

# **Income is No Shield** Against Racial Differences in Lending:

**A Comparison of High-Cost Lending in America's  
Metropolitan Areas**

July 2007

NATIONAL  
COMMUNITY  
REINVESTMENT  
COALITION *NCRC*

## The National Community Reinvestment Coalition

The National Community Reinvestment Coalition (NCRC) is the nation's trade association for economic justice whose members consist of local community based organizations. Since its inception in 1990, NCRC has spearheaded the economic justice movement. NCRC's mission is to build wealth in traditionally underserved communities and bring low- and moderate-income populations across the country into the financial mainstream. NCRC members have constituents in every state in America, in both rural and urban areas.

The Board of Directors would like to express their appreciation to the NCRC professional staff who contributed to this publication and serve as a resource to all of us in the public and private sector who are committed to responsible lending. For more information, please contact:

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## Executive Summary

A looming foreclosure crisis confronts America as lending institutions have engaged in new forms of dangerous high-cost lending. Most of the high-cost or subprime lending made in recent years feature adjustable rate mortgages (ARMs) with low “teaser” rates for the first few years followed by rapidly rising rates. Incredibly, many lenders assessed borrowers’ abilities to repay only at the low teaser rates. These loose underwriting standards have created the conditions for a perfect storm as almost 2 million of the ARM loans will re-set or start adjusting upward from their initial rates in 2007 and 2008.<sup>1</sup> While they were slow to act, the federal regulatory agencies have finally raised the alarm and are now advising lenders to reform their underwriting practices.

In the backdrop of the risky high-cost lending practices, NCRC observes striking racial disparities in high-cost lending. If a consumer is a minority, particularly an African-American or a Hispanic, the consumer is most at risk of receiving a poorly underwritten high-cost loan. In addition, middle-class or upper-class status does not shield minorities from receiving dangerous high-cost loans. In fact, NCRC observes that racial differences in lending increase as income levels increase. In other words, middle- and upper-income (MUI) minorities are more likely relative to their MUI white counterparts to receive high-cost loans than low- and moderate-income (LMI) minorities are relative to LMI whites. Mainstream media has taken notice of the predatory lending plague afflicting middle-class minority communities. For example, the Wall Street Journal recently wrote a poignant and detailed article describing widespread foreclosures due to predatory lending in Detroit’s middle-income African-American communities.<sup>2</sup>

NCRC has always said that responsible high-cost lending serves legitimate credit needs. High-cost loans compensate lenders for the added risk of lending to borrowers with credit imperfections. However, wide differences in lending by race, even when accounting for income levels, suggests that more minorities are receiving high-cost loans than is justified based on creditworthiness. Previous studies by NCRC and others suggest that minorities are, in fact, receiving a

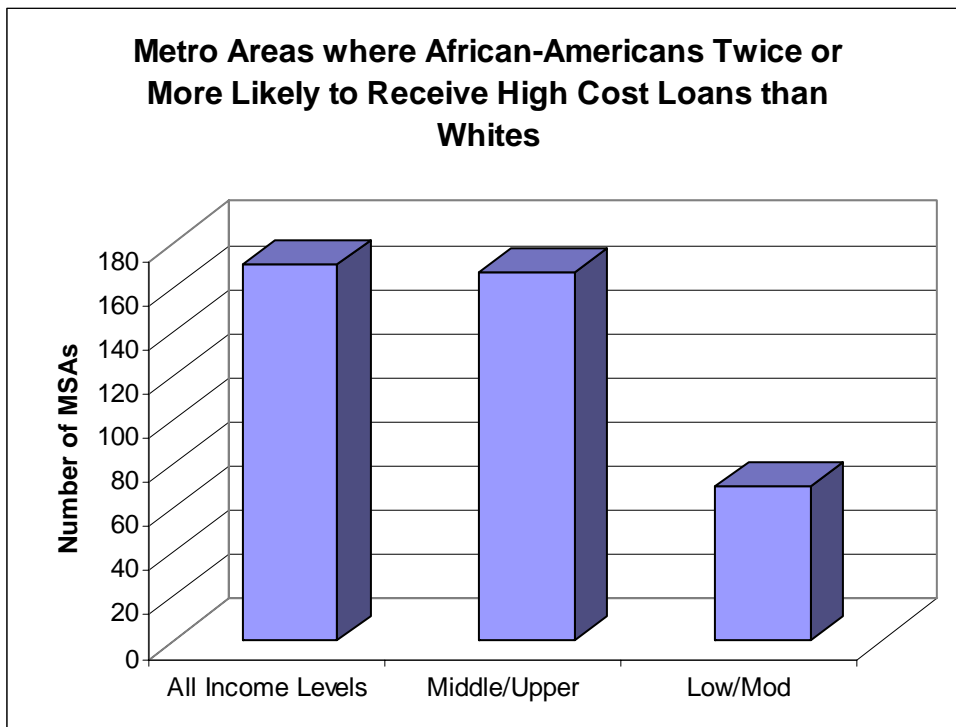
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<sup>1</sup> “Regulators are Pressed to Take Tougher Stand on Mortgages,” by Gregg Hitt and James R. Hagerty, Wall Street Journal, March 23, 2007

<sup>2</sup> Mark Whitehouse, “A Day of Reckoning Subprime Aftermath: Losing the Family Home – Mortgages Bolstered Detroit’s Middle Class Until Money Ran Out,” Wall Street Journal, May 30, 2007, page A1.

disproportionately large amount of high-cost loans, after controlling for creditworthiness and other housing market factors. When minorities receive a disproportionate amount of high-cost loans, they lose substantial amounts of equity through higher payments to their lenders. In addition, they are more exposed to irresponsibly underwritten ARM loans.

The lending disparities for African-Americans were large and increased significantly as income levels increased. African-Americans of all income levels were twice as likely or more than twice as likely to receive high-cost loans as whites in 171 metropolitan statistical areas (MSAs) during 2005, the most recent year for which publicly reported loan data on an industry-wide basis is available. MUI African-Americans were twice as likely or more than twice as likely to receive high-cost loans as MUI whites in 167 MSAs. In contrast, LMI African-Americans were twice as likely or more than twice as likely to receive high-cost loans as LMI whites in 70 MSAs. Moreover, MUI African-Americans receive a large percentage of high-cost loans. In 159 metropolitan areas, more than 40% of the loans received by MUI African-American were high-cost loans.



Hispanics also experienced greater disparities in high-cost lending compared to whites as income levels rose. LMI Hispanics were twice or more likely to receive high-cost loans than LMI whites in 10 MSAs. MUI Hispanics were twice or more likely to receive high-cost loans than MUI whites in 75 MSAs. In addition, the

percentage of high-cost loans received by MUI Hispanics was high. For MUI Hispanics, more than 40% of the loans received were high-cost in 71 MSAs and more than 30% of the loans received were high-cost in 137 MSAs.

The study also serves as a valuable resource for all stakeholders by depicting high-cost lending trends overall and by race in every metropolitan area in America. The study finds that African-Americans experienced large lending disparities in Southern and mid-west MSAs and also in New England MSAs. For Hispanics, the West and Midwest MSAs exhibited high-disparities, and, surprisingly, so did New England MSAs. West coast MSAs exhibited the widest disparities for Asians.

When considering overall racial disparities, NCRC finds that the ten worst MSAs for lending disparities are (in descending order) Charleston, SC; Bridgeport, CT; Omaha, NE; Milwaukee, WI; Springfield, MA; Minneapolis-St. Paul, MN; Philadelphia, PA; Trenton, NJ; Birmingham, AL; and Greenville, SC.

Since racial disparities have been stubborn and persistent over several years, NCRC calls upon all stakeholders to enact bold programmatic and policy reforms. Community groups and financial institutions should engage in more partnerships to devise counseling programs and lending products that are fairly priced and affordable for minorities and working class Americans. Congress must pass a comprehensive anti-predatory law that prohibits steering or price discrimination and that outlaws a range of equity-stripping and abusive practices. Senator Schumer's bill (S. 1299 or the Borrower's Protection Act of 2007) is an excellent start for an anti-predatory lending bill. Congress must also pass the Community Reinvestment Modernization Act of 2007 (H.R. 1289) that would strengthen the Community Reinvestment Act (CRA) and thus encourage more prime or market-rate lending to minorities. Finally, federal and state regulatory agencies must significantly bolster the rigor of their anti-predatory and fair lending enforcement.

## Literature Review and Introduction

A substantial body of research documents significant disparities in loan pricing based on the race, age, and income levels of neighborhood residents. These disparities are due to a combination of discrimination, market failure, and a variety of other factors.<sup>3</sup> Discrimination and market failure impedes wealth

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<sup>3</sup> The disparities discussed in this report reflect a number of factors including income, wealth, credit rating, and many others. Discrimination, of course, remains a significant factor. Several studies discussed below have found that even controlling on credit-related factors, disparities persist. The disparities in this report do not necessarily reveal levels of discrimination in the marketplace; but they do reveal the presence of ongoing barriers associated with socioeconomic factors.

building and the creation of sustainable homeownership opportunities for residents of traditionally underserved neighborhoods.

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

Lending discrimination in the form of steering high cost loans to underserved borrowers qualified for market rate loans results in equity stripping and has contributed to inequalities in wealth. According to the Federal Reserve Survey of Consumer Finances, the median value of financial assets was \$38,500 for whites, but only \$7,200 for minorities in 2001. Whites had more than five times the dollar amount of financial assets than minorities. Likewise the median home value for whites was \$130,000 and only \$92,000 for minorities in 2001.<sup>5</sup> By 2004, the Federal Reserve Survey of Consumer Finances reports the median net worth of minorities was 17.6% of that for all other families. In addition, the median net worth for African-Americans was virtually the same at \$20,400 in 2004 as it was in 2001 (\$20,300).<sup>6</sup>

Since subprime loans often cost \$50,000 to \$100,000 more than comparable prime loans, a neighborhood receiving a disproportionate number of subprime loans loses a significant amount of equity and wealth. Using a mortgage calculator from Bankrate.com, a \$140,000 30-year mortgage with the current

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<sup>4</sup> A non-traditional loan is a loan that does not have a standard fixed-rate interest rate and/or does not have a traditional 30-year term. An example of a non-traditional loan is an interest-only loan in which the borrower only has to make interest payments during a specified time period of the loan. An option ARM loan features a number of payment options; under one option the borrower does not even have to pay the monthly interest that is due. A substantial number of subprime loans are non-traditional loans but so are a significant number of prime loans. Option ARM loans, for example, are almost always prime loans.

<sup>5</sup> Ana M. Aizcorbe, Arthur B. Kennickell, and Kevin B. Moore, *Recent Changes in U.S. Family Finances: Evidence from the 1998 and 2001 Survey of Consumer Finances*, Federal Reserve Bulletin, January 2003.

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

prime rate of 6.25% costs about \$862 a month or about \$310,320 over the life of the loan. In contrast, a 30-year subprime loan with an interest rate of 8.25% costs \$1,052 a month or approximately \$378,637 over the life of the loan. The difference in total costs between the 6.25% and 8.25% loan is \$68,317. Finally, a 30-year subprime loan at 9.25% costs \$1,152 per month and \$414,630 over the life of the loan. The difference in total costs between a 6.25% and 9.25% loan is \$104,310. For a family who is creditworthy for a prime loan but receives a subprime loan, the total loss in equity can be easily between \$50,000 and \$100,000. This amount represents resources that could have been used to send children to college or start a small business. Instead of building family wealth, the equity was transferred from the family to the lender.

Building upon this example, the equity drain from a neighborhood can be tremendous. Suppose 15 percent or 300 families in a predominantly minority census tract with 2,000 households receive subprime loans although they were creditworthy for prime loans (15 percent of families that are inappropriately steered into subprime loans is a realistic figure based on existing research). Further, assume that these families pay \$50,000 more over the life of the loan than they should (the \$50,000 figure is conservative based on the calculations immediately above). In total, the 300 families in the minority census tract have paid lenders \$15 million more than they would have if they had received prime loans for which they could have qualified. The \$15 million in purchasing power could have supported stores in the neighborhood, economic development in the neighborhood, or other wealth building endeavors for the families and neighborhood. For even one neighborhood, the magnitude of wealth loss due to pricing disparities and/or discrimination is stark. Across the country, the wealth loss is staggering and tragic.

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

- The level of refinance subprime lending increased as the portion of African-Americans in a neighborhood increased in nine of the ten metropolitan areas. In the case of home purchase subprime lending, the African-American composition of a neighborhood boosted lending in six metropolitan areas.



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

Another NCRC study, *Fair Lending Disparities by Race, Income and Gender in all Metropolitan Areas in America (spring 2005)*, reveals striking lending disparities across the great majority of the 331 metropolitan areas in the United States. Specifically, minorities, women, and low- and moderate-income borrowers received a disproportionate share of subprime loans relative to prime loans. Lending disparities were compared to the level of segregation controlling for housing affordability across metropolitan areas. As segregation increased, the portion of subprime loans to African-Americans, Hispanics, and minority tracts increased faster than prime lending to these tracts. A segment of subprime lenders is targeting segregated neighborhoods with high cost loans.

In another study conducted in 2006, *Homeownership and Wealth Building Impeded*, NCRC found that racial disparities in the share of borrowers receiving high-cost loans were greater for upper-income borrowers than lower-income borrowers across the nation. High-cost loans made up a high 41.9 percent of all refinance loans to low- and moderate-income (LMI) African-Americans. In contrast, subprime loans were 19.2 percent of refinance loans to LMI whites in 2004. LMI African-Americans were 2.2 times more likely than LMI whites to receive high-cost loans. Even for middle- and upper-income (MUI) African-Americans, high-cost loans made up a large percentage (30.2 percent) of all refinance loans. Moreover, the subprime share of loans to MUI African-Americans was 2.7 times larger than the subprime share of loans to MUI whites. The same phenomena of increasing disparities when income increased was observed when comparing high-cost lending in predominantly white and immigrant neighborhoods.

NCRC's findings are consistent with a wide variety of research on subprime lending. A survey study conducted by Freddie Mac analysts finds that two-thirds of subprime borrowers were not satisfied with their loans, while three-quarters of prime borrowers believed they received fair rates and terms.<sup>7</sup> In previous years, Freddie Mac and Fannie Mae had often been quoted as stating that between a third to a half of borrowers who qualify for low cost loans receive subprime loans.<sup>8</sup> The Federal Reserve also released analyses of the 2004 and 2005 HMDA data revealing racial disparities even after controlling for income levels, loan

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<sup>7</sup> Freddie Mac analysts Marsha J. Courchane, Brian J. Surette, Peter M. Zorn, *Subprime Borrowers: Mortgage Transitions and Outcomes*, September 2002, prepared for Credit Research Center, Subprime Lending Symposium in McLean, VA.

<sup>8</sup> "Fannie Mae Vows More Minority Lending," in the Washington Post, March 16, 2000, page E01. Freddie Mac web page, <http://www.freddiemac.com/corporate/reports/moseley/chap5.htm>.

types, and geographical areas.<sup>9</sup> Dan Immergluck was one of the first researchers to document the “hypersegmentation” of lending by race of neighborhood.<sup>10</sup> The Department of Housing and Urban Development also found that after controlling for housing stock characteristics and the income level of the census tract, subprime lending increases as the minority level of the tract increases.<sup>11</sup> Even the Research Institute for Housing America, an offshoot of the Mortgage Bankers Association, found that minorities were more likely to receive loans from subprime institutions, after controlling for the creditworthiness of the borrowers.<sup>12</sup>

Paul Calem of the Federal Reserve, and Kevin Gillen and Susan Wachter of the Wharton School also use credit scoring data to conduct econometric analysis scrutinizing the influence of credit scores, demographic characteristics, and economic conditions on the level of subprime lending. Their study found that after controlling for creditworthiness and housing market conditions, the level of subprime refinance and home purchase loans increased in a statistically significant fashion as the portion of African-Americans increased on a census tract level in Philadelphia and Chicago.<sup>13</sup> The Center for Responsible Lending also recently used the 2004 HMDA data with pricing information to reach the same troubling conclusions that racial disparities remain after controlling for creditworthiness.<sup>14</sup>

## Research Findings

For this report, NCRC conducted an analysis of Home Mortgage Disclosure Act (HMDA) data for metropolitan areas across the country using the 2005 data,

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<sup>9</sup> Avery, Robert B., Glenn B. Canner, and Robert E. Cook, “New Information Reported under HMDA and Its Application in Fair Lending Enforcement.” *Federal Reserve Bulletin*, Summer 2005. Avery, Robert B., Kenneth P. Brevoort, and Glenn B. Canner, “Higher-Priced Home Lending and the 2005 HMDA Data,” *Federal Reserve Bulletin*, September 2006.

<sup>10</sup> Dan Immergluck, *Two Steps Back: The Dual Mortgage Market, Predatory Lending, and the Undoing of Community Development*, the Woodstock Institute, November 1999.

<sup>11</sup> Randall M. Scheessele, *Black and White Disparities in Subprime Mortgage Refinance Lending*, April 2002, published by the Office of Policy Development and Research, the U.S. Department of Housing and Urban Development.

<sup>12</sup> Anthony Pennington-Cross, Anthony Yezer, and Joseph Nichols, *Credit Risk and Mortgage Lending: Who Uses Subprime and Why?* Working Paper No. 00-03, published by the Research Institute for Housing America, September 2000.

<sup>13</sup> Paul S. Calem, Kevin Gillen, and Susan Wachter, *The Neighborhood Distribution of Subprime Mortgage Lending*, October 30, 2002. Available via [pcalem@frb.gov](mailto:pcalem@frb.gov). also Paul S. Calem, Jonathan E. Hershaff, and Susan M. Wachter, *Neighborhood Patterns of Subprime Lending: Evidence from Disparate Cities*, in Fannie Mae Foundation's Housing Policy Debate, Volume 15, Issue 3, 2004 pp. 603-622

<sup>14</sup> Center for Responsible Lending, *Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages*, see <http://www.responsiblelending.org/issues/mortgage/reports/page.jsp?itemID=29371010>

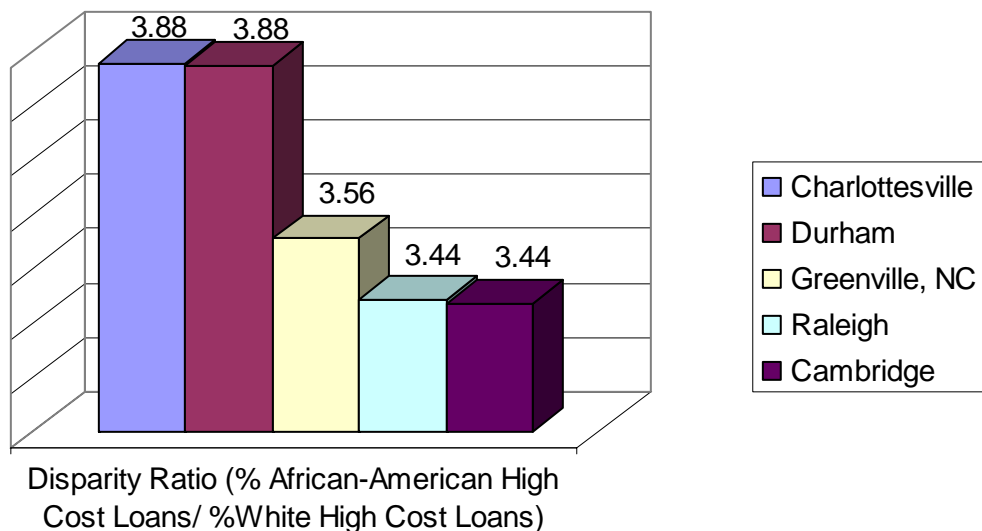
which is the most recent publicly available data on an industry-wide basis. NCRC considered loans for traditional single family homes occupied by the borrowers of the loans (investor owned properties were not considered). The home loan data considered was home purchase, refinance, and home improvement lending (first liens only). HMDA data reports pricing information for high-cost loans. NCRC considered loans without pricing information to be market-rate loans and loans with pricing information to be high-cost loans.

NCRC focused the analysis on racial disparities in lending experienced by low- and moderate-income borrowers considered separately from middle- and upper-income borrowers. Income level is an important factor in the lending process. While persistent racial disparities across all income levels do not prove discrimination, it would appear that stakeholders could take action to narrow particularly large disparities for middle- and upper-income minorities and whites. Large disparities at all income levels suggest a lack of competition among lenders and other market barriers that can be reduced by concerted action. Stakeholders and policymakers must consider carefully any differences by race that persists for middle- and upper-income borrowers.

#### ***Largest and Smallest Disparities Experienced by African-Americans***

Comparing the lending disparities between African-American borrowers and white borrowers, the Charlottesville, VA Metropolitan Statistical Area (MSA) was the worst and the El Paso, TX MSA ranked the best for home lending during 2005. The worst MSAs were predominantly located in the south and mid-west of the United States; the mid-Atlantic and New England also had some MSAs experiencing wide disparities (see Table 1 – tables are after the recommendations).

### The Five Worst Metro Areas Where African-Americans Are More Likely To Receive High-Cost Loans than Whites



Of all home loans to African-Americans in the Charlottesville, VA MSA, 43.0% were high-cost, while only 11.1% of loans received by whites were high-cost. African-Americans received high-cost loans 3.88 times more frequently than white borrowers (43.0% of all loans for African-Americans that were high-cost divided by 11.1% of the loans for whites that were high-cost). Rounding out the worst five metropolitan areas were Durham, NC; Greenville, NC; Raleigh, NC; and Cambridge, MA. In each of these metropolitan areas, African-Americans were more than 3.4 times as likely as whites to receive high-cost loans.

In contrast, in the El Paso, TX MSA 27.0% of loans issued to African-Americans was high-cost while 31.9% of loans received by whites were high-cost.<sup>15</sup> African-Americans were .85 times as likely to receive high-cost loans as whites. In other words, African-Americans were less likely to receive high-cost loans than whites (whenever the disparity ratio is less than one, the minority group is less likely to

<sup>15</sup> Some metropolitan areas in which disparities are low for any particular group (such as African-Americans) also have small populations of the minority group. This study did not attempt to control for the size of the minority population across metropolitan areas. Instead, it provides a picture of disparities across all metropolitan areas so that stakeholders can decide for themselves the meaning of disparities in their communities. The study does not analyze lending patterns to a minority group when the number of loans is below 50 because fewer than 50 observations are not meaningful in a statistical sense for a metropolitan area.

receive high cost loans). MSAs in the Southwest and West Coast generally had the least disparities in high cost lending between African-American and whites.

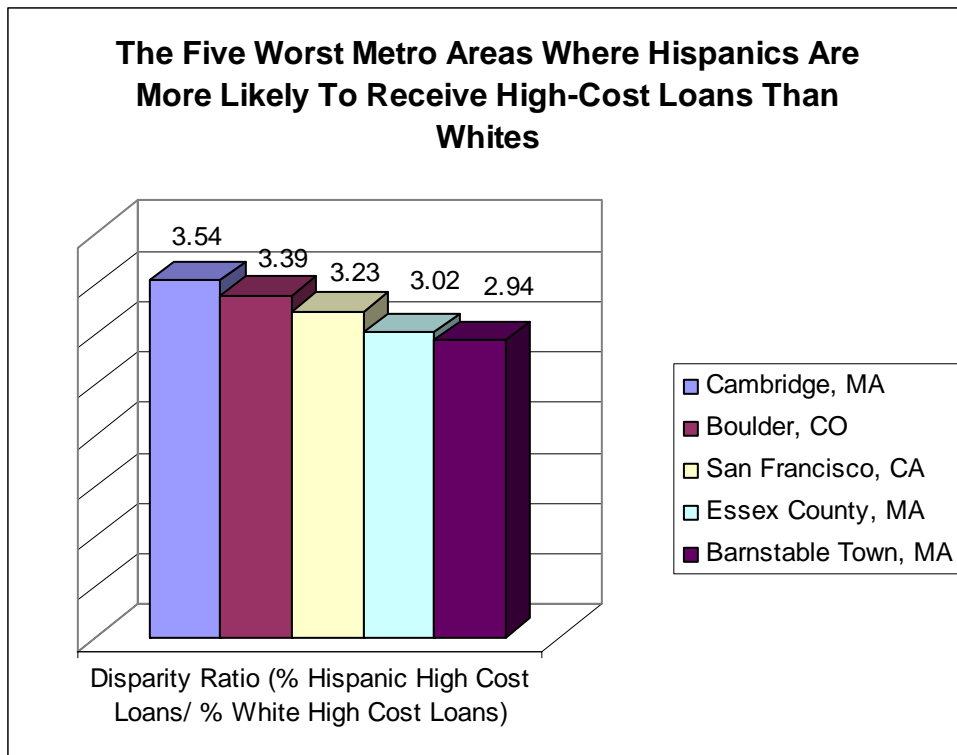
The Charlottesville, VA MSA also ranked the worst in home lending to low- to moderate-income (LMI) African-American borrowers. Of all loans to LMI African-American borrowers, 48.0% were high-cost, while only 15.2% of the loans received by LMI whites were high-cost. This means that LMI African-American borrowers were 3.16 times more likely to receive a high-cost loan than LMI white borrowers. (see Table 2) Those MSAs that were ranked the worst were predominantly located in the south, mid-Atlantic, and mid-west regions of the country.

The Pine Bluff, AR MSA was ranked the best in lending patterns for home loans to LMI African-American borrowers. In the Pine Bluff, AR MSA, 42.3% of all loans to LMI African-Americans were high-cost while 40.3% of all loans issued to LMI whites were high-cost. This means that African-Americans were 1.05 times more likely to receive a high-cost loan than LMI whites.

Similar results were found in terms of the MSAs with the widest disparities when looking at lending patterns for middle- to upper-income (MUI) African-American borrowers. Those MSAs ranked as the worst were located largely in the South, Midwest, and New England regions of the country (see Table 3). The Durham, NC MSA ranked the worst; 38.6% of loans to MUI African-Americans was high-cost, while only 8.6% of loans to MUI whites were high-cost. MUI African-American borrowers in the Durham, NC MSA were 4.50 times more likely to receive a high-cost loan than MUI white borrowers. Rounding out the worst five MSAs were Raleigh, NC; Charlottesville, VA; Cambridge, MA; and Greenville, NC.

### ***Largest and Smallest Disparities Experienced by Hispanics***

Metropolitan areas in Massachusetts constituted three of the five worst areas in terms of disparities in high-cost lending to Hispanics and whites. Surprisingly, New England metropolitan areas tended to cluster among the worst areas, followed by mid-west and West Coast MSAs. The worst disparity occurred in Cambridge, MA during 2005. In Cambridge, MA, 42.8% of all home loans issued to Hispanics were high-cost while 12.1% of all loans received by whites were high-cost. Hispanic borrowers received high-cost loans 3.54 times more frequently than white borrowers (see Table 4).



Some Southern MSAs exhibited the least disparities between Hispanics and whites. For example, in the Dalton, GA MSA, 15.8% of all home loans issued to Hispanic borrowers were high-cost while 28.1% of all loans received by whites were high-cost. Hispanic borrowers were only 0.56 times as likely to receive a high-cost loan than white borrowers.

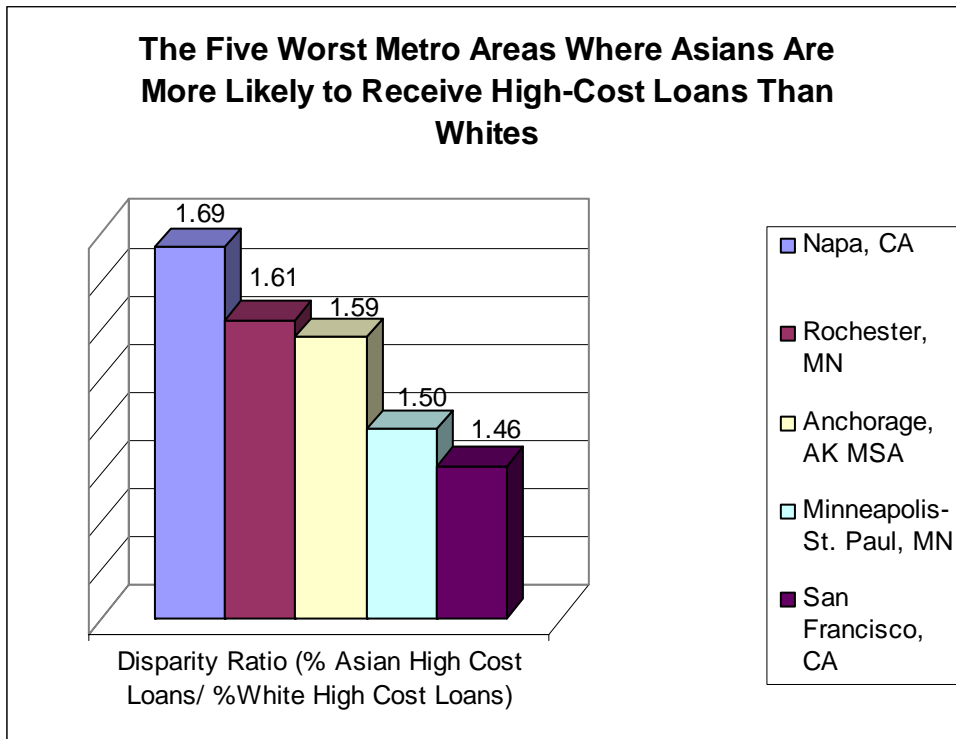
Interestingly, a number of Puerto Rican MSAs had few disparities in high-cost lending between Hispanics and whites. In some of these MSAs, the percentage of high-cost loans for both borrower groups was small. Texas and California MSAs also exhibited narrow disparities in high-cost lending between Hispanics and whites, but in some of these MSAs like Laredo, TX and El Centro, CA, the percentage of high-cost lending was relatively high for both groups of borrowers.

Tables 5 and 6 show specific lending patterns for LMI Hispanics and MUI Hispanics. One noteworthy observation was that New England MSAs and metropolitan areas in Massachusetts continued to exhibit high disparities.

***Largest and Smallest Disparities Experienced by Asians***

Western MSAs tend to exhibit the worst disparities in high-cost lending between Asians and whites. The Napa, CA MSA ranked worst for high-cost lending patterns for Asian borrowers. In the Napa, CA MSA, 20.6% of all home loans

issued to Asian borrowers were high-cost while 12.2% of all loans received by white borrowers were high-cost in 2005. Asian borrowers were 1.69 times more likely to receive a high-cost loan than white borrowers. Rounding out the worst five in terms of disparities was Rochester, MN; Anchorage, AK; Minneapolis, MN; and San Francisco, CA (see Table 7)



Refer to Tables 8 and 9 for more specific data on lending patterns to LMI Asians and MUI Asians.

***Largest and Smallest Disparities by Income Level of Borrower***

Table 10 displays disparities in high-cost lending by income level. No particular region contains a concentration of MSAs with the worst disparities by income level. The five worst metropolitan areas in descending order are San Juan, PR; Morgantown, WV; Philadelphia, PA; Bismark, ND; and Gainesville, FL. The five areas with the least disparities are Barnstable Town, MA; New York-White Plains, NY; Santa Cruz, CA; San Francisco, CA; and Santa Rosa, CA.

***Best and Worst Metropolitan Areas***

Table 11 displays the metropolitan areas with the largest and smallest disparities across the racial categories. For this table, NCRC displayed an MSA if the MSA

had enough observations for calculating disparities for two races or ethnic groups compared to whites and the disparity for LMI compared to MUI borrowers.<sup>16</sup> The MSAs with the largest disparities overall in descending order were Charleston, SC; Bridgeport, CT; Omaha, NE; Milwaukee, WI; and Springfield, MA during 2005.

