FAIR LENDING 101

By: Long Island Housing Services, Inc.

Funded by Enterprise Community Partners – Eliminating Housing Barriers in New York

What is Fair Lending?

- Fair lending prohibits lenders from considering a protected class when applying for residential mortgage loans. Fair lending ensures the same lending opportunities to all people.
- Fair Lending prohibits the following business practices:
  - Predatory lending
  - Redlining and Reverse Redlining
  - Risky Loan Terms and Additional Fees
  - Flipping- causing or encouraging parties to refinance multiple times
  - Inadequate or lack of disclosures
  - Inaccurate appraisals of the property
  - Denials based on reasons other than financial qualifications
  - Failure to provide information or access to information
  - Discouragement from applying for a loan based upon protected class status.

Fair Lending Laws

01

FEDERAL FAIR HOUSING ACT

02

NEW YORK DIVISION OF HUMAN RIGHTS LAW

03

SUFFOLK COUNTY AND NASSAU COUNTY HUMAN RIGHTS LAW

Federal Fair Housing Act

- Passed in 1968, the Fair Housing Act prohibits discrimination for the following housing transactions:
  - Sale
  - Rental
  - Financing
  - Insuring
  - Construction of Housing
- Prohibits discrimination of the basis of:
  - Race/Color
  - National Origin
  - Religion
  - Sex (now including LGBTQ)
  - Familial Status (Presence of Children in the home)
  - Disability

New York State Human Rights Law

- The New York State Human Rights Law includes all of the protected categories found in the Fair Housing Act and also prohibits housing discrimination based on:
  - Age
  - Sexual Orientation
  - Marital Status
  - Military Status
  - Gender Identity
  - Creed
  - Source of Income
  - Arrest Record

Local Laws

- Both Nassau and Suffolk prohibit discrimination based on veteran status and gender identity/expression.
- Suffolk County prohibits discrimination against victims of domestic violence and group identity which includes actual or perceived age, alienage or citizenship status, gender, sexual orientation and military status.
- Nassau County includes ethnicity and first responders.

Community Reinvestment Act

- The Community Reinvestment Act (CRA), enacted in 1977, requires the Federal Reserve and other federal banking regulators to encourage financial institutions to assist with meeting the credit needs of their local communities including areas of including low and moderate income (LMI).
- This law applies to FDIC-insured depository institutions, such as national banks, savings associations and state-chartered commercial and savings banks.
- The lender is required to delineate assessment areas for meeting needs of community including economic and demographic data.
- Revitalize or Stabilize
  - Low and moderate income census tracts;
  - Designated disaster areas;
  - Distressed or underserved non-metropolitan census tracts;
  - Abandoned or Foreclosed Homes

Real Estate Settlement Procedures Act (RESPA, Regulation X) 1974

- RESPA requires the following protections:
  - Ensures borrowers are provided adequate and timely information regarding mortgage closing costs.
  - Protects borrowers against abusive practices, including excessive, unearned & duplicate fees.
  - When applying for a purchase mortgage, borrowers receive a special booklet which contains information about various real estate settlement services.
  - Provides disclosures about mortgage servicing.
  - Provides error resolution procedures.
  - Prohibition on kickbacks also referred to as referral fees.

Truth In Lending Act (TILA, Regulation Z) 1968

- Applies to consumer credit transactions extended by a creditor (residential mortgage lending)
- Requires disclosures of the:
  - Amount financed
  - Finance charge
  - Annual Percentage Rate
  - Payment Schedule
  - Total of Payments
  - Must include the number, amounts and timing of payments
- All TILA actions for damages must be brought within one year of the alleged violation. Actions for rescission based on improper material disclosure must be brought within three years after the date of consummation of the transaction.

Equal Credit Opportunity Act (ECOA)

- Prohibits discrimination in the provision of financing in all consumer lending transactions (car loans, mortgages, student loans etc.) on the basis of:
  - Race/Color
  - National Origin
  - Religion
  - Sex
  - Marital Status
  - Age
  - Receipt of Income from Public Assistance (includes Section 8 Housing Voucher Homeownership Program)
- The legislative history of the ECOA emphasizes, "[t]he availability of credit often determines an individual's effective range of social choice and influences such basic life matters as selection of occupation and housing". CFPB Bulletin 2012-04

Equal Credit Opportunity Act (ECOA)

- When issuing an ECOA evaluation, the CFPB will consider fair lending history and litigation against the entity.
  - Has the entity identified any fair lending risks and how are they addressing these risks?
  - What self-regulation policies has the lender instituted?
  - Are credit scoring models fair lending compliant?
  - Is criteria for underwriting standardized?

