

April 15, 2025

Fair Lending: You Ran the Analysis, Now What?

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You Ran the Analysis, Now What?

Monitoring/ Analysis	What Next?	
Redlining (insufficient activity in MMCTs)	<ul style="list-style-type: none"> • Marketing • Outreach efforts • Market area per loan policy 	<ul style="list-style-type: none"> • Contact loan officers to find out possible relationships • Locations
REMA (significant lending activity outside the AA)	<ul style="list-style-type: none"> • Marketing • Outreach efforts • Market area per loan policy 	<ul style="list-style-type: none"> • Contact loan officers to find out possible relationships • Locations
Exceptions (increased # of pricing and credit)	<ul style="list-style-type: none"> • Review by type and loan product • Review loan policy, underwriting and pricing guidelines 	<ul style="list-style-type: none"> • Discuss with Sr. Mgmt. • Approved reasons for the exceptions
Disparity Analysis (disparities in pricing and/or underwriting)	<ul style="list-style-type: none"> • Regression analysis, if enough volume 	<ul style="list-style-type: none"> • Comparative file review • Review loan policy, underwriting and pricing guidelines
Comparative File Review	<ul style="list-style-type: none"> • Review loan policy, underwriting and pricing guidelines 	<ul style="list-style-type: none"> • Discuss with Sr. Mgmt. • Contact legal counsel

CONTACTS



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