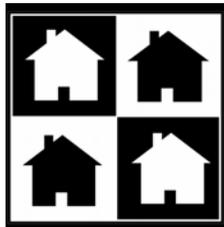


Racial and Ethnic Disparities in Ohio Mortgage Lending

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About the Housing Research & Advocacy Center

The Housing Research & Advocacy Center (the “Housing Center”) is a 501(c)(3) non-profit organization whose mission is to eliminate housing discrimination and assure choice in Northeast Ohio by providing those at risk with effective information, intervention, and advocacy. The Housing Center was founded in 1983 as the Metropolitan Strategy Group and changed its name in 2003.

The Housing Center works to achieve its mission through work in three primary areas: research and mapping, education and outreach, and enforcement of fair housing laws through testing and litigation. In addition to addressing traditional issues of housing discrimination and segregation, the Housing Center also provides research, education, and analysis of subprime and predatory lending practices and trends in the region.

Executive Summary

This report examines mortgage lending applications and originations for the State of Ohio and its seven largest metropolitan statistical areas (MSAs) – the Akron, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown MSAs – to determine if there are racial and/or ethnic disparities in who is denied mortgage loans and, for those who obtain loans, who receives “high-cost” loans.¹

The data reveal disparities in mortgage lending based on both race and ethnicity. Moreover, an examination of the income levels of applicants reveals that these disparities exist regardless of income.

Statewide, *upper income* African Americans were denied home purchase loans 25.20% of the time, compared to a 27.30% denial rate for *low income* whites. For refinance loans, *upper income* African Americans were denied loans 44.97% of the time, compared to a 46.70% denial rate for *low income* whites.

The Cleveland MSA stands out for the strength of the racial disparity for home purchase loans: upper income African Americans were denied home purchase loans 30.26% of the time, whereas low income whites were denied only 21.23% of the time. For refinance loans, the greatest disparity was in the Akron MSA, where 47.20% of upper income African Americans were denied refinance loans compared to 44.93% of low income whites.

The fact that upper income African Americans were denied loans at nearly the same rate – and sometimes at higher rates – as low income whites provides evidence of possible illegal discrimination in the mortgage market and gives rise to concerns that African Americans are not obtaining access to mortgage lending on the same basis as whites.

High-cost lending revealed similar disparities. Statewide, African Americans obtained high-cost home purchase loans at more than two and one-half times the rate of whites, while Hispanics/Latinos obtained them at one and two-thirds the rate of whites. African Americans obtained high-cost refinance loans at nearly twice the rate of whites, while Hispanics/Latinos obtained them at one and one-third the rate of whites.

African Americans at every income level received more high-cost loans than whites at every income level. Statewide, upper income African Americans received high-cost home purchase loans 47.51% of the time, compared to 28.50% of the time for low income whites. For refinance loans, upper income African Americans received high-cost loans 44.80% of the time in Ohio, compared to 35.02% of the time for low income whites.

¹ “High-cost” loans have interest rates of at least 3% (or, for second-lien mortgages, 5%) above the rate on Treasury securities of comparable maturity. See footnote 10, below.

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The rates of high-cost loans for Hispanics/Latinos were typically between those for African Americans and whites. Upper income Latinos receive high-cost loans 25.00% of the time for home purchase loans and 35.02% of the time for refinance loans.

Asians had the lowest rate of high-cost loans for all groups studied; 9.54% of home purchase loans in the state among upper income Asians were high cost, compared to 12.46% of refinance loans for upper income Asians.

The racial disparity in high-cost loans was greatest for home purchase loans in the Cleveland MSA, where 58.69% of upper income African Americans received high-cost loans, compared to 13.39% of upper income whites and 23.40% of low income whites.

For refinance loans, the racial disparity was greatest in the Toledo MSA, where 50.70% of upper income African Americans received high-cost loans, compared with 21.83% of upper income whites and 38.36% of low income whites.

The results of the analysis of mortgage lending presented in this report show a disturbing pattern: African Americans were denied mortgage loans at greatly disproportionate rates compared to whites and, when they obtained such loans, they wound up receiving high-cost loans much more often than whites. In addition, Hispanics/Latinos were denied mortgage loans and obtained high-cost loans at greater rates than whites, although not at rates as high as African Americans. This data raises great concerns that African Americans and Hispanics/Latinos are not obtaining equal access to the mortgage lending market in Ohio compared to whites.

Introduction

Historically, many lending institutions engaged in discrimination against racial and ethnic minorities and in “redlining,” in which individuals living in minority neighborhoods were denied access to mortgage credit.² Although discrimination in mortgage lending and redlining were made illegal by the Fair Housing Act in 1968 and are also prohibited by Ohio law,³ many recent studies have found continuing racial disparities in mortgage lending based on race.⁴

In order to assess whether such disparities continue to exist in Ohio, the Housing Center analyzed 2005 mortgage lending data (the most recent available) for the State of Ohio and its seven largest metropolitan statistical areas – the Akron, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown MSAs.⁵

This report focuses on two aspects of the 2005 Home Mortgage Disclosure Act (HMDA) data: loan denial rates and “high-cost” lending rates based on race, ethnicity, and income.⁶ These two measures were selected to examine if there were racial and/or ethnic disparities in who was denied loans and, for those who actually received loans, who received high-cost loans. Denial rates are important in determining whether individuals of different races have fair access to credit in order to purchase a home or to refinance their mortgage. High-cost lending rates provide further evidence of possible biases in the lending industry for those individuals who are approved for loans. Loans made for home purchases and refinancing were examined separately to determine if there were any significant differences between the two groups.

² See, e.g., HUD Preamble I, 53 Fed. Reg. 44998 (Nov. 7, 1988).

³ 42 U.S.C. Sec. 3605; O.R.C. Sec. 4112.02(H)(3).

⁴ See, e.g., Fishbein, Allen J. and Patrick Woodall, “Supreme Locations: Patterns of Geographic Disparity in Subprime Lending,” Consumer Federation of America, September 5, 2006, p. 1; Bocian, Debbie Gruenstein, Keith S. Ernst & Wei Li, “Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages,” Center for Responsible Lending, May 31, 2006, p. 3; Munnell, Alicia H., et al., “Mortgage Lending in Boston: Interpreting the HMDA Data,” Federal Reserve Bank of Boston Working Paper No. 92-7 (1992).

⁵ The boundaries of the Cincinnati and Youngstown MSAs include non-Ohio counties. For purposes of this report, we examined only the Ohio counties of those MSAs. The counties examined for each MSA in this report are: Akron MSA: Portage and Summit Counties; Cincinnati MSA: Brown, Butler, Clermont, Hamilton, and Warren Counties; Cleveland MSA: Cuyahoga, Geauga, Lake, Lorain, and Medina Counties; Columbus MSA: Delaware, Fairfield, Franklin, Licking, Madison, Morrow, Pickaway, and Union Counties; Dayton MSA: Greene, Miami, Montgomery, and Preble Counties; Toledo MSA: Fulton, Lucas, Ottawa, and Wood Counties; Youngstown MSA: Mahoning and Trumble Counties.

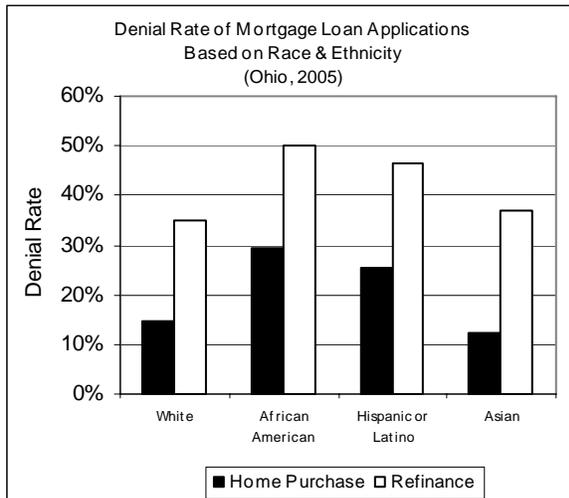
⁶ For purposes of this report, we examined the following racial and ethnic categories: African Americans, Asians, Hispanics/Latinos, and non-Hispanic whites. For ease of reading, in this report we refer to “non-Hispanic whites” as “whites.” Because of the relatively small numbers of applications submitted by American Indians/Alaska Natives and Native Hawaiians/Other Pacific Islanders in the areas studied, these categories were not included. In addition, this report does not examine HMDA data on individuals who listed two or more races or ethnicities or for whom racial and ethnic data is not available.

