



Kevin Hill, Senior Policy Advisor
Catherine Petrusz, CRA Manager

April 3, 2024

THE NEW CRA 101

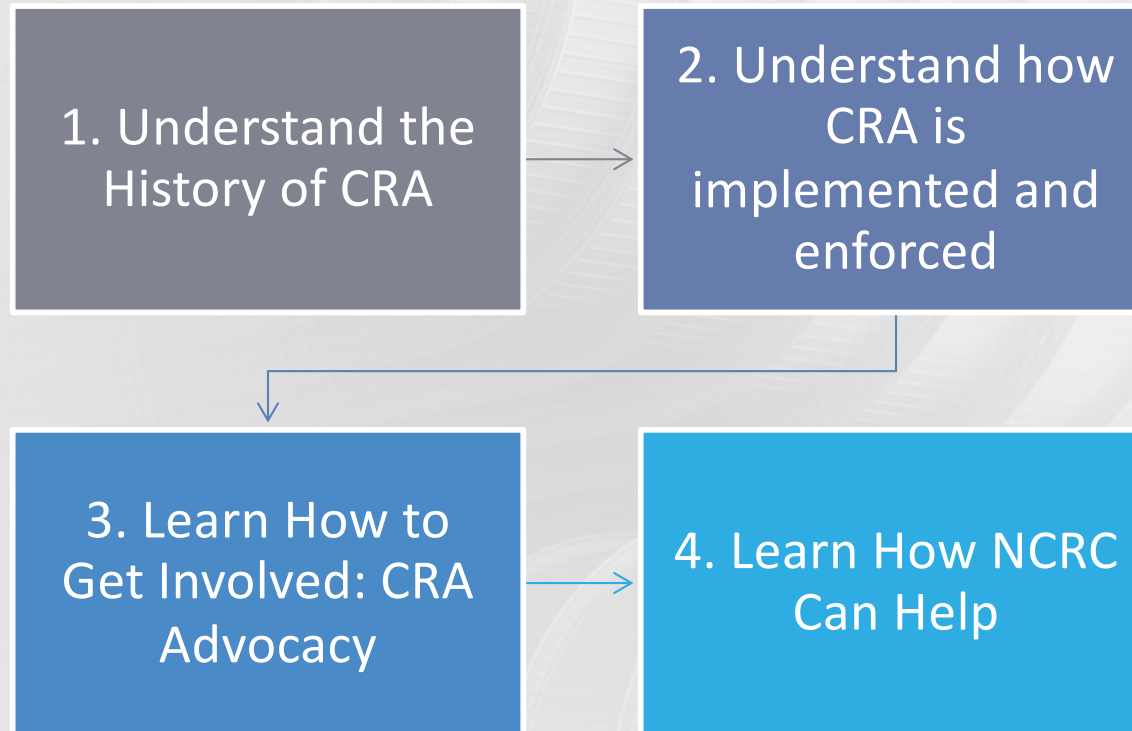
About NCRC

The National Community Reinvestment Coalition (NCRC) and its grassroots member organizations create opportunities for people to build wealth. Its [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, as well as local and social service providers from across the nation

Programs & Services

- Agenda-setting research, training, & insight
- Renovate and build affordable homes for low- and moderate-income families
- Counseling for home buyers and owners
- Business-building expertise for entrepreneurs
- Train and support housing counselors
- Test and challenge discrimination in financial services and housing
- Convene and facilitate agreements between financial institutions and community networks to increase lending, investments and philanthropy in neighborhoods that need it
- Represent members before Congress and federal regulatory agencies
- Routinely cited by journalists, economists and scholars focused on banking, housing, urban renewal, rural development and civil rights

Objectives





1. BRIEF HISTORY OF THE COMMUNITY REINVESTMENT ACT

"National banks are instrumentalities of the federal government, created for a public purpose."

U.S. Supreme Court, *Davis v. Elmira Savings Bank*, 161 U.S. 275 (1896)



Photo by [Caleb Fisher](#) on [Unsplash](#)

- A **good bank** can anchor a vibrant community
- Like some public institutions, **banks have obligations too**
- They have an obligation to address **community needs**
- They have an obligation to produce a **public benefit**
- The CRA aims to ensure that banks remain **responsive to local needs**



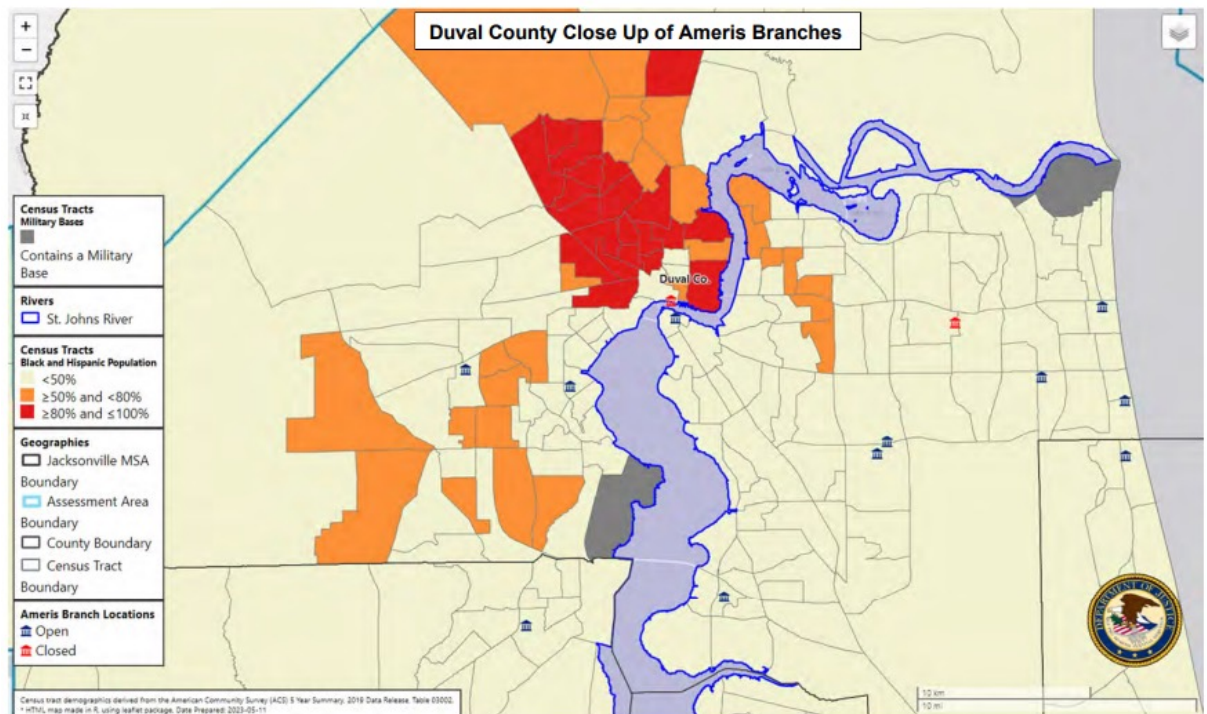
Photo by Seth Dewey @sjdphoto on unsplash.com

Ongoing Impact of Redlining

17 DOJ redlining consent orders since 2016

In 2021, Justice Department announced an initiative to combat redlining.