### ***Racial Disparities Increase as Income Level Increases***

Racial disparities in high-cost lending increase when income levels increase. When the percentage of high-cost loans received by whites is compared against the percentage of high-cost loans received by minorities, the disparities in the percentages is larger for MUI whites and MUI minorities than for LMI whites and LMI minorities.

The percentage of high-cost loans received by MUI borrowers is lower than for LMI borrowers, but the percentage of high-cost loans received by MUI whites drops significantly more than the percentage of high-cost loans received by MUI minorities. For example, in Durham, NC, 48% of the loans received by LMI African-Americans were high-cost while 16.4% of the loans received by LMI whites were high-cost. When considering MUI borrowers, 38.6% of the loans received by MUI African-Americans were high-cost while 8.6% of the loans received by MUI whites were high-cost in Durham, NC during 2005. The percentage of high-cost loans received by whites dropped by about half when climbing the income scale from LMI to MUI (16.4% compared to 8.6%). In contrast, the percentage of loans received by African-Americans dropped by only one-fifth for MUI African-Americans compared to LMI African-Americans (38.6% compared to 48%).

MUI minorities experienced high absolute percentages of high-cost loans in addition to large disparities relative to whites. In 159 metropolitan areas, more than 40% of the loans received by MUI African-American were high-cost loans. For MUI Hispanics, more than 40% of the loans received were high-cost in 71 MSAs and more than 30% of the loans received were high-cost in 137 MSAs.

For African-Americans, differences in high-cost lending increases significantly as income increases. LMI African-Americans were 3 times or more likely than LMI whites to receive high-cost loans in just 1% of the MSAs. In contrast, MUI African-Americans were 3 times or more likely to receive high-cost loans than MUI whites in 12.4% MSAs during 2005 (see Table 12). The same trend of MUI African-Americans experiencing greater disparities continues when considering

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<sup>16</sup> Table 11 displays 10 indicators of lending disparities. An MSA would need to have enough observations (at least 50 high-cost loans for a borrower group) for 7 of the indicators to be included in the table.



the number of MSAs in which African-Americans were between 2.5 to 3 times more likely to receive loans. LMI African-Americans were 2.5 to 3.0 times more likely than LMI whites to receive high-cost loans in 5.1% of the MSAs. In contrast, MUI African-Americans were 2.5 to 3.0 times more likely than MUI whites to receive high-cost loans in 28.0% of the MSAs.

Shockingly, MUI African-Americans were twice as likely or more than MUI whites to receive high-cost loans in 167 MSAs. LMI African-Americans were twice as likely or more than twice as likely to receive high-cost loans in 70 MSAs.

Just as for African-Americans, the disparity in high-cost lending for Hispanics becomes greater for MUI Hispanics than LMI Hispanics. LMI Hispanics were between 2.5 to 3 times more likely than LMI whites to receive high-cost loans in 1.2% of the MSAs. In contrast, MUI Hispanics were between 2.5 to 3 times more likely than MUI whites to receive high-cost loans in 11.8% of the MSAs. Similarly, LMI Hispanics were 2.0 to 2.5 times more likely to receive high-cost loans than LMI whites in 4.8% of the MSAs while MUI Hispanics were 2.0 to 2.5 times more likely to receive high-cost loans than MUI whites in 27.0% of the MSAs.

Distressingly, MUI Hispanics were twice or more likely than MUI whites to receive high-cost loans in 75 MSAs. LMI Hispanics were twice or more likely to receive high-cost loans than LMI whites in 10 MSAs.<sup>17</sup>

Asians generally experienced fewer disparities in high-cost lending than African-Americans and Hispanics, but even for Asians, disparities increased as income level increased. For example, LMI Asians were between 1 to 1.5 times more likely than LMI whites to receive high-cost loans in 8.5% of the MSAs. In contrast, MUI Asians received high-cost loans 1.0 to 1.5 times greater than MUI whites in 20.9% of the MSAs.

A common expectation is that disparities in lending by race would narrow as income increases. More affluent borrowers should have fewer difficulties paying their bills on time, meaning that more affluent borrowers should have fewer difficulties maintaining good credit histories. Therefore, it would seem that MUI minorities should have similar creditworthiness to MUI whites. As a consequence, MUI minorities should have expanded access to market-rate loans and receive fewer high-cost loans. On the other hand, some would say that

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<sup>17</sup> The differences in the number of MSAs in various categories of disparities for African-Americans and Hispanics are due in part to differences in the number of MSAs in the analysis. NCRC did not analyze lending patterns in a MSA if the number of market-rate or high-cost loans for a racial and/or income group was less than 50 loans. Fewer than 50 loans in an MSA reduces the statistically reliability of the data. For the same reason, the study observes lending patterns in fewer MSAs for Asians.

differences in creditworthiness by race could persist even when income increases. Thus, differences in high-cost lending could be the same for MUI minorities compared to MUI whites as it is for LMI minorities compared to LMI whites.

While this study was not able to attain creditworthiness by race and income, it is startling nonetheless that differences in high-cost lending increases as income levels increase. This finding would suggest that creditworthiness of minorities declines compared to whites as income level increases. Another explanation for this finding, which NCRC finds more plausible, is that discrimination and/or other market imperfections is impeding access to market-rate loans for middle- and upper-income minorities. Lenders could be overtly steering minorities qualified for prime loans into high-cost loans. Alternatively, lenders specializing in high-cost loans could be working harder to make loans to MUI minorities than market-rate lenders. Both possibilities (discrimination and less effort by market-rate lenders) could be occurring at the same time. The fact that MUI minorities receive such large percentages of high-cost loans suggests that multiple barriers to equal access are occurring simultaneously. These startling and persistent disparities suggest that the burden lies on skeptics to disprove the existence of discrimination and other barriers to equal access to market-rate loans.

## Conclusion

Responsible subprime lending has an important role to play in the marketplace, however, this study demonstrates that high-cost lending is disproportionately targeted to minorities, even middle- and upper-income minorities. Standard anti-trust theory suggests that when relatively few companies serve any group of consumers, that group of consumers is more likely to suffer abuses. In light of the findings that minorities, regardless of income levels, receive a disproportionate amount of high-cost lending, NCRC offers a number of programmatic and policy recommendations in order to stop predatory lending in minority communities. The level of foreclosure prevention counseling needs to be significantly increased to prevent consumers from falling victim to predatory lending. In addition, policy reforms and increased regulatory enforcement must eradicate widespread abuses in the high-cost lending sphere. Action is urgently needed to head-off a foreclosure crisis.

## Recommendations

NCRC offers the following recommendations:

### *Programmatic Partnerships*

Banks, community organizations, and public agencies should work together to establish programs for refinancing ARM high-cost loans into lower-cost fixed-rate loans. Counseling organizations can identify borrowers who were steered into high-cost loans when they qualified for lower cost loans. In addition, counseling organizations and lending institutions must identify borrowers who are having difficulties paying ARM high-cost loans with rates that are adjusting upward. Public agencies and the Federal Home Loan Banks can provide grants and low interest rate loans, when necessary, to assist borrowers with temporary cash shortfalls. In April of 2007, the federal banking agencies issued a statement encouraging banks to engage in these activities. The statement reiterated that banks can earn points on their Community Reinvestment Act (CRA) exams when engaging in loan modifications and refinancing borrowers into lower cost loans.<sup>18</sup>

### *National Foreclosure Prevention*

NCRC urges policy-makers to adopt a foreclosure prevention bill that provides funding for foreclosure prevention counseling. In the spring of 2007, Senators Schumer (NY) and Reed (RI) have introduced foreclosure prevention bills worthy of swift congressional passage.

Senator Schumer has proposed that Congress appropriate \$300 million to provide funding through the Department of Housing and Urban Development (HUD) to nonprofit counseling agencies to engage in foreclosure prevention counseling. Senators Schumer, Brown of Ohio, and Casey of Pennsylvania have also asked major financial industry trade associations to generate a \$2 private sector match for every \$1 appropriated by the federal government to fund foreclosure prevention efforts like NCRC's CRF program. Based on a report issued in the spring of 2007 by the Joint Economic Committee of the U.S. Congress, the Senators estimate that their public and private sector funding would assist between 300,000 to 900,000 families in danger of foreclosure.<sup>19</sup> A foreclosure can impose societal costs of \$80,000 in contrast to foreclosure prevention counseling, which costs about \$1,000 per assisted borrower. Considering that about 2 million families confront ARM mortgages with interest rates that will increase this year and next, the Senators' approach is cost-effective and promises

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<sup>18</sup> See <http://www.federalreserve.gov/BoardDocs/Press/bcreg/2007/20070417/default.htm>

<sup>19</sup> Joint Economic Committee, *Sheltering Neighborhoods from the Subprime Foreclosure Storm*, April 11, 2007, <http://jec.senate.gov/Documents/Reports/subprime11apr2007revised.pdf>.

to prevent financial and emotional stress inflicted upon families losing their homes.

Senator Reed has introduced a similar bill, S. 1386 - the Homeownership Protection and Enforcement (HOPE) Act, that would provide \$610 million for non-profit counseling agencies and state agencies to provide forbearance and loan modification services to distressed borrowers. Servicers (entities that handle loan payments on behalf of the companies owning the loans) are required to make reasonable loan mitigation efforts before foreclosing on loans.

### ***Comprehensive Anti-Predatory Lending Legislation***

Since our analysis revealed a disproportionate amount of high-cost lending targeted to vulnerable borrowers and communities, Congress must respond by enacting comprehensive anti-predatory lending legislation along the lines of bills introduced by Representatives Watt, Miller, and Frank and Senator Schumer. Comprehensive and strong anti-predatory lending legislation would eliminate the profitability of exploitative practices by making them illegal. It could also reduce the amount of price discrimination since fee packing and other abusive practices would be prohibited. A comprehensive anti-predatory law would also strengthen the Community Reinvestment Act (CRA) if regulatory agencies severely penalize lenders through failing CRA ratings when the lenders violate anti-predatory law.

Senator Schumer has recently introduced S. 1299, or the Borrower's Protection Act of 2007, that would require lenders to assess a borrower's ability to pay a loan at the maximum possible rate during the first seven years of the loan. This procedure eliminates the dangerous practice of qualifying a borrower based on a low "teaser" rate in place during the first two or three years of the loan. The bill would also prohibit steering or price discrimination by making it illegal for lenders to refer borrowers to loans that are not reasonably advantageous for them, based on the loan terms for which borrowers qualify.

### ***Fair Lending Enforcement Must be Increased***

In September of 2005, the Federal Reserve Board stated that it referred about 200 lending institutions to their primary federal regulatory agency for further investigations based upon the Federal Reserve's identification of significant pricing disparities in HMDA data.<sup>20</sup> An industry publication subsequently quoted a Federal Reserve official as stating that these lenders accounted for almost 50

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<sup>20</sup> Robert B. Avery, Glenn B. Canner, and Robert E. Cook, *New Information Reported under HMDA and Its Application in Fair Lending Enforcement*, Federal Reserve Bulletin, Summer 2005, <http://www.federalreserve.gov/pubs/bulletin/2005/05summerbulletin.htm>

percent of the HMDA-reportable loans issued in 2004.<sup>21</sup> In September of 2006, the Federal Reserve Board referred a larger number of lenders, 270, to their primary regulatory agency for further investigations.<sup>22</sup>

After the initial excitement, the public has not heard about the outcomes of the Federal Reserve referrals. Not a single case of discrimination or civil rights violations have arisen from the Federal Reserve's referrals. Given the large share of lending represented by the financial institutions under investigation, the general public should receive an update of the status of these fair lending investigations from all the regulatory agencies. In addition, the federal agencies should annually report to Congress how many fair lending investigations they conducted, the types of fair lending investigations, and the outcomes of these investigations. Since the pricing disparities remain stubborn and persistent in 2005, fair lending investigations and enforcement must be intensified, yet the general public has received little word regarding the actions of the federal regulatory agencies.

### *Enhance the Quality of HMDA Data*

NCRC believes that Congress and the Federal Reserve Board (which implements the HMDA regulations) must enhance HMDA data so that regular and comprehensive studies can scrutinize fairness in lending. Specifically, are minorities, the elderly, women, and low- and moderate-income borrowers and communities able to receive loans that are fairly priced? More information in HMDA data is critical to fully explore the intersection of price, race, gender, and income.

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

HMDA data must contain credit score information similar to the data used in NCRC's *Broken Credit System* report released in the winter of 2003. For each HMDA reportable loan, a financial institution must indicate whether it used a credit score system and if the system was their own or one of the widely used

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<sup>21</sup> Inside Regulatory Strategies, November 14, 2005, p.2.

<sup>22</sup> Joe Adler, *Big Increase in Lenders with Suspect HMDA Data*, American Banker, September 11, 2006.

systems such as FICO (a new data field in HMDA could contain 3 to 5 categories with the names of widely-used systems). The HMDA data also would contain one more field indicating which quintile of risk the credit score system placed the borrower.

Another option is to attach credit score information in the form of quintiles to each census tract in the nation. That way, enhanced analyses can be done on a census tract level to see if pricing disparities still remain after controlling for creditworthiness. This was the approach adopted in NCRC's *Broken Credit System* and in studies conducted by Federal Reserve economists. Finally, HMDA data must contain information on other key underwriting variables including the loan-to-value and debt-to-income ratios. Finally, Senator Reed's bill, S. 1386, would create a database on foreclosures and delinquencies that would be linked with HMDA. This would be an important data enhancement that would help policymakers understand which loan terms and conditions (such as loan-to-value ratios and fixed or ARM) are more likely to be associated with delinquencies and foreclosures.

### ***Federal Reserve Board Must Step Up Anti-Discrimination and Fair Lending Oversight***

The Government Accountability Office concluded that the Federal Reserve Board has the authority to conduct fair lending reviews of affiliates of bank holding companies. The Federal Reserve Board at first insisted that it lacked this authority, but has recently made some moves to examine affiliates.<sup>23</sup> The Federal Reserve should clarify how and to what extent it is examining affiliates because comprehensive anti-discrimination exams of all parts of bank holding companies are critical. Most of the major banks have acquired large subprime lenders that are then considered affiliates. A pressing question is the extent to which the subprime affiliates refer creditworthy customers to the prime parts of the bank so that the customers receive loans at prevailing rates instead of higher subprime rates. Or does the subprime affiliate steer creditworthy borrowers to high-cost loans? These questions remain largely unanswered. Consequently, we do not know the extent of steering by subprime affiliates and/or their parent banks.

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

In order to increase prime lending for minority borrowers and reduce lending disparities, CRA exams must evaluate the banks' records of lending to minority borrowers and neighborhoods as well as scrutinizing banks' performance in

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<sup>23</sup> Government Accountability Office, *Large Bank Mergers: Fair Lending Review Could be Enhanced with Better Coordination*, November 1999, GAO/GGD-00-16.

reaching low- and moderate-income borrowers and neighborhoods. If CRA exams covered minority neighborhoods, pricing disparities in these neighborhoods would be reduced. The Federal Reserve Board, in its review of 2004 HMDA data, found that bank lending exhibited fewer disparities in geographical areas covered by their CRA exams than in areas not covered by their exams.<sup>24</sup> CRA's mandate of affirmatively meeting credit needs is currently incomplete as it is now applied only to low- and moderate-income neighborhoods, not minority communities.

CRA must also be strengthened so that depository institutions undergo CRA examinations in all geographical areas in which they make a significant number of loans. Currently, CRA exams assess lending primarily in geographical areas in which banks have their branches. But the overlap between branching and lending is eroding with each passing year as lending via brokers and correspondents continues to increase. NCRC strongly endorses HR 1289 or the CRA Modernization Act of 2007. HR 1289 mandates that banks undergo CRA exams in geographical areas in which their market share of loans exceeds one half of one percent in addition to areas in which their branches are located.

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

### ***CRA Must be Expanded to Non-Bank Lending Institutions***

Large credit unions and independent mortgage companies do not abide by CRA requirements. NCRC and Government Accountability Office (GAO) research concludes that large credit unions lag CRA-covered banks in their lending and service to minorities and low- and moderate-income borrowers and communities.<sup>25</sup> Unlike their counterparts, credit unions in Massachusetts are covered by a state CRA law. NCRC has also found that CRA-covered credit unions in Massachusetts issue a higher percentage of their loans to LMI and minority borrowers and communities than credit unions not covered by CRA. Therefore, NCRC believes that applying CRA to both large credit unions and independent mortgage companies will increase their market-rate lending to LMI and minority borrowers.

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<sup>24</sup> Avery and Canner, op. cit.

<sup>25</sup> NCRC, *Credit Unions: True to their Mission?*, 2005, <http://www.ncrc.org>; and Government Accountability Office, *Credit Unions: Greater Transparency Needed on Who Credit Unions Serve and on Senior Executive Compensation Arrangements*, November, 2006

### ***CRA Exams Must Scrutinize Subprime Lending More Rigorously***

Currently, CRA exams are not adequately assessing the CRA performance of subprime lenders. For example, the CRA exam of the subprime lender, Superior Bank, FSB, called its lending innovative and flexible before that thrift's spectacular collapse.<sup>26</sup> Previous NCRC comment letters to the regulators have documented cursory fair lending reviews for the great majority of banks and thrifts involved in subprime lending.<sup>27</sup> If CRA exams continue to mechanistically consider subprime lending, subprime lenders will earn good ratings since they usually offer a larger portion of their loans to low- and moderate-income borrowers and communities than prime lenders.

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

### ***GSEs Must Abide by Anti-Predatory Safeguards***

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

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<sup>26</sup> Office of Thrift Supervision Central Region's CRA Evaluation of Superior Bank, FSB, Docket #: 08566, September 1999. Available via <http://www.ots.treas.gov>, go to the CRA search engine and select "inactive" for the status of the institution being searched.

<sup>27</sup> NCRC comment letter to federal banking agencies on joint CRA proposal, April 2, 2004. Available via: <http://www.ncrc.org>.



HUD's ruling is an important first step, but it needs to be enhanced. HUD's ruling, for example, does not include disqualification from goals consideration of loans with mandatory arbitration. The Federal Housing Finance Board, as the regulator for the Federal Home Loan Banks, has not formally applied protections against abusive loans to the Home Loan Banks. Congress has an opportunity to further bolster the anti-predatory protections applied to GSE loan purchasing activity as Congress considers GSE regulatory reform.

# Report Tables

**Table 1 - NCRC Analysis: African-American/White**

State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
51 VA	16820 Charlottesville, VA MSA	248	43.0%	638	11.1%	3.88	251
37 NC	20500 Durham, NC MSA	1,126	40.4%	984	10.4%	3.88	250
37 NC	24780 Greenville, NC MSA	330	44.5%	398	12.5%	3.56	249
37 NC	39580 Raleigh-Cary, NC MSA	2,176	42.1%	3,603	12.2%	3.44	248
25 MA	15764 Cambridge-Newton-Framingham, MA MD	581	41.5%	5,036	12.1%	3.44	247
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	3,868	60.7%	8,093	17.8%	3.42	246
37 NC	48900 Wilmington, NC MSA	354	47.6%	1,691	14.3%	3.33	245
45 SC	16700 Charleston-North Charleston, SC MSA	1,589	51.9%	3,125	16.1%	3.22	244
19 IA	47940 Waterloo-Cedar Falls, IA MSA	98	58.3%	853	18.3%	3.19	243
12 FL	23540 Gainesville, FL MSA	398	52.4%	946	16.5%	3.18	242
42 PA	37964 Philadelphia, PA MD	5,856	43.0%	12,860	13.7%	3.13	241
26 MI	11460 Ann Arbor, MI MSA	499	44.1%	1,294	14.1%	3.13	240
17 IL	28100 Kankakee-Bradley, IL MSA	183	66.8%	598	21.5%	3.11	239
55 WI	31540 Madison, WI MSA	104	38.7%	2,420	12.5%	3.08	238
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	3,091	56.8%	21,974	18.5%	3.07	237
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	1,152	44.1%	3,949	14.5%	3.04	236
25 MA	14484 Boston-Quincy, MA MD	2,621	42.2%	7,625	14.1%	3.00	235
51 VA	40060 Richmond, VA MSA	5,238	47.2%	5,533	15.9%	2.97	234
IL+MO	41180 St. Louis, MO-IL MSA	8,264	59.7%	18,592	20.2%	2.96	233
51 VA	31340 Lynchburg, VA MSA	343	49.9%	964	17.0%	2.93	232
13 GA	42340 Savannah, GA MSA	901	45.3%	1,216	15.5%	2.92	231
34 NJ	45940 Trenton-Ewing, NJ MSA	736	44.6%	1,308	15.4%	2.89	230
25 MA	21604 Essex County, MA MD	392	47.2%	4,273	16.4%	2.88	229
17 IL	14060 Bloomington-Normal, IL MSA	77	36.2%	582	12.7%	2.85	228
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	8,024	62.7%	5,017	22.3%	2.82	227
25 MA	49340 Worcester, MA MSA	521	51.8%	5,126	18.5%	2.80	226
37 NC	40580 Rocky Mount, NC MSA	494	52.0%	320	18.6%	2.80	225
48 TX	46340 Tyler, TX MSA	249	54.0%	746	19.3%	2.80	224
17 IL	44100 Springfield, IL MSA	97	42.2%	864	15.1%	2.79	223
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	7,770	43.5%	7,697	15.6%	2.79	222
12 FL	45220 Tallahassee, FL MSA	844	45.9%	1,335	16.5%	2.77	221
42 PA	25420 Harrisburg-Carlisle, PA MSA	344	43.1%	2,285	15.8%	2.73	220
01 AL	33860 Montgomery, AL MSA	1,123	43.9%	1,117	16.1%	2.73	219
36 NY	15380 Buffalo-Niagara Falls, NY MSA	395	44.7%	2,973	16.4%	2.72	218
01 AL	46220 Tuscaloosa, AL MSA	493	45.1%	659	16.7%	2.70	217
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	546	55.6%	4858	20.6%	2.70	216
37 NC	11700 Asheville, NC MSA	153	50.0%	2,136	18.6%	2.69	215
45 SC	24860 Greenville, SC MSA	789	51.2%	2,562	19.2%	2.67	214
01 AL	12220 Auburn-Opelika, AL MSA	192	43.7%	497	16.6%	2.64	213
28 MS	27140 Jackson, MS MSA	2,348	55.0%	1,786	20.9%	2.64	212
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	4,107	47.1%	9,524	17.9%	2.63	211
42 PA	21500 Erie, PA MSA	95	51.4%	1,102	19.6%	2.62	210
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	3,308	49.5%	4,191	18.9%	2.62	209
29 MO	17860 Columbia, MO MSA	63	37.1%	563	14.2%	2.61	208
KS+MO	28140 Kansas City, MO-KS MSA	3,543	57.4%	15,136	22.0%	2.61	207
13 GA	15260 Brunswick, GA MSA	200	61.7%	567	23.8%	2.60	206

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State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
01 AL	26620 Huntsville, AL MSA	921	43.6%	1,638	16.9%	2.58	205
25 MA	44140 Springfield, MA MSA	540	51.2%	3,695	19.9%	2.58	204
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	250	18.2%	2,558	7.1%	2.57	203
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	4,152	41.2%	7,413	16.2%	2.54	202
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	24,976	43.9%	21,755	17.3%	2.54	201
25 MA	12700 Barnstable Town, MA MSA	59	39.6%	1,487	15.6%	2.54	200
37 NC	49180 Winston-Salem, NC MSA	746	39.6%	1,708	15.6%	2.54	199
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	1,347	43.0%	5,705	17.0%	2.53	198
55 WI	39540 Racine, WI MSA	200	48.0%	1,419	18.9%	2.53	197
12 FL	46940 Vero Beach, FL MSA	127	54.7%	1,110	21.6%	2.53	196
42 PA	49620 York-Hanover, PA MSA	233	45.9%	2,621	18.2%	2.52	195
18 IN	23060 Fort Wayne, IN MSA	362	52.6%	2,415	20.9%	2.52	194
36 NY	40380 Rochester, NY MSA	461	42.2%	3,185	16.8%	2.52	193
18 IN	23844 Gary, IN MD	1,383	58.5%	4,340	23.2%	2.52	192
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	3,280	47.3%	17,230	18.8%	2.51	191
45 SC	17900 Columbia, SC MSA	2,123	48.1%	2,681	19.1%	2.51	190
NJ+PA	35084 Newark-Union, NJ-PA MD	4,897	46.0%	9,618	18.4%	2.51	189
01 AL	13820 Birmingham-Hoover, AL MSA	4,070	56.2%	6,041	22.4%	2.51	188
17 IL	16974 Chicago-Naperville-Joliet, IL MD	25,712	56.5%	58,143	22.6%	2.49	187
37 NC	24140 Goldsboro, NC MSA	202	39.1%	291	15.7%	2.49	186
39 OH	19380 Dayton, OH MSA	1,147	50.0%	4,239	20.1%	2.49	185
12 FL	34940 Naples-Marco Island, FL MSA	248	52.9%	2,929	21.3%	2.49	184
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	240	59.1%	2,018	23.8%	2.49	183
39 OH	41780 Sandusky, OH MSA	56	48.3%	357	19.4%	2.48	182
48 TX	17780 College Station-Bryan, TX MSA	110	56.1%	651	22.6%	2.48	181
13 GA	40660 Rome, GA MSA	73	49.3%	361	20.0%	2.47	180
13 GA	12020 Athens-Clarke County, GA MSA	283	49.0%	784	19.9%	2.46	179
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	26,558	38.9%	22,259	15.8%	2.46	178
45 SC	43900 Spartanburg, SC MSA	463	57.0%	1,276	23.2%	2.46	177
24 MD	12580 Baltimore-Towson, MD MSA	11,228	44.0%	15,843	18.1%	2.44	176
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	2,237	46.5%	12,056	19.1%	2.43	175
37 NC	24660 Greensboro-High Point, NC MSA	1,453	43.1%	2,672	17.9%	2.41	174
12 FL	27260 Jacksonville, FL MSA	3,829	52.3%	9,289	21.7%	2.41	173
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	195	56.5%	1,846	23.5%	2.40	172
42 PA	39740 Reading, PA MSA	133	42.6%	2,009	17.8%	2.40	171
51 VA	19260 Danville, VA MSA	247	50.5%	310	21.1%	2.39	170
45 SC	22500 Florence, SC MSA	598	59.4%	678	24.8%	2.39	169
22 LA	12940 Baton Rouge, LA MSA	2,348	54.6%	3,264	22.8%	2.39	168
26 MI	24340 Grand Rapids-Wyoming, MI MSA	735	56.1%	5,772	23.5%	2.39	167
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	3,887	51.1%	11,120	21.4%	2.39	166
13 GA	31420 Macon, GA MSA	989	59.0%	858	24.8%	2.38	165
18 IN	26900 Indianapolis, IN MSA	2,457	45.7%	10,104	19.3%	2.37	164
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	13,588	66.5%	11,260	28.1%	2.37	163
45 SC	11340 Anderson, SC MSA	185	53.2%	820	22.5%	2.36	162
01 AL	33660 Mobile, AL MSA	1,146	55.1%	1,602	23.3%	2.36	161
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	493	48.0%	6,161	20.4%	2.36	160
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,138	35.7%	13,051	15.1%	2.36	159

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State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
37 NC	15500 Burlington, NC MSA	230	48.3%	580	20.6%	2.35	158
47 TN	27180 Jackson, TN MSA	444	60.2%	594	25.7%	2.34	157
39 OH	10420 Akron, OH MSA	850	49.4%	4,109	21.1%	2.34	156
22 LA	43340 Shreveport-Bossier City, LA MSA	1,089	52.8%	1,573	22.5%	2.34	155
51 VA	40220 Roanoke, VA MSA	353	44.7%	1,545	19.1%	2.34	154
IN+KY	21780 Evansville, IN-KY MSA	138	49.3%	1962	21.1%	2.34	153
26 MI	28020 Kalamazoo-Portage, MI MSA	286	51.9%	2,012	22.2%	2.34	152
42 PA	42540 Scranton--Wilkes-Barre, PA MSA	81	51.9%	2,821	22.3%	2.33	151
09 CT	35300 New Haven-Milford, CT MSA	1,284	48.6%	5,133	20.9%	2.32	150
21 KY	30460 Lexington-Fayette, KY MSA	327	38.9%	2,039	16.8%	2.32	149
12 FL	37460 Panama City-Lynn Haven, FL MSA	139	42.8%	997	18.5%	2.31	148
42 PA	29540 Lancaster, PA MSA	60	33.7%	1,880	14.6%	2.31	147
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	1108	47.9%	11645	20.8%	2.30	146
45 SC	44940 Sumter, SC MSA	312	54.8%	311	23.9%	2.30	145
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	2,837	35.6%	6,489	15.5%	2.29	144
17 IL	37900 Peoria, IL MSA	216	43.3%	1,906	18.9%	2.29	143
05 AR	30780 Little Rock-North Little Rock, AR MSA	996	40.9%	2,635	17.9%	2.28	142
42 PA	38300 Pittsburgh, PA MSA	917	48.2%	10,778	21.1%	2.28	141
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	13,587	42.4%	22,891	18.6%	2.28	140
22 LA	29180 Lafayette, LA MSA	612	55.2%	1,343	24.3%	2.27	139
29 MO	44180 Springfield, MO MSA	63	48.1%	2,996	21.3%	2.26	138
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	499	60.9%	3636	27.1%	2.25	137
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	310	51.6%	1,130	23.0%	2.24	136
17 IL	16580 Champaign-Urbana, IL MSA	107	32.5%	748	14.5%	2.24	135
39 OH	18140 Columbus, OH MSA	2,232	41.5%	9,207	18.5%	2.24	134
IN+KY	31140 Louisville, KY-IN MSA	1,371	45.1%	7,043	20.2%	2.23	133
48 TX	19124 Dallas-Plano-Irving, TX MD	6,993	51.7%	19,361	23.1%	2.23	132
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	309	51.4%	2038	23.1%	2.22	131
53 WA	14740 Bremerton-Silverdale, WA MSA	65	39.2%	1,601	17.7%	2.22	130
33 NH	31700 Manchester-Nashua, NH MSA	77	36.8%	2,569	16.7%	2.21	129
18 IN	33140 Michigan City-La Porte, IN MSA	97	59.1%	740	26.9%	2.20	128
19 IA	19780 Des Moines, IA MSA	180	45.9%	4,155	20.9%	2.20	127
39 OH	30620 Lima, OH MSA	106	57.6%	674	26.3%	2.19	126
26 MI	35660 Niles-Benton Harbor, MI MSA	217	53.3%	1,034	24.3%	2.19	125
34 NJ	15804 Camden, NJ MD	2,780	41.7%	7,687	19.1%	2.19	124
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	2,588	46.0%	9,424	21.1%	2.18	123
39 OH	45780 Toledo, OH MSA	694	48.4%	3,723	22.2%	2.18	122
37 NC	22180 Fayetteville, NC MSA	823	32.6%	870	15.0%	2.18	121
01 AL	23460 Gadsden, AL MSA	128	66.0%	629	30.3%	2.17	120
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	379	37.9%	4650	17.4%	2.17	119
48 TX	30980 Longview, TX MSA	233	62.8%	926	29.0%	2.17	118
40 OK	36420 Oklahoma City, OK MSA	1,151	51.3%	7,077	23.9%	2.15	117
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	591	39.3%	14999	18.3%	2.15	116
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	1,062	36.1%	1,587	16.9%	2.14	115
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	555	45.0%	2,702	21.1%	2.13	114
08 CO	19740 Denver-Aurora, CO MSA	1,716	40.5%	18,690	19.0%	2.13	113
48 TX	47380 Waco, TX MSA	209	57.7%	1,026	27.2%	2.13	112