Loan Denial Rates

In order to examine whether there were disparities in the availability of mortgage credit among different racial and ethnic groups, the Housing Center examined 2005 loan denial rates for the State of Ohio as well as its seven largest Metropolitan Statistical Areas.⁷ Denial rates are commonly used as one factor to determine if certain groups are being afforded adequate access to credit.

Statewide, African Americans were denied home purchase loans 29.56% of the time, compared to 25.33% for Hispanics/Latinos, 14.53% for whites, and 12.23% for Asians. For refinance loans, African Americans were denied loans 50.16% of the time, compared to 46.43% of the time for Hispanics/Latinos, 36.84% for Asians, and 35.13% for whites (see Figure 1).⁸

Figure 1



Source: 2005 HMDA data.

The Housing Center further examined denial rates based on race and income, comparing denial rates for African Americans and whites in two income groups: low income, which consists of individuals with income less than 50% of the median income in the MSA, and upper income, which represents individuals with income greater than 120% of the median income. By adding income to the analysis, the Housing Center attempted to control for some of the borrower characteristics that could explain the discrepancies in high-cost loan rates based on race and ethnicity.

It is expected that upper income individuals would have lower denial rates for mortgage lending than low income individuals. This expected pattern is found when one examines denial rates within racial groups for both home purchase and refinance loans: low income whites were denied

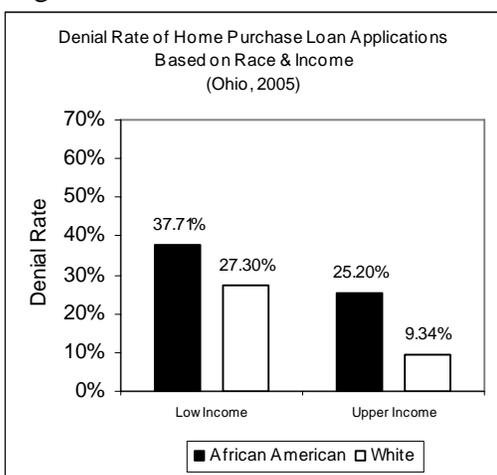
⁷ HMDA data list several dispositions for loan applications: loan originated, approved by not accepted (by the borrower), denied, withdrawn, file closed for incompleteness. Denial rates were calculated by dividing the number of loan applications denied by the sum of the number of applications originated, the number of applications approved but not accepted, and the number of applications denied.

⁸ These results are consistent with nationwide trends. A study published by the Federal Reserve found that nationwide, African Americans and Hispanics had higher denial rates than non-Hispanic whites for all loan product categories. Of these three groups, African Americans had the highest rates and Hispanics had rates about halfway between those for African Americans and those for non-Hispanic whites. Avery, Robert B., Kenneth P. Brevoort, and Glenn B. Canner, "Higher-Priced Home Lending and the 2005 HMDA Data," *Federal Reserve Bulletin* (2006), at A161.

loans at higher rates than upper income whites, and low income African Americans had higher denial rates than upper income African Americans.

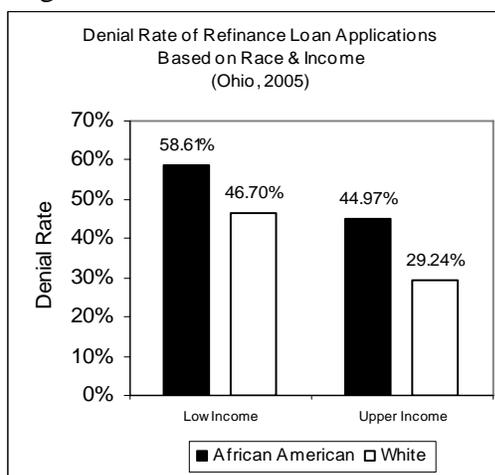
However, when one examines income and denial rates *between* racial groups, the results show that African Americans were denied loans at disproportionate rates. Statewide, *upper income* African Americans were denied home purchase loans 25.20% of the time, compared to a 27.30% denial rate for *low income* whites (see Figure 2). For refinance loans, *upper income* African Americans were denied loans 44.97% of the time, compared to a 46.70% denial rate for *low income* whites (see Figure 3).

Figure 2



Source: 2005 HMDA data.

Figure 3



Source: 2005 HMDA data.

The fact that upper income African Americans were denied loans at nearly the same rate as low income whites provides evidence of possible illegal discrimination in the mortgage market and gives rise to concerns that African Americans are not obtaining access to mortgage lending on the same basis as whites.

Moreover, in a number of communities, upper income African Americans were denied loans at a *higher* rate than low income whites. In both the Cleveland and Dayton MSAs, this racial disparity existed for both home purchase and refinancing loans. In the Akron, Columbus, and Toledo MSAs, the disparity existed for refinancing loans but not for home purchase loans, while in the Youngstown MSA the disparity existed for home purchase loans but not for refinance loans.⁹

The Cleveland MSA stands out for the strength of the racial disparity for home purchase loans: upper income African Americans were denied home purchase loans 30.26% of the time, whereas

⁹ Lending data for the State of Ohio and each of the seven MSAs studied in this report are presented in the Appendix.

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low income whites were denied only 21.23% of the time. For refinancing loans, the greatest disparity was in the Akron MSA, where 47.20% of upper income African Americans were denied refinance loans compared to 44.93% of low income whites.

The fact that African Americans were denied loans at greatly disproportionate rates compared to whites, regardless of income, gives rise to concerns that the mortgage lending industry is not providing access to credit on an equal basis to all racial groups. Likewise, the denial rates for Hispanics/Latinos, while not as high as those for African Americans, also raise concern about access to credit for this group as well.

Rates of High-Cost Lending

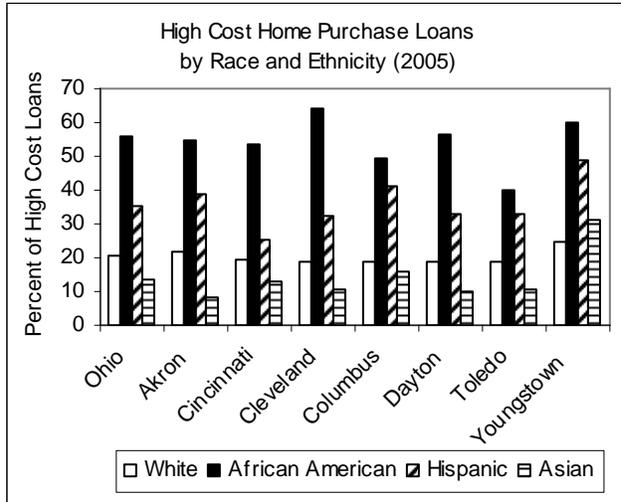
The rates of high-cost lending were examined to determine whether certain racial and ethnic groups were receiving disproportionately more high-cost loans than other groups.¹⁰ While disparities in high-cost lending by themselves are not proof of illegal discrimination, they represent a “useful screen” for determining where further investigation is necessary.¹¹

Statewide, an average of 56.03% of home purchase loans obtained by African Americans had high interest rates, compared to 35.02% for Hispanics/Latinos, 20.83% for whites, and 13.28% for Asians. This means that in Ohio, African Americans obtained high-cost home purchase loans at more than two and one-half times the rate of whites, while Hispanics/Latinos obtained them at one and two-thirds the rate of whites.

¹⁰ The term “high-cost lending” refers to mortgage loans in which the annual percentage rate (APR) is more than 3% (or, for second-lien mortgages, 5%) above the rate on Treasury securities of comparable maturity. This rate was chosen by the Federal Reserve Board for all HMDA-reporting lenders as the threshold for lenders to report certain pricing information about their mortgage loans to the federal government beginning with the 2004 HMDA submissions. The Federal Reserve Board has indicated that it chose the 3% and 5% thresholds in the belief that it would exclude the vast majority of prime-rate loans and include the vast majority of subprime-rate loans. Federal Reserve Board, “Frequently Asked Questions About the New HMDA Data,” p.4, available at <http://www.federalreserve.gov/boarddocs/Press/bcreg/2006/20060403/attachment.pdf>.