What Disclosures are Required?

- Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) as implemented by the CFPB.
- Loan Estimate (LE) replaced the Good Faith Estimate and the initial Truth-In-Lending disclosure effective 10/3/2015.
- Closing Disclosure (CD) replaced the HUD-1 and the final Truth-In-Lending disclosure effective 10/3/2015.
- Copy of Loan Application
- Copies of all Appraisals
- Mortgage Servicing Disclosure Statement
- Special Information Booklet

Closing Disclosure

This form is a statement of final loan terms and closing costs. Compare this document with your Loan Estimate.

Closing Information		Transaction Information		Loan Information	
Date Issued	4/15/2013	**Borrower**	Michael Jones and Mary Stone 123 Anywhere Street Anytown, ST 12345	**Loan Term**	30 years
Closing Date	4/15/2013			**Purpose**	Purchase
Disbursement Date	4/15/2013			**Product**	Fixed Rate
Settlement Agent	Epsilon Title Co.	**Seller**	Steve Cole and Amy Doe 321 Somewhere Drive Anytown, ST 12345		
File #	12-3456			**Loan Type**	☒ Conventional ☐ FHA ☐ VA ☐ ___________
Property	456 Somewhere Ave Anytown, ST 12345	**Lender**	Ficus Bank	**Loan ID #**	123456789
Sale Price	$180,000			**MIC #**	000654321

Loan Terms

Loan Terms		Can this amount increase after closing?
Loan Amount	$162,000	**NO**
Interest Rate	3.875%	**NO**
Monthly Principal & Interest *See Projected Payments below for your Estimated Total Monthly Payment*	$761.78	**NO**
		Does the loan have these features?
Prepayment Penalty		**YES** • **As high as $3,240** if you pay off the loan during the first 2 years
Balloon Payment		**NO**

Projected Payments

Payment Calculation	Years 1-7	Years 8-30
Principal & Interest	$761.78	$761.78
Mortgage Insurance	+ 82.35	+ —
Estimated Escrow *Amount can increase over time*	+ 206.13	+ 206.13
Estimated Total Monthly Payment	$1,050.26	$967.91

		This estimate includes	In escrow?
Estimated Taxes, Insurance & Assessments *Amount can increase over time* *See page 4 for details*	$356.13 a month	☒ Property Taxes	YES
		☒ Homeowner's Insurance	YES
		☒ Other: Homeowner's Association Dues	NO

See Escrow Account on page 4 for details. You must pay for other property costs separately.

Costs at Closing

Closing Costs	$9,712.10	Includes $4,694.05 in Loan Costs + $5,018.05 in Other Costs – $0 in Lender Credits. *See page 2 for details.*
Cash to Close	$14,147.26	Includes Closing Costs. *See Calculating Cash to Close on page 3 for details.*

Closing Cost Details

Loan Costs	Borrower-Paid At Closing	Borrower-Paid Before Closing	Seller-Paid At Closing	Seller-Paid Before Closing	Paid by Others
A. Origination Charges	**$1,802.00**				
01 0.25 % of Loan Amount (Points)	$405.00				
02 Application Fee	$300.00				
03 Underwriting Fee	$1,097.00				
04					
05					
06					
07					
08					
B. Services Borrower Did Not Shop For	**$236.55**				
01 Appraisal Fee to John Smith Appraisers Inc.					$405.00
02 Credit Report Fee to Information Inc.		$29.80			
03 Flood Determination Fee to Info Co.	$20.00				
04 Flood Monitoring Fee to Info Co.	$31.75				
05 Tax Monitoring Fee to Info Co.	$75.00				
06 Tax Status Research Fee to Info Co.	$80.00				
07					
08					
09					
10					
C. Services Borrower Did Shop For	**$2,655.50**				
01 Pest Inspection Fee to Pests Co.	$120.50				
02 Survey Fee to Surveys Co.	$85.00				
03 Title – Insurance Binder to Epsilon Title Co.	$650.00				
04 Title – Lender's Title Insurance to Epsilon Title Co.	$500.00				
05 Title – Settlement Agent Fee to Epsilon Title Co.	$500.00				
06 Title – Title Search to Epsilon Title Co.	$800.00				
07					
08					
D. TOTAL LOAN COSTS (Borrower-Paid)	**$4,694.05**				
Loan Costs Subtotals (A + B + C)	$4,664.25	$29.80			