October 2023: Ameris Bank Consent Order



COMMUNITY REINVESTMENT ACT (CRA)

CRA was among a series of legislative attempts to end redlining and discrimination in housing and lending.

- Fair Housing Act (1968): outlaws redlining
- Equal Credit Opportunity Act (1974): prohibits discrimination
- Home Mortgage Disclosure Act (1975): disclosures
- Community Reinvestment Act (1977): *affirmative obligation*

COMMUNITY REINVESTMENT ACT (CRA)

- **1989**: Required public disclosure
- **1995**: Established current exam procedures
- **2023**: New CRA Rule Finalized in October

Benefits of CRA

- More than **\$6 trillion** of investments in LMI communities.
- Results in **increased small business employment by 1.5% – 1.9%** in minority neighborhoods.
- Losing CRA eligibility results in 20% decline in mortgage lending during the first year.



2.1 CURRENT CRA IMPLEMENTATION AND ENFORCEMENT

Performance Evaluations (aka "CRA exams")

- CRA's basic tool for enforcement
- Exams every 3-4 years
- Conducted by the primary federal regulator (OCC, FDIC or Federal Reserve)
- Opportunity for public comment
- Evaluates lending to LMI borrowers and neighborhoods
- The level of support for community development projects
- Maintaining branches in LMI neighborhoods

Performance Evaluations: CRA Ratings

PASS

Outstanding

Satisfactory

FAIL

Needs to Improve

Substantial
Non-compliance

How are the regulators doing?

Year	Number of Evaluations	Needs to Improve	Substantial Noncompliance	Fail	Pass
2018	1409	20	1	1.49%	98.51%
2019	1486	21	0	1.41%	98.59%
2020	1207	22	3	2.07%	97.93%
2021	1128	12	2	1.24%	98.76%
2022	1092	14	1	1.37%	98.63%

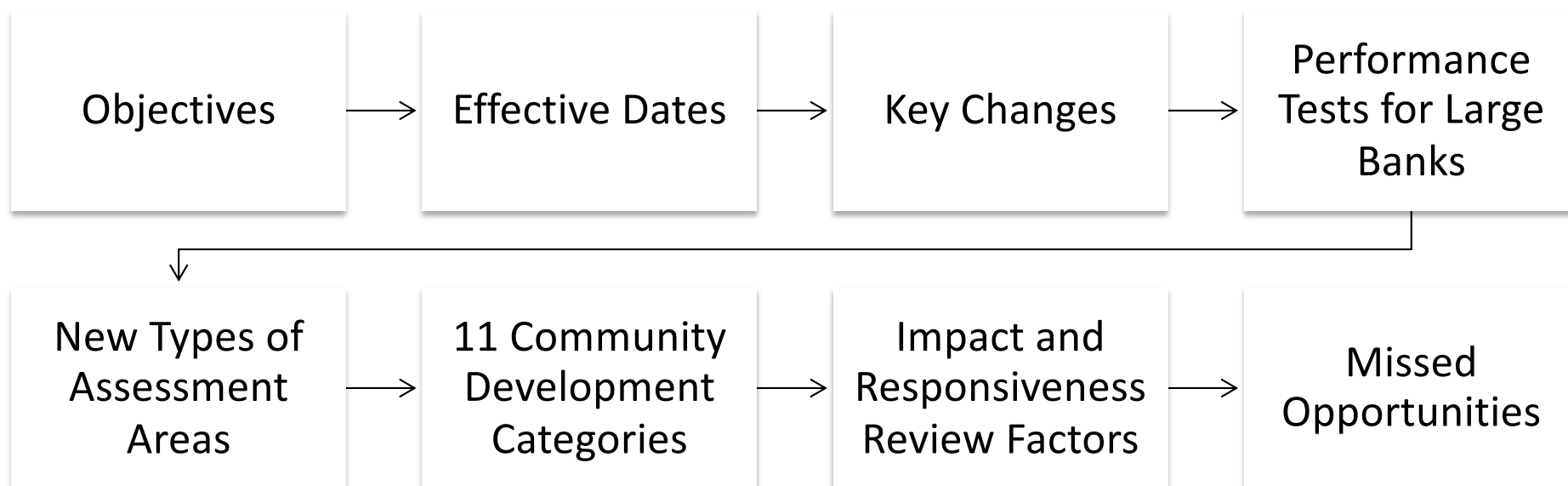
Total **6322** **89** **7** **1.52%** **98.48%**





2.2 NEW CRA RULE

New CRA Final Rule: What We Will Cover Today



New CRA Final Rule: 8 Objectives

Confirm that CRA and fair lending are mutually reinforcing

Strengthen the core purpose of the CRA: to address inequities in access to credit

Promote transparency and public engagement

Provide clarity and consistency

Adapt to industry changes

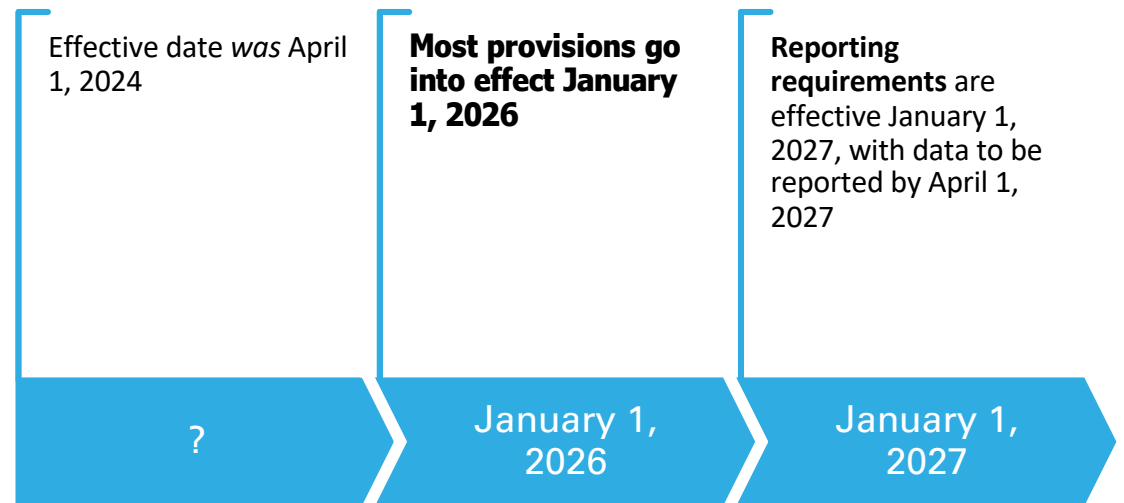
Tailor data collection and reporting requirements and use existing data whenever possible.

Tailor performance tests to for differences in bank size, business model, and local conditions.