¹¹ FFIEC, “Frequently Asked Questions About the New HMDA Data,” April 3, 2006, at 5, available at <http://www.federalreserve.gov/boarddocs/press/bcreg/2006/20060403/attachment.pdf>.

Figure 4



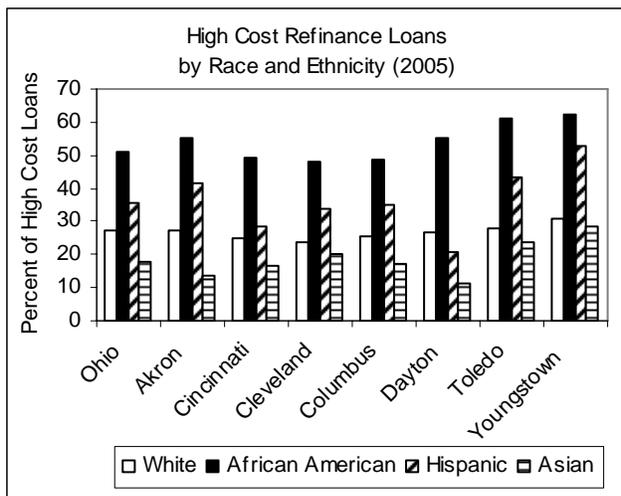
Source: 2005 HMDA data.

The greatest incidence of high-cost home purchase lending for African Americans occurred in the Cleveland MSA, where 64.4% of all loans obtained by African Americans were high-cost. For all other racial and ethnic groups, the Youngstown MSA had the greatest incidence of high-cost home purchase lending, which compromised 49.00% of all loans for Hispanics/Latinos, 24.75% of loans for whites, and 31.25% of loans for Asians (see Figure 4).

The lowest incidence of high-cost home purchase lending for both African Americans and whites occurred in the Toledo MSA, where 39.74% and 18.59%,

respectively, of such loans were high-cost. For Hispanics/Latinos, the lowest rate occurred in the Cincinnati MSA, where 25.12% were high-cost; and for Asians, the lowest rate occurred in Akron, where 8.37% were high-cost.

Figure 5



Source: 2005 HMDA data.

The rates for high-cost refinance lending showed similar racial and ethnic disparities. Statewide, 53.83% of African Americans received high-cost refinance loans, compared to 35.80% of Hispanics/Latinos, 27.03% of whites, and 17.84% of Asians. This means that statewide, African Americans obtained high-cost refinance loans at nearly twice the rate of whites, while Hispanics/Latinos obtained them at one and one-third the rate of whites.

The greatest incidence of high-cost refinance lending for all racial and ethnic groups occurred in the Youngstown MSA, where 62.09% of African Americans, 52.87% of Hispanics/Latinos, 30.72% of whites, and 28.57% of Asians received such loans (see Figure 5).

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The lowest incidence of high-cost refinance lending for African Americans and whites were in the Cleveland MSA, where 48.26% and 23.66%, respectively, of loans were high-cost. For Hispanics/Latinos and Asians, the lowest incidence of high-cost lending was in the Dayton MSA, where 20.93% and 11.01%, respectively, of loans were high-cost.

In addition to looking at the incidence of high-cost lending by racial and ethnic group, the Housing Center also examined high-cost lending for different income groups within and between racial and ethnic groups. The purpose of this second stage of the research was to determine if income could explain the variance in types of loans received. That is, because whites as a group have higher incomes than African Americans as a group, do these differences account for the overall racial and ethnic disparities in high-cost lending.

In examining high-cost lending rates based on income and race/ethnicity, these racial and ethnic disparities are still present. African Americans at every income level received more high-cost loans than whites at every income level. Statewide, upper income African Americans received high-cost home purchase loans 47.51% of the time, compared to 28.50% of the time for low income whites. For refinance loans, upper income African Americans received high-cost loans 44.80% of the time in Ohio, compared to 35.02% of the time for low income whites.

Hispanics/Latinos typically received more high-cost loans than whites but fewer than African Americans. Upper income Latinos receive high-cost loans 25.00% of the time for home purchase loans and 35.02% of the time for refinance loans.

Asians had the lowest incidence of high-cost lending for all groups studied: 9.54% of home purchase loans in the state among upper income Asians were high cost, compared to 12.46% of refinance loans for upper income Asians.

The racial disparity in high-cost home purchase loans was greatest in the Cleveland MSA, where 58.69% of upper income African Americans received high-cost loans, compared to 13.39% of upper income whites and 23.40% of low income whites. For refinance loans, the racial disparity was greatest in the Toledo MSA, where 50.70% of upper income African Americans received high-cost loans, compared with 21.83% of upper income whites and 38.36% of low income whites.

The fact that African Americans at every income level had such large numbers of high-cost loans compared to low income whites is greatly disturbing, providing further evidence of possible racial discrimination.

These findings by the Housing Center are consistent with other national and regional studies that have identified racial and ethnic disparities in mortgage lending. For example, a report published by the Federal Reserve noted that the 2005 HMDA data “indicate[s] that black and Hispanic borrowers are more likely, and Asians [sic] borrowers less likely, to obtain loans with prices

above the pricing thresholds than are non-Hispanic white borrowers.”¹² While the report stated that some of this disparity could be explained for by “borrower-related factors” (wealth or credit history, for example) or the individual lender chosen, it also noted that not all of the discrepancy is explained by such variables.¹³

A recent study by the Consumer Federation of America that examined a sample of the 2005 HMDA data also found that African American and Hispanic/Latino homeowners were more likely to receive higher-priced refinance loans than other racial and ethnic groups.¹⁴ In addition, a December 2005 report published by the Joint Center for Housing Studies at Harvard University found that high-cost lenders disproportionately target minority, and especially African American, borrowers and neighborhoods.¹⁵

Conclusions and Recommendations

The results of the analysis of mortgage lending presented in this report reveal a disturbing pattern: African Americans were denied mortgage loans at greatly disproportionate rates compared to whites and, when they obtained such loans, wound up in high-cost loans much more often than whites. The fact that upper income African Americans were denied loans at nearly the same rate as low income whites, and that upper income African Americans obtained more high-cost loans than low income whites, provides disturbing evidence of continuing racial disparities in the lending industry. This report further documented that Hispanics/Latinos were denied mortgage loans and obtain high-cost loans at greater rates than whites, although not at rates as high as African Americans.

While this evidence reveals a clear picture of racial and ethnic disparities in mortgage lending, it is not possible to definitively conclude that all of this disparity is due to illegal discrimination based solely on HMDA data. Some of the discrepancy could be due to other factors, such as differences in wealth, credit scores, the loan-to-value (LTV) and debt-to-income (DTI) ratios of borrowers, as well as to borrowers approaching different lenders.

However, other research has found that, while these other factors may account for some of the racial and ethnic disparities, they do not account for it all. For example, in a report released in May 2006, the Center for Responsible Lending combined HMDA data with credit information from a proprietary database. The report concluded that even controlling for legitimate risk factors (such as credit scores of borrowers, loan-to-value ratios, and other underwriting factors), African American and Hispanic/Latino borrowers are more likely to receive high-cost loans than

¹² Avery, *et al.*, at A159.

¹³ Avery, *et al.*, at A159.

¹⁴ Fishbein, Allen J. and Patrick Woodall, “Suprime Locations: Patterns of Geographic Disparity in Subprime Lending,” Consumer Federation of America, September 5, 2006, p. 1.

¹⁵ Apgar, Willaim C. and Allegra Calder, “The Dual Mortgage Market: The Persistence of Discrimination in Mortgage Lending,” December 2005, W05-11, p. 2.

white borrowers.¹⁶

More importantly, even if some of the disparity is accounted for by these other factors, there is strong evidence that differences in wealth, credit history, and other similar factors are themselves the product of historic and current racial discrimination. The fact that whites have greater wealth than African Americans and Hispanics/Latinos is due in large part to homeownership rates, both current and in the property that has been passed down over one or more generations. These differences in homeownership rates were (and still are) impacted by racial discrimination in home ownership and lending, which, until the passage of the Fair Housing Act in 1968, was legal in much of the country. Similarly, credit scores and income are impacted by levels and quality of education, which are also to a large degree a product of where people live.