Other Costs	Borrower-Paid At Closing	Borrower-Paid Before Closing	Seller-Paid At Closing	Seller-Paid Before Closing	Paid by Others
E. Taxes and Other Government Fees	**$85.00**				
01 Recording Fees Deed: $40.00 Mortgage: $45.00	$85.00				
02 Transfer Tax to Any State			$950.00		
F. Prepaids	**$2,120.80**				
01 Homeowner's Insurance Premium (12 mo.) to Insurance Co.	$1,209.96				
02 Mortgage Insurance Premium (mo.)					
03 Prepaid Interest ($17.44 per day from 4/15/13 to 5/1/13)	$279.04				
04 Property Taxes (6 mo.) to Any County USA	$631.80				
05					
G. Initial Escrow Payment at Closing	**$412.25**				
01 Homeowner's Insurance $100.83 per month for 2 mo.	$201.66				
02 Mortgage Insurance per month for mo.					
03 Property Taxes $105.30 per month for 2 mo.	$210.60				
04					
05					
06					
07					
08 Aggregate Adjustment	– 0.01				
H. Other	**$2,400.00**				
01 HOA Capital Contribution to HOA Acre Inc.	$500.00				
02 HOA Processing Fee to HOA Acre Inc.	$150.00				
03 Home Inspection Fee to Engineers Inc.	$750.00			$750.00	
04 Home Warranty Fee to XYZ Warranty Inc.			$450.00		
05 Real Estate Commission to Alpha Real Estate Broker			$5,700.00		
06 Real Estate Commission to Omega Real Estate Broker			$5,700.00		
07 Title – Owner's Title Insurance (optional) to Epsilon Title Co.	$1,000.00				
08					
I. TOTAL OTHER COSTS (Borrower-Paid)	**$5,018.05**				
Other Costs Subtotals (E + F + G + H)	$5,018.05				
J. TOTAL CLOSING COSTS (Borrower-Paid)	**$9,712.10**				
Closing Costs Subtotals (D + I)	$9,682.30	$29.80	$12,800.00	$750.00	$405.00
Lender Credits					

Enforcement

- "Proof of a pattern or practice of discrimination does not require a showing that race (or national origin, sex, and age) was the sole motive for the defendant's actions. Village of Arlington Heights v. Metropolitan Housing Development Corporation, 429 U.S. 252, 265-66 (1977). Rather, if any or all of these protected categories is a 'motivating factor' in the actions, illegal discrimination exists. Id. Proof of discriminatory intent requires a 'sensitive inquiry into such circumstantial and direct evidence of intent as may be available'."
  - Department of Justice Memorandum, "Identifying Lender Practices that may Form the Basis of a Pattern or Practice Referral to the Department of Justice"

What do we look for with Fair Lending Compliance?

- HMDA
- Products Offered
- Marketing
- Steering
- Redlining/Reverse Redlining
- Underwriting/Denials
- Pricing
- CRA reports

Home Mortgage Disclosure Act (HMDA)

- HMDA requires lending institutions to report mortgage data.
- This information is used to help:
  - Regulators and the public determine whether financial institutions are serving the housing needs of their communities and service areas.
  - Public officials in distributing public sector investments so as to attract private investment in areas where it is needed.
  - Non-profit fair housing enforcement agencies and regulators in identifying possible discriminatory lending patterns/practices.

