

Will Jordan

Hello. My name is Will Jordan, and I direct the Metropolitan St. Louis Equal Housing Opportunity Council in St. Louis, Missouri. I wanna thank you for having me here today. We are a not-for-profit fair housing agency operating in St. Louis, and we operate in both Missouri and Illinois. Our organization started using HMDA data on a consistent basis for a report that we released in 2008 called bailing out on community reinvestment. We analyze HMDA data for eight lenders operating in the St. Louis Metropolitan area that it already applied or were considering to apply for TARP money to the treasury. HMDA data provided us with a picture of the lending to low income and minority communities, and I wanna tell you, the picture was very disturbing. Based upon the pattern of racial disparities that we were seeing in St. Louis, we convened the St. Louis Equal Housing Opportunity and Community Reinvestment Alliance. We call it SLEHCRA. We are a coalition of 13 non-for-profit organizations working to increase investment in low-end minority communities--low income and minority communities by ensuring that banks are meeting their applications under the Community Reinvestment Act and the Fair Lending Laws. I wanna say this to--in St. Louis, when we filed first public comment based upon the information we were finding at researching HMDA data, we found that in St. Louis, we were the first person--organization to ever file a public comment on the CRA performance of any bank. And suddenly, we were in the limelight for something I thought was kind of a research project. This is kind of blown up pretty large now. Over the past year, we have been regularly submitting comments on CRA performance evaluations and applications for banks operating on the St. Louis Metropolitan area. And as a result of our research, federal agencies including the Department of Justice and the Department of Housing and Urban Development are investigating three different banks. Regulators have met with us and changed the way they conduct supervisory training, and banks have indicated to us that they are changing the practices based upon research that we have shown them and suggestions that we have made to them. The Home Mortgage Disclosure Act data is essential to our work, has become essential to our work, and we are ensuring that banks provide services to all sectors of the community, especially low income and minority communities. We have six recommendations, I'm not gonna go into detail about all six 'cause I've got those in writing and you can read those whenever you need to, to make your changes. But I will talk about the first.

The first is that we believe that we need aggregated HMDA data by county, not just by entire metropolitan area, in a place like St. Louis where there are stark contrast and race and income characteristics between counties. Very stark. It would be extremely helpful to understanding the lending climate in each separate county. For example, the city of St. Louis is a separate county from St. Louis County, with wide income and race differences. We analyzed bank performance in their assessment area against average lending by other banks, and we are currently unable to analyze a bank with an assessment area of a suburban St. Charles County for example, against the average lending patterns in that county. We can only compare it against the lending in the entire MSA. The other recommendations; one of the recommendations that some of those had do the HMDA data research in our office have asked me to bring to you is that if it's possible to influence the way that that data is compiled, rather than in PDF format, somehow, another deal with it and put in the excel spreadsheet so that the data could be more transferrable. So I got that in there, Elizabeth. Another one we'd like to make a recommendation on is that we need publicly available loan performance data that is linked to HMDA data. Alright. It's important to

have information on delinquencies, defaults and foreclosures that are tracked on an institutional level, or at least on a census tract level. County level data on foreclosure, why helpful or not enough. Information on modifications including long-terms and conditions is important to include for our loan modifications and not just half modifications like the bill includes. And I echo many of the comments that Faith Anderson said as well. Thank you very much.