Promote a consistent regulatory approach

Effective Dates

(Pending outcome of CRA lawsuit)



CRA Final Rule: Key Changes

New categories of qualifying community development activities

Four performance tests for large banks

New types of assessment areas

Asset Size Definition Changes

- **Small Banks:** Assets below \$600 million in either of the prior two calendar years.
- **Intermediate Banks:** Assets between \$600 million and \$2 billion in both of the prior two calendar years.
- **Large Banks:** Assets above \$2 billion in both of the prior two calendar years.
- **Limited Purpose Banks:** Includes both "limited purpose banks" and "wholesale banks" as currently defined.



Impact of Asset Size Definition Changes



778 fewer banks will have a community development test



216 banks will no longer have a Service test that evaluates their branch network, nor be subject to the new Retail Services and Products test of their products



15% decrease in the total number of banks with a service test



31% of previously covered banks will be exempt from a community development test

Performance Test Application

Small Banks

- Small Bank Lending Test (default) *or* Retail Lending Test (opt-in)

Intermediate Banks

- Retail Lending Test *and*
- Intermediate Bank Community Development Test (default) *or* Community Development Financing Test (opt-in)

Large Banks

- Retail Lending Test
- Retail Services and Products Test
- Community Development Financing Test
- Community Development Services Test

Limited Purpose Banks

- Community Development Financing Test for Limited Purpose Banks

4 Performance Tests for Large Banks

Retail Lending Test

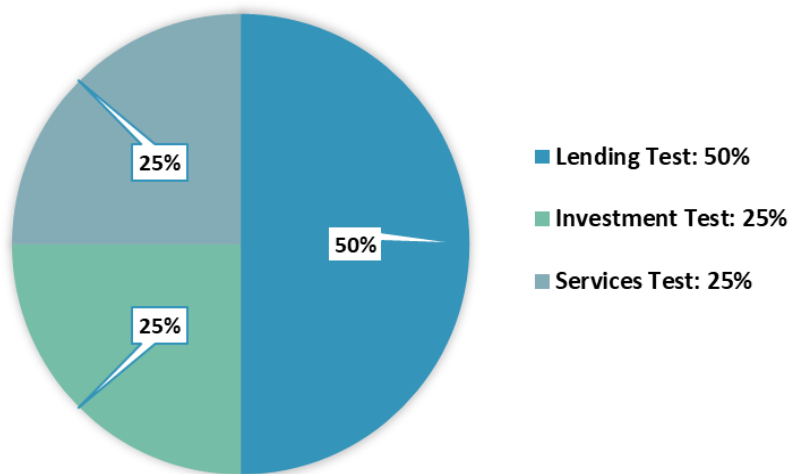
Retail Services and Products Test

Community Development Financing Test

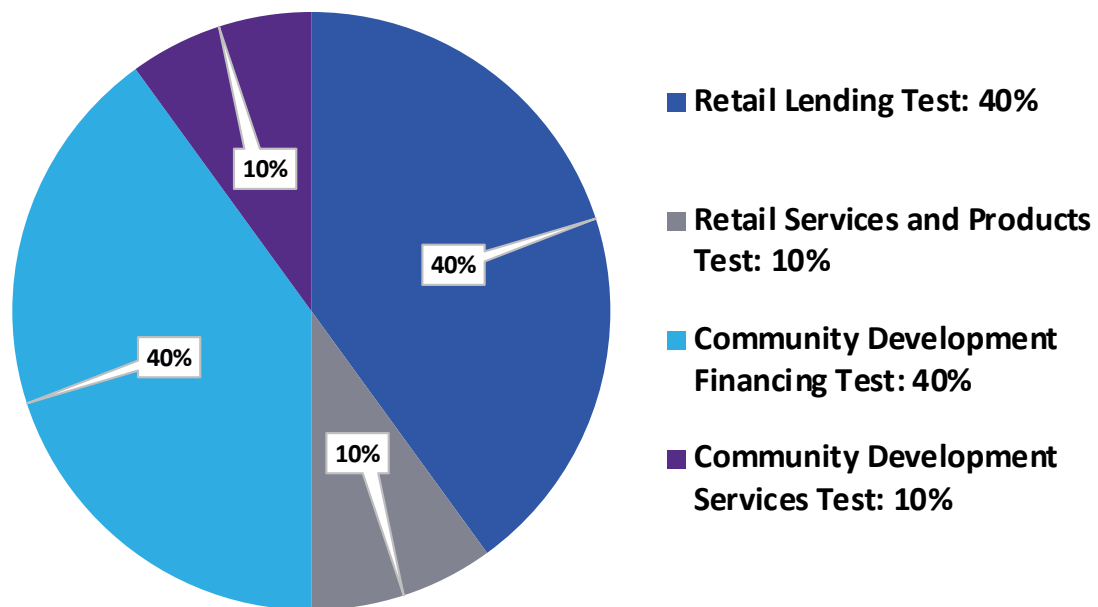
Community Development Services Test

Test Weights for Large Banks Over \$2 billion in assets

Legacy Rule



New Rule



1. Retail Lending Test

Home mortgage loans, multifamily loans, small business loans, small farm loans, and, for certain banks, automobile loans

Facility-based assessment areas

If applicable, retail lending assessment areas and outside retail lending area

1. Retail Lending Test

Much more objective and transparent

Market and community data determine performance standards in the new CRA Retail Lending Test.

In order to pass this test, large banks must lend at levels that match

- **either** 80% of total lending by all lenders to borrowers with LMI or small businesses/farms, **or** 60% of local demographics, and
- in 60% of their assessment areas.

1. Retail Lending Test

Small business/small farm lending review analyzes loans to businesses with under \$250,000 in revenue (previously \$1 million)

Much more of a bank's total mortgage and small business/farm lending will be included in CRA exams due to new assessment areas

2. Retail Services and Products Test

Banks with assets above \$10 billion will be evaluated on

- Branch availability and services
- Remote service facility availability (ATMs for example)
- Digital delivery systems and other delivery systems

Banks with \$2 billion - \$10 billion in assets

- will not be evaluated on digital and other delivery systems, unless the bank requests it, or if the bank does not maintain any branches

2. Retail Services and Products Test

Regulators will also evaluate services provided at branches that improve access or decrease costs for customers with LMI.

The following services are provided as examples

- Bilingual and translation services
- Free or low-cost check cashing services, including, but not limited to, check cashing services for government-issued and payroll checks
- Reasonably priced international remittance services
- Electronic benefit transfers

2. Retail Services and Products Test

All large banks will be evaluated on their **credit products**. Regulators will evaluate:

- Quantity
- Features
- Accessibility
- Affordability

Large banks above \$10 billion in assets will also undergo **deposit products** analysis. Regulators will evaluate:

- Cost
- Availability
- Usage
- Responsiveness

Caveat: The evaluation of both credit and deposit products can only boost a banks score.