HMDA Analysis

- Who is the consumer?
  - Race
  - National Origin
  - Income
  - Sex
  - Community
  - Financial Status

HMDA – Loan Types

- Conventional
  - A type of mortgage in which the underlying terms and conditions meet the funding criteria of Fannie Mae and Freddie Mac.
- FHA Loans
  - Offered to borrowers who are not able to get financing through a conventional loan. FHA loans have special terms relating to down payment requirements and debt-to-income ratios.
- VA Loans
  - Reserved for veterans and active members of the Armed Forces. There are special terms relating to down payment requirements and debt-to-income ratios.
- Prime v. Subprime Mortgages
  - Different terms depending on the level of risk that the borrowers pose to the lender

HMDA – Purchase

- Fixed Rate Mortgage
  - A mortgage with an interest rate that does not change for the life of the loan.
- Adjustable Rate Mortgage (ARM)
  - The interest rate will change at a specified time according to a published index such as the LIBOR index or the Treasury Index.
- Step/Graduated ARM
  - An interest rate that gradually increases during first few years, then remains fixed for the remainder of the loan.

HMDA - Refinance

- Refinance – Generally, paying off of the existing mortgage with a new mortgage with differing terms. Some choose to do a refinance to lower the interest rate or change from an ARM to a conventional fixed mortgage.
- Refinance with a cash out – taking out a mortgage on real property based upon the equity in the house. Equity is the value of the home minus the debt owed on the property.
- Home Equity Line of Credit – taking out a mortgage based upon the equity in the home for the purposes of home improvement.
- Is the appraisal being conducted in a non-discriminatory manner?

HMDA – Loan Costs

- Principle – Loan Amount borrowed from the lender.
- Annual Percentage Rate (APR)
  - What a loan costs expressed in a yearly interest rate. The APR includes the interest rate and other finance charges. It provides consumers with a good basis for comparing the costs of the mortgage.
- Private Mortgage Insurance/PMI or Mortgage Insurance Premium/MIP for FHA/VA Loans
  - Insurance purchased by a buyer to protect the lender in the event of default. Mortgage insurance is generally maintained until over 22 percent of the outstanding amount of the loan is paid or for a set period of time, seven years is typical. MIP lasts for the life of the loan and parties must refinance to remove the insurance.

HMDA – Closing Costs

- Closing Costs
  - Fees for purchasing the property not included in the purchase price of the property.
- Typical closing costs include:
  - Origination Fees
  - Discount points – a point is equal to 1% of the principal amount of the mortgage
  - Appraisal fee
  - Survey
  - Title Insurance which is inclusive of a fee policy and loan policy (protects the lender and owner against any claims that may arise over the ownership of the property and other lies on the property)
  - Attorney Fees (not disclosed in HMDA)
  - Prepayment of taxes and insurance, etc.

Forms of Lending Discrimination

- Disparate Treatment
  - Overt Discrimination
  - Redlining
  - Reverse Redlining
- Disparate Impact

Disparate Treatment

- The treatment of a borrower by a lender, servicer or mortgage broker in a manner that differs from their peers based on a protected class.
- The existence of illegal disparate treatment may be established either by statements revealing that a lender explicitly considered prohibited factors (overt evidence) or by differences in treatment that are not fully explained by legitimate nondiscriminatory factors (comparative evidence).
- While overt comments that express a discriminatory intent do occur, most discrimination is done with a 'shake and a smile'. As such, we must rely on HMDA and testing to determine if discrimination is occurring.