To argue that the racial disparities that exist in mortgage lending can be explained by underwriting guidelines or other such “borrower characteristics” is simply an admission that our society has produced great inequalities in these areas based on race and that we will continue to tolerate such inequity. Rather than reaching for such excuses, the Housing Center believes that we must address not only current racial disparities and illegal discrimination in mortgage lending but also develop remedies to address the lingering effects of past discrimination.

Based on the conclusions found in this report, we recommend:

1. Increasing investigations of mortgage lenders to ensure that they are adequately complying with the Fair Housing Act and other anti-discrimination statutes to provide loans on a non-discriminatory manner. In the fall of 2005, the Federal Reserve Board identified approximately 200 lending institutions for review by federal regulators to determine if they were discriminating against minorities by charging them higher rates.¹⁷ To date, no further information has been released on any of these investigations, including even identifying the lenders under investigation. The Housing Center strongly urges federal, state, and local regulatory agencies and departments to undertake thorough investigations of mortgage lenders to ensure that they are complying with all applicable anti-discrimination laws.
2. Strengthen HMDA disclosure requirements to require the release of data regarding credit scores, LTV and DTI ratios, and other information, in order to better assess lenders’ compliance with anti-discrimination laws. Although lenders point to such credit-related factors as potential explanations for disparities in denial rates and high-cost lending rates, these same lenders have argued strenuously against the release of data that could either support or disprove these contentions, in essence telling

¹⁶ Bocian, Debbie Gruenstein, Keith S. Ernst & Wei Li, “Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages,” Center for Responsible Lending, May 31, 2006, p. 3.

¹⁷ Downey, Kirstin, “Mortgage Lenders Analyzed for Bias: Action Could Lead to Broader Probe,” *Washington Post*, October 1, 2005, D-1.

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consumers to “trust us.” Given the history of lending discrimination in our country, it is important that accurate, objective information be released, both to allow individuals and regulators to address institutions that are engaging in illegal discrimination as well as to support those institutions that are not engaging in such practices and are making credit available in responsible ways to all members of the community.

3. Amending the Community Reinvestment Act (CRA) to ensure that all depository institutions are meeting the credit needs of all communities, including not only low and moderate income borrowers and neighborhoods but also minority borrowers and neighborhoods.
4. Developing creative mechanisms that ensure that African Americans, and other racial and ethnic minorities, are not penalized in the mortgage underwriting process, through the use of credit scores, credit histories, and other screening tools, that themselves reflect and reproduce historic racial and ethnic discrimination.

Appendix – Data Sources & Tables

This report used mortgage lending data provided by lenders to the federal government under the Home Mortgage Disclosure Act (HMDA), 12 U.S.C. §2801, *et seq.* This statute requires most mortgage lenders – including banks, savings and loan associations, credit unions, and mortgage and consumer finance companies – located in metropolitan areas to report certain data regarding their loans to the federal government and members of the public.

Lenders without offices in metropolitan areas and/or who originate or accept fewer than five applications in metropolitan areas are exempt from the HMDA reporting requirements.¹⁸ Lenders with small assets size are not required to report data for the following year.¹⁹ Lenders who are covered by the HMDA reporting requirements must report data on home purchase loans, refinancing loans, home improvement loans. However, reporting is optional for home equity loans (HELOCs) that are intended for home improvement or home purchase, and HELOCs that are not intended for home improvements or home purchases are not required to be reported.²⁰

Although not all lenders are required to provide data under the Act, HMDA data is generally regarded as providing the most thorough information available on mortgage lending.²¹

Nationwide, there were over 36 million loan records reported for calendar year 2005, with 8,848 institutions reporting.²² These lenders account for approximately 80% of the estimated number of loans originated nationwide in 2005.²³ In Ohio, there were over 1.16 million loan records reported for calendar year 2005, with approximately 1,200 institutions reporting.

Under HMDA, lenders are required to report data on the race, ethnicity, gender, and income of an applicant; the type, amount, and, in some instances, price of the loan; the disposition of the application; the type and location of the property; and whether the loan was sold.²⁴ While some

¹⁸ See FFIEC, “2005 Reporting Criteria for Depository Institutions,” available at <http://www.ffiec.gov/hmda/reportde2005.htm>, and FFIEC, “2005 Reporting Criteria for Nondepository Institutions,” available at <http://www.ffiec.gov/hmda/reportno2005.htm>. However, if a lender is required to report HMDA data, it must report information on all of its applications and loans (other than HELOCs, as is discussed below), including those in non-metropolitan areas. Avery, *et al.*, at A165.

¹⁹ Lenders with less than \$34 million in assets on December 31, 2004, did not have to report data in 2005. FFIEC, “2005 Reporting Criteria for Depository Institutions,” available at <http://www.ffiec.gov/hmda/reportde2005.htm>.

²⁰ Federal Reserve, “Frequently Asked Questions About the New HMDA Data,” April 3, 2006, at 2, available at <http://www.federalreserve.gov/boarddocs/press/bcreg/2006/20060403/attachment.pdf>.

²¹ See, e.g., Carsey Institute, “Subprime and Predatory Lending in Rural America: Mortgage Lending Practices that Can Trap Low-Income Rural People,” Policy Brief No. 4 (Fall 2006), p. 2.

²² Of these, 11.67 million were home purchase loans, 15.90 were refinancing loans, 2.54 were home improvement loans, and 5.87 were loans purchased from other institutions. Avery, *et al.*, at A129.

²³ Avery, *et al.* at A123.

²⁴ FFIEC, “Frequently Asked Questions About the New HMDA Data,” April 3, 2006, at 1, available at <http://www.federalreserve.gov/boarddocs/press/bcreg/2006/20060403/attachment.pdf>; Avery, *et al.* at A165-166.

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HMDA data on race and ethnicity is not reported, under Federal Reserve Board regulations, lenders are required to complete this information based on “visual observation or surname.”²⁵

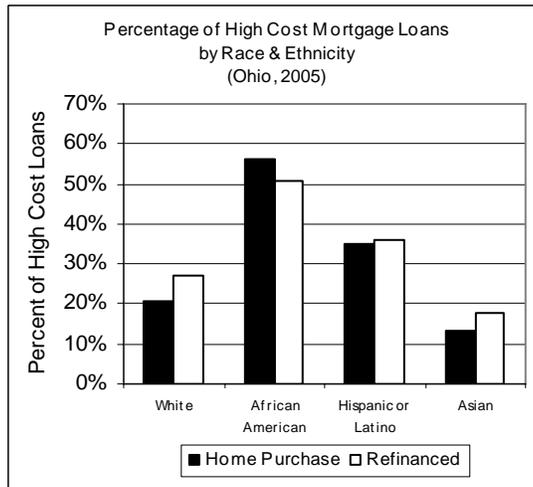
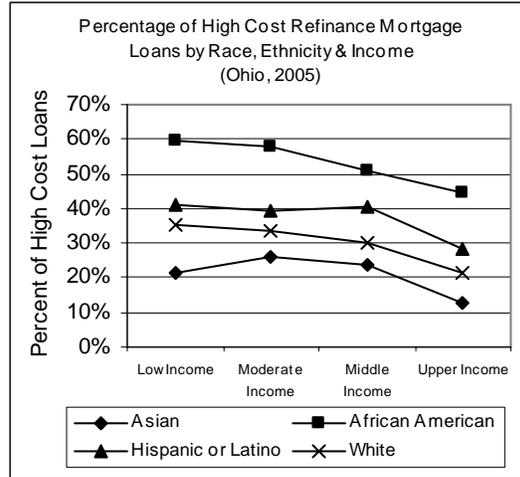
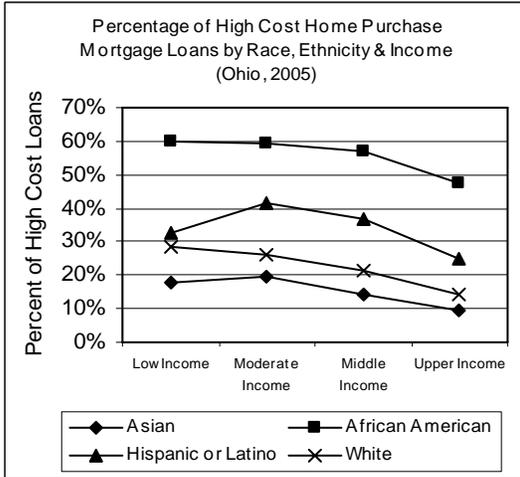
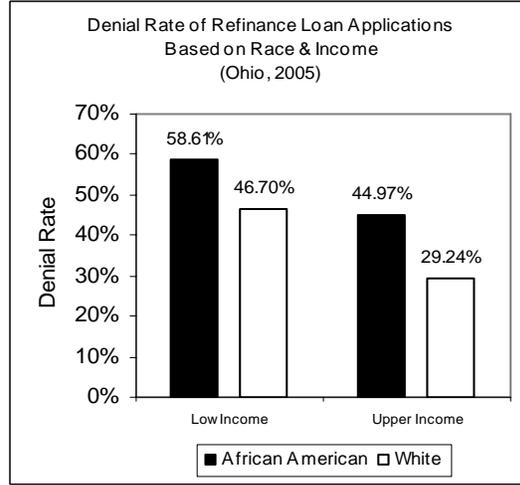
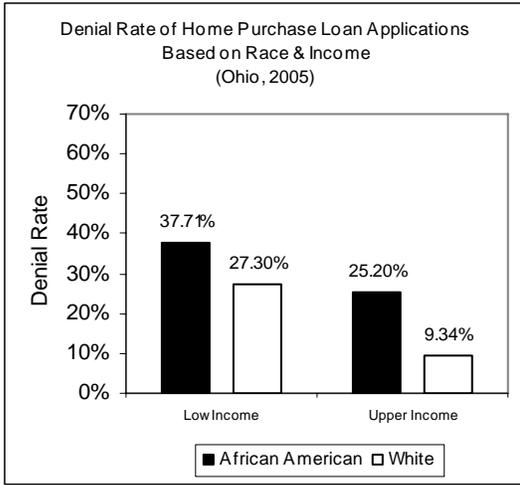
“High-cost lending” is not synonymous with “subprime lending” or “predatory lending.” High-cost lending is a more narrow category than “subprime” lending, and some subprime loans are likely not counted among the loans identified in this report. Further, while many “predatory” loans are likely included in the high-cost category, not all loans in this category are necessarily predatory, and some predatory loans may not meet the threshold triggers.