3. Community Development Financing Test

Community development financing in each facility-based assessment area, each State, or multistate MSA, as applicable, and at the institution level

Will evaluate the dollar volume of a bank's community development loans and investments relative to the bank's deposit base

Includes standardized benchmarks to aid in evaluating performance

Includes an **impact and responsiveness review** to ensure consideration of community development loans, investments, and services that are particularly impactful or responsive

4. Community Development Services Test

Fostering partnerships among different stakeholders, building capacity, and creating conditions for effective community development, including in rural areas

Qualitative review of relevant community development services data and impact and responsiveness review.

Changes to Assessment Areas

Legacy
Assessment Area
Concept Remains

New Assessment Areas

Facility-based
assessment
areas

Retail lending
assessment
areas

Outside retail
lending areas

Facility-based Assessment Areas

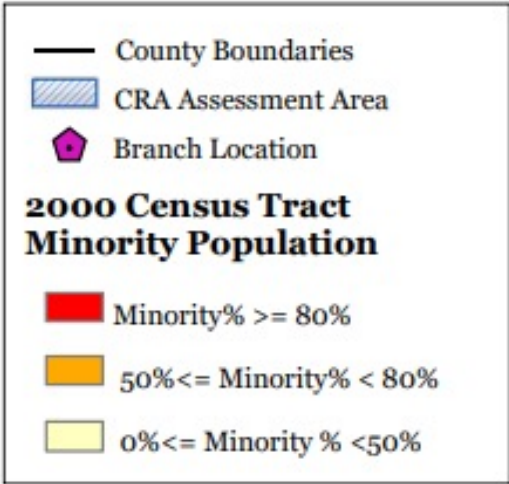
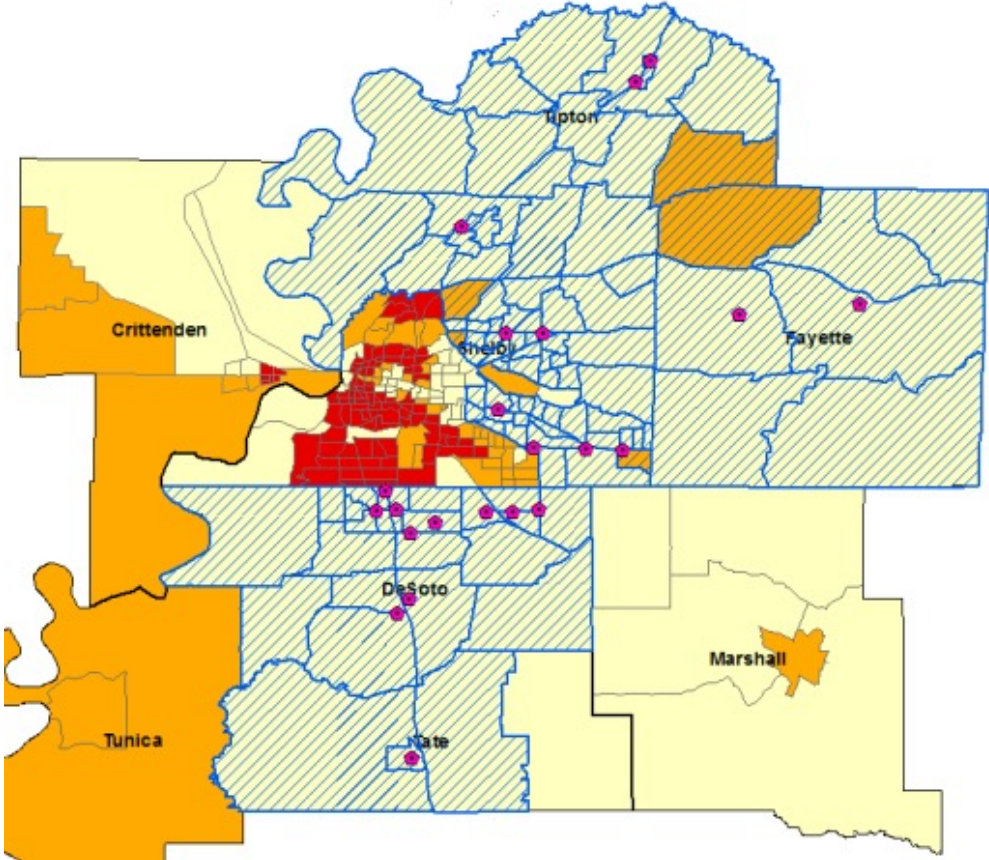
Largely the same as in the current rule

Large banks must now include the entire county surrounding a qualifying facility

Intermediate and small banks can still use partial counties as the rules had previously allowed for all sizes of bank

Performance Evaluations: Assessment Areas

BancorpSouth Pre-January 2013 Assessment Area and Branches, Memphis MSA



Retail Lending Assessment Areas

Will apply only to a subset of the industry

Large banks that do less than 80% of their retail lending inside their branch network will now have retail lending assessment areas in markets where they've originated either 150 closed-end mortgages or 400 small business loans in each of the last two years

No community development lending test in these areas

Will analyze closed-end mortgages and small business lending, depending on which of these loan types trigger the loan threshold

Outside Retail Lending Areas



New, nationwide assessment areas that exclude the bank's facility-based and retail lending assessment areas, as well as any non-metropolitan counties where the bank did not originate or purchase any loans



All large banks will be evaluated in this new fashion



Intermediate banks will have Outside Retail Lending Areas if 50% or more of their loans and purchases – calculated using a combination of loan counts and dollars – are outside of their facility-based assessment areas



Other banks may opt in to

Community Development: 11 Categories

1. Affordable housing, with new provisions discussed below

2. Economic development

3. Community supportive services (activities that assist, benefit, or contribute to the health, stability, or well-being of LMI individuals)

4. Revitalization or stabilization

5. Essential community facilities

6. Essential community infrastructure

Community Development: 11 Categories

7. Recovery of designated disaster areas

8. Disaster preparedness and weather resiliency, a new category

9. Any of the previous 5 items effected within Native Land Areas specifically

10. Activities with minority depository institutions, Women-owned depository institutions, low-income credit unions, or CDFIs

11. Financial Literacy

IMPACT AND RESPONSIVENESS REVIEW FACTORS

Serves persistent–
poverty counties

Serves census tracts
with a poverty rate of
40% or higher – these
are mainly urban areas

Serves areas with low
levels of community
development financing

IMPACT AND RESPONSIVENESS REVIEW FACTORS

Supports a Minority-Owned Depository Institution , Women-Owned Depository Institution , Low Income Credit Union , or Community Development Financial Institution , excluding certificates of deposit with a term of less than one year

Benefits or serves individuals, families, or households with low income

Supports small businesses or small farms with gross annual revenues of \$250,000 or less

IMPACT AND RESPONSIVENESS REVIEW FACTORS

Directly facilitates the acquisition, construction, development, preservation or improvement of affordable housing in High Opportunity areas

Benefits or serves residents of Native Land Areas

Is a grant or donation; These must be tied to CRA-eligible community development work

IMPACT AND RESPONSIVENESS REVIEW FACTORS

Is an investment in projects
financed with Low Income
Housing Tax Credits or New
Markets Tax Credits