Disparate Impact

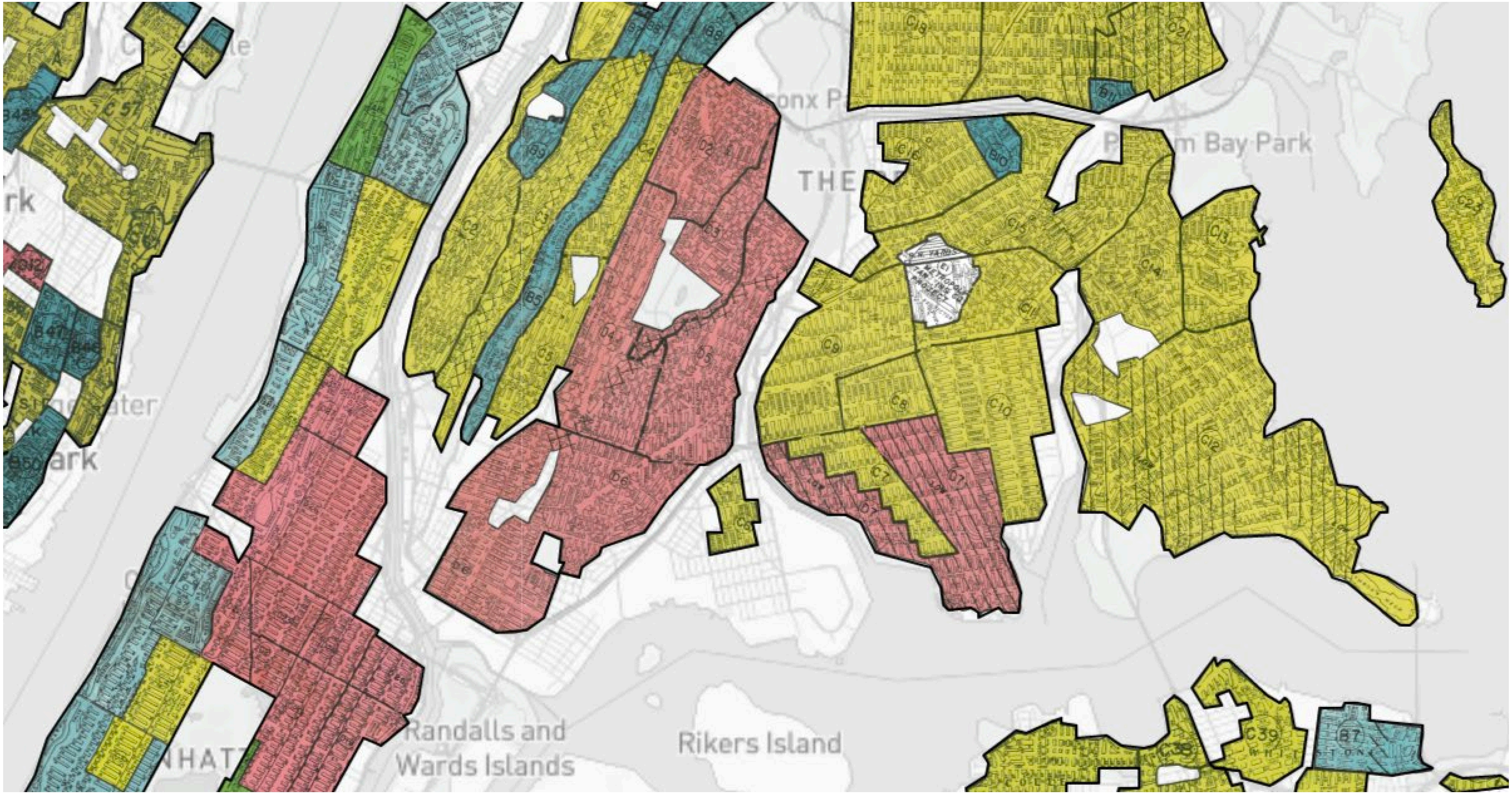
- When a lender applies a racially or otherwise neutral policy or practice equally to all credit applicants, but the policy or practice disproportionately excludes or burdens certain persons on a prohibited basis, the policy or practice is described as having a "disparate impact."
- Does the policy or business practice not have a legitimate financial reason or less discriminatory alternative?
  - Examples: Lenders are permitted to deny loans based on poor credit, even if a particular community of persons has an overall lower credit score than their counterparts. However, a lender may not have an underwriting guidelines that refuses to lend to certain communities of color because there are higher rates of foreclosures in those communities.
- Justification as a 'business necessity'.

Redlining

- A form of illegal disparate treatment in which a lender provides unequal access to credit, or unequal terms of credit, because of the race, color, national origin, or other prohibited characteristic(s) of the residents of the area in which the credit seeker resides or will reside or in which the residential property to be mortgaged is located. Redlining may violate both the FHA and ECOA.
- Branch locations
- Purchases and Refinances
- Marketing

Redlining

- The term redlining dates back to the 1930s when the government first started guaranteeing home loans for the American people and subsidizing builders that were creating large housing developments. While the government was able to drastically increase the rate of homeownership for white citizens, it did not offer the same opportunities for black citizens.
- The Home Owners Loan Corp. and eventually the FHA began analyzing different communities to make determinations about what would be safe investments and risky investments. The agencies would draw red lines on maps around communities that they determined to be risky investments and most of those communities were minority majority communities.
- Mixed neighborhoods were considered risky as well with the best investments being deemed as white majority neighborhoods.