Despite these limitations, the Housing Center believes that an examination of the rates of high-cost lending for different racial, ethnic, and income groups is useful as one factor to look at in order to determine possible racial and ethnic disparities in mortgage lending.

²⁵ 12 C.F.R. Sec. 202.13(b).

Racial & Ethnic Disparities in Ohio Mortgage Lending

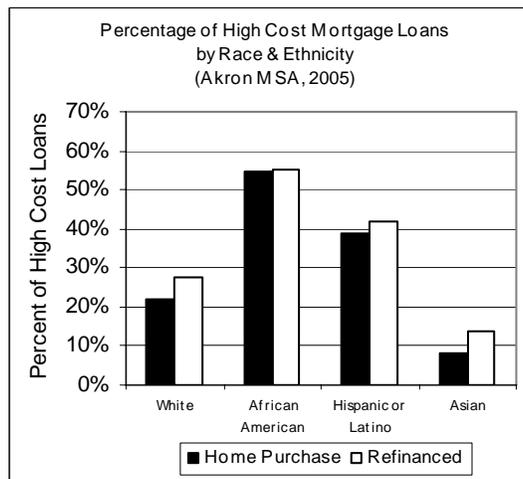
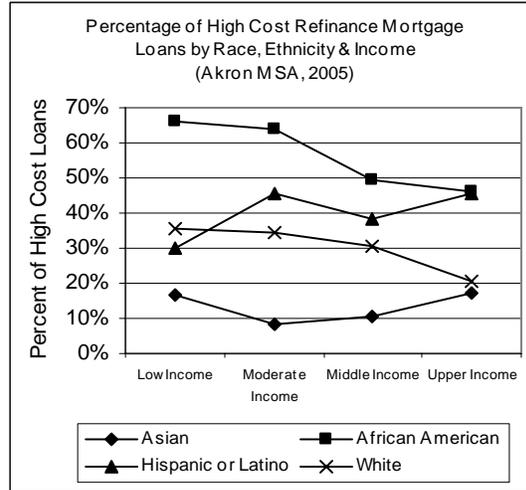
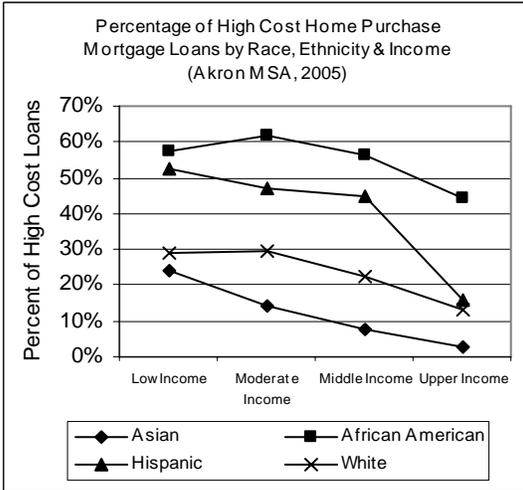
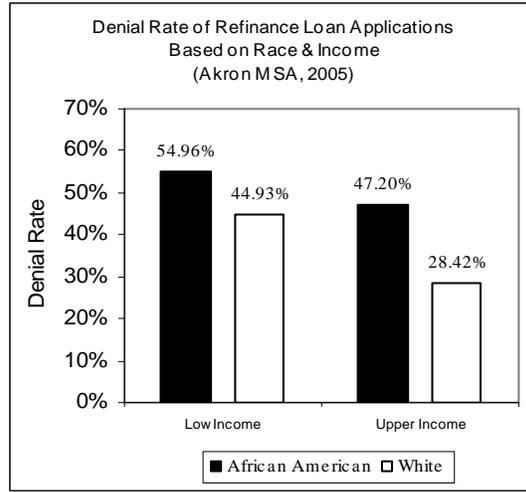
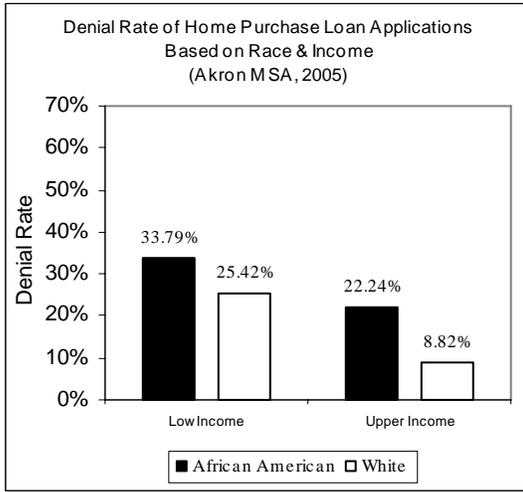
State of Ohio