**Table 1 - NCRC Analysis: African-American/White**

State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
13 GA	10500 Albany, GA MSA	546	53.8%	524	25.4%	2.12	111
24 MD	41540 Salisbury, MD MSA	281	52.7%	785	24.9%	2.12	110
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	1,539	38.2%	3,798	18.1%	2.11	109
36 NY	35004 Nassau-Suffolk, NY MD	3,895	47.5%	14,839	22.5%	2.11	108
26 MI	29620 Lansing-East Lansing, MI MSA	521	53.0%	3,572	25.1%	2.11	107
34 NJ	20764 Edison, NJ MD	1,694	34.6%	11,741	16.4%	2.11	106
36 NY	28740 Kingston, NY MSA	78	43.1%	844	20.5%	2.11	105
02 AK	11260 Anchorage, AK MSA	149	29.9%	1,631	14.2%	2.10	104
36 NY	10580 Albany-Schenectady-Troy, NY MSA	265	37.0%	3,706	17.6%	2.10	103
AL+GA	17980 Columbus, GA-AL MSA	893	43.9%	923	21.0%	2.09	102
13 GA	23580 Gainesville, GA MSA	114	45.4%	1,081	21.8%	2.08	101
06 CA	36084 Oakland-Fremont-Hayward, CA MD	3,662	32.3%	11,825	15.5%	2.08	100
37 NC	27340 Jacksonville, NC MSA	104	24.6%	404	11.9%	2.08	99
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	2,859	40.6%	16,490	19.6%	2.07	98
34 NJ	12100 Atlantic City, NJ MSA	558	47.7%	2,110	23.0%	2.07	97
20 KS	48620 Wichita, KS MSA	325	45.0%	3,322	21.7%	2.07	96
48 TX	13140 Beaumont-Port Arthur, TX MSA	427	50.1%	1,163	24.2%	2.07	95
01 AL	20020 Dothan, AL MSA	250	58.5%	854	28.4%	2.06	94
26 MI	22420 Flint, MI MSA	998	53.3%	3,333	25.9%	2.06	93
48 TX	12420 Austin-Round Rock, TX MSA	617	32.2%	5,503	15.7%	2.05	92
39 OH	15940 Canton-Massillon, OH MSA	271	54.9%	2,852	26.9%	2.04	91
09 CT	35980 Norwich-New London, CT MSA	130	39.8%	1,610	19.5%	2.04	90
26 MI	12980 Battle Creek, MI MSA	187	57.4%	1,170	28.3%	2.02	89
17 IL	40420 Rockford, IL MSA	313	54.4%	2,822	27.0%	2.02	88
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	778	56.5%	5,833	28.1%	2.01	87
21 KY	14540 Bowling Green, KY MSA	50	44.2%	599	22.0%	2.01	86
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	11,633	59.1%	30,038	29.5%	2.01	85
49 UT	41620 Salt Lake City, UT MSA	91	42.5%	8,369	21.2%	2.00	84
26 MI	34740 Muskegon-Norton Shores, MI MSA	282	58.8%	1,406	29.3%	2.00	83
22 LA	26380 Houma-Bayou Cane-Thibodaux, LA MSA	159	57.0%	1,150	28.5%	2.00	82
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	692	42.9%	3,451	21.5%	2.00	81
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	527	39.6%	6,639	19.9%	1.99	80
12 FL	36100 Ocala, FL MSA	417	51.2%	2,534	25.8%	1.98	79
48 TX	31180 Lubbock, TX MSA	72	46.5%	1,176	23.5%	1.98	78
13 GA	47580 Warner Robins, GA MSA	313	35.6%	543	18.1%	1.97	77
32 NV	39900 Reno-Sparks, NV MSA	87	34.8%	3,396	17.7%	1.97	76
06 CA	42220 Santa Rosa-Petaluma, CA MSA	58	24.1%	2,246	12.2%	1.97	75
01 AL	19460 Decatur, AL MSA	197	56.8%	922	28.9%	1.96	74
53 WA	45104 Tacoma, WA MD	814	46.5%	7,268	23.7%	1.96	73
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	4,560	52.0%	28,368	26.5%	1.96	72
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	9,762	52.7%	17,931	26.9%	1.96	71
47 TN	28940 Knoxville, TN MSA	360	46.5%	4,940	23.8%	1.95	70
40 OK	46140 Tulsa, OK MSA	601	53.9%	5,616	27.7%	1.95	69
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	833	43.1%	5,125	22.2%	1.94	68
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,135	51.7%	4,804	26.8%	1.93	67
18 IN	21140 Elkhart-Goshen, IN MSA	72	47.4%	1,358	24.6%	1.92	66
48 TX	23104 Fort Worth-Arlington, TX MD	2,339	46.7%	10,694	24.3%	1.92	65

**Table 1 - NCRC Analysis: African-American/White**

State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
13 GA	46660 Valdosta, GA MSA	250	48.7%	631	25.4%	1.92	64
12 FL	39460 Punta Gorda, FL MSA	128	45.1%	1,552	23.7%	1.90	63
12 FL	36740 Orlando-Kissimmee, FL MSA	4,728	49.2%	21,561	26.3%	1.87	62
22 LA	33740 Monroe, LA MSA	338	54.4%	860	29.3%	1.86	61
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	235	38.8%	2375	20.9%	1.86	60
36 NY	45060 Syracuse, NY MSA	111	30.7%	2,023	16.6%	1.86	59
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,107	27.3%	14,152	14.7%	1.85	58
GA+TN	16860 Chattanooga, TN-GA MSA	732	54.7%	3954	29.7%	1.84	57
17 IL	19500 Decatur, IL MSA	59	36.6%	458	20.0%	1.83	56
01 AL	22520 Florence-Muscle Shoals, AL MSA	131	47.1%	778	25.9%	1.82	55
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	144	47.1%	2731	25.9%	1.82	54
12 FL	15980 Cape Coral-Fort Myers, FL MSA	760	55.4%	9,228	30.6%	1.81	53
53 WA	36500 Olympia, WA MSA	76	31.1%	1,566	17.2%	1.81	52
28 MS	37700 Pascagoula, MS MSA	199	52.2%	833	29.0%	1.80	51
01 AL	11500 Anniston-Oxford, AL MSA	193	53.0%	690	29.5%	1.80	50
28 MS	25060 Gulfport-Biloxi, MS MSA	224	42.4%	1,037	23.6%	1.80	49
04 AZ	46060 Tucson, AZ MSA	320	36.6%	7,989	20.4%	1.79	48
22 LA	29340 Lake Charles, LA MSA	270	49.0%	956	27.3%	1.79	47
08 CO	17820 Colorado Springs, CO MSA	355	31.5%	4,375	17.8%	1.77	46
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	136	26.8%	4,509	15.2%	1.77	45
18 IN	11300 Anderson, IN MSA	84	53.8%	1,114	30.7%	1.76	44
39 OH	31900 Mansfield, OH MSA	73	42.7%	815	24.6%	1.74	43
15 HI	26180 Honolulu, HI MSA	116	24.0%	1,019	13.9%	1.73	42
06 CA	46700 Vallejo-Fairfield, CA MSA	1,197	35.8%	3,036	20.8%	1.72	41
12 FL	29460 Lakeland, FL MSA	1,081	56.0%	5,887	32.6%	1.72	40
20 KS	45820 Topeka, KS MSA	77	37.6%	1,399	22.0%	1.71	39
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	3,048	42.6%	57,200	25.0%	1.71	38
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	399	26.9%	13,455	15.8%	1.70	37
39 OH	44220 Springfield, OH MSA	84	46.4%	983	27.3%	1.70	36
22 LA	10780 Alexandria, LA MSA	261	55.7%	823	32.9%	1.69	35
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	220	47.3%	941	28.0%	1.69	34
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	281	22.8%	5,900	13.6%	1.68	33
KY+TN	17300 Clarksville, TN-KY MSA	307	31.4%	1196	18.9%	1.66	32
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	125	27.0%	1,113	16.3%	1.66	31
26 MI	27100 Jackson, MI MSA	121	51.9%	1,717	31.9%	1.63	30
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	11,550	38.4%	53,882	23.6%	1.63	29
06 CA	49700 Yuba City, CA MSA	85	42.9%	1,644	27.0%	1.59	28
AR+TX	45500 Texarkana, TX-Texarkana, AR MSA	143	48.3%	625	30.5%	1.58	27
28 MS	25620 Hattiesburg, MS MSA	196	48.2%	786	30.4%	1.58	26
10 DE	20100 Dover, DE MSA	296	31.8%	936	20.2%	1.57	25
32 NV	29820 Las Vegas-Paradise, NV MSA	3,117	43.8%	23,991	28.3%	1.55	24
06 CA	47300 Visalia-Porterville, CA MSA	90	49.7%	4,028	32.2%	1.55	23
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	6,793	56.5%	30,362	36.7%	1.54	22
06 CA	23420 Fresno, CA MSA	596	44.5%	7,946	29.2%	1.52	21
06 CA	12540 Bakersfield, CA MSA	729	48.8%	10,124	32.4%	1.51	20
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	7,104	45.3%	54,024	30.2%	1.50	19
06 CA	44700 Stockton, CA MSA	1,303	43.3%	7,569	29.0%	1.49	18

**Table 1 - NCRC Analysis: African-American/White**

State	MSA	# High-Cost Loans to African-Americans	% High-Cost Loans to African-Americans	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
48 TX	18580 Corpus Christi, TX MSA	76	43.4%	2,162	29.1%	1.49	17
21 KY	21060 Elizabethtown, KY MSA	125	41.3%	831	27.7%	1.49	16
06 CA	31460 Madera, CA MSA	64	44.4%	1,547	30.2%	1.47	15
06 CA	25260 Hanford-Corcoran, CA MSA	69	44.5%	1,126	30.4%	1.47	14
35 NM	10740 Albuquerque, NM MSA	143	27.4%	4,984	18.9%	1.45	13
40 OK	30020 Lawton, OK MSA	162	34.1%	516	23.7%	1.44	12
06 CA	33700 Modesto, CA MSA	338	40.0%	6,804	27.9%	1.43	11
VA+WV	49020 Winchester, VA-WV MSA	67	34.4%	1430	24.2%	1.42	10
AR+OK	22900 Fort Smith, AR-OK MSA	63	45.0%	1857	32.2%	1.40	9
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	341	21.4%	1,136	16.1%	1.33	8
05 AR	38220 Pine Bluff, AR MSA	166	37.1%	262	28.4%	1.31	7
06 CA	41500 Salinas, CA MSA	56	23.5%	2,265	19.4%	1.22	6
06 CA	32900 Merced, CA MSA	118	37.9%	3,103	32.4%	1.17	5
13 GA	25980 Hinesville-Fort Stewart, GA MSA	179	33.5%	269	28.9%	1.16	4
48 TX	41700 San Antonio, TX MSA	669	28.2%	9,801	25.0%	1.13	3
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	256	7.7%	2,658	6.9%	1.12	2
48 TX	21340 El Paso, TX MSA	121	27.0%	4,156	31.9%	0.85	1



**Table 2 - NCRC Analysis: LMI African-American/LMI White**

State	MSA	# High-Cost Loans to LMI African-Americans	% High-Cost Loans to LMI African-Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
51 VA	16820 Charlottesville, VA MSA	154	48.0%	275	15.2%	3.16	195
37 NC	48900 Wilmington, NC MSA	187	56.5%	498	18.5%	3.06	194
37 NC	24780 Greenville, NC MSA	153	48.3%	112	16.4%	2.95	193
37 NC	20500 Durham, NC MSA	598	48.0%	413	16.4%	2.94	192
37 NC	39580 Raleigh-Cary, NC MSA	1,332	49.4%	1,711	18.1%	2.73	191
25 MA	15764 Cambridge-Newton-Framingham, MA MD	173	36.1%	1,622	13.2%	2.73	190
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	2,651	66.5%	3,618	25.0%	2.66	189
51 VA	31340 Lynchburg, VA MSA	200	59.7%	416	22.5%	2.66	188
42 PA	25420 Harrisburg-Carlisle, PA MSA	216	53.9%	1,091	20.6%	2.61	187
26 MI	11460 Ann Arbor, MI MSA	270	52.0%	652	20.0%	2.60	186
12 FL	34940 Naples-Marco Island, FL MSA	76	56.3%	478	22.0%	2.56	185
51 VA	40060 Richmond, VA MSA	3,035	54.5%	2,458	21.8%	2.50	184
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,796	59.5%	11,334	23.9%	2.49	183
IL+MO	41180 St. Louis, MO-IL MSA	5,668	67.4%	9,581	27.6%	2.44	182
36 NY	15380 Buffalo-Niagara Falls, NY MSA	239	50.3%	1,292	20.7%	2.43	181
45 SC	16700 Charleston-North Charleston, SC MSA	848	57.5%	1,075	23.9%	2.41	180
25 MA	49340 Worcester, MA MSA	170	50.4%	1,713	21.1%	2.40	179
37 NC	40580 Rocky Mount, NC MSA	261	61.0%	97	25.5%	2.40	178
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	52	14.9%	174	6.3%	2.39	177
01 AL	12220 Auburn-Opelika, AL MSA	108	52.4%	180	22.2%	2.37	176
01 AL	46220 Tuscaloosa, AL MSA	258	51.3%	218	21.7%	2.36	175
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	3,633	51.7%	2,624	22.0%	2.35	174
12 FL	23540 Gainesville, FL MSA	212	59.7%	359	25.4%	2.35	173
13 GA	42340 Savannah, GA MSA	418	50.3%	391	21.6%	2.33	172
48 TX	46340 Tyler, TX MSA	108	65.5%	250	28.2%	2.32	171
42 PA	37964 Philadelphia, PA MD	3,871	48.4%	5,087	20.9%	2.32	170
42 PA	49620 York-Hanover, PA MSA	68	52.3%	1,085	22.8%	2.29	169
51 VA	19260 Danville, VA MSA	140	57.9%	128	25.3%	2.29	168
01 AL	33860 Montgomery, AL MSA	655	50.9%	449	22.4%	2.27	167
25 MA	14484 Boston-Quincy, MA MD	539	30.7%	1,713	13.6%	2.26	166
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	121	63.4%	665	28.1%	2.26	165
17 IL	16974 Chicago-Naperville-Joliet, IL MD	12,223	61.6%	17,406	27.8%	2.21	164
34 NJ	45940 Trenton-Ewing, NJ MSA	447	48.3%	574	21.9%	2.21	163
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	371	63.4%	2,547	28.7%	2.21	162
17 IL	44100 Springfield, IL MSA	56	44.8%	470	20.4%	2.20	161
39 OH	19380 Dayton, OH MSA	760	60.3%	2,185	27.6%	2.19	160
18 IN	23844 Gary, IN MD	799	66.3%	1,980	30.4%	2.18	159
25 MA	44140 Springfield, MA MSA	240	53.8%	1,554	24.7%	2.17	158
01 AL	26620 Huntsville, AL MSA	562	53.2%	826	24.5%	2.17	157
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	2,520	51.5%	4,370	23.8%	2.17	156
18 IN	23060 Fort Wayne, IN MSA	256	60.4%	1,481	27.9%	2.17	155
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	1,573	53.8%	9,581	24.8%	2.17	154
NJ+PA	35084 Newark-Union, NJ-PA MD	1,734	48.5%	2,257	22.5%	2.16	153
12 FL	37460 Panama City-Lynn Haven, FL MSA	70	58.3%	299	27.2%	2.15	152
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	4,203	73.0%	1,824	34.1%	2.14	151
45 SC	17900 Columbia, SC MSA	1,221	54.2%	1,199	25.5%	2.12	150

**Table 2 - NCRC Analysis: LMI African-American/LMI White**

State	MSA	# High-Cost Loans to LMI African-Americans	% High-Cost Loans to LMI African-Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
KS+MO	28140 Kansas City, MO-KS MSA	2189	63.6%	7296	29.9%	2.12	149
36 NY	40380 Rochester, NY MSA	313	45.2%	1,666	21.4%	2.11	148
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	632	45.4%	1,424	21.6%	2.11	147
55 WI	39540 Racine, WI MSA	127	55.0%	729	26.1%	2.10	146
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	318	71.6%	1779	34.1%	2.10	145
13 GA	12020 Athens-Clarke County, GA MSA	137	54.2%	286	26.0%	2.08	144
25 MA	21604 Essex County, MA MD	99	35.4%	1,204	17.0%	2.08	143
45 SC	24860 Greenville, SC MSA	471	58.3%	1,236	28.0%	2.08	142
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	824	46.7%	2,862	22.5%	2.08	141
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	12,127	43.4%	7,314	21.0%	2.07	140
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	2,443	48.8%	3,309	23.6%	2.07	139
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	1,333	53.8%	5,962	26.1%	2.06	138
12 FL	45220 Tallahassee, FL MSA	396	49.7%	519	24.1%	2.06	137
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	1,459	55.2%	1,271	27.0%	2.05	136
37 NC	15500 Burlington, NC MSA	136	56.0%	256	27.4%	2.05	135
39 OH	10420 Akron, OH MSA	550	60.5%	2,210	29.6%	2.04	134
34 NJ	20764 Edison, NJ MD	575	38.0%	3,743	18.6%	2.04	133
37 NC	49180 Winston-Salem, NC MSA	380	44.5%	787	21.9%	2.03	132
37 NC	22180 Fayetteville, NC MSA	280	43.1%	257	21.3%	2.03	131
18 IN	26900 Indianapolis, IN MSA	1,592	53.6%	5,263	26.5%	2.03	130
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	192	52.2%	1,542	25.8%	2.03	129
IN+KY	21780 Evansville, IN-KY MSA	92	60.1%	1,088	29.7%	2.02	128
28 MS	27140 Jackson, MS MSA	1,165	64.5%	525	32.0%	2.02	127
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	119	62.3%	900	31.1%	2.00	126
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	1,343	51.8%	2,579	26.0%	1.99	125
24 MD	12580 Baltimore-Towson, MD MSA	5,607	50.2%	6,372	25.3%	1.99	124
26 MI	24340 Grand Rapids-Wyoming, MI MSA	446	60.7%	3,202	30.6%	1.98	123
22 LA	43340 Shreveport-Bossier City, LA MSA	573	61.9%	511	31.3%	1.97	122
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	13,490	49.0%	10,470	24.8%	1.97	121
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	550	46.8%	677	23.8%	1.97	120
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	144	47.4%	1,996	24.1%	1.96	119
45 SC	43900 Spartanburg, SC MSA	275	59.7%	596	30.4%	1.96	118
17 IL	37900 Peoria, IL MSA	139	52.5%	1,056	26.8%	1.96	117
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	7,097	73.6%	4,182	37.7%	1.95	116
13 GA	47580 Warner Robins, GA MSA	155	43.1%	234	22.1%	1.95	115
36 NY	35004 Nassau-Suffolk, NY MD	928	40.9%	2,874	21.0%	1.95	114
12 FL	27260 Jacksonville, FL MSA	1,886	60.5%	3,456	31.1%	1.95	113
22 LA	12940 Baton Rouge, LA MSA	1,336	62.1%	1,273	32.0%	1.94	112
26 MI	29620 Lansing-East Lansing, MI MSA	284	61.5%	1,928	31.7%	1.94	111
39 OH	15940 Canton-Massillon, OH MSA	193	66.6%	1,451	34.4%	1.94	110
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,423	39.6%	2,902	20.5%	1.94	109
51 VA	40220 Roanoke, VA MSA	220	49.1%	764	25.4%	1.93	108
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	282	41.9%	3,068	21.7%	1.93	107
01 AL	13820 Birmingham-Hoover, AL MSA	2,326	64.5%	2,608	33.5%	1.93	106
20 KS	48620 Wichita, KS MSA	195	54.3%	1,685	28.3%	1.92	105
26 MI	35660 Niles-Benton Harbor, MI MSA	134	63.5%	485	33.2%	1.91	104
IN+KY	31140 Louisville, KY-IN MSA	813	52.4%	3,454	27.4%	1.91	103
37 NC	11700 Asheville, NC MSA	56	48.3%	762	25.2%	1.91	102

**Table 2 - NCRC Analysis: LMI African-American/LMI White**

State	MSA	# High-Cost Loans to LMI African-Americans	% High-Cost Loans to LMI African-Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
17 IL	40420 Rockford, IL MSA	184	62.4%	1,379	32.6%	1.91	101
01 AL	20020 Dothan, AL MSA	141	66.8%	293	35.1%	1.90	100
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	728	26.6%	963	14.0%	1.90	99
06 CA	46700 Vallejo-Fairfield, CA MSA	172	33.9%	326	17.9%	1.89	98
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	521	39.5%	2,397	20.9%	1.89	97
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	164	59.4%	562	31.4%	1.89	96
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	55	44.7%	656	23.7%	1.89	95
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	884	43.8%	1,907	23.3%	1.88	94
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	216	58.1%	1,127	30.9%	1.88	93
26 MI	28020 Kalamazoo-Portage, MI MSA	176	59.3%	1,065	31.7%	1.87	92
13 GA	31420 Macon, GA MSA	587	67.8%	358	36.2%	1.87	91
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	73	36.9%	375	19.7%	1.87	90
01 AL	33660 Mobile, AL MSA	602	60.6%	603	32.5%	1.87	89
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	295	62.5%	1,561	33.5%	1.86	88
39 OH	18140 Columbus, OH MSA	1,397	48.1%	4,561	25.9%	1.86	87
17 IL	16580 Champaign-Urbana, IL MSA	68	37.8%	369	20.4%	1.86	86
34 NJ	15804 Camden, NJ MD	1,202	45.6%	3,109	24.6%	1.85	85
37 NC	24660 Greensboro-High Point, NC MSA	757	49.8%	1,250	26.9%	1.85	84
05 AR	30780 Little Rock-North Little Rock, AR MSA	542	46.6%	1,060	25.2%	1.85	83
53 WA	45104 Tacoma, WA MD	242	55.3%	1,858	29.9%	1.85	82
12 FL	36100 Ocala, FL MSA	131	57.7%	662	31.3%	1.85	81
21 KY	30460 Lexington-Fayette, KY MSA	182	44.9%	1,011	24.4%	1.84	80
12 FL	15980 Cape Coral-Fort Myers, FL MSA	220	57.9%	1,491	31.5%	1.84	79
06 CA	36084 Oakland-Fremont-Hayward, CA MD	580	26.2%	1,154	14.3%	1.83	78
39 OH	45780 Toledo, OH MSA	407	52.8%	1,737	28.8%	1.83	77
40 OK	36420 Oklahoma City, OK MSA	592	57.3%	3,032	31.3%	1.83	76
45 SC	11340 Anderson, SC MSA	116	58.3%	380	31.9%	1.83	75
09 CT	35300 New Haven-Milford, CT MSA	590	48.1%	2,141	26.3%	1.83	74
42 PA	39740 Reading, PA MSA	54	39.7%	854	21.8%	1.82	73
24 MD	41540 Salisbury, MD MSA	124	60.2%	292	33.0%	1.82	72
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	209	48.6%	740	26.7%	1.82	71
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	248	42.8%	5,488	23.6%	1.82	70
02 AK	11260 Anchorage, AK MSA	52	28.4%	606	15.7%	1.81	69
13 GA	10500 Albany, GA MSA	254	66.0%	175	36.6%	1.80	68
47 TN	27180 Jackson, TN MSA	255	67.3%	282	37.4%	1.80	67
34 NJ	12100 Atlantic City, NJ MSA	232	53.0%	656	29.5%	1.79	66
53 WA	42644 Seattle-Bellevue-Everett, WA MD	381	37.2%	4,371	20.8%	1.79	65
26 MI	22420 Flint, MI MSA	576	60.4%	1,523	34.0%	1.78	64
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	1,457	53.5%	4,638	30.2%	1.77	63
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	1,607	58.6%	7,753	33.2%	1.77	62
19 IA	19780 Des Moines, IA MSA	120	50.8%	2,483	28.8%	1.77	61
22 LA	29180 Lafayette, LA MSA	384	63.8%	566	36.1%	1.76	60
AL+GA	17980 Columbus, GA-AL MSA	429	54.6%	338	31.1%	1.76	59
45 SC	44940 Sumter, SC MSA	163	62.9%	111	35.9%	1.75	58
42 PA	38300 Pittsburgh, PA MSA	501	52.7%	4,904	30.2%	1.75	57
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	243	48.8%	814	28.0%	1.74	56
36 NY	10580 Albany-Schenectady-Troy, NY MSA	140	41.1%	1,544	23.7%	1.74	55
08 CO	17820 Colorado Springs, CO MSA	145	40.1%	1,714	23.1%	1.73	54

**Table 2 - NCRC Analysis: LMI African-American/LMI White**

State	MSA	# High-Cost Loans to LMI African-Americans	% High-Cost Loans to LMI African-Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
45 SC	22500 Florence, SC MSA	311	66.2%	285	38.3%	1.73	53
40 OK	46140 Tulsa, OK MSA	328	60.5%	2,422	35.2%	1.72	52
26 MI	34740 Muskegon-Norton Shores, MI MSA	202	63.7%	743	37.2%	1.71	51
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	2,598	53.1%	3,288	31.0%	1.71	50
47 TN	28940 Knoxville, TN MSA	218	58.4%	2,419	34.2%	1.71	49
13 GA	23580 Gainesville, GA MSA	61	48.4%	469	28.5%	1.70	48
KY+TN	17300 Clarksville, TN-KY MSA	130	41.8%	455	24.6%	1.70	47
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	321	47.6%	1,732	28.3%	1.69	46
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	153	38.5%	858	22.9%	1.68	45
08 CO	19740 Denver-Aurora, CO MSA	857	45.3%	8,509	27.0%	1.68	44
26 MI	12980 Battle Creek, MI MSA	126	63.6%	650	38.0%	1.68	43
12 FL	36740 Orlando-Kissimmee, FL MSA	1,664	54.5%	5,710	32.7%	1.67	42
01 AL	11500 Anniston-Oxford, AL MSA	86	59.7%	283	36.2%	1.65	41
48 TX	13140 Beaumont-Port Arthur, TX MSA	191	59.7%	395	36.3%	1.64	40
12 FL	29460 Lakeland, FL MSA	390	61.0%	1,566	37.3%	1.64	39
48 TX	19124 Dallas-Plano-Irving, TX MD	3,005	58.5%	8,435	35.8%	1.63	38
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	104	21.2%	892	13.0%	1.63	37
48 TX	12420 Austin-Round Rock, TX MSA	315	39.1%	2,547	24.2%	1.62	36
04 AZ	46060 Tucson, AZ MSA	88	45.1%	2,251	28.0%	1.61	35
48 TX	23104 Fort Worth-Arlington, TX MD	995	54.9%	4,653	34.6%	1.58	34
37 NC	24140 Goldsboro, NC MSA	84	44.9%	109	28.4%	1.58	33
01 AL	19460 Decatur, AL MSA	109	59.2%	423	37.7%	1.57	32
13 GA	46660 Valdosta, GA MSA	140	61.7%	255	39.3%	1.57	31
22 LA	33740 Monroe, LA MSA	166	63.1%	325	40.4%	1.56	30
GA+TN	16860 Chattanooga, TN-GA MSA	425	61.9%	1,788	39.6%	1.56	29
09 CT	35980 Norwich-New London, CT MSA	62	39.2%	688	25.2%	1.56	28
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	288	44.6%	3,369	28.6%	1.56	27
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	4,325	67.0%	12,266	43.6%	1.54	26
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	927	32.7%	2,808	21.5%	1.52	25
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	84	50.3%	284	33.1%	1.52	24
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	93	51.1%	1,475	33.7%	1.52	23
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	1,164	53.6%	2,081	35.4%	1.52	22
01 AL	22520 Florence-Muscle Shoals, AL MSA	77	51.3%	354	34.1%	1.51	21
40 OK	30020 Lawton, OK MSA	65	50.4%	200	33.7%	1.49	20
28 MS	37700 Pascagoula, MS MSA	109	66.5%	337	44.8%	1.49	19
06 CA	44700 Stockton, CA MSA	97	40.6%	655	27.5%	1.48	18
26 MI	27100 Jackson, MI MSA	71	57.7%	888	39.4%	1.46	17
22 LA	29340 Lake Charles, LA MSA	128	58.2%	369	40.1%	1.45	16
28 MS	25060 Gulfport-Biloxi, MS MSA	91	50.8%	326	35.1%	1.45	15
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	70	30.2%	299	20.9%	1.44	14
06 CA	12540 Bakersfield, CA MSA	128	53.1%	1,641	37.3%	1.42	13
36 NY	45060 Syracuse, NY MSA	55	30.9%	912	22.2%	1.39	12
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	920	48.6%	18,259	34.9%	1.39	11
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	634	41.4%	5,915	30.1%	1.37	10
22 LA	10780 Alexandria, LA MSA	111	66.1%	268	48.2%	1.37	9
32 NV	29820 Las Vegas-Paradise, NV MSA	828	48.2%	5,434	35.4%	1.36	8
06 CA	23420 Fresno, CA MSA	108	49.3%	1,312	37.0%	1.33	7
10 DE	20100 Dover, DE MSA	87	31.8%	314	25.7%	1.24	6

**Table 2 - NCRC Analysis: LMI African-American/LMI White**

State	MSA	# High-Cost Loans to LMI African-Americans	% High-Cost Loans to LMI African-Americans	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
28 MS	25620 Hattiesburg, MS MSA	79	52.3%	233	44.1%	1.19	5
AR+TX	45500 Texarkana, TX-Texarkana, AR MSA	62	55.4%	220	48.0%	1.15	4
13 GA	25980 Hinesville-Fort Stewart, GA MSA	51	48.1%	83	44.1%	1.09	3
48 TX	41700 San Antonio, TX MSA	227	43.2%	3,762	40.3%	1.07	2
05 AR	38220 Pine Bluff, AR MSA	66	42.3%	89	40.3%	1.05	1