Reflects bank leadership through
multi-faceted or instrumental
support; This covers activities that
entail multiple forms of support
provided by the bank for a
particular program or initiative

Is a new community development
financing product or service that
addresses community
development needs for LMI
individuals, families, or
households

IMPACT AND RESPONSIVENESS REVIEW FACTORS

Large banks will be required to collect and maintain data related to impact and responsiveness factors

This data could help the regulators create additional metrics and benchmarks related to impact, since the regulators cited a lack of information as a challenge for establishing performance measures in the final rule

The agencies are considering issuing additional guidance to examiners “in the near term” to provide additional clarity on how to apply the impact and responsiveness review

Missed Opportunities

Nothing new to link CRA performance with merger or branch-siting review processes

No change in how CRA performance impacts merger reviews

Little updates to process for community input

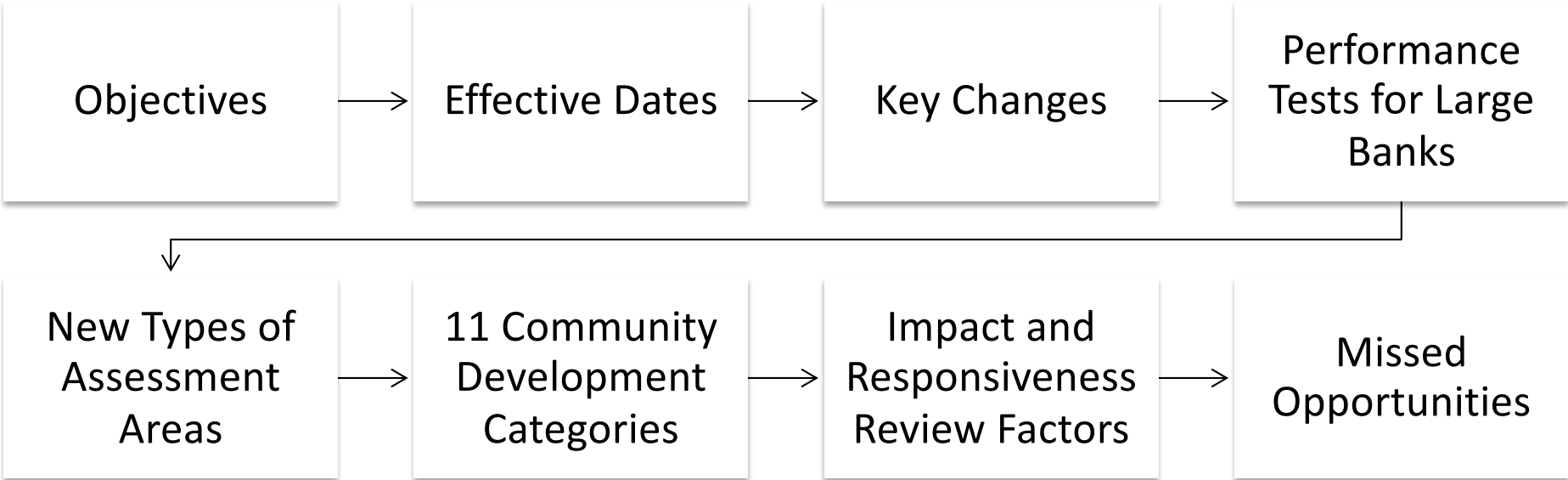
Missed Opportunities: Race

Given CRA's legislative purpose of addressing redlining by evaluating banks on how well they meet the financial service needs of the entire community, it's disappointing that the CRA continues to leave race out of the process

Agencies will start publishing data on large banks' lending performance by race and ethnicity in all their assessment areas using Home Mortgage Disclosure Act data *but this information will not be republished in CRA exams or in any way affect a bank's CRA rating*

SPCPs were not included in the initially proposed rule but have been added into the final rule after NCRC and many others submitted comments arguing for the change. SPCPs do not have to come with income restrictions to qualify for CRA credit

New CRA Final Rule: Questions?





3. HOW TO GET INVOLVED: CRA ADVOCACY

CRA WORKS WHEN YOU DO



*“Full responsibility for
CRA enforcement has always
been the job of people in
the neighborhoods.”*

Gale Cincotta, former Chairperson, National People's
Action; Co-Founder and former Executive
Director, National Training and Information Center

CRA Advocacy: Why get involved?

Your participation:

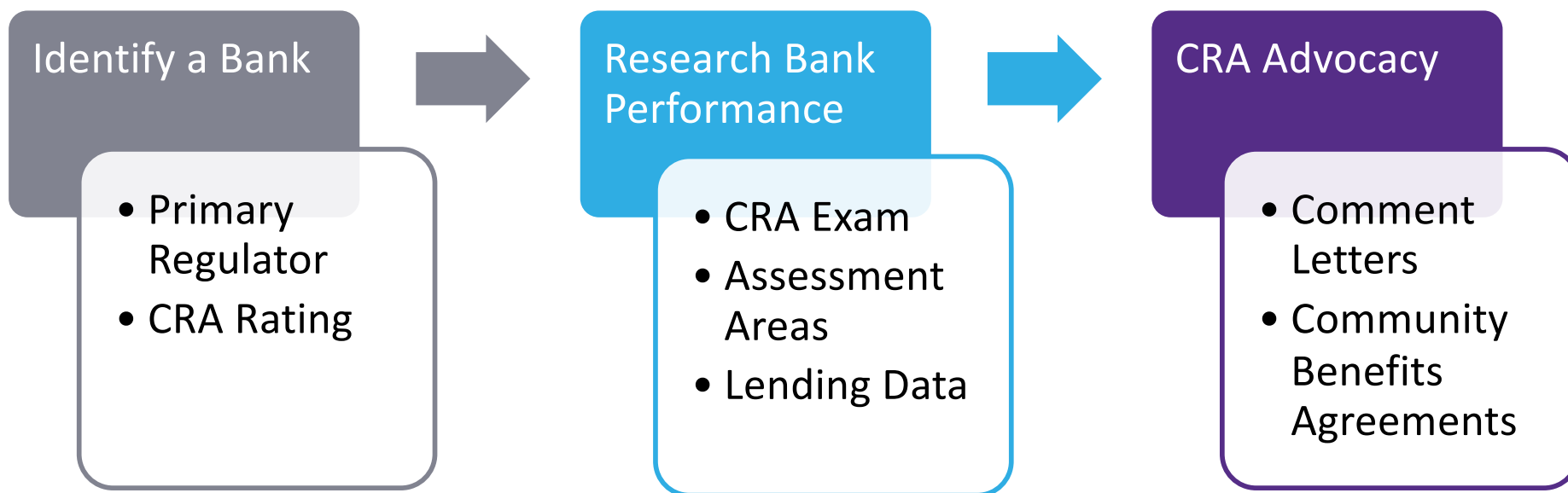
Improves bank performance, especially if they're not serving everyone

Increases resources for community development

Directs more resources into underserved neighborhoods

Builds partnerships with financial institutions

CRA Advocacy: Step by Step



Researching a Bank: First Questions



- Who is the bank's primary federal regulator (OCC, FRB or FDIC)?
- What is the bank's CRA rating?