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

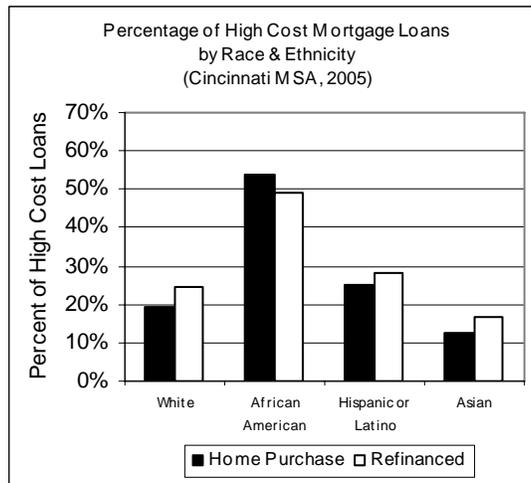
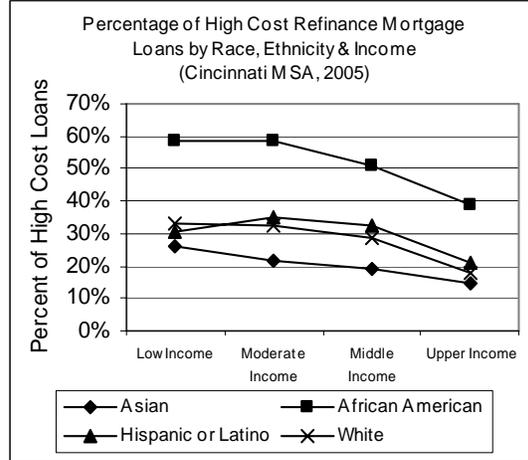
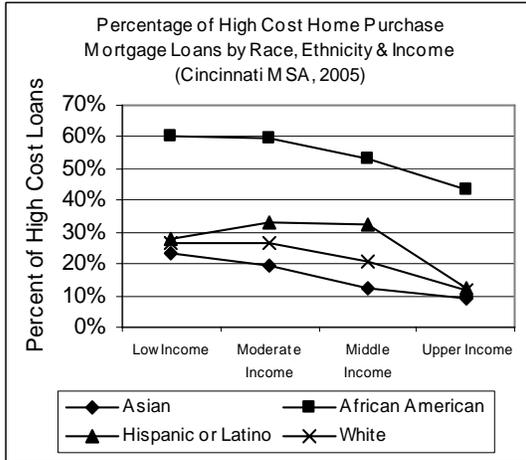
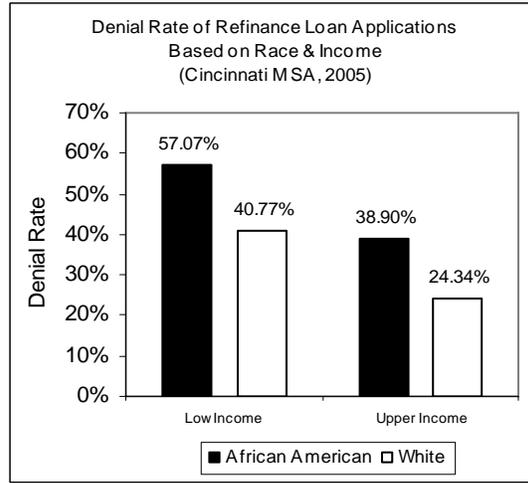
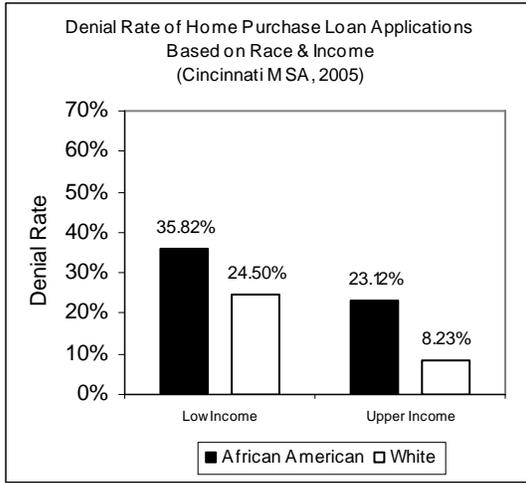
Akron MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

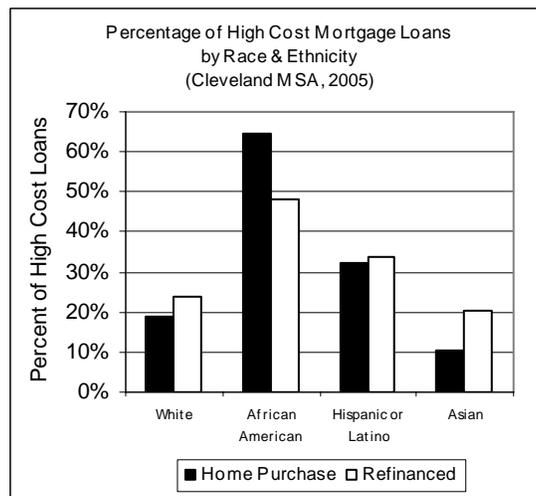
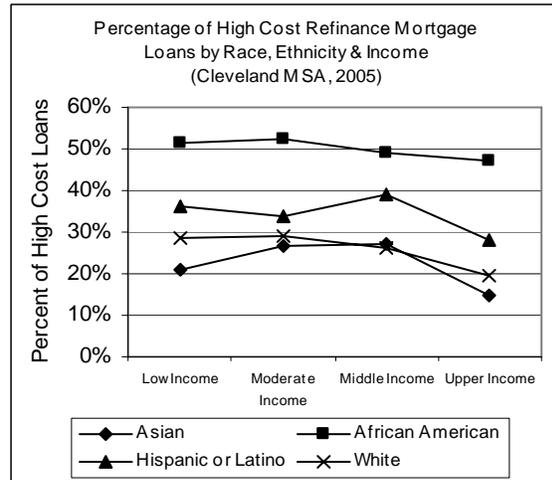
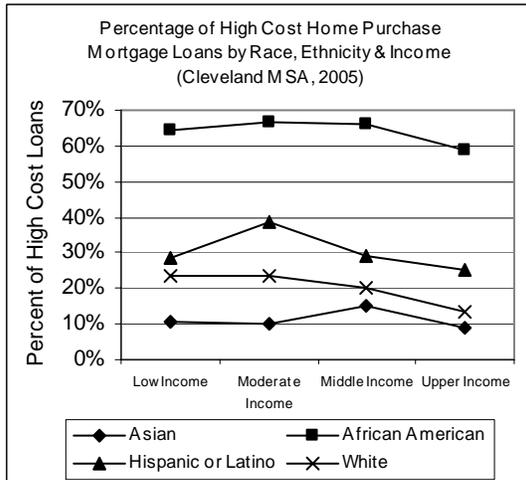
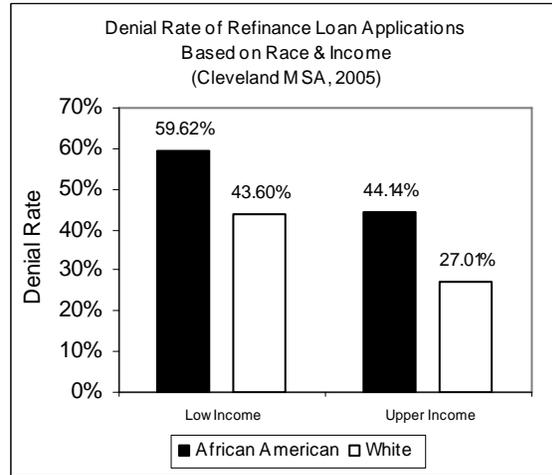
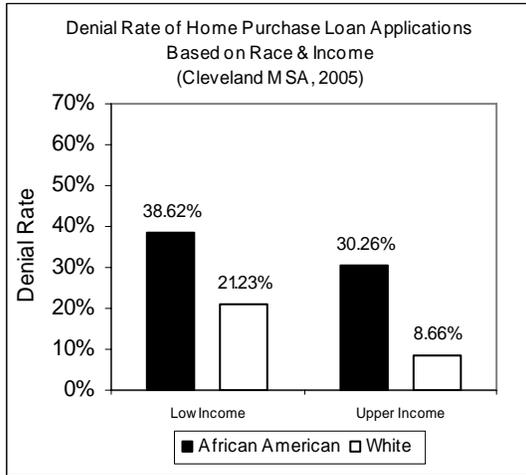
Cincinnati MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