**Table 3 - NCRC Analysis: MUI African-American/MUI White**

State	MSA	# High-Cost Loans to MUI African-Americans	% High-Cost Loans to MUI African-Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
37 NC	20500 Durham, NC MSA	517	38.6%	542	8.6%	4.50	225
37 NC	39580 Raleigh-Cary, NC MSA	808	40.6%	1,755	9.8%	4.13	224
51 VA	16820 Charlottesville, VA MSA	90	37.5%	343	9.5%	3.97	223
25 MA	15764 Cambridge-Newton-Framingham, MA MD	398	47.1%	3,256	11.9%	3.95	222
37 NC	24780 Greenville, NC MSA	173	44.5%	261	11.3%	3.95	221
55 WI	31540 Madison, WI MSA	59	39.3%	1,269	10.6%	3.70	220
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	1,194	53.6%	4,347	14.9%	3.59	219
26 MI	11460 Ann Arbor, MI MSA	226	39.9%	618	11.2%	3.58	218
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	502	45.5%	2,420	12.8%	3.57	217
12 FL	23540 Gainesville, FL MSA	180	47.7%	543	13.5%	3.54	216
MN+WI	33461 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,275	56.0%	10,385	15.8%	3.54	215
45 SC	16700 Charleston-North Charleston, SC MSA	726	48.4%	1,931	13.9%	3.49	214
17 IL	28100 Kankakee-Bradley, IL MSA	80	67.8%	391	20.1%	3.38	213
25 MA	21604 Essex County, MA MD	288	55.9%	2,959	16.7%	3.35	212
25 MA	14484 Boston-Quincy, MA MD	2,045	49.0%	5,689	14.7%	3.33	211
42 PA	37964 Philadelphia, PA MD	1,904	38.2%	7,412	11.5%	3.32	210
34 NJ	45940 Trenton-Ewing, NJ MSA	281	43.2%	700	13.2%	3.27	209
IL+MO	41181 St. Louis, MO-IL MSA	2,529	52.2%	8,749	16.4%	3.19	208
51 VA	40060 Richmond, VA MSA	2,146	43.4%	2,953	13.7%	3.17	207
12 FL	45220 Tallahassee, FL MSA	437	45.1%	781	14.3%	3.15	206
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	11,042	44.2%	10,853	14.1%	3.14	205
13 GA	42340 Savannah, GA MSA	474	43.8%	797	14.0%	3.13	204
37 NC	48900 Wilmington, NC MSA	163	42.8%	1,131	13.7%	3.12	203
45 SC	24860 Greenville, SC MSA	309	46.1%	1,247	14.8%	3.10	202
25 MA	49340 Worcester, MA MSA	338	54.4%	3,317	17.9%	3.04	201
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	1,659	45.3%	7,346	15.0%	3.03	200
37 NC	11700 Asheville, NC MSA	93	51.4%	1,331	17.1%	3.01	199
37 NC	49180 Winston-Salem, NC MSA	356	39.7%	876	13.2%	3.00	198
48 TX	46340 Tyler, TX MSA	140	50.5%	477	17.0%	2.97	197
51 VA	31340 Lynchburg, VA MSA	140	43.5%	520	14.6%	2.97	196
37 NC	24140 Goldsboro, NC MSA	116	38.3%	179	13.0%	2.93	195
25 MA	44140 Springfield, MA MSA	290	51.4%	2,048	17.6%	2.93	194
AR+MS+TN	32821 Memphis, TN-MS-AR MSA	3,775	58.3%	3,114	19.9%	2.92	193
NC+SC	16741 Charlotte-Gastonia-Concord, NC-SC MSA	1,641	38.9%	3,820	13.4%	2.91	192
37 NC	24660 Greensboro-High Point, NC MSA	671	42.5%	1,353	14.6%	2.90	191
IA+NE	36541 Omaha-Council Bluffs, NE-IA MSA	169	48.7%	2,239	16.8%	2.90	190
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	1,531	44.2%	4,948	15.3%	2.89	189
18 IN	23060 Fort Wayne, IN MSA	103	44.8%	875	15.6%	2.88	188
45 SC	43900 Spartanburg, SC MSA	177	56.2%	661	19.5%	2.88	187
NC+VA	47261 Virginia Beach-Norfolk-Newport News, VA-NC MSA	4,029	40.3%	4,877	14.0%	2.88	186
01 AL	33860 Montgomery, AL MSA	459	40.7%	659	14.2%	2.87	185
36 NY	40380 Rochester, NY MSA	138	39.2%	1,423	13.7%	2.87	184
26 MI	24340 Grand Rapids-Wyoming, MI MSA	284	54.5%	2,505	19.1%	2.86	183
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	513	40.7%	2,729	14.3%	2.85	182
42 PA	39740 Reading, PA MSA	71	46.1%	1,090	16.2%	2.84	181
KS+MO	28141 Kansas City, MO-KS MSA	1137	51.1%	7,021	18.2%	2.81	180

**Table 3 - NCRC Analysis: MUI African-American/MUI White**

State	MSA	# High-Cost Loans to MUI African-Americans	% High-Cost Loans to MUI African-Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
01 AL	26620 Huntsville, AL MSA	349	37.3%	785	13.3%	2.80	179
01 AL	13820 Birmingham-Hoover, AL MSA	1,724	52.2%	3,353	18.7%	2.80	178
36 NY	15380 Buffalo-Niagara Falls, NY MSA	153	41.4%	1,619	14.8%	2.80	177
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	1,822	47.9%	2,817	17.2%	2.78	176
01 AL	46220 Tuscaloosa, AL MSA	233	42.8%	435	15.4%	2.78	175
45 SC	17900 Columbia, SC MSA	875	44.5%	1,419	16.1%	2.76	174
55 WI	39540 Racine, WI MSA	72	41.9%	672	15.2%	2.76	173
48 TX	19124 Dallas-Plano-Irving, TX MD	3,942	53.0%	10,624	19.3%	2.75	172
47 TN	27180 Jackson, TN MSA	187	57.4%	304	20.9%	2.74	171
13 GA	15260 Brunswick, GA MSA	97	54.2%	354	19.9%	2.72	170
42 PA	49620 York-Hanover, PA MSA	157	45.2%	1,476	16.7%	2.72	169
45 SC	22500 Florence, SC MSA	282	54.7%	388	20.1%	2.71	168
37 NC	40580 Rocky Mount, NC MSA	231	46.7%	211	17.3%	2.70	167
28 MS	27140 Jackson, MS MSA	1,171	50.5%	1,227	18.7%	2.70	166
24 MD	12580 Baltimore-Towson, MD MSA	5,465	42.2%	9,060	15.7%	2.70	165
21 KY	30460 Lexington-Fayette, KY MSA	143	35.7%	999	13.3%	2.68	164
18 IN	26900 Indianapolis, IN MSA	846	42.3%	4,654	15.8%	2.67	163
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	192	20.0%	2,351	7.5%	2.67	162
09 CT	35300 New Haven-Milford, CT MSA	679	51.1%	2,906	19.2%	2.66	161
19 IA	19780 Des Moines, IA MSA	58	41.7%	1,621	15.7%	2.65	160
18 IN	23844 Gary, IN MD	566	53.4%	2,276	20.2%	2.65	159
17 IL	37900 Peoria, IL MSA	73	36.9%	811	13.9%	2.65	158
IN+KY+OH	17141 Cincinnati-Middletown, OH-KY-IN MSA	881	41.6%	5,928	15.7%	2.65	157
DC+MD+VA+WV	47895 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	14,062	38.1%	13,830	14.4%	2.64	156
26 MI	28020 Kalamazoo-Portage, MI MSA	107	45.5%	905	17.2%	2.64	155
45 SC	11340 Anderson, SC MSA	67	47.9%	425	18.2%	2.63	154
42 PA	38300 Pittsburgh, PA MSA	409	45.9%	5,719	17.5%	2.63	153
13 GA	12020 Athens-Clarke County, GA MSA	145	47.1%	481	18.0%	2.62	152
53 WA	42644 Seattle-Bellevue-Everett, WA MD	749	36.4%	8,532	13.9%	2.62	151
NJ+PA	35085 Newark-Union, NJ-PA MD	3,073	48.0%	7,103	18.3%	2.62	150
42 PA	25420 Harrisburg-Carlisle, PA MSA	125	35.0%	1,129	13.4%	2.62	149
12 FL	46940 Vero Beach, FL MSA	70	55.1%	746	21.1%	2.62	148
48 TX	12420 Austin-Round Rock, TX MSA	299	33.2%	2,799	12.7%	2.62	147
51 VA	40220 Roanoke, VA MSA	129	41.9%	752	16.2%	2.59	146
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	146	48.0%	551	18.7%	2.57	145
01 AL	33660 Mobile, AL MSA	535	53.0%	971	20.6%	2.57	144
53 WA	14740 Bremerton-Silverdale, WA MSA	52	43.0%	1,096	16.7%	2.57	143
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	73	50.7%	912	19.7%	2.57	142
17 IL	16974 Chicago-Naperville-Joliet, IL MD	13,256	56.5%	39,614	22.1%	2.56	141
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,364	34.4%	3,313	13.5%	2.56	140
08 CO	19740 Denver-Aurora, CO MSA	842	42.7%	9,959	16.7%	2.56	139
12 FL	27260 Jacksonville, FL MSA	1,854	48.9%	5,539	19.1%	2.55	138
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	6,331	63.6%	6,880	25.3%	2.52	137
01 AL	23460 Gadsden, AL MSA	61	65.6%	362	26.2%	2.51	136
IL+WI	29405 Lake County-Kenosha County, IL-WI MD	233	39.8%	3,141	15.9%	2.50	135
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	2,403	52.7%	7,971	21.1%	2.49	134
13 GA	31420 Macon, GA MSA	398	51.8%	491	20.8%	2.49	133
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	1,096	42.6%	4,612	17.2%	2.48	132

**Table 3 - NCRC Analysis: MUI African-American/MUI White**

State	MSA	# High-Cost Loans to MUI African-Americans	% High-Cost Loans to MUI African-Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
22 LA	12940 Baton Rouge, LA MSA	997	49.0%	1,907	19.8%	2.47	131
48 TX	17780 College Station-Bryan, TX MSA	55	51.9%	465	21.0%	2.47	130
13 GA	23580 Gainesville, GA MSA	52	47.7%	592	19.3%	2.47	129
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	115	56.9%	1,263	23.0%	2.47	128
01 AL	12220 Auburn-Opelika, AL MSA	83	37.1%	314	15.0%	2.47	127
39 OH	18140 Columbus, OH MSA	816	37.7%	4,511	15.3%	2.46	126
36 NY	10580 Albany-Schenectady-Troy, NY MSA	121	37.5%	2,049	15.2%	2.46	125
39 OH	19380 Dayton, OH MSA	375	39.9%	1,981	16.2%	2.46	124
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	800	52.0%	8,328	21.3%	2.45	123
05 AR	30780 Little Rock-North Little Rock, AR MSA	449	39.2%	1,529	16.1%	2.44	122
12 FL	34940 Naples-Marco Island, FL MSA	164	54.1%	2,318	22.2%	2.44	121
37 NC	15500 Burlington, NC MSA	93	44.3%	315	18.2%	2.43	120
IN+KY	31141 Louisville, KY-IN MSA	548	40.9%	3,509	16.8%	2.43	119
34 NJ	15804 Camden, NJ MD	1,531	41.7%	4,389	17.2%	2.42	118
48 TX	47380 Waco, TX MSA	123	57.2%	643	23.7%	2.41	117
33 NH	31700 Manchester-Nashua, NH MSA	55	39.9%	1,659	16.5%	2.41	116
45 SC	44940 Sumter, SC MSA	147	49.8%	196	20.8%	2.39	115
09 CT	35980 Norwich-New London, CT MSA	65	41.7%	897	17.4%	2.39	114
NJ+PA	10901 Allentown-Bethlehem-Easton, PA-NJ MSA	226	35.3%	2,504	14.9%	2.37	113
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	283	47.0%	4,333	19.9%	2.37	112
36 NY	28740 Kingston, NY MSA	62	48.8%	623	20.6%	2.36	111
51 VA	19260 Danville, VA MSA	104	47.5%	175	20.2%	2.36	110
02 AK	11260 Anchorage, AK MSA	97	33.6%	1,013	14.3%	2.36	109
39 OH	45780 Toledo, OH MSA	280	44.4%	1,910	18.9%	2.35	108
48 TX	30980 Longview, TX MSA	133	61.6%	607	26.2%	2.35	107
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	7,219	58.7%	17,275	25.0%	2.35	106
NJ+NY	35645 New York-White Plains-Wayne, NY-NJ MD	12,563	45.8%	21,168	19.6%	2.34	105
22 LA	43340 Shreveport-Bossier City, LA MSA	510	48.2%	1,045	20.7%	2.33	104
26 MI	29620 Lansing-East Lansing, MI MSA	230	48.4%	1,587	20.8%	2.32	103
40 OK	36420 Oklahoma City, OK MSA	555	47.8%	3,922	20.7%	2.32	102
OR+WA	38901 Portland-Vancouver-Beaverton, OR-WA MSA	338	39.3%	9,322	17.0%	2.31	101
39 OH	10420 Akron, OH MSA	288	37.9%	1,831	16.4%	2.31	100
37 NC	22180 Fayetteville, NC MSA	533	32.8%	598	14.3%	2.29	99
GA+SC	12261 Augusta-Richmond County, GA-SC MSA	503	32.6%	881	14.3%	2.28	98
48 TX	23104 Fort Worth-Arlington, TX MD	1,325	48.1%	5,856	21.2%	2.27	97
36 NY	45060 Syracuse, NY MSA	53	31.2%	1,052	13.7%	2.27	96
22 LA	29180 Lafayette, LA MSA	223	46.2%	759	20.5%	2.25	95
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	339	45.4%	1,883	20.1%	2.25	94
01 AL	20020 Dothan, AL MSA	99	51.8%	449	23.0%	2.25	93
01 AL	19460 Decatur, AL MSA	86	57.0%	489	25.3%	2.25	92
AL+GA	17981 Columbus, GA-AL MSA	457	40.4%	567	18.0%	2.24	91
26 MI	12980 Battle Creek, MI MSA	61	50.0%	510	22.3%	2.24	90
IN+MI	43781 South Bend-Mishawaka, IN-MI MSA	91	41.4%	887	18.5%	2.24	89
26 MI	35660 Niles-Benton Harbor, MI MSA	78	45.6%	538	20.4%	2.24	88
DE+MD+NJ	48865 Wilmington, DE-MD-NJ MD	631	34.7%	1,833	15.5%	2.24	87
24 MD	41540 Salisbury, MD MSA	156	50.3%	476	22.6%	2.23	86
34 NJ	12100 Atlantic City, NJ MSA	320	48.1%	1,375	21.9%	2.20	85
36 NY	35004 Nassau-Suffolk, NY MD	2,877	52.4%	11,503	23.9%	2.19	84



**Table 3 - NCRC Analysis: MUI African-American/MUI White**

State	MSA	# High-Cost Loans to MUI African-Americans	% High-Cost Loans to MUI African-Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
48 TX	13140 Beaumont-Port Arthur, TX MSA	233	47.0%	758	21.5%	2.19	83
OH+PA	49661 Youngstown-Warren-Boardman, OH-PA MSA	177	50.6%	1,792	23.1%	2.19	82
26 MI	34740 Muskegon-Norton Shores, MI MSA	80	53.7%	647	24.6%	2.18	81
17 IL	40420 Rockford, IL MSA	126	52.1%	1,397	24.3%	2.14	80
22 LA	26380 Houma-Bayou Cane-Thibodaux, LA MSA	86	55.8%	737	26.1%	2.14	79
34 NJ	20764 Edison, NJ MD	1,079	35.3%	7,545	16.5%	2.14	78
06 CA	36084 Oakland-Fremont-Hayward, CA MD	3,058	35.0%	10,568	16.4%	2.14	77
26 MI	22420 Flint, MI MSA	411	48.2%	1,780	22.6%	2.13	76
12 FL	37460 Panama City-Lynn Haven, FL MSA	69	35.4%	678	16.7%	2.12	75
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	531	45.8%	2,516	21.7%	2.11	74
13 GA	10500 Albany, GA MSA	291	48.1%	345	22.8%	2.11	73
06 CA	42220 Santa Rosa-Petaluma, CA MSA	56	27.7%	2,027	13.2%	2.10	72
20 KS	48620 Wichita, KS MSA	127	38.5%	1,583	18.3%	2.10	71
32 NV	39900 Reno-Sparks, NV MSA	63	35.6%	2,404	17.0%	2.09	70
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	2,318	41.8%	13,880	20.1%	2.08	69
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	477	42.6%	3,193	20.7%	2.06	68
IL+IA	19341 Davenport-Moline-Rock Island, IA-IL MSA	51	43.2%	1,202	21.0%	2.06	67
12 FL	39460 Punta Gorda, FL MSA	87	49.4%	1,130	24.2%	2.04	66
37 NC	27340 Jacksonville, NC MSA	79	23.8%	313	11.7%	2.03	65
12 FL	36100 Ocala, FL MSA	266	50.1%	1,764	24.8%	2.02	64
40 OK	46140 Tulsa, OK MSA	267	49.0%	3,133	24.4%	2.01	63
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	832	55.1%	3,682	27.5%	2.00	62
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	6,895	54.4%	14,028	27.2%	2.00	61
13 GA	47580 Warner Robins, GA MSA	155	32.7%	300	16.4%	2.00	60
08 CO	17820 Colorado Springs, CO MSA	209	33.9%	2,596	17.0%	2.00	59
13 GA	46660 Valdosta, GA MSA	108	40.9%	359	20.5%	1.99	58
TN+GA	16861 Chattanooga, TN-GA MSA	298	50.6%	2,095	25.4%	1.99	57
53 WA	45104 Tacoma, WA MD	570	45.7%	5,362	22.9%	1.99	56
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	2,802	50.6%	19,589	25.4%	1.99	55
47 TN	28940 Knoxville, TN MSA	141	38.1%	2,457	19.2%	1.98	54
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	462	54.4%	4,036	27.5%	1.98	53
01 AL	11500 Anniston-Oxford, AL MSA	107	52.7%	398	26.7%	1.97	52
01 AL	22520 Florence-Muscle Shoals, AL MSA	54	43.2%	415	22.0%	1.96	51
12 FL	36740 Orlando-Kissimmee, FL MSA	2,881	49.4%	14,784	25.5%	1.94	50
28 MS	25060 Gulfport-Biloxi, MS MSA	130	40.1%	686	20.9%	1.92	49
53 WA	36500 Olympia, WA MSA	54	30.5%	1,012	16.0%	1.91	48
MD+WV	25181 Hagerstown-Martinsburg, MD-WV MSA	176	39.2%	1,668	20.8%	1.89	47
22 LA	29340 Lake Charles, LA MSA	140	44.0%	573	23.4%	1.88	46
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	997	29.0%	13,099	15.4%	1.88	45
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	2,050	42.8%	37,192	23.0%	1.86	44
21 KY	21060 Elizabethtown, KY MSA	94	44.1%	456	23.8%	1.86	43
04 AZ	46060 Tucson, AZ MSA	229	35.7%	5,592	19.2%	1.85	42
22 LA	33740 Monroe, LA MSA	165	49.0%	529	26.6%	1.84	41
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	119	28.9%	3,976	15.8%	1.83	40
10 DE	20100 Dover, DE MSA	205	33.5%	585	18.4%	1.82	39
12 FL	15980 Cape Coral-Fort Myers, FL MSA	512	58.0%	7,300	31.8%	1.82	38
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	134	49.4%	638	27.2%	1.82	37
28 MS	37700 Pascagoula, MS MSA	90	43.3%	480	23.8%	1.82	36

**Table 3 - NCRC Analysis: MUI African-American/MUI White**

State	MSA	# High-Cost Loans to MUI African-Americans	% High-Cost Loans to MUI African-Americans	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
AR+TX	45501 Texarkana, TX-Texarkana, AR MSA	81	46.3%	387	25.9%	1.79	35
22 LA	10780 Alexandria, LA MSA	150	52.1%	544	29.2%	1.79	34
39 OH	15940 Canton-Massillon, OH MSA	78	40.6%	1,362	22.9%	1.77	33
28 MS	25620 Hattiesburg, MS MSA	116	47.9%	545	27.2%	1.76	32
12 FL	29460 Lakeland, FL MSA	657	55.9%	4,098	32.1%	1.74	31
VA+WV	49021 Winchester, VA-WV MSA	50	37.9%	935	21.9%	1.73	30
15 HI	26180 Honolulu, HI MSA	99	25.4%	879	14.8%	1.72	29
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	242	24.5%	5,096	14.3%	1.72	28
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	79	26.2%	737	15.3%	1.71	27
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	354	28.2%	11,975	16.6%	1.70	26
06 CA	46700 Vallejo-Fairfield, CA MSA	1,019	37.5%	2,674	22.0%	1.70	25
KY+TN	17301 Clarksville, TN-KY MSA	172	29.0%	728	17.6%	1.65	24
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	10,536	40.3%	50,553	24.7%	1.63	23
32 NV	29820 Las Vegas-Paradise, NV MSA	2,251	44.4%	18,140	28.2%	1.58	22
35 NM	10740 Albuquerque, NM MSA	99	29.0%	3,257	18.5%	1.57	21
06 CA	49700 Yuba City, CA MSA	80	44.4%	1,490	28.4%	1.57	20
48 TX	18580 Corpus Christi, TX MSA	52	41.6%	1,504	26.9%	1.55	19
06 CA	23420 Fresno, CA MSA	486	44.5%	6,576	28.9%	1.54	18
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	5,465	58.8%	27,500	38.3%	1.54	17
06 CA	47300 Visalia-Porterville, CA MSA	75	49.7%	3,322	32.4%	1.53	16
06 CA	12540 Bakersfield, CA MSA	596	49.2%	8,384	32.6%	1.51	15
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	6,419	46.7%	47,573	31.2%	1.49	14
06 CA	44700 Stockton, CA MSA	1,199	44.7%	6,870	30.1%	1.48	13
06 CA	31460 Madera, CA MSA	56	46.3%	1,347	31.2%	1.48	12
06 CA	25260 Hanford-Corcoran, CA MSA	59	43.7%	933	30.1%	1.45	11
40 OK	30020 Lawton, OK MSA	97	29.8%	313	20.7%	1.44	10
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	266	22.6%	818	15.9%	1.42	9
05 AR	38220 Pine Bluff, AR MSA	99	36.7%	167	25.8%	1.42	8
06 CA	33700 Modesto, CA MSA	315	41.4%	6,165	29.3%	1.41	7
13 GA	25980 Hinesville-Fort Stewart, GA MSA	125	32.6%	169	24.7%	1.32	6
48 TX	41700 San Antonio, TX MSA	428	27.4%	5,841	21.6%	1.27	5
06 CA	41500 Salinas, CA MSA	54	24.7%	2,140	20.5%	1.20	4
06 CA	32900 Merced, CA MSA	106	39.1%	2,905	33.7%	1.16	3
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	181	5.9%	2,262	6.4%	0.93	2
48 TX	21340 El Paso, TX MSA	107	28.8%	3,069	32.2%	0.90	1

**Table 4 - NCRC Analysis: Hispanic/White**

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
25 MA	15764 Cambridge-Newton-Framingham, MA MD	1,023	42.8%	5,036	12.1%	3.54	241
08 CO	14500 Boulder, CO MSA	193	32.1%	940	9.5%	3.39	240
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,431	22.9%	2,558	7.1%	3.23	239
25 MA	21604 Essex County, MA MD	1,539	49.4%	4,273	16.4%	3.02	238
25 MA	12700 Barnstable Town, MA MSA	129	45.9%	1,487	15.6%	2.94	237
25 MA	14484 Boston-Quincy, MA MD	1,396	39.1%	7,625	14.1%	2.78	236
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	1,372	37.4%	3,949	14.5%	2.57	235
09 CT	35980 Norwich-New London, CT MSA	247	50.1%	1,610	19.5%	2.57	234
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,917	46.9%	21,974	18.5%	2.53	233
31 NE	30700 Lincoln, NE MSA	60	35.5%	1,165	14.1%	2.53	232
37 NC	39580 Raleigh-Cary, NC MSA	464	30.8%	3,603	12.2%	2.52	231
41 OR	21660 Eugene-Springfield, OR MSA	195	48.3%	2,067	19.3%	2.50	230
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	283	27.1%	929	10.8%	2.50	229
53 WA	34580 Mount Vernon-Anacortes, WA MSA	96	44.0%	700	17.9%	2.47	228
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	1,726	45.0%	14999	18.3%	2.46	227
42 PA	37964 Philadelphia, PA MD	1,340	33.4%	12,860	13.7%	2.44	226
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,494	36.7%	13,051	15.1%	2.43	225
25 MA	49340 Worcester, MA MSA	729	44.2%	5,126	18.5%	2.39	224
25 MA	44140 Springfield, MA MSA	765	47.4%	3,695	19.9%	2.38	223
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	1,008	40.4%	5,705	17.0%	2.38	222
08 CO	22660 Fort Collins-Loveland, CO MSA	155	33.6%	1,584	14.2%	2.36	221
37 NC	20500 Durham, NC MSA	125	24.4%	984	10.4%	2.34	220
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	1,203	41.4%	8,093	17.8%	2.33	219
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	2,123	48.4%	11,645	20.8%	2.33	218
26 MI	26100 Holland-Grand Haven, MI MSA	143	37.8%	1,304	16.3%	2.32	217
06 CA	42220 Santa Rosa-Petaluma, CA MSA	1,099	28.1%	2,246	12.2%	2.30	216
06 CA	42100 Santa Cruz-Watsonville, CA MSA	418	24.9%	891	10.9%	2.28	215
12 FL	34940 Naples-Marco Island, FL MSA	1,424	47.4%	2,929	21.3%	2.23	214
08 CO	19740 Denver-Aurora, CO MSA	5,836	41.9%	18,690	19.0%	2.20	213
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	1,932	43.7%	6,639	19.9%	2.19	212
45 SC	16700 Charleston-North Charleston, SC MSA	168	35.2%	3,125	16.1%	2.19	211
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	1,015	44.3%	6,161	20.4%	2.18	210
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	8,871	34.0%	13,455	15.8%	2.16	209
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	3,122	33.4%	6,489	15.5%	2.15	208
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	11077	34.0%	22,259	15.8%	2.15	207
49 UT	41620 Salt Lake City, UT MSA	1,560	45.5%	8,369	21.2%	2.14	206
34 NJ	45940 Trenton-Ewing, NJ MSA	334	32.8%	1,308	15.4%	2.12	205
49 UT	39340 Provo-Orem, UT MSA	368	40.3%	3,004	19.0%	2.12	204
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	4,467	28.6%	5,900	13.6%	2.10	203
02 AK	11260 Anchorage, AK MSA	123	29.9%	1,631	14.2%	2.10	202
09 CT	35300 New Haven-Milford, CT MSA	1,075	43.5%	5,133	20.9%	2.08	201
41 OR	13460 Bend, OR MSA	63	31.8%	1,241	15.4%	2.07	200
33 NH	31700 Manchester-Nashua, NH MSA	145	34.3%	2,569	16.7%	2.05	199
42 PA	25420 Harrisburg-Carlisle, PA MSA	80	32.1%	2,285	15.8%	2.03	198
04 AZ	39140 Prescott, AZ MSA	205	37.5%	1,631	18.4%	2.03	197
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	873	35.4%	4,650	17.4%	2.03	196
NJ+PA	35084 Newark-Union, NJ-PA MD	3,828	37.2%	9,618	18.4%	2.03	195

**Table 4 - NCRC Analysis: Hispanic/White**

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
06 CA	36084 Oakland-Fremont-Hayward, CA MD	7,460	31.2%	11,825	15.5%	2.01	194
55 WI	39540 Racine, WI MSA	188	37.8%	1,419	18.9%	2.00	193
49 UT	36260 Ogden-Clearfield, UT MSA	448	38.2%	3,641	19.2%	1.99	192
48 TX	31180 Lubbock, TX MSA	447	46.8%	1,176	23.5%	1.99	191
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	22,608	49.7%	57,200	25.0%	1.99	190
16 ID	14260 Boise City-Nampa, ID MSA	400	33.8%	4,255	17.1%	1.98	189
41 OR	41420 Salem, OR MSA	529	44.4%	2,499	22.4%	1.98	188
01 AL	13820 Birmingham-Hoover, AL MSA	223	44.3%	6,041	22.4%	1.98	187
04 AZ	46060 Tucson, AZ MSA	3,628	40.2%	7,989	20.4%	1.97	186
49 UT	41100 St. George, UT MSA	126	40.3%	1,364	20.4%	1.97	185
28 MS	27140 Jackson, MS MSA	54	40.9%	1,786	20.9%	1.96	184
ID+UT	30860 Logan, UT-ID MSA	50	30.3%	446	15.5%	1.96	183
36 NY	35004 Nassau-Suffolk, NY MD	5,031	44.1%	14,839	22.5%	1.96	182
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	8,130	28.8%	14,152	14.7%	1.96	181
48 TX	12420 Austin-Round Rock, TX MSA	1,884	30.7%	5,503	15.7%	1.96	180
26 MI	28020 Kalamazoo-Portage, MI MSA	83	43.5%	2,012	22.2%	1.96	179
08 CO	17820 Colorado Springs, CO MSA	659	34.8%	4,375	17.8%	1.95	178
18 IN	26900 Indianapolis, IN MSA	543	37.3%	10,104	19.3%	1.94	177
24 MD	12580 Baltimore-Towson, MD MSA	1,238	34.9%	15,843	18.1%	1.93	176
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	3,054	29.2%	4,509	15.2%	1.93	175
12 FL	39460 Punta Gorda, FL MSA	166	45.6%	1,552	23.7%	1.92	174
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	11,175	35.7%	22,891	18.6%	1.92	173
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	5,776	37.1%	16,490	19.6%	1.89	172
55 WI	31540 Madison, WI MSA	113	23.7%	2,420	12.5%	1.89	171
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	3,241	32.7%	21,755	17.3%	1.89	170
13 GA	12020 Athens-Clarke County, GA MSA	59	37.6%	784	19.9%	1.89	169
06 CA	34900 Napa, CA MSA	273	22.9%	544	12.2%	1.88	168
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	818	30.4%	7,413	16.2%	1.87	167
42 PA	39740 Reading, PA MSA	336	33.1%	2,009	17.8%	1.86	166
42 PA	42540 Scranton--Wilkes-Barre, PA MSA	248	41.5%	2,821	22.3%	1.86	165
42 PA	49620 York-Hanover, PA MSA	88	33.6%	2,621	18.2%	1.85	164
48 TX	19124 Dallas-Plano-Irving, TX MD	7,304	42.8%	19,361	23.1%	1.85	163
34 NJ	20764 Edison, NJ MD	2,039	30.3%	11,741	16.4%	1.84	162
32 NV	39900 Reno-Sparks, NV MSA	843	32.5%	3,396	17.7%	1.84	161
08 CO	24300 Grand Junction, CO MSA	128	34.2%	1,117	18.6%	1.84	160
36 NY	28740 Kingston, NY MSA	80	37.6%	844	20.5%	1.84	159
VA+WV	49020 Winchester, VA-WV MSA	179	44.3%	1,430	24.2%	1.83	158
36 NY	40380 Rochester, NY MSA	153	30.7%	3,185	16.8%	1.83	157
12 FL	15980 Cape Coral-Fort Myers, FL MSA	3,535	55.9%	9,228	30.6%	1.83	156
17 IL	16974 Chicago-Naperville-Joliet, IL MD	23,049	41.2%	58,143	22.6%	1.82	155
37 NC	24660 Greensboro-High Point, NC MSA	227	32.5%	2,672	17.9%	1.81	154
35 NM	42140 Santa Fe, NM MSA	388	26.7%	707	14.7%	1.81	153
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	1,315	28.3%	1,798	15.6%	1.81	152
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	3,701	38.6%	11,120	21.4%	1.81	151
15 HI	26180 Honolulu, HI MSA	218	25.1%	1,019	13.9%	1.80	150
34 NJ	12100 Atlantic City, NJ MSA	556	41.5%	2,110	23.0%	1.80	149
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	369	33.3%	1,213	18.5%	1.80	148
56 WY	16940 Cheyenne, WY MSA	84	34.4%	681	19.3%	1.78	147