Example: City National Bank Performance Test Ratings

Performance Levels	City National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

Example: City National Bank Assessment Area and State Test Ratings

Appendix B: Summary of MMSA and State Ratings

RATINGS City National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
City National Bank	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Georgia	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Minnesota	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Nevada	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Tennessee	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
District of Columbia	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Understanding Lending Data: *Home Lending*

Assessment Area or State	Total	Hispanic	Native	Asian	Black	LMIB	MINB
Philadelphia MSA	2064	-4%	0%	1%	-7%	-14%	-1%
Boston MSA	1,512	-3%	0%	3%	-3%	-9%	-1%
Miami MSA	1,385	-19%	0%	0%	-5%	-7%	-1%
DC-MD-VA MMSA	963	-9%	0%	2%	-11%	-20%	1%
Hartford-W. Hartford-E. Hartford MSA	387	-4%	0%	4%	-4%	-13%	-1%
Portland MSA	371	0%	0%	1%	-1%	-7%	0%
State of Delaware	301	-3%	0%	4%	-12%	-16%	1%
State of New Jersey	284	-3%	0%	1%	-5%	-16%	-1%
New Haven MSA	236	-7%	0%	4%	-3%	-8%	1%
Manchester-Nashua MSA	202	-3%	0%	0%	0%	1%	1%

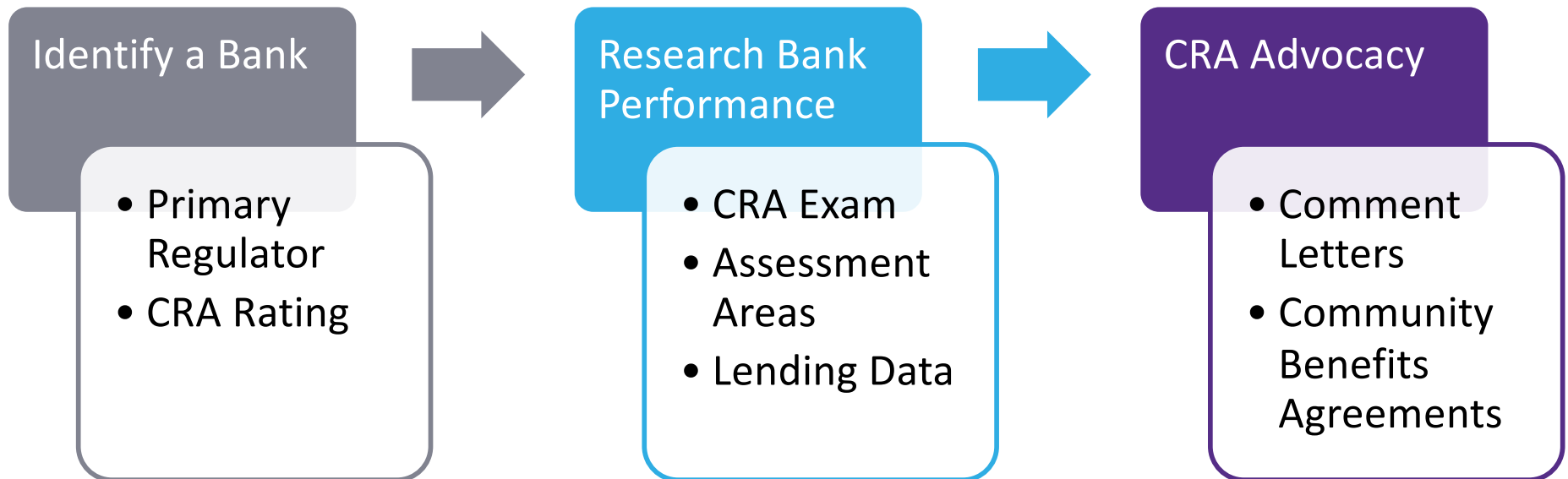
Example of HMDA Data for one bank showing performance, relative to the aggregate lending in each market

Understanding Lending Data: Small Business Lending

Summary of Small Business Lending - CommunityBank							
Springfield MSA 2014							
	Number of Business	Percent of Business	CommunityBank		All Lenders		Percentage Point Difference:
			Count of Loans	Percent	Count of Loans	Percent	
LMI Census Tracts	39,442	23.91%	220	32.21%	8,615	22.57%	9.65%
Businesses <\$1 mil in Revenue	115,705	70.15%	18	2.64%	17,697	46.35%	-43.72%
Total	164,936		683	100.00%	38,178	100.00%	0.00%

Example of small business data for a bank in its Springfield MSA

With research and data in hand, what's next?



How to get involved: *Public Comment Letters* *When?*

1. Mergers

2. CRA Performance Evaluations

3. Branch Closures

How to get involved: *Public Comment Letters*

What to include in the letter?

1. Requests

Oppose a merger approval absent a meaningful community benefits plan

Request to extend the comment period

Convene a meeting or public hearing

2. Information to back up your position or request

Data analysis

Other information relevant to a bank's CRA performance and your community

How your organization or coalition can improve performance

How to get involved: Public Comment Letters

1. Mergers

- Banks must apply to acquire branches or other financial institutions, and the public can comment on those applications
- When approving mergers, regulators have a general obligation under the law to **“take into consideration...the convenience and needs of the community to be served.”**
- Regulators look at previous record, as well as how the expanding bank will serve communities going forward
- Opportunity to negotiate community benefits plans

How to get involved: *Merger Public Hearings*



Community Benefits Agreements: What?

Public
Commitment to
Communities

Includes goals to
increase CRA
loans, investments
and services

Includes non-CRA
commitments like
supplier diversity,
EEO-1 transparency

Community Benefits Agreements: Why?