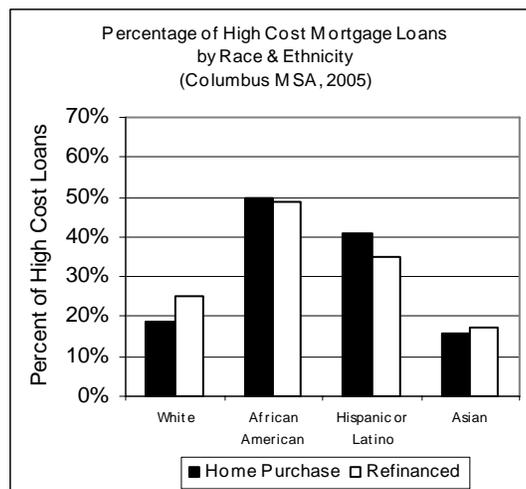
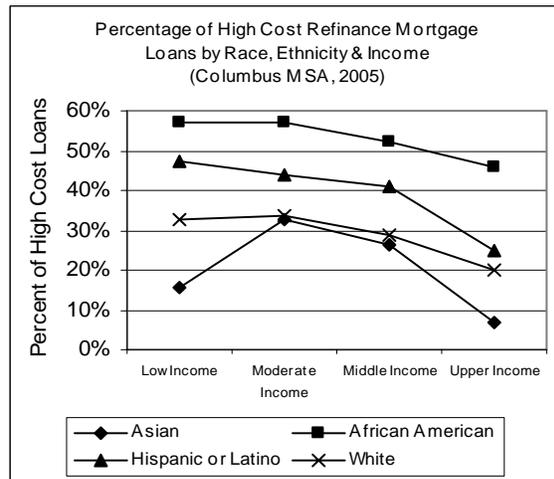
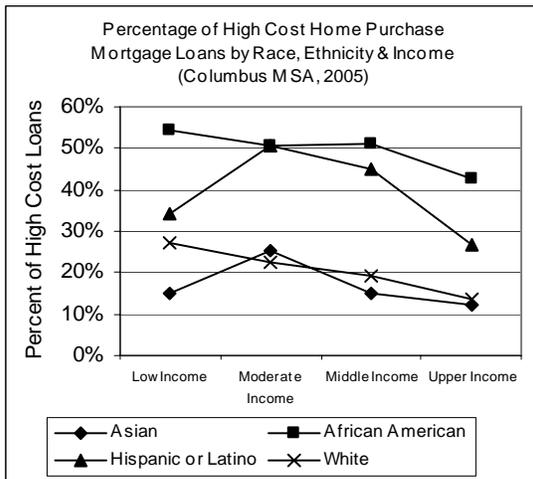
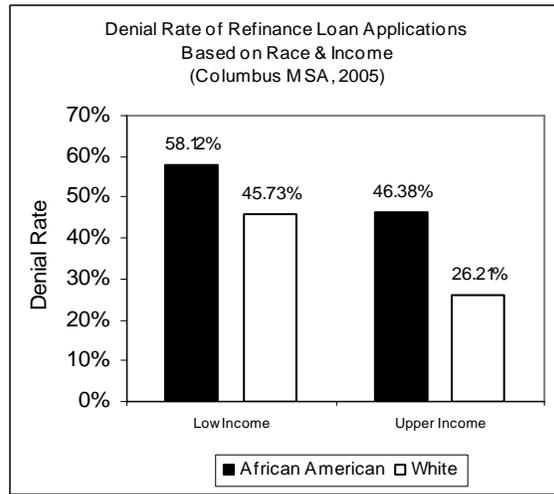
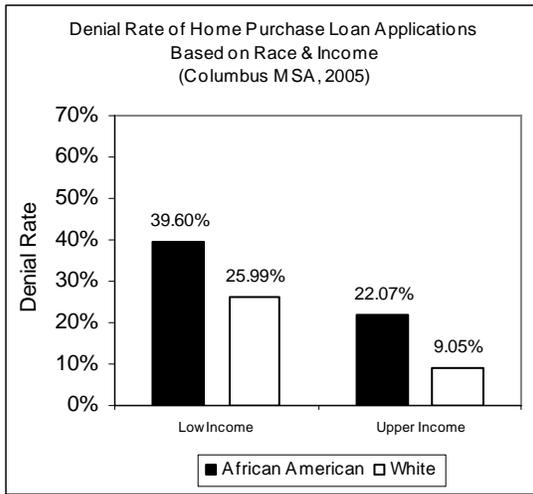
Cleveland MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

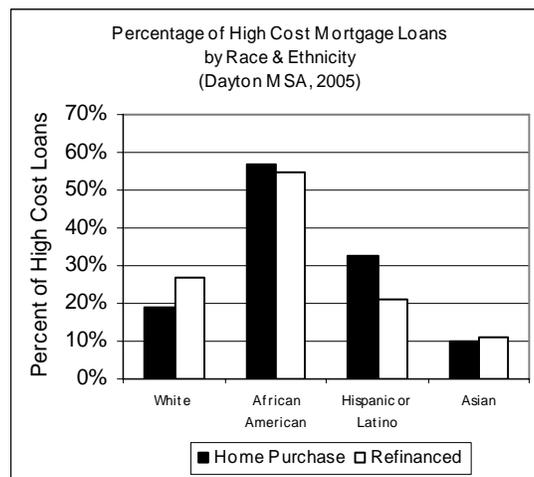
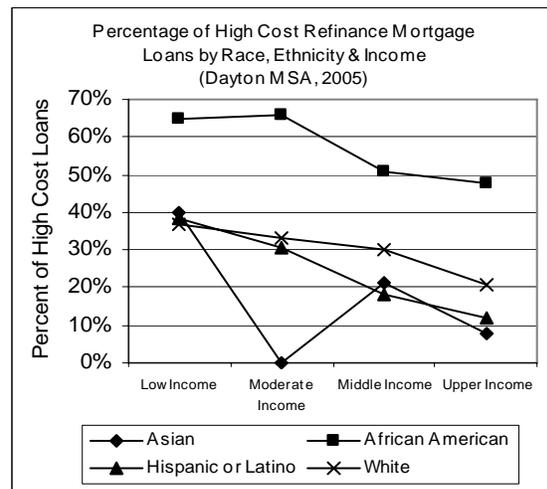
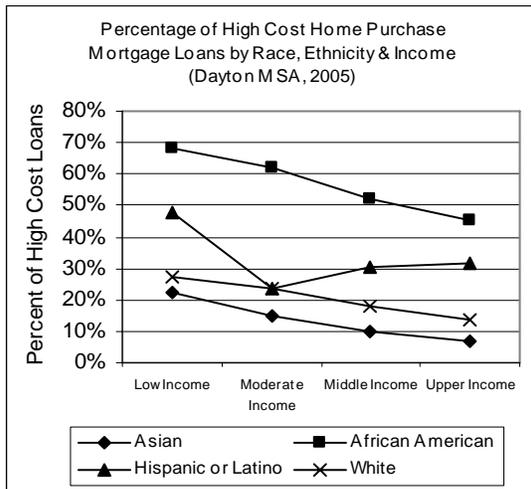
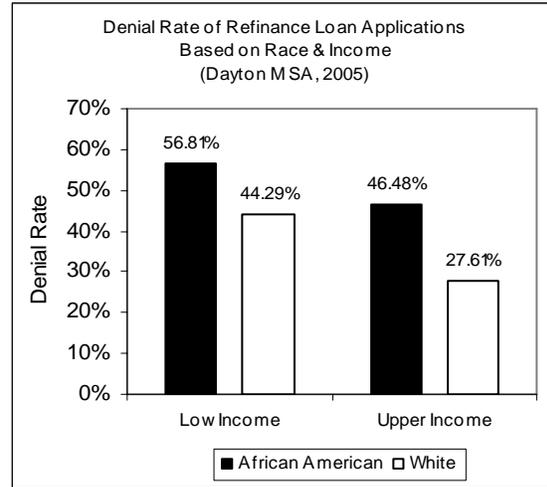
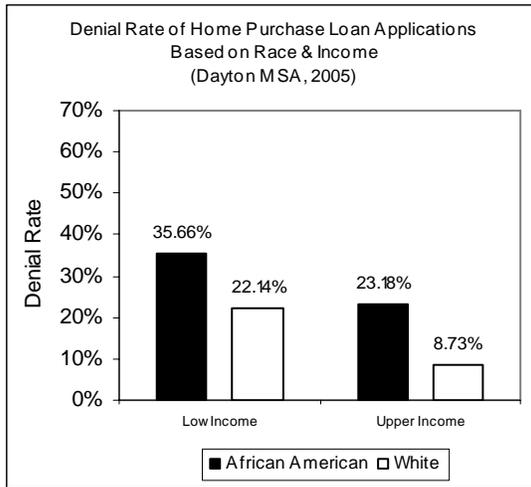
Columbus MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