**Table 4 - NCRC Analysis: Hispanic/White**

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
35 NM	22140 Farmington, NM MSA	115	44.2%	536	24.8%	1.78	146
39 OH	18140 Columbus, OH MSA	266	33.0%	9,207	18.5%	1.78	145
51 VA	40060 Richmond, VA MSA	356	28.3%	5,533	15.9%	1.78	144
17 IL	28100 Kankakee-Bradley, IL MSA	56	37.8%	598	21.5%	1.76	143
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	91	40.4%	1,130	23.0%	1.76	142
18 IN	23060 Fort Wayne, IN MSA	128	36.7%	2,415	20.9%	1.76	141
08 CO	24540 Greeley, CO MSA	621	39.4%	2,255	22.4%	1.76	140
48 TX	17780 College Station-Bryan, TX MSA	134	39.8%	651	22.6%	1.76	139
01 AL	26620 Huntsville, AL MSA	62	29.7%	1,638	16.9%	1.76	138
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	389	36.1%	4858	20.6%	1.75	137
37 NC	11700 Asheville, NC MSA	78	32.4%	2,136	18.6%	1.74	136
48 TX	47380 Waco, TX MSA	256	47.1%	1,026	27.2%	1.74	135
42 PA	29540 Lancaster, PA MSA	129	25.3%	1,880	14.6%	1.73	134
55 WI	27500 Janesville, WI MSA	77	41.6%	1,354	24.0%	1.73	133
39 OH	45780 Toledo, OH MSA	159	38.4%	3,723	22.2%	1.73	132
53 WA	45104 Tacoma, WA MD	527	40.8%	7,268	23.7%	1.72	131
06 CA	17020 Chico, CA MSA	198	31.9%	1,223	18.6%	1.72	130
12 FL	46940 Vero Beach, FL MSA	157	37.1%	1,110	21.6%	1.72	129
16 ID	26820 Idaho Falls, ID MSA	56	31.8%	763	18.6%	1.71	128
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	302	38.1%	5,017	22.3%	1.71	127
34 NJ	15804 Camden, NJ MD	740	32.6%	7,687	19.1%	1.71	126
48 TX	47020 Victoria, TX MSA	177	41.8%	385	24.5%	1.71	125
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	376	32.2%	4,191	18.9%	1.71	124
41 OR	32780 Medford, OR MSA	111	32.5%	1,462	19.0%	1.71	123
55 WI	24580 Green Bay, WI MSA	63	26.9%	1,818	15.9%	1.69	122
45 SC	43900 Spartanburg, SC MSA	64	39.3%	1,276	23.2%	1.69	121
19 IA	19780 Des Moines, IA MSA	215	35.2%	4,155	20.9%	1.69	120
45 SC	17900 Columbia, SC MSA	125	32.3%	2,681	19.1%	1.69	119
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	75	45.7%	3636	27.1%	1.69	118
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	826	47.3%	11,260	28.1%	1.68	117
26 MI	24340 Grand Rapids-Wyoming, MI MSA	544	39.5%	5,772	23.5%	1.68	116
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	50	40.0%	2,018	23.8%	1.68	115
IL+MO	41180 St. Louis, MO-IL MSA	454	33.8%	18,592	20.2%	1.68	114
39 OH	10420 Akron, OH MSA	56	35.2%	4,109	21.1%	1.67	113
29 MO	44180 Springfield, MO MSA	57	35.4%	2,996	21.3%	1.67	112
32 NV	29820 Las Vegas-Paradise, NV MSA	10,343	47.0%	23,991	28.3%	1.66	111
37 NC	49180 Winston-Salem, NC MSA	132	25.8%	1,708	15.6%	1.66	110
48 TX	46340 Tyler, TX MSA	102	31.9%	746	19.3%	1.65	109
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,250	44.2%	4,804	26.8%	1.65	108
40 OK	36420 Oklahoma City, OK MSA	645	39.3%	7,077	23.9%	1.65	107
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	417	30.9%	17,230	18.8%	1.64	106
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	6,181	43.4%	28,368	26.5%	1.64	105
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	472	25.5%	7,697	15.6%	1.64	104
47 TN	28940 Knoxville, TN MSA	99	38.8%	4,940	23.8%	1.63	103
04 AZ	22380 Flagstaff, AZ MSA	50	22.3%	458	13.7%	1.63	102
36 NY	15380 Buffalo-Niagara Falls, NY MSA	73	26.6%	2,973	16.4%	1.62	101
48 TX	41660 San Angelo, TX MSA	157	41.4%	432	25.6%	1.62	100
53 WA	48300 Wenatchee, WA MSA	95	29.8%	547	18.4%	1.62	99

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48 TX	33260 Midland, TX MSA	261	44.8%	750	27.7%	1.62	98
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	628	34.7%	3,451	21.5%	1.62	97
06 CA	46700 Vallejo-Fairfield, CA MSA	1,481	33.6%	3,036	20.8%	1.61	96
53 WA	49420 Yakima, WA MSA	503	36.0%	1,045	22.4%	1.61	95
36 NY	10580 Albany-Schenectady-Troy, NY MSA	96	28.3%	3,706	17.6%	1.61	94
06 CA	39820 Redding, CA MSA	88	32.8%	1,367	20.5%	1.60	93
33 NH	40484 Rockingham County-Strafford County, NH MD	58	27.9%	3,004	17.4%	1.60	92
12 FL	45220 Tallahassee, FL MSA	72	26.4%	1,335	16.5%	1.59	91
26 MI	29620 Lansing-East Lansing, MI MSA	195	40.0%	3,572	25.1%	1.59	90
48 TX	10180 Abilene, TX MSA	108	45.2%	732	28.5%	1.58	89
17 IL	40420 Rockford, IL MSA	449	42.7%	2,822	27.0%	1.58	88
18 IN	21140 Elkhart-Goshen, IN MSA	182	39.0%	1,358	24.6%	1.58	87
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	15,261	46.5%	30,038	29.5%	1.58	86
48 TX	30980 Longview, TX MSA	105	45.7%	926	29.0%	1.58	85
12 FL	36740 Orlando-Kissimmee, FL MSA	9,543	41.3%	21,561	26.3%	1.57	84
12 FL	23540 Gainesville, FL MSA	89	25.8%	946	16.5%	1.57	83
48 TX	23104 Fort Worth-Arlington, TX MD	2,848	38.0%	10,694	24.3%	1.56	82
45 SC	24860 Greenville, SC MSA	151	29.9%	2,562	19.2%	1.56	81
12 FL	27260 Jacksonville, FL MSA	883	33.8%	9,289	21.7%	1.55	80
22 LA	43340 Shreveport-Bossier City, LA MSA	50	35.0%	1,573	22.5%	1.55	79
48 TX	48660 Wichita Falls, TX MSA	67	37.9%	662	24.5%	1.55	78
35 NM	29740 Las Cruces, NM MSA	686	37.8%	941	24.4%	1.55	77
06 CA	49700 Yuba City, CA MSA	618	41.6%	1,644	27.0%	1.54	76
18 IN	23844 Gary, IN MD	783	35.8%	4,340	23.2%	1.54	75
13 GA	42340 Savannah, GA MSA	51	23.5%	1,216	15.5%	1.52	74
53 WA	44060 Spokane, WA MSA	62	27.8%	2,909	18.3%	1.52	73
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	238	27.4%	3,798	18.1%	1.51	72
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	377	27.1%	9,524	17.9%	1.51	71
KS+MO	28140 Kansas City, MO-KS MSA	872	33.2%	15,136	22.0%	1.51	70
48 TX	41700 San Antonio, TX MSA	6,384	37.7%	9,801	25.0%	1.51	69
22 LA	12940 Baton Rouge, LA MSA	94	34.3%	3,264	22.8%	1.50	68
10 DE	20100 Dover, DE MSA	50	30.3%	936	20.2%	1.50	67
48 TX	18580 Corpus Christi, TX MSA	1,341	43.5%	2,162	29.1%	1.49	66
06 CA	41500 Salinas, CA MSA	2,082	28.8%	2,265	19.4%	1.49	65
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	475	33.0%	5,125	22.2%	1.49	64
12 FL	36100 Ocala, FL MSA	384	38.4%	2,534	25.8%	1.48	63
32 NV	16180 Carson City, NV MSA	66	25.7%	355	17.4%	1.48	62
06 CA	23420 Fresno, CA MSA	5,548	43.0%	7,946	29.2%	1.47	61
12 FL	29460 Lakeland, FL MSA	1,685	48.0%	5,887	32.6%	1.47	60
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	43,454	34.7%	53,882	23.6%	1.47	59
35 NM	10740 Albuquerque, NM MSA	2,574	27.7%	4,984	18.9%	1.47	58
05 AR	30780 Little Rock-North Little Rock, AR MSA	72	26.2%	2,635	17.9%	1.46	57
53 WA	36500 Olympia, WA MSA	64	25.0%	1,566	17.2%	1.46	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	105	30.4%	2375	20.9%	1.45	55
20 KS	45820 Topeka, KS MSA	70	31.7%	1,399	22.0%	1.44	54
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	134	33.3%	2038	23.1%	1.44	53
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	896	40.1%	5,833	28.1%	1.43	52
20 KS	48620 Wichita, KS MSA	296	31.0%	3,322	21.7%	1.42	51

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08 CO	39380 Pueblo, CO MSA	751	44.5%	1,645	31.3%	1.42	50
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	9,031	38.0%	17,931	26.9%	1.41	49
48 TX	13140 Beaumont-Port Arthur, TX MSA	85	34.0%	1,163	24.2%	1.41	48
06 CA	31460 Madera, CA MSA	1,143	42.4%	1,547	30.2%	1.40	47
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	259	39.3%	941	28.0%	1.40	46
06 CA	25260 Hanford-Corcoran, CA MSA	673	42.2%	1,126	30.4%	1.39	45
06 CA	12540 Bakersfield, CA MSA	6,743	44.6%	10,124	32.4%	1.38	44
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	92	35.7%	866	25.9%	1.38	43
06 CA	44700 Stockton, CA MSA	4,934	39.7%	7,569	29.0%	1.37	42
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	36,881	41.0%	54,024	30.2%	1.36	41
53 WA	14740 Bremerton-Silverdale, WA MSA	50	23.8%	1,601	17.7%	1.35	40
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	106	28.3%	2,702	21.1%	1.34	39
GA+TN	16860 Chattanooga, TN-GA MSA	78	39.8%	3,954	29.7%	1.34	38
48 TX	11100 Amarillo, TX MSA	189	27.8%	1,038	20.8%	1.33	37
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	169	25.5%	12,056	19.1%	1.33	36
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	404	28.1%	9,424	21.1%	1.33	35
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	54	21.7%	1,113	16.3%	1.33	34
06 CA	33700 Modesto, CA MSA	4,081	37.2%	6,804	27.9%	1.33	33
13 GA	23580 Gainesville, GA MSA	237	28.7%	1,081	21.8%	1.32	32
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	130	34.0%	2,731	25.9%	1.31	31
48 TX	36220 Odessa, TX MSA	358	58.4%	774	45.7%	1.28	30
06 CA	47300 Visalia-Porterville, CA MSA	2,777	41.0%	4,028	32.2%	1.27	29
04 AZ	49740 Yuma, AZ MSA	856	27.2%	1,279	21.4%	1.27	28
IN+KY	31140 Louisville, KY-IN MSA	152	25.6%	7,043	20.2%	1.27	27
26 MI	22420 Flint, MI MSA	57	32.6%	3,333	25.9%	1.26	26
72 PR	21940 Fajardo, PR MSA	157	9.9%	87	8.0%	1.24	25
06 CA	32900 Merced, CA MSA	2,480	39.0%	3,103	32.4%	1.20	24
37 NC	22180 Fayetteville, NC MSA	99	17.7%	870	15.0%	1.18	23
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	62	27.7%	1,846	23.5%	1.18	22
40 OK	46140 Tulsa, OK MSA	286	32.0%	5,616	27.7%	1.16	21
48 TX	21340 El Paso, TX MSA	3,745	36.5%	4,156	31.9%	1.14	20
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	210	18.3%	1,136	16.1%	1.14	19
48 TX	15180 Brownsville-Harlingen, TX MSA	2,041	51.2%	2,202	45.2%	1.13	18
42 PA	38300 Pittsburgh, PA MSA	90	23.9%	10,778	21.1%	1.13	17
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	27,420	41.3%	30,362	36.7%	1.13	16
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	50	18.9%	1,587	16.9%	1.12	15
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	4,021	7.6%	2,658	6.9%	1.10	14
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	4,263	53.1%	4,422	49.2%	1.08	13
72 PR	38660 Ponce, PR MSA	304	9.5%	221	8.9%	1.07	12
72 PR	41900 San German-Cabo Rojo, PR MSA	207	11.5%	173	11.0%	1.05	11
06 CA	20940 El Centro, CA MSA	1,766	40.4%	1,665	38.7%	1.04	10
48 TX	29700 Laredo, TX MSA	1,452	43.4%	1,467	41.6%	1.04	9
72 PR	10380 Aguadilla-Isabela-San Sebastian, PR MSA	390	12.6%	319	12.3%	1.02	8
72 PR	32420 Mayaguez, PR MSA	125	10.5%	107	10.4%	1.01	7
72 PR	49500 Yauco, PR MSA	119	13.0%	98	12.9%	1.00	6
72 PR	25020 Guayama, PR MSA	140	9.0%	90	9.0%	1.00	5
KY+TN	17300 Clarksville, TN-KY MSA	50	15.2%	1,196	18.9%	0.81	4
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	252	13.6%	2,883	18.9%	0.72	3

**Table 4 - NCRC Analysis: Hispanic/White**

State	MSA	# High-Cost Loans to Hispanics	% High-Cost Loans to Hispanics	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
AR+OK	22900 Fort Smith, AR-OK MSA	59	21.4%	1857	32.2%	0.66	2
13 GA	19140 Dalton, GA MSA	154	15.8%	843	28.1%	0.56	1



**Table 5 - NCRC Analysis: LMI Hispanic/LMI White**

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
25 MA	15764 Cambridge-Newton-Framingham, MA MD	287	34.7%	1,622	13.2%	2.63	167
08 CO	14500 Boulder, CO MSA	144	37.4%	442	14.3%	2.62	166
25 MA	21604 Essex County, MA MD	441	40.5%	1,204	17.0%	2.39	165
49 UT	39340 Provo-Orem, UT MSA	194	48.4%	912	21.3%	2.27	164
41 OR	21660 Eugene-Springfield, OR MSA	77	48.1%	650	22.9%	2.11	163
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	852	49.1%	5488	23.6%	2.08	162
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,321	49.6%	11,334	23.9%	2.08	161
37 NC	39580 Raleigh-Cary, NC MSA	328	36.8%	1,711	18.1%	2.04	160
08 CO	22660 Fort Collins-Loveland, CO MSA	86	36.9%	673	18.3%	2.01	159
45 SC	16700 Charleston-North Charleston, SC MSA	84	47.7%	1,075	23.9%	2.00	158
09 CT	35980 Norwich-New London, CT MSA	124	50.2%	688	25.2%	1.99	157
53 WA	42644 Seattle-Bellevue-Everett, WA MD	658	41.4%	4,371	20.8%	1.99	156
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	633	44.2%	2,862	22.5%	1.97	155
25 MA	44140 Springfield, MA MSA	431	48.3%	1,554	24.7%	1.95	154
26 MI	26100 Holland-Grand Haven, MI MSA	109	38.7%	743	19.9%	1.94	153
25 MA	14484 Boston-Quincy, MA MD	207	25.6%	1,713	13.6%	1.88	152
04 AZ	39140 Prescott, AZ MSA	54	38.6%	330	20.8%	1.86	151
49 UT	41620 Salt Lake City, UT MSA	1,040	51.9%	3,712	28.1%	1.85	150
25 MA	49340 Worcester, MA MSA	241	38.6%	1,713	21.1%	1.83	149
37 NC	20500 Durham, NC MSA	86	29.7%	413	16.4%	1.81	148
06 CA	25260 Hanford-Corcoran, CA MSA	141	42.9%	656	23.7%	1.81	147
42 PA	37964 Philadelphia, PA MD	827	37.7%	5,087	20.9%	1.81	146
42 PA	25420 Harrisburg-Carlisle, PA MSA	50	37.0%	1,091	20.6%	1.80	145
08 CO	19740 Denver-Aurora, CO MSA	3,815	47.9%	8,509	27.0%	1.77	144
49 UT	36260 Ogden-Clearfield, UT MSA	314	42.4%	1,800	24.1%	1.76	143
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	563	37.8%	1,424	21.6%	1.75	142
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	850	43.2%	3,618	25.0%	1.73	141
09 CT	35300 New Haven-Milford, CT MSA	551	44.8%	2,141	26.3%	1.70	140
26 MI	28020 Kalamazoo-Portage, MI MSA	66	53.7%	1,065	31.7%	1.69	139
41 OR	41420 Salem, OR MSA	275	45.7%	914	27.0%	1.69	138
12 FL	34940 Naples-Marco Island, FL MSA	193	36.7%	478	22.0%	1.67	137
08 CO	17820 Colorado Springs, CO MSA	335	38.4%	1,714	23.1%	1.66	136
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	1,376	46.9%	3,369	28.6%	1.64	135
55 WI	39540 Racine, WI MSA	150	42.7%	729	26.1%	1.64	134
16 ID	14260 Boise City-Nampa, ID MSA	226	36.5%	1,741	22.5%	1.62	133
18 IN	26900 Indianapolis, IN MSA	408	42.8%	5,263	26.5%	1.62	132
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,328	33.1%	2,902	20.5%	1.62	131
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	496	38.8%	1,996	24.1%	1.61	130
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	477	34.8%	3,068	21.7%	1.60	129
36 NY	35004 Nassau-Suffolk, NY MD	739	33.6%	2,874	21.0%	1.60	128
04 AZ	46060 Tucson, AZ MSA	1,265	44.7%	2,251	28.0%	1.59	127
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	253	40.8%	1,542	25.8%	1.58	126
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	10,227	54.9%	18,259	34.9%	1.57	125
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	480	20.8%	765	13.3%	1.57	124
53 WA	45104 Tacoma, WA MD	178	46.8%	1,858	29.9%	1.57	123
39 OH	18140 Columbus, OH MSA	181	39.9%	4,561	25.9%	1.54	122
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	472	20.0%	892	13.0%	1.54	121

**Table 5 - NCRC Analysis: LMI Hispanic/LMI White**

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
NJ+PA	35084 Newark-Union, NJ-PA MD	730	34.5%	2,257	22.5%	1.54	120
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	826	22.0%	1,294	14.4%	1.53	119
34 NJ	20764 Edison, NJ MD	596	28.5%	3,743	18.6%	1.53	118
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	879	31.9%	2,397	20.9%	1.52	117
34 NJ	45940 Trenton-Ewing, NJ MSA	188	33.3%	574	21.9%	1.52	116
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	3100	31.9%	7,314	21.0%	1.52	115
18 IN	23060 Fort Wayne, IN MSA	96	42.1%	1,481	27.9%	1.51	114
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	57	47.5%	562	31.4%	1.51	113
48 TX	12420 Austin-Round Rock, TX MSA	1,164	36.5%	2,547	24.2%	1.51	112
48 TX	10180 Abilene, TX MSA	52	59.8%	243	39.6%	1.51	111
47 TN	28940 Knoxville, TN MSA	66	51.6%	2,419	34.2%	1.51	110
45 SC	17900 Columbia, SC MSA	73	38.4%	1,199	25.5%	1.51	109
36 NY	40380 Rochester, NY MSA	104	32.2%	1,666	21.4%	1.51	108
42 PA	29540 Lancaster, PA MSA	80	26.5%	764	17.6%	1.50	107
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	342	22.8%	487	15.3%	1.49	106
55 WI	27500 Janesville, WI MSA	61	44.5%	701	30.0%	1.48	105
01 AL	13820 Birmingham-Hoover, AL MSA	119	49.6%	2,608	33.5%	1.48	104
06 CA	36084 Oakland-Fremont-Hayward, CA MD	607	21.0%	1,154	14.3%	1.47	103
17 IL	16974 Chicago-Naperville-Joliet, IL MD	8,574	40.8%	17,406	27.8%	1.47	102
08 CO	24540 Greeley, CO MSA	292	41.5%	720	28.3%	1.47	101
42 PA	39740 Reading, PA MSA	209	31.8%	854	21.8%	1.46	100
12 FL	15980 Cape Coral-Fort Myers, FL MSA	467	45.7%	1,491	31.5%	1.45	99
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	1,989	35.8%	10,470	24.8%	1.44	98
34 NJ	12100 Atlantic City, NJ MSA	212	42.5%	656	29.5%	1.44	97
34 NJ	15804 Camden, NJ MD	391	35.4%	3,109	24.6%	1.44	96
48 TX	17780 College Station-Bryan, TX MSA	58	47.5%	176	33.1%	1.44	95
32 NV	29820 Las Vegas-Paradise, NV MSA	3,086	50.6%	5,434	35.4%	1.43	94
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	924	37.3%	2,579	26.0%	1.43	93
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	148	32.7%	858	22.9%	1.42	92
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	242	34.8%	548	24.5%	1.42	91
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	234	34.9%	9,581	24.8%	1.41	90
32 NV	39900 Reno-Sparks, NV MSA	285	31.7%	915	22.6%	1.40	89
35 NM	42140 Santa Fe, NM MSA	116	26.7%	180	19.1%	1.40	88
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	50	47.6%	1779	34.1%	1.40	87
17 IL	40420 Rockford, IL MSA	278	45.5%	1,379	32.6%	1.39	86
42 PA	42540 Scranton--Wilkes-Barre, PA MSA	144	40.3%	1,277	29.0%	1.39	85
39 OH	45780 Toledo, OH MSA	90	40.0%	1,737	28.8%	1.39	84
48 TX	47020 Victoria, TX MSA	76	45.5%	123	32.8%	1.39	83
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	444	52.2%	4,182	37.7%	1.39	82
18 IN	23844 Gary, IN MD	465	42.1%	1,980	30.4%	1.38	81
40 OK	36420 Oklahoma City, OK MSA	393	42.9%	3,032	31.3%	1.37	80
IL+MO	41180 St. Louis, MO-IL MSA	289	37.7%	9,581	27.6%	1.37	79
37 NC	24660 Greensboro-High Point, NC MSA	141	36.6%	1,250	26.9%	1.36	78
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	198	29.8%	2,624	22.0%	1.36	77
51 VA	40060 Richmond, VA MSA	179	29.4%	2,458	21.8%	1.35	76
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	1,764	44.2%	7,753	33.2%	1.33	75
26 MI	24340 Grand Rapids-Wyoming, MI MSA	409	40.7%	3,202	30.6%	1.33	74
12 FL	36740 Orlando-Kissimmee, FL MSA	2,764	43.3%	5,710	32.7%	1.33	73

**Table 5 - NCRC Analysis: LMI Hispanic/LMI White**

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
06 CA	46700 Vallejo-Fairfield, CA MSA	121	23.6%	326	17.9%	1.32	72
MS+TN+AR	32820 Memphis, TN-MS-AR MSA	168	44.9%	1,824	34.1%	1.32	71
48 TX	19124 Dallas-Plano-Irving, TX MD	4,574	47.1%	8,435	35.8%	1.32	70
24 MD	12580 Baltimore-Towson, MD MSA	412	32.9%	6,372	25.3%	1.30	69
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	286	37.4%	2,547	28.7%	1.30	68
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	351	18.2%	963	14.0%	1.30	67
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	167	30.2%	1,907	23.3%	1.30	66
26 MI	29620 Lansing-East Lansing, MI MSA	121	41.0%	1,928	31.7%	1.29	65
53 WA	49420 Yakima, WA MSA	234	37.4%	345	29.0%	1.29	64
48 TX	46340 Tyler, TX MSA	65	36.3%	250	28.2%	1.29	63
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	436	30.4%	3,309	23.6%	1.29	62
55 WI	31540 Madison, WI MSA	57	20.9%	1,114	16.3%	1.28	61
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	93	33.2%	5,962	26.1%	1.27	60
48 TX	41660 San Angelo, TX MSA	78	46.2%	174	36.3%	1.27	59
48 TX	47380 Waco, TX MSA	146	53.3%	375	42.0%	1.27	58
35 NM	29740 Las Cruces, NM MSA	212	48.0%	243	37.9%	1.27	57
48 TX	33260 Midland, TX MSA	131	52.2%	281	41.3%	1.26	56
18 IN	21140 Elkhart-Goshen, IN MSA	129	39.2%	729	31.2%	1.26	55
35 NM	10740 Albuquerque, NM MSA	1,018	28.0%	1,628	22.3%	1.26	54
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	247	29.8%	4,370	23.8%	1.25	53
37 NC	49180 Winston-Salem, NC MSA	87	27.4%	787	21.9%	1.25	52
42 PA	38300 Pittsburgh, PA MSA	54	37.5%	4,904	30.2%	1.24	51
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	129	33.2%	1,271	27.0%	1.23	50
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	1,487	38.2%	3,288	31.0%	1.23	49
48 TX	23104 Fort Worth-Arlington, TX MD	1,817	42.6%	4,653	34.6%	1.23	48
08 CO	39380 Pueblo, CO MSA	331	48.0%	634	39.2%	1.22	47
19 IA	19780 Des Moines, IA MSA	161	35.1%	2,483	28.8%	1.22	46
KS+MO	28140 Kansas City, MO-KS MSA	585	36.4%	7,296	29.9%	1.22	45
12 FL	27260 Jacksonville, FL MSA	339	37.8%	3,456	31.1%	1.22	44
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	151	34.0%	1,732	28.3%	1.20	43
48 TX	18580 Corpus Christi, TX MSA	465	54.4%	627	45.3%	1.20	42
48 TX	41700 San Antonio, TX MSA	2,965	48.4%	3,762	40.3%	1.20	41
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	139	33.3%	814	28.0%	1.19	40
06 CA	31460 Madera, CA MSA	169	37.1%	186	31.2%	1.19	39
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	257	39.7%	1,561	33.5%	1.18	38
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	111	39.1%	284	33.1%	1.18	37
06 CA	41500 Salinas, CA MSA	94	19.5%	110	16.6%	1.18	36
12 FL	36100 Ocala, FL MSA	90	36.6%	662	31.3%	1.17	35
06 CA	23420 Fresno, CA MSA	1,120	43.3%	1,312	37.0%	1.17	34
12 FL	29460 Lakeland, FL MSA	401	43.5%	1,566	37.3%	1.17	33
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	100	39.2%	1,475	33.7%	1.16	32
48 TX	36220 Odessa, TX MSA	118	64.8%	200	55.9%	1.16	31
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	8,105	50.4%	12,266	43.6%	1.16	30
48 TX	11100 Amarillo, TX MSA	105	33.8%	386	29.4%	1.15	29
06 CA	33700 Modesto, CA MSA	330	28.1%	582	24.4%	1.15	28
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	573	22.6%	375	19.7%	1.15	27
20 KS	48620 Wichita, KS MSA	217	32.3%	1,685	28.3%	1.14	26
48 TX	30980 Longview, TX MSA	53	47.3%	308	41.5%	1.14	25

**Table 5 - NCRC Analysis: LMI Hispanic/LMI White**

State	MSA	# High-Cost Loans to LMI Hispanics	% High-Cost Loans to LMI Hispanics	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	67	38.5%	470	33.7%	1.14	24
45 SC	24860 Greenville, SC MSA	86	32.0%	1,236	28.0%	1.14	23
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	129	25.2%	214	22.3%	1.13	22
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,934	33.9%	5,915	30.1%	1.13	21
06 CA	12540 Bakersfield, CA MSA	1,267	41.8%	1,641	37.3%	1.12	20
06 CA	44700 Stockton, CA MSA	385	30.4%	655	27.5%	1.11	19
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	96	34.0%	1,127	30.9%	1.10	18
04 AZ	49740 Yuma, AZ MSA	173	24.6%	210	22.8%	1.08	17
48 TX	15180 Brownsville-Harlingen, TX MSA	422	59.2%	412	56.6%	1.05	16
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	2,194	22.5%	2,808	21.5%	1.04	15
48 TX	29700 Laredo, TX MSA	199	55.7%	195	54.0%	1.03	14
48 TX	21340 El Paso, TX MSA	982	43.8%	999	42.5%	1.03	13
13 GA	23580 Gainesville, GA MSA	146	29.0%	469	28.5%	1.02	12
06 CA	47300 Visalia-Porterville, CA MSA	536	38.1%	668	37.7%	1.01	11
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	1,854	35.6%	2,081	35.4%	1.01	10
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	593	66.6%	588	66.3%	1.00	9
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	241	29.9%	4,638	30.2%	0.99	8
06 CA	32900 Merced, CA MSA	138	28.3%	174	28.7%	0.98	7
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	66	19.9%	299	20.9%	0.95	6
IN+KY	31140 Louisville, KY-IN MSA	79	25.7%	3,454	27.4%	0.94	5
40 OK	46140 Tulsa, OK MSA	163	31.8%	2,422	35.2%	0.90	4
06 CA	20940 El Centro, CA MSA	155	39.8%	153	45.4%	0.88	3
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	111	11.3%	980	23.7%	0.48	2
13 GA	19140 Dalton, GA MSA	80	11.7%	414	29.7%	0.39	1

**Table 6 - NCRC Analysis: MUI Hispanic/MUI White**

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
25 MA	15764 Cambridge-Newton-Framingham, MA MD	722	49.7%	3,256	11.9%	4.17	178
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,372	25.7%	2,351	7.5%	3.43	177
25 MA	21604 Essex County, MA MD	1,060	56.2%	2,959	16.7%	3.37	176
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	782	39.2%	2,420	12.8%	3.07	175
25 MA	14484 Boston-Quincy, MA MD	1,137	44.8%	5,689	14.7%	3.05	174
09 CT	35980 Norwich-New London, CT MSA	120	52.6%	897	17.4%	3.02	173
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	1,610	38.1%	3,313	13.5%	2.83	172
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	581	44.4%	10,385	15.8%	2.81	171
25 MA	49340 Worcester, MA MSA	469	49.5%	3,317	17.9%	2.76	170
25 MA	12700 Barnstable Town, MA MSA	121	50.4%	1,229	18.3%	2.76	169
25 MA	44140 Springfield, MA MSA	313	48.1%	2,048	17.6%	2.74	168
53 WA	34580 Mount Vernon-Anacortes, WA MSA	60	45.5%	487	16.8%	2.70	167
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	523	43.0%	3,141	15.9%	2.70	166
34 NJ	45940 Trenton-Ewing, NJ MSA	141	35.6%	700	13.2%	2.69	165
55 WI	31540 Madison, WI MSA	54	28.4%	1,269	10.6%	2.67	164
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	252	29.1%	808	10.9%	2.66	163
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	1,586	56.5%	8,328	21.3%	2.66	162
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	7165	38.2%	13,830	14.4%	2.65	161
41 OR	21660 Eugene-Springfield, OR MSA	114	50.7%	1,381	19.2%	2.65	160
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	333	39.4%	4,347	14.9%	2.64	159
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	356	36.9%	2,729	14.3%	2.58	158
08 CO	22660 Fort Collins-Loveland, CO MSA	69	33.2%	880	12.9%	2.57	157
53 WA	42644 Seattle-Bellevue-Everett, WA MD	831	35.5%	8,532	13.9%	2.56	156
42 PA	37964 Philadelphia, PA MD	474	29.4%	7,412	11.5%	2.55	155
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	885	43.1%	9,322	17.0%	2.53	154
02 AK	11260 Anchorage, AK MSA	74	35.9%	1,013	14.3%	2.52	153
33 NH	31700 Manchester-Nashua, NH MSA	104	41.3%	1,659	16.5%	2.50	152
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	315	32.3%	3,820	13.4%	2.41	151
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	718	47.4%	4,333	19.9%	2.38	150
24 MD	12580 Baltimore-Towson, MD MSA	758	37.3%	9,060	15.7%	2.38	149
08 CO	19740 Denver-Aurora, CO MSA	1,988	39.6%	9,959	16.7%	2.37	148
37 NC	39580 Raleigh-Cary, NC MSA	111	23.3%	1,755	9.8%	2.37	147
12 FL	34940 Naples-Marco Island, FL MSA	1,173	52.2%	2,318	22.2%	2.35	146
49 UT	41620 Salt Lake City, UT MSA	509	44.7%	4,570	19.2%	2.33	145
09 CT	35300 New Haven-Milford, CT MSA	511	44.6%	2,906	19.2%	2.32	144
06 CA	42220 Santa Rosa-Petaluma, CA MSA	1,043	30.4%	2,027	13.2%	2.31	143
06 CA	42100 Santa Cruz-Watsonville, CA MSA	384	27.3%	829	11.8%	2.30	142
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	7,930	37.9%	11,975	16.6%	2.28	141
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	1,187	32.1%	10,853	14.1%	2.28	140
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	98	37.5%	2,239	16.8%	2.24	139
48 TX	12420 Austin-Round Rock, TX MSA	685	28.4%	2,799	12.7%	2.23	138
51 VA	40060 Richmond, VA MSA	162	30.3%	2,953	13.7%	2.21	137
NJ+PA	35084 Newark-Union, NJ-PA MD	3,018	40.3%	7,103	18.3%	2.20	136
42 PA	42540 Scranton--Wilkes-Barre, PA MSA	84	42.2%	1,486	19.2%	2.20	135
NJ+PA	10901 Allentown-Bethlehem-Easton, PA-NJ MSA	344	32.7%	2,504	14.9%	2.20	134
01 AL	13820 Birmingham-Hoover, AL MSA	100	41.0%	3,353	18.7%	2.20	133

