providers from across the nation. Their work serves primarily low- and moderate-income neighborhoods and communities.

The Board of Directors would like to express its appreciation to the NCRC professional staff who contributed to this publication, and continue to serve as an invaluable resource to all of us committed to promoting responsible lending and a Financially Inclusive Society. For more information, please contact:

John Taylor, President and CEO
James H. Carr, Chief Operating Officer
David Berenbaum, Executive Vice President
Joshua Silver, Vice President, Policy and Research
Denitza Mantcheva, Research Analyst
D'An Hagan, Manager of Communications

© 2009 by the National Community Reinvestment Coalition

Reproduction of this document is permitted and encouraged, with credit given to the National Community Reinvestment Coalition.