Randalls and
Wards Islands
Rikers Island

Reverse Redlining

- Targeting of residents within certain geographic boundaries, often based on race, income or ethnicity and giving those targeted borrowers credit on unfair terms.
- Reverse redlining often includes the use of subprime loans targeted at specific locations resulting in borrowers being unable to build equity at the rate of their white counterparts due to the higher loan costs over the life of the line.
- Some of the loan products are so costly to borrowers, it results in higher foreclosure rates and ghost homes in the community. This results in lower home values.
- Reverse redlining creates blight in the community.

Steering

- Encouraging an applicant to apply for certain loans products that are more expensive or do not have the benefits of a conventional loan.
- Are there products that are geared to assisting low income communities?
- Withdrawal or rejection rates by applicants
- Which loan products are the most expensive over the life of the loan? Prime v. subprime loans.
- How are loan officers being compensated?

Marketing

- “Advertising patterns or practices that a reasonable person would believe indicate prohibited basis customers are less desirable.
- Advertising only in media serving non-minority areas of the market.
- Marketing through brokers or other agents that the institution knows (or has reason to know) would serve only one racial or ethnic group in the market.
- Use of marketing programs or procedures for residential loan products that exclude one or more regions or geographies within the institutions assessment or marketing area that have significantly higher percentages of minority group residents than does the remainder of the assessment or marketing area.
- Proportion of prohibited basis applicants is significantly lower than that group's representation in the total population of the market area.”

FFIEC’s **Interagency Fair Lending Examination Procedures**

Marketing

- HUD v. Facebook (2019)
- "Facebook's advertisement delivery practices determine which users will actually see a particular advertisement, regardless of the advertisers' own preferences, and using user data that include sex and close proxies for other protected characteristics…"
- "The company engages in price discrimination by varying advertisement pricing based on the audience for each advertisement, using user data that include sex and close proxies for other protected characteristics…"
- "[E]xample(s) to exclude "women in the workforce," "moms of grade school kids," "foreigners," "Puerto Rico Islanders," or people interested in "parenting," "accessibility," "service animal," "Hijab Fashion," or "Hispanic Culture." Respondent also has offered advertisers the ability to limit the audience of an ad by selecting to include only those classified as, for example, "Christian" or "Childfree."
- Source: Press Release, HUD, HUD Files Housing Discrimination Complaint Against Facebook (August 17, 2018). & HUD Discimination Charge FHEO 01-18-0323-8

Underwriting Risks

By maintaining the white person denial rate as the control, we can compare denial rates for minorities as against a white applicant.

Reasons for denials that have fair lending implications:

- Collateral – Are surveyors fairly determining the value of a home? Is the value of the home affected by the owners of the home or the community in which the home is located?
- Credit Denials – Are applicants being coached how to increase their credit scores? Are all applicants given an opportunity to remedy so that they may qualify?
- Debt to income ratios – Are monthly debts being calculated in the same manner for all applicants? Are applicants being encouraged to borrow FHA with greater allowances for debt ratios rather than coaching about paying off debts in exchange for a cheaper loan product?

Pricing

- We compare short term and long term costs of borrowing.
  - Interest Rates
  - Loan Amount
  - Loan Type
  - Closing Costs
  - Appraisal Fees
  - Discount Points
  - PMI/MIP
  - Origination Fees
  - Risk Based Pricing

Effects of Fair Lending Violations

- Segregation of entire Communities
- Decreased homeownership for minority communities
- Subprime loans, adjustable rate loans and expensive loan products
- Foreclosure Rates
- Mitigation Efforts
- Communities without Lending Opportunities or Banks
- Greater Wealth Gap

Segregation

- “Men and women of all races are born with the same range of abilities. But ability is not just the product of birth. Ability is stretched or stunted by the family that you live with, and the neighborhood you live in—by the school you go to and the poverty or the richness of your surroundings. It is the product of a hundred unseen forces playing upon the little infant, the child, and finally the man.”