**Table 6 - NCRC Analysis: MUI Hispanic/MUI White**

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
16 ID	14260 Boise City-Nampa, ID MSA	158	33.5%	2,406	15.2%	2.20	132
41 OR	41420 Salem, OR MSA	248	47.1%	1,555	21.5%	2.19	131
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	3,950	30.9%	5,096	14.3%	2.16	130
26 MI	24340 Grand Rapids-Wyoming, MI MSA	126	41.2%	2,505	19.1%	2.16	129
49 UT	36260 Ogden-Clearfield, UT MSA	128	37.2%	1,798	17.2%	2.16	128
VA+WV	49020 Winchester, VA-WV MSA	152	47.2%	935	21.9%	2.16	127
42 PA	39740 Reading, PA MSA	95	34.9%	1,090	16.2%	2.15	126
48 TX	19124 Dallas-Plano-Irving, TX MD	2,622	41.2%	10,624	19.3%	2.14	125
53 WA	48300 Wenatchee, WA MSA	55	36.4%	360	17.0%	2.14	124
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	11,942	48.7%	37,192	23.0%	2.12	123
45 SC	16700 Charleston-North Charleston, SC MSA	74	29.1%	1,931	13.9%	2.10	122
04 AZ	46060 Tucson, AZ MSA	2,321	40.4%	5,592	19.2%	2.10	121
08 CO	17820 Colorado Springs, CO MSA	316	35.6%	2,596	17.0%	2.10	120
04 AZ	39140 Prescott, AZ MSA	146	38.9%	1,225	18.6%	2.09	119
49 UT	39340 Provo-Orem, UT MSA	171	40.6%	2,050	19.5%	2.09	118
48 TX	31180 Lubbock, TX MSA	254	45.5%	794	21.8%	2.08	117
49 UT	41100 St. George, UT MSA	104	43.9%	1,125	21.2%	2.07	116
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	123	33.6%	653	16.2%	2.07	115
06 CA	36084 Oakland-Fremont-Hayward, CA MD	6,771	33.8%	10,568	16.4%	2.06	114
36 NY	35004 Nassau-Suffolk, NY MD	4,137	49.1%	11,503	23.9%	2.06	113
12 FL	39460 Punta Gorda, FL MSA	121	49.8%	1,130	24.2%	2.05	112
34 NJ	20764 Edison, NJ MD	1,386	33.8%	7,545	16.5%	2.05	111
08 CO	24300 Grand Junction, CO MSA	83	39.5%	768	19.4%	2.04	110
32 NV	39900 Reno-Sparks, NV MSA	537	34.4%	2,404	17.0%	2.02	109
34 NJ	12100 Atlantic City, NJ MSA	329	44.1%	1,375	21.9%	2.02	108
12 FL	46940 Vero Beach, FL MSA	114	42.4%	746	21.1%	2.01	107
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	2,686	31.7%	3,976	15.8%	2.01	106
17 IL	16974 Chicago-Naperville-Joliet, IL MD	14,120	44.3%	39,614	22.1%	2.00	105
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	7,580	30.8%	13,099	15.4%	2.00	104
39 OH	45780 Toledo, OH MSA	65	37.6%	1,910	18.9%	1.99	103
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	10,506	38.8%	21,168	19.6%	1.98	102
18 IN	26900 Indianapolis, IN MSA	125	31.2%	4,654	15.8%	1.97	101
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	4,834	39.6%	13,880	20.1%	1.96	100
37 NC	24660 Greensboro-High Point, NC MSA	78	28.7%	1,353	14.6%	1.96	99
08 CO	24540 Greeley, CO MSA	327	43.1%	1,516	22.2%	1.94	98
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	242	33.3%	2,817	17.2%	1.94	97
35 NM	42140 Santa Fe, NM MSA	268	27.7%	519	14.4%	1.93	96
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	2,581	40.6%	7,971	21.1%	1.92	95
06 CA	34900 Napa, CA MSA	257	24.3%	482	12.7%	1.92	94
26 MI	29620 Lansing-East Lansing, MI MSA	73	39.9%	1,587	20.8%	1.91	93
12 FL	15980 Cape Coral-Fort Myers, FL MSA	2,904	60.9%	7,300	31.8%	1.91	92
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	1,175	30.0%	1,572	15.8%	1.89	91
12 FL	23540 Gainesville, FL MSA	55	25.3%	543	13.5%	1.88	90
36 NY	28740 Kingston, NY MSA	55	38.7%	623	20.6%	1.88	89
06 CA	17020 Chico, CA MSA	151	34.7%	979	18.5%	1.87	88
15 HI	26180 Honolulu, HI MSA	183	27.6%	879	14.8%	1.87	87
IL+MO	41180 St. Louis, MO-IL MSA	158	30.4%	8,749	16.4%	1.86	86
48 TX	47380 Waco, TX MSA	110	43.8%	643	23.7%	1.85	85

**Table 6 - NCRC Analysis: MUI Hispanic/MUI White**

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
34 NJ	15804 Camden, NJ MD	334	31.9%	4,389	17.2%	1.85	84
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	171	27.3%	7,346	15.0%	1.83	83
48 TX	47020 Victoria, TX MSA	99	42.1%	259	23.4%	1.80	82
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	372	45.4%	6,880	25.3%	1.80	81
48 TX	41660 San Angelo, TX MSA	77	40.3%	249	22.5%	1.79	80
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	6,885	44.7%	17,275	25.0%	1.78	79
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	4,166	44.9%	19,589	25.4%	1.76	78
41 OR	32780 Medford, OR MSA	87	34.9%	1,156	19.8%	1.76	77
45 SC	24860 Greenville, SC MSA	50	26.2%	1,247	14.8%	1.76	76
39 OH	18140 Columbus, OH MSA	81	26.9%	4,511	15.3%	1.76	75
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,018	48.3%	3,682	27.5%	1.76	74
48 TX	33260 Midland, TX MSA	129	41.6%	454	23.7%	1.75	73
12 FL	27260 Jacksonville, FL MSA	507	33.5%	5,539	19.1%	1.75	72
53 WA	45104 Tacoma, WA MD	341	40.0%	5,362	22.9%	1.74	71
48 TX	17780 College Station-Bryan, TX MSA	73	36.5%	465	21.0%	1.74	70
13 GA	23580 Gainesville, GA MSA	81	33.5%	592	19.3%	1.73	69
53 WA	49420 Yakima, WA MSA	258	35.7%	677	20.7%	1.72	68
35 NM	22140 Farmington, NM MSA	81	42.2%	438	24.6%	1.72	67
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	129	34.0%	3,114	19.9%	1.71	66
32 NV	29820 Las Vegas-Paradise, NV MSA	7,104	48.1%	18,140	28.2%	1.71	65
17 IL	40420 Rockford, IL MSA	163	41.4%	1,397	24.3%	1.70	64
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	256	23.8%	4,877	14.0%	1.70	63
40 OK	36420 Oklahoma City, OK MSA	234	34.9%	3,922	20.7%	1.69	62
12 FL	36740 Orlando-Kissimmee, FL MSA	6,220	42.8%	14,784	25.5%	1.68	61
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	468	36.3%	2,516	21.7%	1.67	60
48 TX	23104 Fort Worth-Arlington, TX MD	985	35.3%	5,856	21.2%	1.67	59
06 CA	39820 Redding, CA MSA	77	35.3%	1,158	21.2%	1.67	58
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	305	34.2%	3,193	20.7%	1.66	57
06 CA	46700 Vallejo-Fairfield, CA MSA	1,337	36.3%	2,674	22.0%	1.65	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	83	33.9%	1,668	20.8%	1.63	55
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	148	27.8%	4,612	17.2%	1.62	54
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	69	25.1%	1,833	15.5%	1.62	53
48 TX	41700 San Antonio, TX MSA	3,308	34.8%	5,841	21.6%	1.61	52
12 FL	36100 Ocala, FL MSA	265	39.8%	1,764	24.8%	1.61	51
12 FL	29460 Lakeland, FL MSA	1,177	51.5%	4,098	32.1%	1.60	50
35 NM	29740 Las Cruces, NM MSA	465	35.9%	687	22.4%	1.60	49
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	120	24.5%	4,948	15.3%	1.60	48
IN+KY	31140 Louisville, KY-IN MSA	71	26.9%	3,509	16.8%	1.60	47
35 NM	10740 Albuquerque, NM MSA	1,515	29.5%	3,257	18.5%	1.59	46
KS+MO	28140 Kansas City, MO-KS MSA	264	29.0%	7,021	18.2%	1.59	45
06 CA	49700 Yuba City, CA MSA	568	44.6%	1,490	28.4%	1.57	44
48 TX	18580 Corpus Christi, TX MSA	868	42.2%	1,504	26.9%	1.57	43
18 IN	23844 Gary, IN MD	304	31.2%	2,276	20.2%	1.55	42
20 KS	48620 Wichita, KS MSA	71	28.2%	1,583	18.3%	1.54	41
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	592	42.3%	4,036	27.5%	1.54	40
06 CA	23420 Fresno, CA MSA	4,363	44.3%	6,576	28.9%	1.53	39
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	40,734	37.4%	50,553	24.7%	1.51	38
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	137	40.9%	638	27.2%	1.50	37

**Table 6 - NCRC Analysis: MUI Hispanic/MUI White**

State	MSA	# High-Cost Loans to MUI Hispanics	% High-Cost Loans to MUI Hispanics	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Whites	High-Cost Disparity Ratio	Rank
08 CO	39380 Pueblo, CO MSA	413	44.7%	986	29.9%	1.49	36
06 CA	41500 Salinas, CA MSA	1,957	30.5%	2,140	20.5%	1.49	35
48 TX	10180 Abilene, TX MSA	54	38.3%	468	25.8%	1.48	34
06 CA	12540 Bakersfield, CA MSA	5,377	47.3%	8,384	32.6%	1.45	33
06 CA	31460 Madera, CA MSA	966	45.2%	1,347	31.2%	1.45	32
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	7,271	39.2%	14,028	27.2%	1.44	31
40 OK	46140 Tulsa, OK MSA	120	35.0%	3,133	24.4%	1.43	30
06 CA	25260 Hanford-Corcoran, CA MSA	518	43.0%	933	30.1%	1.43	29
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	74	28.4%	1,883	20.1%	1.41	28
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	32,568	43.5%	47,573	31.2%	1.39	27
06 CA	44700 Stockton, CA MSA	4,515	41.9%	6,870	30.1%	1.39	26
06 CA	47300 Visalia-Porterville, CA MSA	2,188	43.5%	3,322	32.4%	1.34	25
06 CA	33700 Modesto, CA MSA	3,715	39.3%	6,165	29.3%	1.34	24
48 TX	11100 Amarillo, TX MSA	81	24.8%	630	18.6%	1.33	23
04 AZ	49740 Yuma, AZ MSA	654	28.3%	1,031	21.6%	1.32	22
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	72	20.2%	5,928	15.7%	1.29	21
48 TX	36220 Odessa, TX MSA	238	58.2%	563	45.3%	1.29	20
06 CA	32900 Merced, CA MSA	2,319	40.9%	2,905	33.7%	1.21	19
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	140	19.2%	818	15.9%	1.21	18
37 NC	22180 Fayetteville, NC MSA	59	17.2%	598	14.3%	1.20	17
48 TX	21340 El Paso, TX MSA	2,679	38.1%	3,069	32.2%	1.18	16
72 PR	21940 Fajardo, PR MSA	134	9.5%	78	8.2%	1.17	15
48 TX	15180 Brownsville-Harlingen, TX MSA	1,590	51.3%	1,756	45.0%	1.14	14
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	24,863	43.5%	27,500	38.3%	1.14	13
72 PR	38660 Ponce, PR MSA	263	9.1%	187	8.2%	1.10	12
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	3,399	7.0%	2,262	6.4%	1.10	11
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	3,602	52.4%	3,769	48.3%	1.08	10
72 PR	41900 San German-Cabo Rojo, PR MSA	167	10.1%	138	9.5%	1.06	9
06 CA	20940 El Centro, CA MSA	1,592	41.9%	1,500	39.6%	1.06	8
48 TX	29700 Laredo, TX MSA	1,227	44.6%	1,247	42.6%	1.05	7
72 PR	10380 Aguadilla-Isabela-San Sebastian, PR MSA	363	12.5%	300	12.2%	1.02	6
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	126	18.1%	1840	17.8%	1.01	5
72 PR	25020 Guayama, PR MSA	113	8.4%	75	8.3%	1.01	4
72 PR	49500 Yauco, PR MSA	109	12.9%	90	12.8%	1.00	3
72 PR	32420 Mayaguez, PR MSA	100	9.7%	88	9.7%	1.00	2
13 GA	19140 Dalton, GA MSA	72	26.8%	423	27.9%	0.96	1



**Table 7 - NCRC Analysis: Asian/White**

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
06 CA	34900 Napa, CA MSA	82	20.6%	544	12.2%	1.69	105
27 MN	40340 Rochester, MN MSA	53	24.9%	941	15.5%	1.61	104
02 AK	11260 Anchorage, AK MSA	152	22.7%	1,631	14.2%	1.59	103
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	1,498	27.7%	21,974	18.5%	1.50	102
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,206	10.3%	2,558	7.1%	1.46	101
06 CA	46700 Vallejo-Fairfield, CA MSA	1,041	27.8%	3,036	20.8%	1.34	100
32 NV	39900 Reno-Sparks, NV MSA	218	22.5%	3,396	17.7%	1.27	99
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	237	21.8%	8,093	17.8%	1.23	98
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	366	18.7%	7,697	15.6%	1.20	97
53 WA	45104 Tacoma, WA MD	491	27.8%	7,268	23.7%	1.18	96
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	197	23.7%	11,645	20.8%	1.14	95
15 HI	26180 Honolulu, HI MSA	1,715	15.6%	1,019	13.9%	1.12	94
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	69	17.3%	1,798	15.6%	1.11	93
34 NJ	12100 Atlantic City, NJ MSA	224	25.5%	2,110	23.0%	1.11	92
06 CA	42220 Santa Rosa-Petaluma, CA MSA	74	13.3%	2,246	12.2%	1.09	91
06 CA	41500 Salinas, CA MSA	162	20.4%	2,265	19.4%	1.05	90
25 MA	44140 Springfield, MA MSA	61	21.0%	3,695	19.9%	1.05	89
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,798	15.6%	13,051	15.1%	1.03	88
08 CO	17820 Colorado Springs, CO MSA	88	18.0%	4,375	17.8%	1.01	87
06 CA	47300 Visalia-Porterville, CA MSA	150	32.3%	4,028	32.2%	1.00	86
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	2,193	19.4%	16,490	19.6%	0.99	85
53 WA	14740 Bremerton-Silverdale, WA MSA	56	17.3%	1,601	17.7%	0.98	84
08 CO	19740 Denver-Aurora, CO MSA	525	18.5%	18,690	19.0%	0.97	83
25 MA	21604 Essex County, MA MD	89	15.8%	4,273	16.4%	0.97	82
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,432	13.8%	14,152	14.7%	0.94	81
53 WA	36500 Olympia, WA MSA	65	16.0%	1,566	17.2%	0.93	80
12 FL	27260 Jacksonville, FL MSA	315	20.1%	9,289	21.7%	0.92	79
06 CA	23420 Fresno, CA MSA	793	26.8%	7,946	29.2%	0.92	78
32 NV	29820 Las Vegas-Paradise, NV MSA	2,575	25.8%	23,991	28.3%	0.91	77
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	132	13.2%	3,949	14.5%	0.91	76
24 MD	12580 Baltimore-Towson, MD MSA	725	16.4%	15,843	18.1%	0.91	75
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	77	24.2%	4,804	26.8%	0.90	74
26 MI	24340 Grand Rapids-Wyoming, MI MSA	71	21.0%	5,772	23.5%	0.89	73
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	74	18.0%	6,161	20.4%	0.89	72
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	506	23.6%	17,931	26.9%	0.88	71
37 NC	24660 Greensboro-High Point, NC MSA	65	15.7%	2,672	17.9%	0.88	70
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	170	18.2%	9,424	21.1%	0.86	69
06 CA	33700 Modesto, CA MSA	411	24.1%	6,804	27.9%	0.86	68
19 IA	19780 Des Moines, IA MSA	67	18.0%	4,155	20.9%	0.86	67
12 FL	15980 Cape Coral-Fort Myers, FL MSA	95	25.7%	9,228	30.6%	0.84	66
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	172	13.6%	7,413	16.2%	0.84	65
12 FL	29460 Lakeland, FL MSA	101	27.3%	5,887	32.6%	0.84	64
06 CA	12540 Bakersfield, CA MSA	336	26.9%	10,124	32.4%	0.83	63
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	71	18.4%	5,125	22.2%	0.83	62
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	87	15.6%	4,191	18.9%	0.83	61
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	99	18.4%	5,017	22.3%	0.83	60
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	1,646	20.5%	57,200	25.0%	0.82	59
KS+MO	28140 Kansas City, MO-KS MSA	188	17.7%	15,136	22.0%	0.80	58

**Table 7 - NCRC Analysis: Asian/White**

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	2,492	12.6%	22,259	15.8%	0.80	57
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,670	12.5%	13,455	15.8%	0.79	56
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	232	16.9%	11,120	21.4%	0.79	55
25 MA	14484 Boston-Quincy, MA MD	256	11.1%	7,625	14.1%	0.79	54
06 CA	49700 Yuba City, CA MSA	186	21.3%	1,644	27.0%	0.79	53
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,735	12.2%	11,825	15.5%	0.78	52
17 IL	16974 Chicago-Naperville-Joliet, IL MD	3,161	17.7%	58,143	22.6%	0.78	51
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	3,043	14.5%	22,891	18.6%	0.78	50
06 CA	44700 Stockton, CA MSA	1,390	22.6%	7,569	29.0%	0.78	49
42 PA	37964 Philadelphia, PA MD	712	10.6%	12,860	13.7%	0.77	48
IL+MO	41180 St. Louis, MO-IL MSA	233	15.5%	18,592	20.2%	0.77	47
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,226	23.1%	54,024	30.2%	0.76	46
36 NY	35004 Nassau-Suffolk, NY MD	570	17.1%	14,839	22.5%	0.76	45
49 UT	41620 Salt Lake City, UT MSA	137	16.0%	8,369	21.2%	0.76	44
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	6,339	17.8%	53,882	23.6%	0.76	43
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	285	15.0%	6,639	19.9%	0.75	42
51 VA	40060 Richmond, VA MSA	153	12.0%	5,533	15.9%	0.75	41
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	699	11.7%	6,489	15.5%	0.75	40
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	600	19.8%	28,368	26.5%	0.75	39
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	182	11.3%	4,509	15.2%	0.75	38
35 NM	10740 Albuquerque, NM MSA	81	13.9%	4,984	18.9%	0.74	37
12 FL	36740 Orlando-Kissimmee, FL MSA	753	19.4%	21,561	26.3%	0.74	36
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	913	12.6%	21,755	17.3%	0.73	35
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	320	26.7%	30,362	36.7%	0.73	34
25 MA	15764 Cambridge-Newton-Framingham, MA MD	259	8.7%	5,036	12.1%	0.72	33
01 AL	13820 Birmingham-Hoover, AL MSA	53	16.2%	6,041	22.4%	0.72	32
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	115	12.2%	5,705	17.0%	0.72	31
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	584	13.1%	14,999	18.3%	0.71	30
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	71	12.3%	4,650	17.4%	0.70	29
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	51	19.4%	5,833	28.1%	0.69	28
NJ+PA	35084 Newark-Union, NJ-PA MD	340	12.6%	9,618	18.4%	0.68	27
25 MA	49340 Worcester, MA MSA	107	12.6%	5,126	18.5%	0.68	26
48 TX	23104 Fort Worth-Arlington, TX MD	258	16.3%	10,694	24.3%	0.67	25
34 NJ	15804 Camden, NJ MD	194	12.6%	7,687	19.1%	0.66	24
04 AZ	46060 Tucson, AZ MSA	102	13.2%	7,989	20.4%	0.65	23
18 IN	26900 Indianapolis, IN MSA	107	12.4%	10,104	19.3%	0.64	22
06 CA	32900 Merced, CA MSA	228	20.7%	3,103	32.4%	0.64	21
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	59	13.6%	3,451	21.5%	0.63	20
36 NY	10580 Albany-Schenectady-Troy, NY MSA	67	11.0%	3,706	17.6%	0.62	19
39 OH	18140 Columbus, OH MSA	147	11.4%	9,207	18.5%	0.62	18
20 KS	48620 Wichita, KS MSA	61	12.8%	3,322	21.7%	0.59	17
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	224	16.6%	11,260	28.1%	0.59	16
40 OK	36420 Oklahoma City, OK MSA	101	14.0%	7,077	23.9%	0.59	15
37 NC	39580 Raleigh-Cary, NC MSA	94	7.0%	3,603	12.2%	0.58	14
48 TX	41700 San Antonio, TX MSA	100	14.3%	9,801	25.0%	0.57	13
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	82	10.2%	9,524	17.9%	0.57	12
09 CT	35300 New Haven-Milford, CT MSA	77	11.9%	5,133	20.9%	0.57	11
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,510	7.6%	5,900	13.6%	0.55	10
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	289	10.4%	17,230	18.8%	0.55	9

**Table 7 - NCRC Analysis: Asian/White**

State	MSA	# High-Cost Loans to Asians	% High-Cost Loans to Asians	# High-Cost Loans to Whites	% High-Cost Loans to Whites	High-Cost Disparity Ratio	Rank
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	1,250	16.0%	30,038	29.5%	0.54	8
48 TX	19124 Dallas-Plano-Irving, TX MD	607	12.6%	19,361	23.1%	0.54	7
34 NJ	20764 Edison, NJ MD	584	8.6%	11,741	16.4%	0.52	6
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	58	9.3%	3,798	18.1%	0.51	5
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	89	9.4%	12,056	19.1%	0.49	4
34 NJ	45940 Trenton-Ewing, NJ MSA	63	6.8%	1,308	15.4%	0.44	3
48 TX	12420 Austin-Round Rock, TX MSA	102	6.6%	5,503	15.7%	0.42	2
42 PA	38300 Pittsburgh, PA MSA	53	8.1%	10,778	21.1%	0.38	1

**Table 8 - NCRC Analysis: LMI Asian/LMI White**

State	MSA	# High-Cost Loans to LMI Asians	% High-Cost Loans to LMI Asian	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	126	33.3%	3,618	25.0%	1.34	47
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	700	30.7%	11,334	23.9%	1.28	46
02 AK	11260 Anchorage, AK MSA	52	18.8%	606	15.7%	1.20	45
15 HI	26180 Honolulu, HI MSA	277	11.8%	132	11.5%	1.03	44
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	96	37.2%	4,182	37.7%	0.99	43
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	59	6.1%	174	6.3%	0.98	42
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	93	20.9%	2,624	22.0%	0.95	41
06 CA	44700 Stockton, CA MSA	50	25.8%	655	27.5%	0.94	40
34 NJ	12100 Atlantic City, NJ MSA	58	27.2%	656	29.5%	0.92	39
32 NV	29820 Las Vegas-Paradise, NV MSA	324	29.8%	5,434	35.4%	0.84	38
KS+MO	28140 Kansas City, MO-KS MSA	90	25.2%	7296	29.9%	0.84	37
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	70	26.1%	3,288	31.0%	0.84	36
08 CO	19740 Denver-Aurora, CO MSA	196	22.6%	8,509	27.0%	0.84	35
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	75	19.7%	3,309	23.6%	0.83	34
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	138	17.1%	2,397	20.9%	0.82	33
51 VA	40060 Richmond, VA MSA	50	17.7%	2,458	21.8%	0.81	32
53 WA	45104 Tacoma, WA MD	79	24.2%	1,858	29.9%	0.81	31
12 FL	27260 Jacksonville, FL MSA	84	24.6%	3,456	31.1%	0.79	30
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	69	23.0%	4,638	30.2%	0.76	29
IL+MO	41180 St. Louis, MO-IL MSA	90	20.9%	9,581	27.6%	0.76	28
53 WA	42644 Seattle-Bellevue-Everett, WA MD	408	15.6%	4,371	20.8%	0.75	27
39 OH	18140 Columbus, OH MSA	67	18.9%	4,561	25.9%	0.73	26
42 PA	37964 Philadelphia, PA MD	321	15.1%	5,087	20.9%	0.72	25
24 MD	12580 Baltimore-Towson, MD MSA	129	17.7%	6,372	25.3%	0.70	24
34 NJ	15804 Camden, NJ MD	60	16.9%	3,109	24.6%	0.69	23
12 FL	36740 Orlando-Kissimmee, FL MSA	119	22.2%	5,710	32.7%	0.68	22
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	68	19.0%	3369	28.6%	0.66	21
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	447	13.9%	7,314	21.0%	0.66	20
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	87	19.9%	5,915	30.1%	0.66	19
25 MA	15764 Cambridge-Newton-Framingham, MA MD	66	8.7%	1,622	13.2%	0.65	18
49 UT	41620 Salt Lake City, UT MSA	54	18.1%	3,712	28.1%	0.64	17
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	229	13.2%	2,902	20.5%	0.64	16
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	82	21.2%	7,753	33.2%	0.64	15
17 IL	16974 Chicago-Naperville-Joliet, IL MD	539	17.3%	17,406	27.8%	0.62	14
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	107	15.3%	9,581	24.8%	0.62	13
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	223	21.3%	18,259	34.9%	0.61	12
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	135	8.0%	765	13.3%	0.60	11
48 TX	23104 Fort Worth-Arlington, TX MD	105	20.7%	4,653	34.6%	0.60	10
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	167	13.7%	5488	23.6%	0.58	9
06 CA	36084 Oakland-Fremont-Hayward, CA MD	110	7.9%	1,154	14.3%	0.56	8
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	333	13.2%	10,470	24.8%	0.53	7
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	61	7.5%	1,294	14.4%	0.52	6
48 TX	19124 Dallas-Plano-Irving, TX MD	190	17.4%	8,435	35.8%	0.49	5
34 NJ	20764 Edison, NJ MD	88	9.0%	3,743	18.6%	0.48	4
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	317	19.4%	12,266	43.6%	0.44	3
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	79	9.0%	2,808	21.5%	0.42	2

**Table 8 - NCRC Analysis: LMI Asian/LMI White**

State	MSA	# High-Cost Loans to LMI Asians	% High-Cost Loans to LMI Asian	# High-Cost Loans to LMI Whites	% High-Cost Loans to LMI Whites	High-Cost Disparity Ratio	Rank
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	55	5.5%	963	14.0%	0.39	1

**Table 9 - NCRC Analysis: MUI Asian/MUI White**

State	MSA	# High-Cost Loans to MUI Asians	% High-Cost Loans to MUI Asians	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Asians	High-Cost Disparity Ratio	Rank
02 AK	11260 Anchorage, AK MSA	100	26.6%	1,013	14.3%	1.87	91
MN+WI	33461 Minneapolis-St. Paul-Bloomington, MN-WI MSA	770	26.5%	10,385	15.8%	1.68	90
06 CA	34900 Napa, CA MSA	79	20.7%	482	12.7%	1.64	89
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	1,137	11.3%	2,351	7.5%	1.50	88
32 NV	39900 Reno-Sparks, NV MSA	163	23.2%	2,404	17.0%	1.37	87
06 CA	46700 Vallejo-Fairfield, CA MSA	990	29.2%	2,674	22.0%	1.33	86
NC+VA	47261 Virginia Beach-Norfolk-Newport News, VA-NC MSA	254	18.4%	4,877	14.0%	1.31	85
53 WA	45104 Tacoma, WA MD	404	29.2%	5,362	22.9%	1.27	84
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	158	26.2%	8,328	21.3%	1.23	83
34 NJ	12100 Atlantic City, NJ MSA	154	26.5%	1,375	21.9%	1.21	82
15 HI	26180 Honolulu, HI MSA	1,430	17.3%	879	14.8%	1.17	81
53 WA	42644 Seattle-Bellevue-Everett, WA MD	1,365	15.9%	8,532	13.9%	1.15	80
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	63	18.1%	1,572	15.8%	1.14	79
53 WA	36500 Olympia, WA MSA	53	18.2%	1,012	16.0%	1.14	78
06 CA	42220 Santa Rosa-Petaluma, CA MSA	68	14.1%	2,027	13.2%	1.07	77
08 CO	19740 Denver-Aurora, CO MSA	323	17.9%	9,959	16.7%	1.07	76
06 CA	41500 Salinas, CA MSA	157	21.5%	2,140	20.5%	1.05	75
24 MD	12580 Baltimore-Towson, MD MSA	564	16.4%	9,060	15.7%	1.05	74
06 CA	47300 Visalia-Porterville, CA MSA	132	33.4%	3,322	32.4%	1.03	73
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	103	15.3%	4,347	14.9%	1.03	72
25 MA	21604 Essex County, MA MD	68	17.1%	2,959	16.7%	1.03	71
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	2,015	20.3%	13,880	20.1%	1.01	70
12 FL	27260 Jacksonville, FL MSA	211	19.2%	5,539	19.1%	1.00	69
08 CO	17820 Colorado Springs, CO MSA	51	16.9%	2,596	17.0%	0.99	68
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	91	12.6%	2,420	12.8%	0.98	67
06 CA	23420 Fresno, CA MSA	735	27.9%	6,576	28.9%	0.96	66
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	95	16.5%	4,612	17.2%	0.96	65
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	61	18.7%	4,333	19.9%	0.94	64
32 NV	29820 Las Vegas-Paradise, NV MSA	2,131	26.4%	18,140	28.2%	0.94	63
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,364	14.3%	13,099	15.4%	0.93	62
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	61	25.3%	3,682	27.5%	0.92	61
IL+WI	29405 Lake County-Kenosha County, IL-WI MD	206	14.4%	3,141	15.9%	0.91	60
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	50	18.6%	3,193	20.7%	0.90	59
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	544	12.6%	10,853	14.1%	0.89	58
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	415	24.1%	14,028	27.2%	0.89	57
12 FL	29460 Lakeland, FL MSA	77	28.1%	4,098	32.1%	0.87	56
12 FL	15980 Cape Coral-Fort Myers, FL MSA	83	27.7%	7,300	31.8%	0.87	55
DC+MD+VA+WV	47895 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	1899	12.5%	13,830	14.4%	0.87	54
25 MA	14484 Boston-Quincy, MA MD	212	12.5%	5,689	14.7%	0.85	53
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	56	14.5%	2,817	17.2%	0.85	52
17 IL	16974 Chicago-Naperville-Joliet, IL MD	2,571	18.6%	39,614	22.1%	0.84	51
06 CA	33700 Modesto, CA MSA	396	24.6%	6,165	29.3%	0.84	50
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	436	11.2%	3,313	13.5%	0.83	49
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	1,120	19.0%	37,192	23.0%	0.83	48
06 CA	12540 Bakersfield, CA MSA	305	26.7%	8,384	32.6%	0.82	47
49 UT	41620 Salt Lake City, UT MSA	81	15.6%	4,570	19.2%	0.81	46
IL+MO	41181 St. Louis, MO-IL MSA	131	13.3%	8,749	16.4%	0.81	45