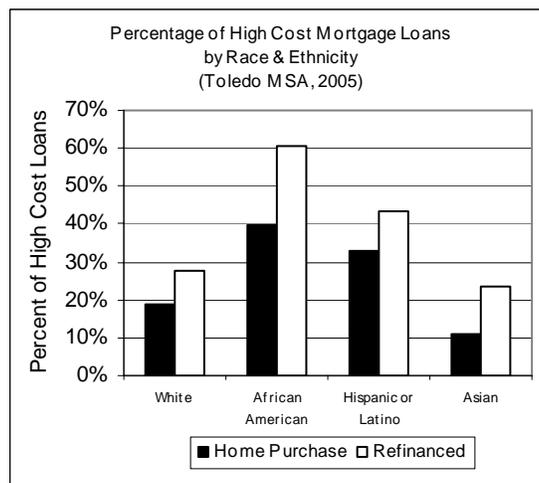
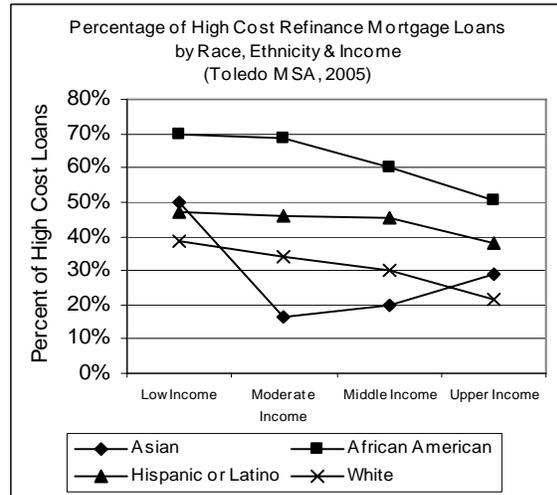
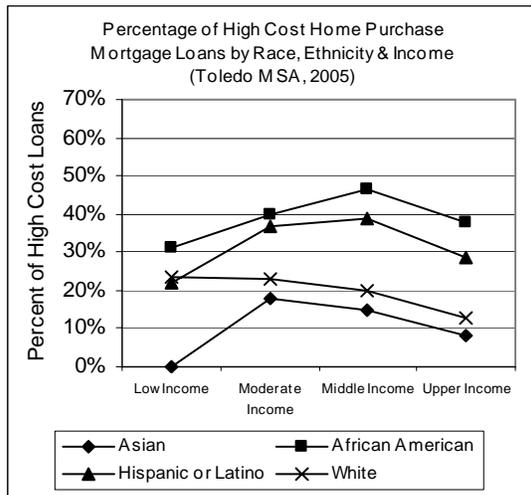
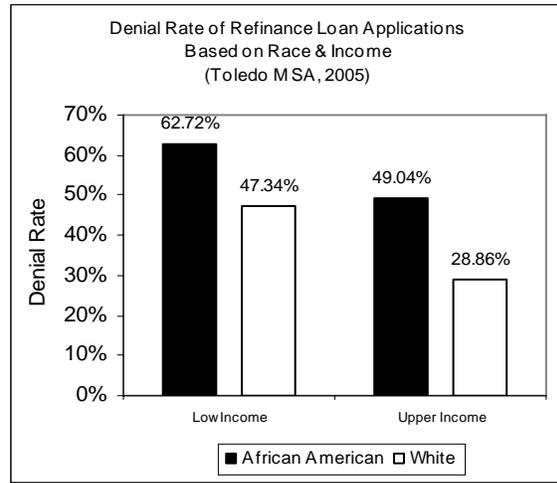
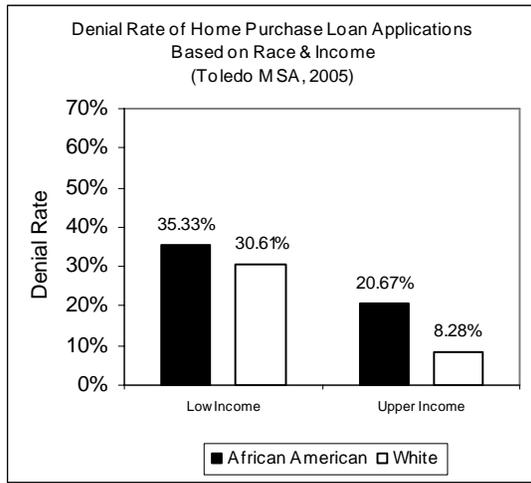
Dayton MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

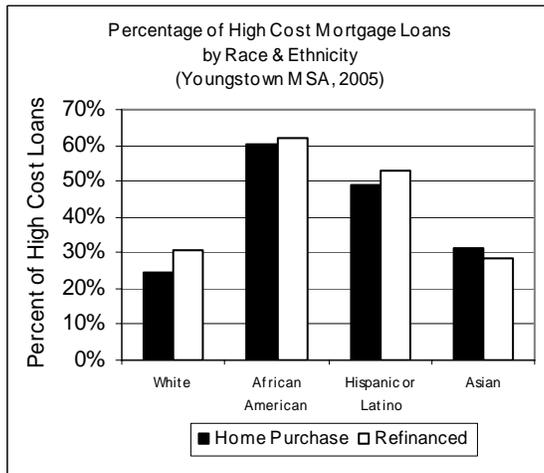
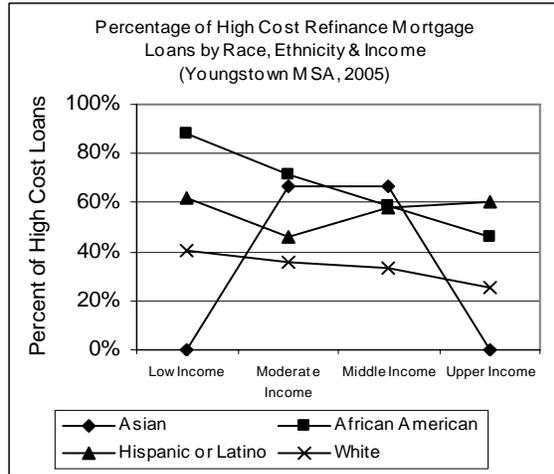
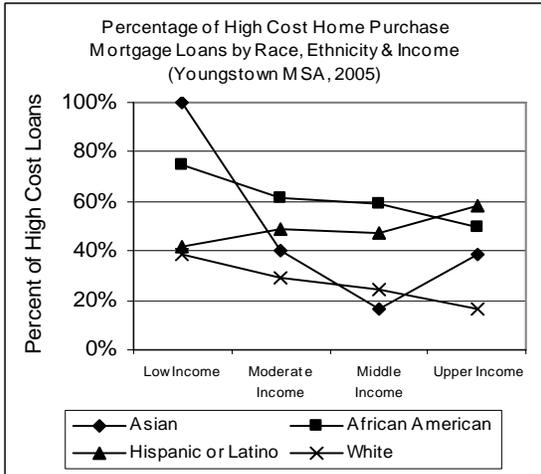
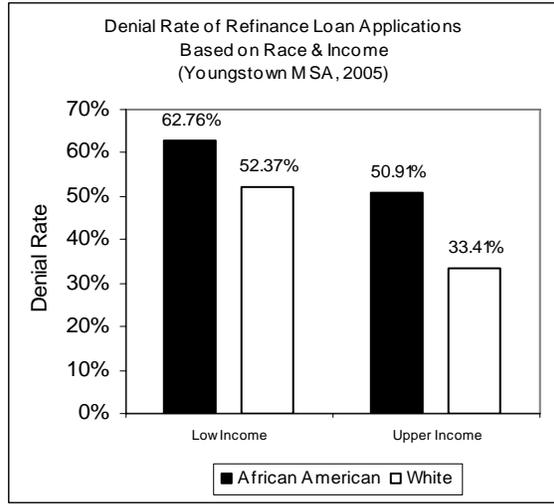
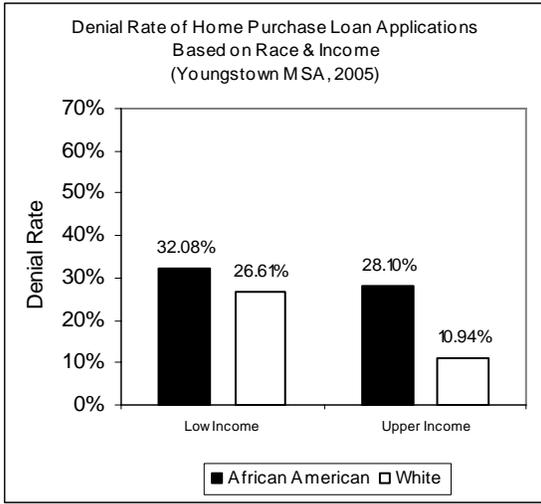
Toledo MSA



Source: 2005 HMDA data.

Racial & Ethnic Disparities in Ohio Mortgage Lending

Youngstown MSA



Source: 2005 HMDA data.