President Lyndon B. Johnson

Commencement Address at Howard University

June 4, 1965

Statistics - Segregation

- "Half of Long Island's black population lives in just 11 of the Island's 291 communities, and 90 percent lives in just 62 of them, according to 2017 census estimates."
- "Nassau County is ranked as America's most segregated county among those with 1.2 million-1.6 million residents, according to data from the 2010 census…"
- "The student bodies of 47 of Nassau's 56 school districts were less than 10 percent black in 1976. The proportion of black students has risen above 10 percent in only nine of them. As a result, districts are more segregated than they were four decades ago."
- "ERASE Racism advocacy group concluded in 2004 that "racial isolation is the norm for Long Island's residential neighborhoods and racially separate and unequal is the norm for Long Island's public schools."
- All information sourced from Newsday, Long Island Divided Part 10 (Nov. 2019)

Statistics - Homeownership

- According to 2020 data from the Home Mortgage Disclosure Act, lenders deny mortgages for Black applicants at a rate 80% higher than that of White applicants. Source: Zillow
- In 2005, before the housing crisis, the median net worth of Black households was $12,124, compared to White households who have a median net worth of $134,992. By 2009, the net worth of Black households had fallen to $5,677, and the median net worth of White families had dropped to $113,149. Source: Wealth Gaps Rise to Record Highs Between Whites, Blacks, Hispanics. Pew Research Center.
- "White working-class families who bought those homes [Levittown] in 1948 have gained, over three generations, more than $200,000 in wealth," he wrote. Source: THE COLOR OF LAW: A FORGOTTEN HISTORY OF HOW OUR GOVERNMENT SEGREGATED AMERICA by Richard Rothstein. Copyright © 2017 by Richard Rothstein.

Statistics - Costs of Homeownership

- Between 2004 and 2007, Hispanic Americans and Black Americans were 78% and 105% more likely than White Americans to have a high-cost mortgage, respectively, according to data from the National Bureau of Economic Research.
- Black and Hispanic households today are still far less likely than white households to own their own homes (41.3% and 47%, respectively, versus 71.9% for whites), and the homeownership gap between blacks and whites has widened since 2004.
- In 2015, fewer than 66% of black and Hispanic homeowners had mortgage rates below 5%, compared with 73% of white homeowners and 83% of Asian householders. By contrast, 23% of black homeowners and 18% of Hispanic homeowners with mortgages were paying 6% or more on their home loans, compared with 13% of white homeowners and just 6% of Asian homeowners.
- Source: Pew Research Center, Blacks and Hispanics face extra challenges in getting home loans (Jan. 2017).

Statistics - Foreclosure

- [A] disproportionate number of Black and Brown families [were] negatively impacted by the 2007-2010 housing crisis. During this time, nearly 8% of Black American and Latino families lost their homes due to foreclosure, compared to 4.5% of White families.
- In the first half of 2012, there were 17,119 90 day notices filed in Nassau County. 15 of 66 zip codes in Nassau County accounted for 53.7% of all the notices.
  - 74.5% of all of Nassau County's Black and Hispanic homeowners reside in those 15 zip codes as opposed to only 26.8% white.
- Top 6 zip codes affected by foreclosure are also the top six zip codes with highest minority population.

Source – Empire Justice Center, "The Long Island Foreclosure Crisis" (April 2013)

Requirements for Lenders

- Cannot overtly discriminate or MAKE A COMMENT of overt discrimination. This applies even if the comment is never acted upon.
  - Example: "We would rather not lend to persons who are immigrants, but the law says we have to, so we do."

- All treatment must be equal.
  - Example: A non-minority couple applied for a house loan. The lender found adverse information in the couple's credit report. The lender discussed the credit report with them and determined that the adverse information, a judgment against the couple, was incorrect because the judgment had been vacated. The non-minority couple was granted their loan. The lender denied the minority couple on the basis of the adverse information without giving the couple an opportunity to discuss the report.

Requirements for Lenders

- Lenders may not:
  - Fail to provide information or services or provide different information or services regarding any aspect of the lending process, including credit availability, application procedures, or lending standards.
  - Discourage or selectively encourage applicants with respect to inquiries about applications for credit.
  - Refuse to extend credit or use different standards in determining whether to extend credit based on protected classes.
  - Vary of the terms of credit offered, including the amount, interest rate, duration or type of loan based on protected classes.
  - Use different standards to evaluate collateral.

What can Consumers do to protect themselves?

- Contact your local HUD housing counselors
- Shop around
- Do your research
- Check reviews and ratings of any lending institutions

If you feel that you have been discriminated against in obtaining housing, please contact Long Island Housing Services, Inc.

631-567-5111 Ext. 375 · info@lifairhousing.org