**Table 9 - NCRC Analysis: MUI Asian/MUI White**

State	MSA	# High-Cost Loans to MUI Asians	% High-Cost Loans to MUI Asians	# High-Cost Loans to MUI Whites	% High-Cost Loans to MUI Asians	High-Cost Disparity Ratio	Rank
06 CA	49700 Yuba City, CA MSA	178	22.6%	1,490	28.4%	0.80	44
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,579	13.2%	11,975	16.6%	0.79	43
35 NM	10740 Albuquerque, NM MSA	61	14.6%	3,257	18.5%	0.79	42
NC+SC	16741 Charlotte-Gastonia-Concord, NC-SC MSA	82	10.5%	3,820	13.4%	0.78	41
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,593	12.8%	10,568	16.4%	0.78	40
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	65	11.1%	2,729	14.3%	0.78	39
OR+WA	38901 Portland-Vancouver-Beaverton, OR-WA MSA	407	13.2%	9,322	17.0%	0.78	38
NJ+NY	35645 New York-White Plains-Wayne, NY-NJ MD	2,879	15.2%	21,168	19.6%	0.77	37
06 CA	44700 Stockton, CA MSA	1,325	23.2%	6,870	30.1%	0.77	36
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	462	19.6%	19,589	25.4%	0.77	35
12 FL	36740 Orlando-Kissimmee, FL MSA	553	19.5%	14,784	25.5%	0.76	34
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	170	16.1%	7,971	21.1%	0.76	33
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	3,077	23.8%	47,573	31.2%	0.76	32
KS+MO	28141 Kansas City, MO-KS MSA	90	13.8%	7,021	18.2%	0.76	31
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	6,158	18.7%	50,553	24.7%	0.76	30
51 VA	40060 Richmond, VA MSA	94	10.3%	2,953	13.7%	0.75	29
AR+MS+TN	32821 Memphis, TN-MS-AR MSA	57	15.0%	3,114	19.9%	0.75	28
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	171	11.9%	3,976	15.8%	0.75	27
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	301	28.4%	27,500	38.3%	0.74	26
36 NY	35004 Nassau-Suffolk, NY MD	502	17.7%	11,503	23.9%	0.74	25
25 MA	15764 Cambridge-Newton-Framingham, MA MD	178	8.5%	3,256	11.9%	0.72	24
42 PA	37964 Philadelphia, PA MD	345	8.0%	7,412	11.5%	0.69	23
NJ+PA	35085 Newark-Union, NJ-PA MD	293	12.7%	7,103	18.3%	0.69	22
48 TX	23104 Fort Worth-Arlington, TX MD	141	14.2%	5,856	21.2%	0.67	21
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	51	14.5%	2,516	21.7%	0.67	20
48 TX	41700 San Antonio, TX MSA	78	14.3%	5,841	21.6%	0.66	19
34 NJ	15804 Camden, NJ MD	124	11.2%	4,389	17.2%	0.65	18
06 CA	32900 Merced, CA MSA	221	21.7%	2,905	33.7%	0.64	17
25 MA	49340 Worcester, MA MSA	78	11.5%	3,317	17.9%	0.64	16
04 AZ	46060 Tucson, AZ MSA	71	12.1%	5,592	19.2%	0.63	15
37 NC	39580 Raleigh-Cary, NC MSA	61	6.2%	1,755	9.8%	0.63	14
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	52	9.6%	4,948	15.3%	0.62	13
40 OK	36420 Oklahoma City, OK MSA	58	12.9%	3,922	20.7%	0.62	12
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	877	15.3%	17,275	25.0%	0.61	11
39 OH	18140 Columbus, OH MSA	79	9.2%	4,511	15.3%	0.60	10
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	176	8.8%	7,346	15.0%	0.59	9
48 TX	19124 Dallas-Plano-Irving, TX MD	398	11.2%	10,624	19.3%	0.58	8
09 CT	35300 New Haven-Milford, CT MSA	53	11.1%	2,906	19.2%	0.58	7
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,359	7.7%	5,096	14.3%	0.54	6
34 NJ	20764 Edison, NJ MD	477	8.6%	7,545	16.5%	0.52	5
34 NJ	45940 Trenton-Ewing, NJ MSA	53	6.8%	700	13.2%	0.51	4
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	127	11.9%	6,880	25.3%	0.47	3
IN+KY+OH	17141 Cincinnati-Middletown, OH-KY-IN MSA	50	7.3%	5,928	15.7%	0.47	2
48 TX	12420 Austin-Round Rock, TX MSA	62	5.6%	2,799	12.7%	0.44	1

**Table 10 - NCRC Analysis: LMI/MUI**

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
72 PR	41980 San Juan-Caguas-Guaynabo, PR MSA	584	22.6%	3,568	7.2%	3.16	380
54 WV	34060 Morgantown, WV MSA	240	33.3%	308	14.4%	2.32	379
42 PA	37964 Philadelphia, PA MD	12,520	30.0%	12,697	14.7%	2.04	378
38 ND	13900 Bismarck, ND MSA	322	25.1%	221	12.5%	2.01	377
12 FL	23540 Gainesville, FL MSA	679	33.3%	888	16.7%	1.99	376
42 PA	44300 State College, PA MSA	224	21.0%	237	10.6%	1.99	375
51 VA	13980 Blacksburg-Christiansburg-Radford, VA MSA	362	26.0%	318	13.3%	1.96	374
37 NC	20500 Durham, NC MSA	1,244	28.2%	1,322	14.5%	1.94	373
37 NC	39580 Raleigh-Cary, NC MSA	3,607	25.8%	3,148	13.3%	1.94	372
08 CO	14500 Boulder, CO MSA	563	15.6%	581	8.1%	1.93	371
54 WV	16620 Charleston, WV MSA	703	34.9%	884	18.1%	1.93	370
17 IL	37900 Peoria, IL MSA	1,313	29.6%	995	15.3%	1.93	369
13 GA	15260 Brunswick, GA MSA	341	46.9%	522	24.3%	1.93	368
MN+WI	29100 La Crosse, WI-MN MSA	365	26.6%	325	13.9%	1.92	367
13 GA	46660 Valdosta, GA MSA	425	45.4%	523	23.7%	1.92	366
48 TX	12420 Austin-Round Rock, TX MSA	3,569	26.3%	3,805	13.8%	1.90	365
34 NJ	45940 Trenton-Ewing, NJ MSA	1,459	32.1%	1,364	16.9%	1.90	364
45 SC	24860 Greenville, SC MSA	1,918	33.2%	1,798	17.6%	1.89	363
01 AL	26620 Huntsville, AL MSA	1,523	31.9%	1,272	16.9%	1.89	362
55 WI	33340 Milwaukee-Waukesha-West Allis, WI MSA	7,411	35.6%	6,621	18.9%	1.89	361
09 CT	14860 Bridgeport-Stamford-Norwalk, CT MSA	2,837	28.1%	3,710	15.0%	1.87	360
51 VA	16820 Charlottesville, VA MSA	560	22.4%	551	12.1%	1.86	359
55 WI	20740 Eau Claire, WI MSA	622	29.1%	476	15.6%	1.86	358
28 MS	37700 Pascagoula, MS MSA	510	49.7%	668	26.8%	1.86	357
25 MA	38340 Pittsfield, MA MSA	287	21.1%	287	11.4%	1.85	356
26 MI	28020 Kalamazoo-Portage, MI MSA	1,436	35.5%	1,162	19.2%	1.85	355
48 TX	41700 San Antonio, TX MSA	4,795	40.7%	7,595	22.0%	1.85	354
IN+KY	21780 Evansville, IN-KY MSA	1266	31.6%	997	17.1%	1.84	353
39 OH	10420 Akron, OH MSA	3,355	35.8%	2,579	19.4%	1.84	352
22 LA	29180 Lafayette, LA MSA	1,026	43.8%	1,106	23.8%	1.84	351
19 IA	16300 Cedar Rapids, IA MSA	1,026	25.5%	643	13.9%	1.83	350
47 TN	28940 Knoxville, TN MSA	3,062	37.1%	2,990	20.3%	1.83	349
19 IA	26980 Iowa City, IA MSA	277	15.5%	194	8.5%	1.83	348
28 MS	27140 Jackson, MS MSA	1,962	51.5%	2,734	28.3%	1.82	347
42 PA	11020 Altoona, PA MSA	421	37.7%	409	20.7%	1.82	346
IL+MO	41180 St. Louis, MO-IL MSA	17,724	36.7%	13,272	20.2%	1.82	345
NC+SC	16740 Charlotte-Gastonia-Concord, NC-SC MSA	7,018	32.0%	6,801	17.6%	1.81	344
01 AL	13820 Birmingham-Hoover, AL MSA	5,325	43.2%	5,553	23.9%	1.80	343
45 SC	16700 Charleston-North Charleston, SC MSA	2,358	33.9%	3,347	18.8%	1.80	342
IL+WI	29404 Lake County-Kenosha County, IL-WI MD	4284	30.4%	4033	16.9%	1.80	341
26 MI	11460 Ann Arbor, MI MSA	1,089	24.5%	1,014	13.6%	1.80	340
37 NC	24140 Goldsboro, NC MSA	226	35.8%	373	19.9%	1.79	339
18 IN	23060 Fort Wayne, IN MSA	1,915	31.2%	1,112	17.4%	1.79	338
21 KY	36980 Owensboro, KY MSA	334	29.5%	297	16.5%	1.79	337
17 IL	16580 Champaign-Urbana, IL MSA	495	22.5%	468	12.6%	1.79	336
45 SC	44940 Sumter, SC MSA	310	48.9%	405	27.4%	1.78	335



**Table 10 - NCRC Analysis: LMI/MUI**

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
48 TX	33260 Midland, TX MSA	352	44.6%	534	25.1%	1.78	334
19 IA	47940 Waterloo-Cedar Falls, IA MSA	612	26.4%	425	14.9%	1.77	333
13 GA	31420 Macon, GA MSA	1,046	51.3%	1,001	29.0%	1.77	332
39 OH	19380 Dayton, OH MSA	3,545	34.1%	2,934	19.3%	1.77	331
21 KY	30460 Lexington-Fayette, KY MSA	1,460	28.3%	1,443	16.0%	1.77	330
OH+WV	37620 Parkersburg-Marietta-Vienna, WV-OH MSA	443	31.3%	423	17.7%	1.76	329
55 WI	48140 Wausau, WI MSA	415	24.2%	371	13.8%	1.76	328
19 IA	19780 Des Moines, IA MSA	3,021	30.6%	2,038	17.4%	1.76	327
47 TN	34980 Nashville-Davidson--Murfreesboro, TN MSA	7,259	35.0%	6,841	20.0%	1.75	326
MN+ND	24220 Grand Forks, ND-MN MSA	231	30.0%	220	17.2%	1.75	325
39 OH	18140 Columbus, OH MSA	7,121	30.9%	6,410	17.7%	1.75	324
45 SC	22500 Florence, SC MSA	665	49.9%	770	28.6%	1.75	323
45 SC	11340 Anderson, SC MSA	564	36.3%	578	20.8%	1.74	322
42 PA	38300 Pittsburgh, PA MSA	6,634	33.7%	7,583	19.4%	1.74	321
47 TN	27180 Jackson, TN MSA	620	48.9%	555	28.2%	1.73	320
AR+MS+TN	32820 Memphis, TN-MS-AR MSA	6,927	55.5%	8,103	32.1%	1.73	319
AR+TX	45500 Texarkana, TX-Texarkana, AR MSA	312	49.5%	536	28.6%	1.73	318
48 TX	19124 Dallas-Plano-Irving, TX MD	13,539	39.6%	17,555	22.9%	1.73	317
IA+NE	36540 Omaha-Council Bluffs, NE-IA MSA	3332	31.7%	2779	18.4%	1.73	316
01 AL	33860 Montgomery, AL MSA	1,225	33.9%	1,261	19.7%	1.72	315
21 KY	14540 Bowling Green, KY MSA	320	33.9%	404	19.7%	1.72	314
20 KS	29940 Lawrence, KS MSA	205	19.0%	243	11.0%	1.72	313
18 IN	26900 Indianapolis, IN MSA	7,725	30.7%	6,286	17.9%	1.71	312
48 TX	47380 Waco, TX MSA	529	46.2%	882	27.0%	1.71	311
55 WI	39540 Racine, WI MSA	1,026	30.8%	906	18.1%	1.70	310
48 TX	13140 Beaumont-Port Arthur, TX MSA	667	42.6%	1,138	25.0%	1.70	309
26 MI	12980 Battle Creek, MI MSA	887	42.1%	661	24.7%	1.70	308
22 LA	12940 Baton Rouge, LA MSA	2,943	43.1%	3,336	25.3%	1.70	307
51 VA	40060 Richmond, VA MSA	6,653	33.4%	6,358	19.8%	1.69	306
GA+SC	12260 Augusta-Richmond County, GA-SC MSA	1,412	31.9%	1,632	18.9%	1.69	305
48 TX	18580 Corpus Christi, TX MSA	733	46.2%	1,795	27.3%	1.69	304
KS+MO	28140 Kansas City, MO-KS MSA	11,744	36.0%	10,410	21.3%	1.69	303
48 TX	46340 Tyler, TX MSA	431	36.6%	748	21.7%	1.69	302
55 WI	11540 Appleton, WI MSA	734	20.5%	617	12.2%	1.68	301
48 TX	17780 College Station-Bryan, TX MSA	266	38.3%	591	22.8%	1.68	300
01 AL	12220 Auburn-Opelika, AL MSA	324	28.6%	438	17.1%	1.68	299
35 NM	29740 Las Cruces, NM MSA	292	38.4%	854	22.9%	1.68	298
48 TX	41660 San Angelo, TX MSA	219	39.5%	297	23.5%	1.68	297
37 NC	24660 Greensboro-High Point, NC MSA	2,472	34.6%	2,598	20.7%	1.68	296
22 LA	29340 Lake Charles, LA MSA	550	44.7%	796	26.7%	1.67	295
12 FL	27260 Jacksonville, FL MSA	6,562	38.5%	9,124	23.0%	1.67	294
AL+GA	17980 Columbus, GA-AL MSA	899	41.6%	1,273	24.9%	1.67	293
41 OR	18700 Corvallis, OR MSA	105	15.6%	118	9.3%	1.67	292
IN+KY+OH	17140 Cincinnati-Middletown, OH-KY-IN MSA	8,794	31.3%	8,381	18.8%	1.67	291
28 MS	25060 Gulfport-Biloxi, MS MSA	487	39.2%	964	23.5%	1.67	290
12 FL	37460 Panama City-Lynn Haven, FL MSA	462	32.7%	980	19.7%	1.67	289
NC+VA	47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	7,815	34.4%	11,242	20.7%	1.66	288
12 FL	45220 Tallahassee, FL MSA	1,087	32.8%	1,451	19.7%	1.66	287

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State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
22 LA	43340 Shreveport-Bossier City, LA MSA	1,294	44.6%	1,839	26.9%	1.66	286
18 IN	34620 Muncie, IN MSA	472	38.8%	369	23.5%	1.65	285
26 MI	35660 Niles-Benton Harbor, MI MSA	704	38.4%	721	23.3%	1.65	284
51 VA	31340 Lynchburg, VA MSA	720	30.2%	783	18.3%	1.65	283
IN+MI	43780 South Bend-Mishawaka, IN-MI MSA	1484	34.0%	1146	20.6%	1.65	282
36 NY	27060 Ithaca, NY MSA	87	17.4%	100	10.6%	1.64	281
18 IN	18020 Columbus, IN MSA	245	24.7%	189	15.0%	1.64	280
48 TX	48660 Wichita Falls, TX MSA	308	36.8%	487	22.4%	1.64	279
IN+KY	31140 Louisville, KY-IN MSA	4,907	31.3%	4,715	19.1%	1.64	278
27 MN	40340 Rochester, MN MSA	688	21.8%	469	13.3%	1.64	277
55 WI	36780 Oshkosh-Neenah, WI MSA	633	25.2%	503	15.4%	1.64	276
TN+VA	28700 Kingsport-Bristol-Bristol, TN-VA MSA	948	35.7%	1168	21.8%	1.63	275
39 OH	30620 Lima, OH MSA	446	39.3%	432	24.0%	1.63	274
36 NY	40380 Rochester, NY MSA	2,388	25.5%	1,889	15.6%	1.63	273
24 MD	12580 Baltimore-Towson, MD MSA	15,102	34.5%	18,595	21.2%	1.63	272
39 OH	17460 Cleveland-Elyria-Mentor, OH MSA	8,352	32.1%	7,952	19.7%	1.63	271
IL+IA	19340 Davenport-Moline-Rock Island, IA-IL MSA	1740	35.2%	1381	21.6%	1.63	270
NJ+PA	10900 Allentown-Bethlehem-Easton, PA-NJ MSA	2929	28.9%	3679	17.8%	1.62	269
22 LA	10780 Alexandria, LA MSA	418	52.1%	745	32.1%	1.62	268
26 MI	40980 Saginaw-Saginaw Township North, MI MSA	831	36.9%	805	22.7%	1.62	267
36 NY	13780 Binghamton, NY MSA	476	29.8%	524	18.4%	1.62	266
37 NC	40580 Rocky Mount, NC MSA	418	46.2%	550	28.5%	1.62	265
17 IL	44100 Springfield, IL MSA	593	23.1%	507	14.2%	1.62	264
09 CT	25540 Hartford-West Hartford-East Hartford, CT MSA	4,706	27.2%	4,106	16.8%	1.62	263
18 IN	29140 Lafayette, IN MSA	427	23.7%	375	14.6%	1.62	262
IA+NE+SD	43580 Sioux City, IA-NE-SD MSA	537	35.1%	410	21.7%	1.62	261
29 MO	27620 Jefferson City, MO MSA	502	26.5%	365	16.4%	1.61	260
08 CO	19740 Denver-Aurora, CO MSA	11,879	30.2%	13,470	18.7%	1.61	259
26 MI	13020 Bay City, MI MSA	448	30.7%	338	19.1%	1.61	258
13 GA	10500 Albany, GA MSA	469	50.3%	729	31.3%	1.61	257
22 LA	35380 New Orleans-Metairie-Kenner, LA MSA	3,192	38.0%	5,440	23.7%	1.61	256
48 TX	26420 Houston-Sugar Land-Baytown, TX MSA	19,476	47.2%	29,458	29.4%	1.61	255
47 TN	27740 Johnson City, TN MSA	606	38.3%	834	23.8%	1.61	254
42 PA	25420 Harrisburg-Carlisle, PA MSA	1,524	23.8%	1,507	14.8%	1.60	253
40 OK	30020 Lawton, OK MSA	329	38.4%	522	24.0%	1.60	252
18 IN	14020 Bloomington, IN MSA	481	27.9%	503	17.4%	1.60	251
45 SC	17900 Columbia, SC MSA	2,949	36.7%	2,865	22.9%	1.60	250
26 MI	24340 Grand Rapids-Wyoming, MI MSA	4,163	33.7%	3,175	21.1%	1.60	249
13 GA	12060 Atlanta-Sandy Springs-Marietta, GA MSA	29,052	35.2%	27,070	22.0%	1.60	248
18 IN	45460 Terre Haute, IN MSA	681	38.5%	621	24.1%	1.60	247
48 TX	31180 Lubbock, TX MSA	492	37.7%	984	23.6%	1.60	246
13 GA	42340 Savannah, GA MSA	972	32.4%	1,573	20.3%	1.60	245
48 TX	11100 Amarillo, TX MSA	495	31.3%	776	19.6%	1.60	244
01 AL	46220 Tuscaloosa, AL MSA	507	31.8%	722	20.0%	1.59	243
36 NY	10580 Albany-Schenectady-Troy, NY MSA	2,328	28.4%	2,836	17.8%	1.59	242
05 AR	30780 Little Rock-North Little Rock, AR MSA	1,905	31.8%	2,397	20.0%	1.59	241
36 NY	45060 Syracuse, NY MSA	1,190	24.7%	1,355	15.5%	1.59	240
45 SC	43900 Spartanburg, SC MSA	982	37.2%	954	23.4%	1.59	239

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48 TX	23104 Fort Worth-Arlington, TX MD	6,808	37.7%	8,646	23.7%	1.59	238
GA+TN	16860 Chattanooga, TN-GA MSA	2472	43.5%	2709	27.4%	1.59	237
37 NC	24780 Greenville, NC MSA	320	29.0%	555	18.3%	1.59	236
18 IN	23844 Gary, IN MD	3,114	36.9%	3,162	23.3%	1.58	235
37 NC	25860 Hickory-Lenoir-Morganton, NC MSA	1,181	34.8%	1,153	21.9%	1.58	234
01 AL	33660 Mobile, AL MSA	1,370	43.7%	1,766	27.6%	1.58	233
26 MI	47644 Warren-Farmington Hills-Troy, MI MD	12,817	27.4%	10,535	17.3%	1.58	232
37 NC	49180 Winston-Salem, NC MSA	1,456	29.0%	1,554	18.4%	1.58	231
19 IA	11180 Ames, IA MSA	174	20.7%	162	13.1%	1.58	230
26 MI	34740 Muskegon-Norton Shores, MI MSA	1,095	42.5%	823	27.0%	1.58	229
29 MO	17860 Columbia, MO MSA	371	20.0%	350	12.7%	1.58	228
01 AL	20020 Dothan, AL MSA	468	41.2%	608	26.1%	1.58	227
MN+WI	20260 Duluth, MN-WI MSA	1162	31.7%	1050	20.1%	1.58	226
22 LA	33740 Monroe, LA MSA	535	46.8%	748	29.8%	1.57	225
30 MT	33540 Missoula, MT MSA	180	20.2%	305	12.9%	1.57	224
28 MS	25620 Hattiesburg, MS MSA	340	47.0%	722	30.1%	1.56	223
39 OH	45780 Toledo, OH MSA	2,482	33.0%	2,537	21.1%	1.56	222
KY+OH+WV	26580 Huntington-Ashland, WV-KY-OH MSA	687	35.6%	1075	22.8%	1.56	221
51 VA	40220 Roanoke, VA MSA	1,210	30.9%	1,106	19.8%	1.56	220
DE+MD+NJ	48864 Wilmington, DE-MD-NJ MD	3,563	29.5%	3,091	18.9%	1.56	219
DC+MD+VA+WV	47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	24,550	30.5%	35,661	19.7%	1.55	218
26 MI	19804 Detroit-Livonia-Dearborn, MI MD	13,040	54.9%	15,278	35.4%	1.55	217
OH+WV	48540 Wheeling, WV-OH MSA	333	32.5%	404	21.0%	1.55	216
13 GA	12020 Athens-Clarke County, GA MSA	517	33.5%	726	21.6%	1.55	215
26 MI	22420 Flint, MI MSA	2,424	40.2%	2,543	26.1%	1.54	214
34 NJ	36140 Ocean City, NJ MSA	295	28.8%	569	18.7%	1.54	213
17 IL	19500 Decatur, IL MSA	276	29.3%	303	19.1%	1.54	212
39 OH	15940 Canton-Massillon, OH MSA	1,922	38.3%	1,711	24.9%	1.53	211
37 NC	48900 Wilmington, NC MSA	839	24.7%	1,557	16.1%	1.53	210
01 AL	22520 Florence-Muscle Shoals, AL MSA	471	37.4%	525	24.4%	1.53	209
05 AR	27860 Jonesboro, AR MSA	329	39.9%	452	26.1%	1.53	208
47 TN	34100 Morristown, TN MSA	488	41.7%	705	27.2%	1.53	207
24 MD	13644 Bethesda-Gaithersburg-Frederick, MD MD	5,508	23.6%	6,053	15.5%	1.53	206
40 OK	36420 Oklahoma City, OK MSA	4,310	35.0%	5,302	22.9%	1.53	205
48 TX	30980 Longview, TX MSA	455	47.0%	863	30.7%	1.53	204
53 WA	28420 Kennewick-Richland-Pasco, WA MSA	684	26.4%	800	17.3%	1.53	203
48 TX	10180 Abilene, TX MSA	290	40.6%	562	26.7%	1.52	202
OH+WV	48260 Weirton-Steubenville, WV-OH MSA	346	33.8%	388	22.2%	1.52	201
20 KS	48620 Wichita, KS MSA	2,269	31.3%	2,120	20.6%	1.52	200
55 WI	24580 Green Bay, WI MSA	992	21.8%	1,027	14.3%	1.52	199
42 PA	48700 Williamsport, PA MSA	292	30.4%	373	20.1%	1.52	198
16 ID	14260 Boise City-Nampa, ID MSA	2,481	27.3%	3,275	18.0%	1.52	197
01 AL	19460 Decatur, AL MSA	577	41.1%	617	27.1%	1.51	196
24 MD	41540 Salisbury, MD MSA	530	40.5%	769	26.7%	1.51	195
42 PA	21500 Erie, PA MSA	661	28.2%	712	18.6%	1.51	194
13 GA	25980 Hinesville-Fort Stewart, GA MSA	146	42.8%	355	28.3%	1.51	193
55 WI	27500 Janesville, WI MSA	867	32.9%	748	21.7%	1.51	192
21 KY	21060 Elizabethtown, KY MSA	448	39.0%	621	25.8%	1.51	191

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55 WI	43100 Sheboygan, WI MSA	382	25.7%	368	17.1%	1.51	190
18 IN	21140 Elkhart-Goshen, IN MSA	851	32.2%	693	21.4%	1.51	189
37 NC	22180 Fayetteville, NC MSA	731	33.1%	1,521	22.0%	1.50	188
42 PA	42540 Scranton--Wilkes-Barre, PA MSA	1,618	31.9%	1,850	21.2%	1.50	187
17 IL	28100 Kankakee-Bradley, IL MSA	352	36.4%	535	24.3%	1.50	186
MN+WI	33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	16,261	27.8%	14,630	18.5%	1.50	185
17 IL	14060 Bloomington-Normal, IL MSA	369	18.6%	372	12.4%	1.50	184
04 AZ	38060 Phoenix-Mesa-Scottsdale, AZ MSA	23,748	36.1%	49,649	24.1%	1.50	183
36 NY	24020 Glens Falls, NY MSA	405	36.6%	579	24.4%	1.50	182
39 OH	44220 Springfield, OH MSA	720	39.5%	594	26.4%	1.50	181
26 MI	29620 Lansing-East Lansing, MI MSA	2,511	34.7%	2,103	23.2%	1.50	180
36 NY	15380 Buffalo-Niagara Falls, NY MSA	1,890	25.3%	2,132	17.0%	1.49	179
13 GA	40660 Rome, GA MSA	240	31.1%	282	20.9%	1.49	178
26 MI	26100 Holland-Grand Haven, MI MSA	890	21.5%	636	14.5%	1.49	177
01 AL	23460 Gadsden, AL MSA	342	44.4%	468	29.9%	1.49	176
13 GA	23580 Gainesville, GA MSA	620	30.8%	756	20.8%	1.48	175
46 SD	43620 Sioux Falls, SD MSA	504	19.6%	550	13.3%	1.48	174
47 TN	17420 Cleveland, TN MSA	498	48.6%	631	32.9%	1.48	173
37 NC	11700 Asheville, NC MSA	950	27.5%	1,668	18.7%	1.47	172
49 UT	41620 Salt Lake City, UT MSA	4,652	30.2%	5,554	20.5%	1.47	171
18 IN	29020 Kokomo, IN MSA	509	35.4%	429	24.0%	1.47	170
VA+WV	49020 Winchester, VA-WV MSA	543	33.6%	1,157	22.9%	1.47	169
04 AZ	46060 Tucson, AZ MSA	2,953	29.8%	7,303	20.3%	1.47	168
37 NC	15500 Burlington, NC MSA	469	33.7%	501	23.0%	1.47	167
55 WI	31540 Madison, WI MSA	1,288	17.0%	1,559	11.6%	1.46	166
OH+PA	49660 Youngstown-Warren-Boardman, OH-PA MSA	2434	39.0%	2434	26.7%	1.46	165
31 NE	30700 Lincoln, NE MSA	727	19.0%	623	13.0%	1.46	164
48 TX	43300 Sherman-Denison, TX MSA	339	43.2%	564	29.7%	1.45	163
48 TX	47020 Victoria, TX MSA	177	35.0%	317	24.1%	1.45	162
20 KS	45820 Topeka, KS MSA	915	30.3%	844	20.9%	1.45	161
05 AR	38220 Pine Bluff, AR MSA	187	44.2%	310	30.5%	1.45	160
39 OH	31900 Mansfield, OH MSA	472	33.9%	530	23.4%	1.45	159
26 MI	27100 Jackson, MI MSA	1,077	41.4%	953	28.6%	1.45	158
53 WA	42644 Seattle-Bellevue-Everett, WA MD	6,515	22.2%	13,539	15.3%	1.45	157
KS+MO	41140 St. Joseph, MO-KS MSA	639	43.6%	623	30.1%	1.45	156
40 OK	46140 Tulsa, OK MSA	3,297	37.8%	4,105	26.2%	1.44	155
ID+WA	30300 Lewiston, ID-WA MSA	109	21.4%	181	14.9%	1.44	154
53 WA	44060 Spokane, WA MSA	1,515	25.7%	2,049	17.9%	1.44	153
36 NY	46540 Utica-Rome, NY MSA	567	28.9%	716	20.1%	1.44	152
39 OH	41780 Sandusky, OH MSA	237	28.8%	250	20.1%	1.43	151
49 UT	36260 Ogden-Clearfield, UT MSA	2,219	26.2%	2,133	18.3%	1.43	150
16 ID	26820 Idaho Falls, ID MSA	421	25.1%	466	17.5%	1.43	149
MN+ND	22020 Fargo, ND-MN MSA	454	18.9%	470	13.2%	1.43	148
53 WA	49420 Yakima, WA MSA	473	32.1%	859	22.5%	1.42	147
22 LA	26380 Houma-Bayou Cane-Thibodaux, LA MSA	535	40.8%	955	28.7%	1.42	146
33 NH	40484 Rockingham County-Strafford County, NH MD	1,348	24.2%	2,179	17.0%	1.42	145
KY+TN	17300 Clarksville, TN-KY MSA	688	28.9%	1091	20.4%	1.42	144
29 MO	44180 Springfield, MO MSA	1,579	28.9%	1,837	20.5%	1.41	143