Branches:
92,394 in 2009
80,000 in 2023

Banks:
14,261 in 1985
4638 in 2023

FDIC Insured Institutions & Branches 1984-2020

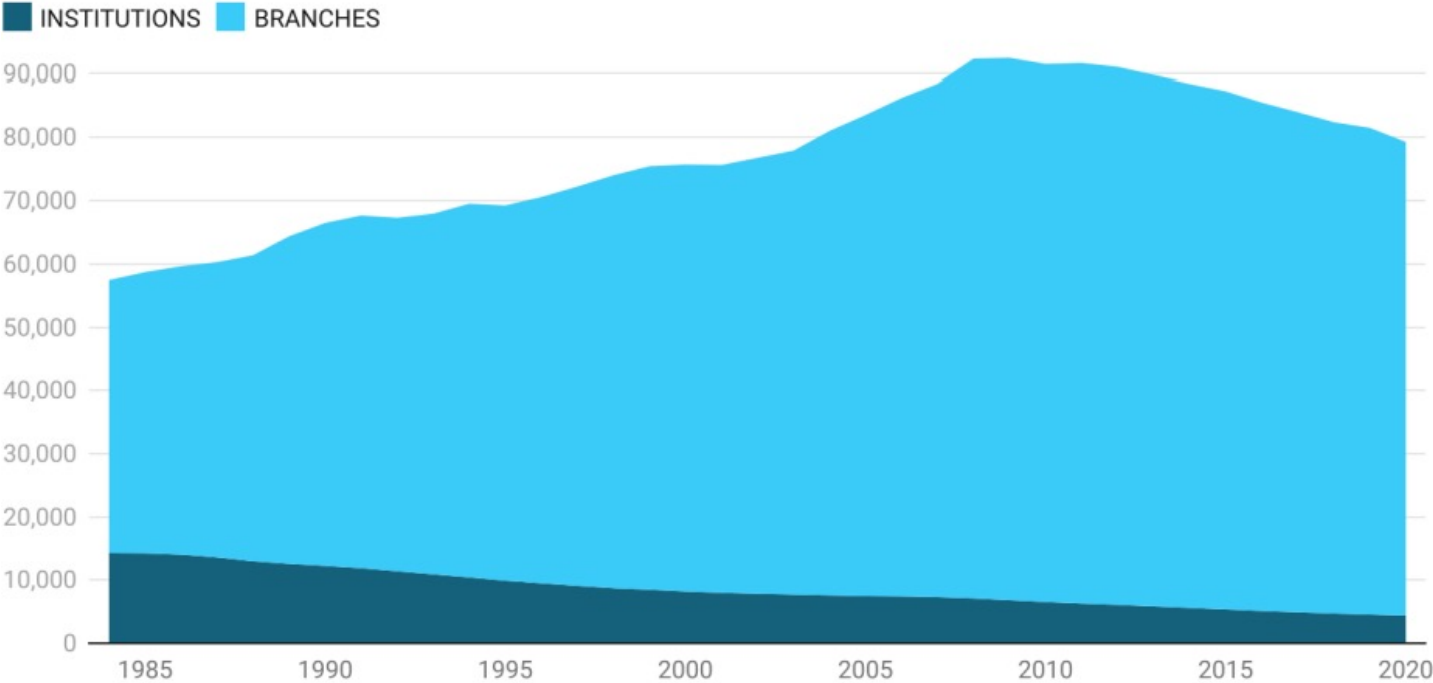


Chart: NCRC • Source: <https://banks.data.fdic.gov/docs/> retrieved on Dec 7, 2021 • Created with Datawrapper

Community Benefits Agreements: When?

The logo for American Banker, featuring a hamburger menu icon on the left and the text "AMERICAN BANKER" in a bold, serif font.

Bank M&A gets busier in August, bolstered by pent-up demand

Eighteen banks announced agreements to sell themselves last month. It was the most active month for bank deals since July 2022.

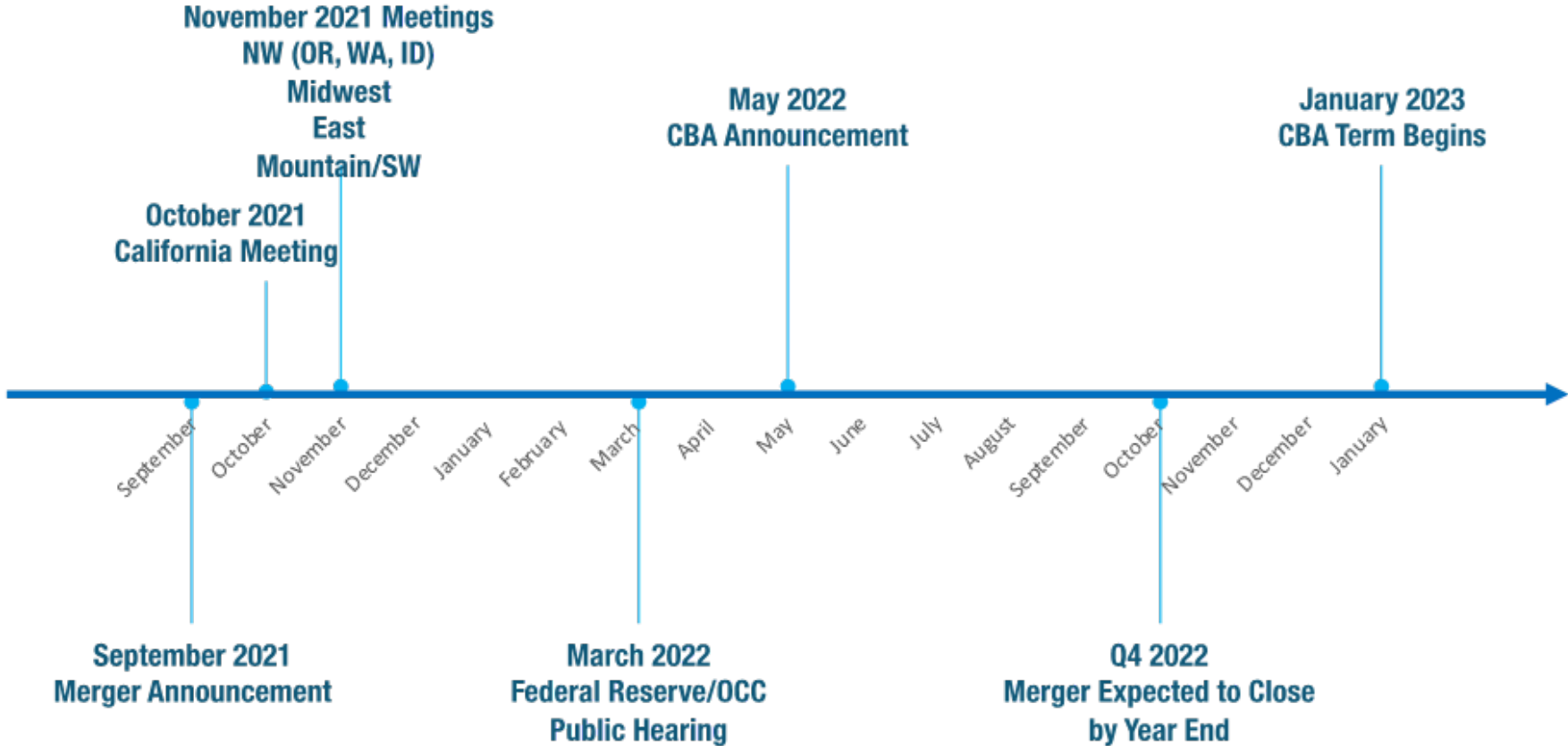
By Jim Dobbs
September 21

PRESS RELEASE

Justice Department Secures \$9 Million from Park National Bank to Address Lending Discrimination Allegations

February 28, 2023

Community Benefits Agreements: How?