**Table 10 - NCRC Analysis: LMI/MUI**

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
08 CO	22660 Fort Collins-Loveland, CO MSA	811	19.7%	1,074	13.9%	1.41	142
23 ME	12620 Bangor, ME MSA	494	36.6%	898	26.0%	1.41	141
25 MA	44140 Springfield, MA MSA	2,314	29.2%	2,905	20.7%	1.41	140
19 IA	20220 Dubuque, IA MSA	223	19.7%	213	14.0%	1.41	139
29 MO	27900 Joplin, MO MSA	796	38.7%	845	27.5%	1.41	138
41 OR	13460 Bend, OR MSA	432	21.4%	958	15.2%	1.41	137
12 FL	37860 Pensacola-Ferry Pass-Brent, FL MSA	1,257	33.0%	2,857	23.5%	1.41	136
13 GA	47580 Warner Robins, GA MSA	451	27.9%	527	19.8%	1.41	135
26 MI	33780 Monroe, MI MSA	637	29.4%	757	21.0%	1.40	134
09 CT	35980 Norwich-New London, CT MSA	958	27.4%	1,265	19.5%	1.40	133
12 FL	37340 Palm Bay-Melbourne-Titusville, FL MSA	2,505	31.3%	4,347	22.3%	1.40	132
34 NJ	15804 Camden, NJ MD	5,784	30.7%	7,913	22.0%	1.40	131
48 TX	32580 McAllen-Edinburg-Mission, TX MSA	686	67.5%	4,347	48.5%	1.39	130
02 AK	21820 Fairbanks, AK MSA	168	24.5%	281	17.6%	1.39	129
08 CO	17820 Colorado Springs, CO MSA	2,308	25.6%	3,440	18.4%	1.39	128
12 FL	23020 Fort Walton Beach-Crestview-Destin, FL MSA	531	24.2%	1,080	17.4%	1.39	127
OR+WA	38900 Portland-Vancouver-Beaverton, OR-WA MSA	7342	25.5%	12491	18.4%	1.39	126
51 VA	19260 Danville, VA MSA	320	38.3%	338	27.7%	1.38	125
55 WI	22540 Fond du Lac, WI MSA	380	25.7%	377	18.6%	1.38	124
09 CT	35300 New Haven-Milford, CT MSA	3,535	31.4%	4,514	22.8%	1.38	123
18 IN	33140 Michigan City-La Porte, IN MSA	493	35.8%	421	26.0%	1.38	122
50 VT	15540 Burlington-South Burlington, VT MSA	441	16.8%	587	12.2%	1.37	121
17 IL	16974 Chicago-Naperville-Joliet, IL MD	34,031	35.9%	62,515	26.2%	1.37	120
56 WY	16220 Casper, WY MSA	306	30.4%	368	22.2%	1.37	119
48 TX	28660 Killeen-Temple-Fort Hood, TX MSA	460	24.0%	1,327	17.6%	1.37	118
16 ID	38540 Pocatello, ID MSA	261	24.2%	306	17.7%	1.36	117
46 SD	39660 Rapid City, SD MSA	338	27.6%	563	20.3%	1.36	116
NJ+PA	35084 Newark-Union, NJ-PA MD	5,531	31.6%	13,420	23.2%	1.36	115
53 WA	14740 Bremerton-Silverdale, WA MSA	647	24.6%	1,517	18.1%	1.36	114
17 IL	40420 Rockford, IL MSA	1,757	35.4%	1,746	26.1%	1.36	113
36 NY	21300 Elmira, NY MSA	198	33.4%	243	24.6%	1.36	112
53 WA	34580 Mount Vernon-Anacortes, WA MSA	256	25.3%	634	18.7%	1.35	111
12 FL	45300 Tampa-St. Petersburg-Clearwater, FL MSA	11,404	37.1%	26,944	27.4%	1.35	110
53 WA	48300 Wenatchee, WA MSA	211	25.1%	445	18.5%	1.35	109
48 TX	21340 El Paso, TX MSA	1,181	43.9%	3,699	32.7%	1.34	108
04 AZ	22380 Flagstaff, AZ MSA	121	19.9%	483	14.9%	1.34	107
12 FL	42260 Sarasota-Bradenton-Venice, FL MSA	2,111	28.7%	5,649	21.4%	1.34	106
AR+MO	22220 Fayetteville-Springdale-Rogers, AR-MO MSA	1,132	24.9%	2,172	18.6%	1.34	105
12 FL	36740 Orlando-Kissimmee, FL MSA	9,279	37.0%	21,873	27.9%	1.33	104
42 PA	49620 York-Hanover, PA MSA	1,340	24.6%	1,945	18.6%	1.33	103
30 MT	13740 Billings, MT MSA	246	19.2%	428	14.5%	1.33	102
34 NJ	12100 Atlantic City, NJ MSA	1,223	35.2%	2,363	26.6%	1.33	101
01 AL	11500 Anniston-Oxford, AL MSA	397	40.3%	568	30.5%	1.32	100
17 IL	19180 Danville, IL MSA	223	35.6%	276	27.0%	1.32	99
42 PA	39740 Reading, PA MSA	1,163	24.8%	1,480	18.8%	1.32	98
06 CA	42060 Santa Barbara-Santa Maria, CA MSA	294	22.1%	2,208	16.7%	1.32	97
12 FL	46940 Vero Beach, FL MSA	413	30.3%	951	23.0%	1.32	96
MD+WV	19060 Cumberland, MD-WV MSA	275	37.5%	430	28.5%	1.31	95

**Table 10 - NCRC Analysis: LMI/MUI**

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
53 WA	36500 Olympia, WA MSA	700	23.5%	1,457	17.9%	1.31	94
06 CA	42020 San Luis Obispo-Paso Robles, CA MSA	154	15.6%	1,100	11.9%	1.31	93
12 FL	48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	4,727	32.5%	12,247	24.8%	1.31	92
32 NV	39900 Reno-Sparks, NV MSA	1,242	24.2%	3,283	18.5%	1.31	91
18 IN	11300 Anderson, IN MSA	670	38.6%	626	29.5%	1.31	90
42 PA	27780 Johnstown, PA MSA	255	26.6%	427	20.4%	1.30	89
48 TX	15180 Brownsville-Harlingen, TX MSA	489	59.2%	2,002	45.5%	1.30	88
05 AR	26300 Hot Springs, AR MSA	209	30.8%	433	23.7%	1.30	87
53 WA	31020 Longview, WA MSA	353	32.9%	683	25.4%	1.30	86
10 DE	20100 Dover, DE MSA	495	28.3%	988	21.9%	1.29	85
41 OR	41420 Salem, OR MSA	1,204	30.4%	1,993	23.6%	1.29	84
12 FL	36100 Ocala, FL MSA	1,010	36.2%	2,558	28.2%	1.28	83
08 CO	24540 Greeley, CO MSA	906	30.5%	1,858	23.8%	1.28	82
08 CO	39380 Pueblo, CO MSA	762	40.7%	1,238	31.8%	1.28	81
53 WA	45104 Tacoma, WA MD	2,709	32.8%	8,097	25.7%	1.27	80
35 NM	42140 Santa Fe, NM MSA	212	19.5%	643	15.3%	1.27	79
27 MN	41060 St. Cloud, MN MSA	588	24.1%	682	18.9%	1.27	78
56 WY	16940 Cheyenne, WY MSA	288	23.8%	478	18.8%	1.27	77
42 PA	29540 Lancaster, PA MSA	940	19.2%	1,329	15.1%	1.27	76
48 TX	29700 Laredo, TX MSA	218	54.9%	1,414	43.3%	1.27	75
23 ME	38860 Portland-South Portland-Biddeford, ME MSA	1,490	22.1%	2,777	17.5%	1.26	74
48 TX	36220 Odessa, TX MSA	235	57.2%	654	45.3%	1.26	73
35 NM	22140 Farmington, NM MSA	136	34.9%	604	27.7%	1.26	72
37 NC	27340 Jacksonville, NC MSA	131	18.6%	540	14.8%	1.26	71
12 FL	19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	2,242	37.7%	5,366	30.0%	1.26	70
41 OR	21660 Eugene-Springfield, OR MSA	799	24.7%	1,654	20.0%	1.24	69
45 SC	34820 Myrtle Beach-Conway-North Myrtle Beach, SC MSA	897	31.6%	1,631	25.5%	1.24	68
06 CA	23420 Fresno, CA MSA	1,992	38.1%	10,362	30.8%	1.24	67
32 NV	29820 Las Vegas-Paradise, NV MSA	7,922	36.1%	27,478	29.2%	1.23	66
34 NJ	47220 Vineland-Millville-Bridgeton, NJ MSA	515	40.1%	1,047	32.6%	1.23	65
06 CA	25260 Hanford-Corcoran, CA MSA	273	38.8%	1,416	31.9%	1.22	64
25 MA	49340 Worcester, MA MSA	2,394	23.8%	4,507	19.6%	1.22	63
35 NM	10740 Albuquerque, NM MSA	2,007	23.3%	4,100	19.2%	1.21	62
42 PA	30140 Lebanon, PA MSA	302	20.8%	409	17.2%	1.21	61
34 NJ	20764 Edison, NJ MD	5,933	21.8%	11,703	18.0%	1.21	60
30 MT	24500 Great Falls, MT MSA	138	20.9%	264	17.3%	1.21	59
53 WA	13380 Bellingham, WA MSA	335	16.9%	825	14.0%	1.21	58
12 FL	29460 Lakeland, FL MSA	2,390	41.8%	5,810	34.6%	1.21	57
AR+OK	22900 Fort Smith, AR-OK MSA	845	39.0%	1409	32.4%	1.20	56
MD+WV	25180 Hagerstown-Martinsburg, MD-WV MSA	893	27.1%	2243	22.5%	1.20	55
23 ME	30340 Lewiston-Auburn, ME MSA	370	31.3%	709	26.1%	1.20	54
33 NH	31700 Manchester-Nashua, NH MSA	1,047	20.4%	2,050	17.2%	1.18	53
12 FL	22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	6,961	38.3%	24,518	32.4%	1.18	52
36 NY	28740 Kingston, NY MSA	311	27.7%	949	23.5%	1.18	51
04 AZ	39140 Prescott, AZ MSA	421	23.0%	1,512	19.6%	1.17	50
16 ID	17660 Coeur d'Alene, ID MSA	362	21.5%	967	18.5%	1.16	49
06 CA	47300 Visalia-Porterville, CA MSA	992	38.5%	4,759	33.2%	1.16	48
25 MA	15764 Cambridge-Newton-Framingham, MA MD	2,295	14.7%	4,458	12.8%	1.16	47

**Table 10 - NCRC Analysis: LMI/MUI**

State	MSA	# High-Cost Loans to LMI Borrowers	% High-Cost Loans to LMI Borrowers	# High-Cost Loans to MUI Borrowers	% High-Cost Loans to MU Borrowers	High-Cost Disparity Ratio	Rank
06 CA	17020 Chico, CA MSA	306	23.6%	1,358	20.7%	1.14	46
49 UT	39340 Provo-Orem, UT MSA	1,128	23.5%	2,377	20.7%	1.14	45
06 CA	12540 Bakersfield, CA MSA	2,541	40.0%	12,987	35.5%	1.13	44
32 NV	16180 Carson City, NV MSA	102	21.1%	339	18.9%	1.11	43
12 FL	39460 Punta Gorda, FL MSA	483	28.3%	1,450	25.8%	1.10	42
51 VA	25500 Harrisonburg, VA MSA	189	18.2%	313	16.6%	1.09	41
06 CA	34900 Napa, CA MSA	87	15.5%	786	14.3%	1.08	40
06 CA	31460 Madera, CA MSA	305	35.0%	1,928	32.3%	1.08	39
36 NY	39100 Poughkeepsie-Newburgh-Middletown, NY MSA	1,364	26.3%	3,932	24.4%	1.08	38
06 CA	20940 El Centro, CA MSA	224	42.6%	2,347	39.5%	1.08	37
12 FL	34940 Naples-Marco Island, FL MSA	685	25.3%	2,855	23.5%	1.08	36
12 FL	38940 Port St. Lucie-Fort Pierce, FL MSA	1,346	33.3%	5,378	31.1%	1.07	35
02 AK	11260 Anchorage, AK MSA	869	17.5%	1,496	16.4%	1.07	34
08 CO	24300 Grand Junction, CO MSA	416	22.5%	954	21.3%	1.06	33
12 FL	15980 Cape Coral-Fort Myers, FL MSA	2,137	35.3%	9,241	33.4%	1.06	32
06 CA	40900 Sacramento--Arden-Arcade--Roseville, CA MSA	4,320	24.3%	25,237	23.0%	1.06	31
04 AZ	49740 Yuma, AZ MSA	292	25.1%	1,429	23.8%	1.05	30
MA+RI	39300 Providence-New Bedford-Fall River, RI-MA MSA	4524	25.2%	11755	24.3%	1.04	29
13 GA	19140 Dalton, GA MSA	475	29.9%	501	28.9%	1.03	28
12 FL	33124 Miami-Miami Beach-Kendall, FL MD	3,785	40.9%	37,115	40.4%	1.01	27
06 CA	39820 Redding, CA MSA	272	23.4%	1,583	23.2%	1.01	26
25 MA	21604 Essex County, MA MD	1,583	18.5%	3,903	18.5%	1.00	25
41 OR	32780 Medford, OR MSA	358	20.9%	1,393	20.9%	1.00	24
06 CA	41940 San Jose-Sunnyvale-Santa Clara, CA MSA	1,291	13.3%	8,951	13.4%	0.99	23
06 CA	40140 Riverside-San Bernardino-Ontario, CA MSA	9,260	31.8%	77,697	32.6%	0.97	22
06 CA	37100 Oxnard-Thousand Oaks-Ventura, CA MSA	753	16.7%	5,966	17.2%	0.97	21
ID+UT	30860 Logan, UT-ID MSA	163	16.8%	345	17.4%	0.97	20
49 UT	41100 St. George, UT MSA	248	21.1%	1,270	22.0%	0.96	19
06 CA	49700 Yuba City, CA MSA	205	27.4%	2,426	29.1%	0.94	18
06 CA	44700 Stockton, CA MSA	1,104	28.8%	12,656	30.6%	0.94	17
06 CA	36084 Oakland-Fremont-Hayward, CA MD	2,616	16.8%	21,565	18.0%	0.94	16
36 NY	35004 Nassau-Suffolk, NY MD	5,019	24.8%	18,159	26.5%	0.94	15
25 MA	14484 Boston-Quincy, MA MD	2,909	16.7%	9,542	18.4%	0.91	14
06 CA	31084 Los Angeles-Long Beach-Glendale, CA MD	5,293	23.3%	88,682	26.0%	0.90	13
06 CA	32900 Merced, CA MSA	281	29.7%	4,292	33.2%	0.89	12
06 CA	41740 San Diego-Carlsbad-San Marcos, CA MSA	1,520	14.8%	21,908	17.2%	0.86	11
06 CA	33700 Modesto, CA MSA	845	25.9%	9,083	30.2%	0.86	10
06 CA	41500 Salinas, CA MSA	178	18.2%	3,159	21.3%	0.85	9
06 CA	42044 Santa Ana-Anaheim-Irvine, CA MD	1,869	14.3%	18,441	16.9%	0.85	8
06 CA	46700 Vallejo-Fairfield, CA MSA	767	21.9%	6,428	25.9%	0.85	7
15 HI	26180 Honolulu, HI MSA	787	15.4%	3,965	18.3%	0.84	6
06 CA	42220 Santa Rosa-Petaluma, CA MSA	275	11.4%	2,774	14.0%	0.81	5
06 CA	41884 San Francisco-San Mateo-Redwood City, CA MD	398	7.5%	4,939	9.2%	0.81	4
06 CA	42100 Santa Cruz-Watsonville, CA MSA	82	9.3%	1,078	12.3%	0.76	3
NJ+NY	35644 New York-White Plains-Wayne, NY-NJ MD	2,353	17.5%	44,982	23.6%	0.74	2
25 MA	12700 Barnstable Town, MA MSA	299	12.2%	1,529	19.5%	0.62	1

**Table 11 - NCRC Analysis: Overall Rank**

MSA	African-American	LMI African-American	MUI African-American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
16700 Charleston-North Charleston, SC MSA	244	180	214	211	158	122	0	0	0	342	210.14	116
14860 Bridgeport-Stamford-Norwalk, CT MSA	236	147	217	235	142	175	76	67	0	360	183.89	115
36540 Omaha-Council Bluffs, NE-IA MSA	216	162	190	137	68	139	0	0	0	316	175.43	114
33340 Milwaukee-Waukesha-West Allis, WI MSA	246	189	219	219	141	159	98	72	47	361	175.10	113
44140 Springfield, MA MSA	204	158	194	223	154	168	89	0	0	140	166.25	112
33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA	237	183	215	233	161	171	102	90	46	185	162.30	111
37964 Philadelphia, PA MD	241	170	210	226	146	155	48	23	25	378	162.20	110
45940 Trenton-Ewing, NJ MSA	230	163	209	205	116	165	3	4	0	364	162.11	109
13820 Birmingham-Hoover, AL MSA	188	106	178	187	104	133	32	0	0	343	158.88	108
24860 Greenville, SC MSA	214	142	202	81	23	76	0	0	0	363	157.29	107
25540 Hartford-West Hartford-East Hartford, CT MSA	198	141	182	222	155	158	31	39	0	263	154.33	106
26900 Indianapolis, IN MSA	164	130	163	177	132	101	22	0	0	312	150.13	105
21604 Essex County, MA MD	229	143	212	238	165	176	82	71	0	25	149.00	104
34940 Naples-Marco Island, FL MSA	184	185	121	214	137	146	0	0	0	36	146.14	103
14484 Boston-Quincy, MA MD	235	166	211	236	152	174	54	53	0	14	143.89	102
24660 Greensboro-High Point, NC MSA	174	84	191	154	78	99	70	0	0	296	143.25	101
39580 Raleigh-Cary, NC MSA	248	191	224	231	160	147	14	14	0	37	140.67	100
16740 Charlotte-Gastonia-Concord, NC-SC MSA	202	139	192	167	62	151	65	41	34	344	139.70	99
49340 Worcester, MA MSA	226	179	201	224	149	170	26	16	0	63	139.33	98
24340 Grand Rapids-Wyoming, MI MSA	167	123	183	116	74	129	73	0	0	249	139.25	97
40060 Richmond, VA MSA	234	184	207	144	76	137	41	29	32	306	139.00	96
10900 Allentown-Bethlehem-Easton, PA-NJ MSA	119	119	113	196	130	134	29	0	0	269	138.63	95
35380 New Orleans-Metairie-Kenner, LA MSA	209	135	176	124	50	97	61	0	0	256	138.50	94
32820 Memphis, TN-MS-AR MSA	227	151	193	127	71	66	60	28	0	319	138.00	93
41180 St. Louis, MO-IL MSA	233	182	208	114	79	86	47	45	28	345	136.70	92
15764 Cambridge-Newton-Framingham, MA MD	247	190	222	241	167	178	33	24	18	47	136.70	91
35084 Newark-Union, NJ-PA MD	189	153	150	195	120	136	27	0	0	115	135.63	90
23844 Gary, IN MD	192	159	159	75	81	42	0	0	0	235	134.71	89
47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	222	174	186	104	77	63	97	85	41	288	133.70	88
39740 Reading, PA MSA	171	73	181	166	100	126	0	0	0	116	133.29	87
35980 Norwich-New London, CT MSA	90	28	114	234	157	173	0	0	0	133	132.71	86
41884 San Francisco-San Mateo-Redwood City, CA MD	203	177	162	239	0	177	101	88	42	4	132.56	85
47894 Washington-Arlington-Alexandria, DC-MD-VA-WV MD	178	140	156	207	115	161	57	54	20	218	130.60	84
12580 Baltimore-Towson, MD MSA	176	124	165	176	69	149	75	74	24	272	130.40	83
19780 Des Moines, IA MSA	127	61	160	120	46	0	67	0	0	327	129.71	82
12060 Atlanta-Sandy Springs-Marietta, GA MSA	201	121	205	170	98	140	35	58	7	248	128.30	81
42644 Seattle-Bellevue-Everett, WA MD	159	65	151	225	156	156	88	80	27	157	126.40	80
35300 New Haven-Milford, CT MSA	150	74	161	201	140	144	11	0	0	123	125.50	79
42260 Sarasota-Bradenton-Venice, FL MSA	160	129	112	210	126	150	72	64	0	106	125.44	78
19740 Denver-Aurora, CO MSA	113	44	139	213	144	148	83	76	35	259	125.40	77
29404 Lake County-Kenosha County, IL-WI MD	80	27	135	212	135	166	42	60	21	341	121.90	76
13644 Bethesda-Gaithersburg-Frederick, MD MD	144	109	140	208	131	172	40	49	16	206	121.50	75
39300 Providence-New Bedford-Fall River, RI-MA MSA	146	107	123	218	129	162	95	83	0	29	121.33	74
45780 Toledo, OH MSA	122	77	108	132	84	103	0	0	0	222	121.14	73
16974 Chicago-Naperville-Joliet, IL MD	187	164	141	155	102	105	51	51	0	120	119.56	72
12420 Austin-Round Rock, TX MSA	92	36	147	180	112	138	2	1	0	365	119.22	71
17460 Cleveland-Elyria-Mentor, OH MSA	211	156	189	71	53	48	12	13	0	271	113.78	70
19124 Dallas-Plano-Irving, TX MD	132	38	172	163	70	125	7	76	5	317	110.50	69



**Table 11 - NCRC Analysis: Overall Rank**

MSA	African-American	LMI African-American	MUI African-American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
28140 Kansas City, MO-KS MSA	207	149	180	40	45	45	58	31	37	303	109.50	68
27260 Jacksonville, FL MSA	173	113	138	80	44	72	79	69	30	294	109.20	67
41620 Salt Lake City, UT MSA	84	0	0	206	150	145	44	46	17	171	107.88	66
29620 Lansing-East Lansing, MI MSA	107	111	103	90	65	93	0	0	0	180	107.00	65
47644 Warren-Farmington Hills-Troy, MI MD	191	154	200	106	90	83	9	9	13	212	106.70	64
18140 Columbus, OH MSA	134	87	126	145	122	75	18	10	26	324	106.70	63
38300 Pittsburgh, PA MSA	141	57	153	17	51	0	1	0	0	321	105.86	62
48424 West Palm Beach-Boca Raton-Boynton Beach, FL MD	166	125	134	151	93	95	55	33	0	92	104.89	61
38900 Portland-Vancouver-Beaverton, OR-WA MSA	116	70	101	227	162	154	30	38	9	126	103.30	60
31140 Louisville, KY-IN MSA	133	103	119	27	5	47	0	0	0	278	101.71	59
11260 Anchorage, AK MSA	104	69	109	202	0	153	103	91	45	34	101.11	58
35004 Nassau-Suffolk, NY MD	108	114	84	182	128	113	45	0	0	15	98.63	57
17140 Cincinnati-Middletown, OH-KY-IN MSA	175	138	157	36	60	21	4	2	0	291	98.22	56
39900 Reno-Sparks, NV MSA	76	0	70	161	89	109	99	87	0	91	97.75	55
19804 Detroit-Livonia-Dearborn, MI MD	163	116	137	117	82	81	16	3	43	217	97.50	54
17820 Colorado Springs, CO MSA	46	54	59	178	135	120	87	68	0	128	97.22	53
42220 Santa Rosa-Petaluma, CA MSA	75	0	72	216	0	143	91	77	0	5	97.00	52
12100 Atlantic City, NJ MSA	97	66	85	149	97	108	92	82	39	101	91.60	51
34980 Nashville-Davidson--Murfreesboro, TN MSA	123	63	132	35	8	54	69	65	29	326	90.40	50
40420 Rockford, IL MSA	88	101	80	88	86	64	0	0	0	113	88.57	49
48864 Wilmington, DE-MD-NJ MD	109	94	87	72	66	53	5	0	0	219	88.13	48
40900 Sacramento--Arden-Arcade--Roseville, CA MSA	98	97	69	172	117	100	85	70	33	31	87.20	47
36420 Oklahoma City, OK MSA	117	76	102	107	80	62	15	12	0	205	86.22	46
46060 Tucson, AZ MSA	48	35	42	186	127	121	23	15	0	168	85.00	45
38060 Phoenix-Mesa-Scottsdale, AZ MSA	38	11	44	190	125	123	59	48	12	183	83.30	44
15804 Camden, NJ MD	124	85	118	126	96	84	24	18	23	131	82.90	43
45104 Tacoma, WA MD	73	82	56	131	123	71	96	84	31	80	82.70	42
35644 New York-White Plains-Wayne, NY-NJ MD	140	99	105	173	67	102	50	0	1	2	82.11	41
23580 Gainesville, GA MSA	101	48	129	32	12	69	0	0	0	175	80.86	40
20764 Edison, NJ MD	106	133	78	162	118	111	6	5	4	60	78.30	39
36084 Oakland-Fremont-Hayward, CA MD	100	78	77	194	103	114	52	40	8	16	78.20	38
41740 San Diego-Carlsbad-San Marcos, CA MSA	58	37	45	181	121	104	81	62	0	11	77.78	37
48620 Wichita, KS MSA	96	105	71	51	26	41	17	0	0	200	75.88	36
41980 San Juan-Caguas-Guaynabo, PR MSA	2	90	2	14	27	11	0	0	0	380	75.14	35
15980 Cape Coral-Fort Myers, FL MSA	53	79	38	156	99	92	66	55	0	32	74.44	34
42044 Santa Ana-Anaheim-Irvine, CA MD	37	0	26	209	119	141	56	43	6	8	71.67	33
37100 Oxnard-Thousand Oaks-Ventura, CA MSA	45	0	40	175	106	106	38	27	0	21	69.75	32
26420 Houston-Sugar Land-Baytown, TX MSA	85	26	106	86	30	79	8	11	3	255	68.90	31
23104 Fort Worth-Arlington, TX MD	65	34	97	82	48	59	25	21	10	238	67.90	30
26180 Honolulu, HI MSA	42	0	29	150	0	87	94	81	44	6	66.63	29
37340 Palm Bay-Melbourne-Titusville, FL MSA	68	46	68	64	43	57	62	59	0	132	66.56	28
36100 Ocala, FL MSA	79	81	64	63	35	51	0	0	0	83	65.14	27
45300 Tampa-St. Petersburg-Clearwater, FL MSA	72	62	55	105	75	78	39	35	15	110	64.60	26
46700 Vallejo-Fairfield, CA MSA	41	98	25	96	72	56	100	86	0	7	64.56	25
38940 Port St. Lucie-Fort Pierce, FL MSA	67	56	62	108	40	74	74	61	0	35	64.11	24
41700 San Antonio, TX MSA	3	2	5	69	41	52	13	19	0	354	62.00	23
41940 San Jose-Sunnyvale-Santa Clara, CA MSA	33	0	28	203	124	130	10	6	11	12	61.89	22
39100 Poughkeepsie-Newburgh-Middletown, NY MSA	81	45	74	97	92	60	20	20	0	38	58.56	21
19660 Deltona-Daytona Beach-Ormond Beach, FL MSA	87	88	53	52	38	40	28	0	0	70	57.00	20
36740 Orlando-Kissimmee, FL MSA	62	42	50	84	73	61	36	34	22	104	56.80	19

**Table 11 - NCRC Analysis: Overall Rank**

MSA	African-American	LMI African-American	MUI African-American	Hispanic	LMI Hispanic	MUI Hispanic	Asian	MUI Asian	LMI Asian	LMI	Raw Score	Rank (1 being best)
29820 Las Vegas-Paradise, NV MSA	24	8	22	111	94	65	77	63	38	66	56.80	18
46140 Tulsa, OK MSA	69	52	63	21	4	30	0	0	0	155	56.29	17
22744 Fort Lauderdale-Pompano Beach-Deerfield, FL MD	71	50	61	49	49	31	71	57	36	52	52.70	16
28660 Killeen-Temple-Fort Hood, TX MSA	8	14	180	19	6	18	0	0	0	118	51.86	15
29460 Lakeland, FL MSA	40	39	31	60	33	50	64	56	0	57	47.78	14
23420 Fresno, CA MSA	21	7	18	61	34	39	78	66	0	67	43.44	13
10740 Albuquerque, NM MSA	13	0	21	58	54	46	37	42	0	62	41.63	12
49700 Yuba City, CA MSA	28	0	20	76	0	44	53	44	0	18	40.43	11
47220 Vineland-Millville-Bridgeton, NJ MSA	34	24	37	46	37	37	0	0	0	65	40.00	10
41500 Salinas, CA MSA	6	0	4	65	36	35	90	75	0	9	40.00	9
47300 Visalia-Porterville, CA MSA	23	0	16	29	11	25	86	73	0	48	38.88	8
12540 Bakersfield, CA MSA	20	13	15	44	20	33	63	47	0	44	33.22	7
33700 Modesto, CA MSA	11	0	7	33	28	24	68	50	0	10	28.88	6
44700 Stockton, CA MSA	18	18	13	42	19	26	49	36	40	17	27.80	5
31084 Los Angeles-Long Beach-Glendale, CA MD	29	25	23	59	15	38	43	30	2	13	27.70	4
40140 Riverside-San Bernardino-Ontario, CA MSA	19	10	14	41	21	27	46	32	19	22	25.10	3
33124 Miami-Miami Beach-Kendall, FL MD	22	22	17	16	10	13	34	26	0	27	20.78	2
32900 Merced, CA MSA	5	0	3	24	7	19	21	17	0	12	13.50	1

**Table 12 - NCRC Analysis: Disparitiy Ratios**

	African-Americans v. Whites	LMI African-Americans v. LMI Whites	MUI African-Americans v. MUI Whites	Asian v. Whites	LMI Asians v. LMI Whites	MUI Asians v. LMI Whites	Hispanics v. Whites	LMI Hispanics v. LMI Whites	MUI Hispanics v. MUI Whites	LMI v. MUI
<b>Disparity Ratio &gt; 3</b>										
Number of MSAs	17	2	28	0	0	0	4	0	6	1
Percent of MSAs	6.8%	1.0%	12.4%	0.0%	0.0%	0.0%	1.7%	0.0%	3.4%	0.3%
<b>Disparity Ratio 2.5 to 3</b>										
Number of MSAs	47	10	63	0	0	0	9	2	21	0
Percent of MSAs	18.7%	5.1%	28.0%	0.0%	0.0%	0.0%	3.7%	1.2%	11.8%	0.0%
<b>Disparity Ratio 2 to 2.5</b>										
Number of MSAs	107	58	76	0	0	0	36	8	48	3
Percent of MSAs	42.6%	29.7%	33.8%	0.0%	0.0%	0.0%	14.9%	4.8%	27.0%	0.8%
<b>Disparity Ratio 1.5 to 2</b>										
Number of MSAs	62	105	44	4	0	4	126	51	67	197
Percent of MSAs	24.7%	53.8%	19.6%	3.8%	0.0%	4.4%	52.3%	30.5%	37.6%	51.8%
<b>Disparity Ratio 1.0 to 1.5</b>										
Number of MSAs	14	20	12	16	4	19	62	98	35	156
Percent of MSAs	5.6%	10.3%	5.3%	15.2%	8.5%	20.9%	25.7%	58.7%	19.7%	41.1%
<b>Disparity Ratio Below 1.0</b>										
Number of MSAs	1	0	2	85	43	68	4	8	1	23
Percent of MSAs	0.4%	0.0%	0.9%	81.0%	91.5%	74.7%	1.7%	4.8%	0.6%	6.1%
<b>Total</b>	<b>251</b>	<b>195</b>	<b>225</b>	<b>105</b>	<b>47</b>	<b>91</b>	<b>241</b>	<b>167</b>	<b>178</b>	<b>380</b>