4. WHAT DOES NCRC DO TO HELP?

What NCRC does to help:

Data Analysis

Assessment Area or State	Total	Hispanic	Native	Asian	Black	LMIB	MINB
Philadelphia MSA	2064	-4%	0%	1%	-7%	-14%	-1%
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State of New Jersey	284	-3%	0%	1%	-5%	-16%	-1%
New Haven MSA	236	-7%	0%	4%	-3%	-8%	1%
Manchester-Nashua MSA	202	-3%	0%	0%	0%	1%	1%

What NCRC does to help:

Sample Comment Letters

MANUAL | CRA Strategies

Sample CRA Comment and Meeting Request Letter

Once a bank has been identified, a comment letter and meeting request letter v attention to the concerns that community groups have and offer the bank a ch with local groups to improve their CRA performance. This sample letter for com CRA exam, as well as the sample merger letter that follows, should be used as a kind of information included in a successful comment letter. Both of these letter as sign-on letters for other organizations to join, which is a useful format to sho and coordinated concern about a bank's performance. The data and arguments campaign to campaign, but the letter format can remain similar.

For the CRA comment letter, the letter is written to the CEO of the particular bar request a meeting to address the issues you have identified. However, a copy is bank's regulator and a clear request is made at the beginning of the letter for th added to a bank's CRA public file and to be considered during their next CRA pe evaluation. The name CommunityFirstBank and Libertyville were created for thi and are not meant to reference any particular bank or community.

Date

CEO Name
Title
Name of Bank
...

MANUAL | CRA Strategies

Sample Merger Comment Letter

NOTE: This is a sample letter for commenting on a merger or acquisition. The names Big River Bank and Platinum State Bank were created for this sample letter. They are not meant to reference any particular bank.

Date

Regulator Name
Regulator Title
Regulator Department
Address Line
City, State, ZIP
regulatoremail@regulator.gov

RE: Big River Bank's acquisition of Platinum State Bank

Dear Mr./Ms. Regulator:

The undersigned organizations, working together in coalition with the National Community Reinvestment Coalition (NCRC), have serious concerns about the acquisition of Platinum State Bank (PSB) by Big River Bank. We do not believe that Big River Bank is meeting the needs of low- and moderate-income (LMI) communities, nor do we believe that the acquisition of Platinum State Bank will create a clear public benefit required by law. Big River Bank's level of LMI lending in their largest urban Metropolitan Statistical Areas (MSA) is consistently behind the aggregate LMI lending for the area. Absent a commitment to increase LMI lending in these areas and a plan to improve relationships with community groups, we respectfully request that the [INSERT REGULATOR] hold public hearings to discuss the bank's plans. We also recommend extending the comment period on the merger by a period of 90 days on the grounds that the merger application was not publicly available 30 days prior to the close of the comment period.

Our organizations are concerned that this acquisition will not provide a clear or significant public benefit. For over 50 years, banking law has recognized that merging is a privilege, not a right. Before a merger or acquisition is approved, the law requires regulatory agencies to ensure that public benefits outweigh the costs and potentially negative effects of a merger. In implementing the Federal Deposit Insurance Act, the FDIC Statement of Policy requires that an

What NCRC does to help

Facilitate
Community
Benefit
Agreements



Explainer: How NCRC brings banks and local leaders together for community benefits agreements

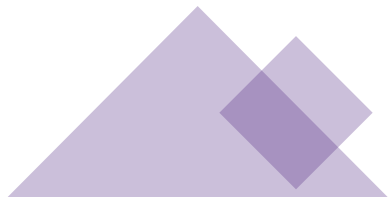
by Alexandria Robinson / September 11, 2019 / Field Notes / 5 minutes of reading

Get Involved Now – Visit the Advocacy Hub!

Oppose the Capital One – Discover Merger

Become a NCRC Member

<https://ncrc.org/membership/>





APPENDIX

Community Reinvestment Act

[Community Reinvestment Act](#)

[27-page Memo: Final Rule Amending Community Reinvestment Act Regulations \(Regulation BB\) \(federalreserve.gov\)](#)

[Full Text of New Rule: Federal Register :: Community Reinvestment Act](#)

[NCRC's Guide To The 2023 Community Reinvestment Act Final Rule » NCRC](#)

[Video: The New Community Reinvestment Act Rule: What's In It And What Will It Mean » NCRC](#)

Benefits of CRA

- [Fact Sheet on the Community Reinvestment Act: Advance Notice of Proposed Rulemaking \(federalreserve.gov\)](https://www.federalreserve.gov)
- Mee Jung Kim, Impact of the Community Reinvestment Act on small business employment in lower income neighborhoods, Regional Science and Urban Economics, Volume 98, 2023, 103837, <https://doi.org/10.1016/j.regsciurbeco.2022.103837>.
- [Four decades in, here's how and why the CRA keeps evolving - Fed Communities](https://www.fedcommunities.org/insights/four-decades-in-how-and-why-the-cra-keeps-evolving)
- <https://ncrc.org/what-the-community-reinvestment-act-means-to-lending-in-Philadelphia>
- https://www.jchs.harvard.edu/sites/default/files/media/imp/Harvard_JCHS_Lee_Effects_of_CRA_on_Lending.pdf
- <https://www.philadelphiafed.org/community-development/housing-and-neighborhoods/federal-reserve-study-finds-evidence-of-significant-impact-of-the-community-reinvestment-act>

CRA Assessment Areas

Understanding the Community Reinvestment Act's Assessment Area Requirements

By Kenneth Benton, Senior Consumer Regulation Specialist, and Donna Harris, Research Assistant, Federal Reserve Bank of Philadelphia:

<https://www.consumercomplianceoutlook.org/2014/first-quarter/understanding-cras-assessment-area-requirements/>

CRA Exam Schedules

- [FDIC: CRA Report](#)
- [Community Reinvestment Act \(CRA\) Evaluations Coming Due | OCC \(treas.gov\)](#)
- [Community Reinvestment Act - Exam Schedule \(federalreserve.gov\)](#)

Research Tools

- [FDIC BankFind Suite](#)
- [FFIEC Interagency CRA Rating Search](#)
- [OCC Performance Evaluations](#)
- [FDIC Performance Evaluations](#)
- [Federal Reserve Performance Evaluations](#)

Loan Data

HMDA Data is available online from the CFPB:

[The Home Mortgage Disclosure Act | Consumer Financial Protection Bureau \(consumerfinance.gov\)](#)

CFPB Summary of 2022 Data on Mortgage Lending: [The Home Mortgage Disclosure Act | Consumer Financial Protection Bureau \(consumerfinance.gov\)](#)

NCRC Summary: [2022 HMDA Data: Unraveling The Impact Of Rising Interest Rates On Homebuyers And Lenders In 2022 » NCRC](#)

Small business lending data is available online from FFIEC (Federal Financial Institutions Examination Council): [CRA Data Products \(ffiec.gov\)](#)

Maps and Redlining's Ongoing Impact

[A 1935 redlining map of Miami, Florida. | DPLA](#)

[Ameris Bank Consent Order Announcement: Office of Public Affairs | Justice Department Reaches Significant Milestone in Combating Redlining Initiative After Securing Over \\$107 Million in Relief for Communities of Color Nationwide | United States Department of Justice](#)