



Fair Housing Lender Compliance Checklist

Expanding Access to Credit in Underserved Communities

- Offer low down payment or no-PMI mortgage products
- Accept alternative credit data (e.g., rent, utility payments)
- Provide first-time or first-generation homebuyer assistance
- Partner with CDFIs, MDIs, or local nonprofits
- Support or co-sponsor homebuyer education programs
- Deploy multilingual marketing and application materials
- Employ diverse staff and culturally competent loan officers
- Focus outreach on previously redlined or underserved areas
- Invest in Community Reinvestment Act (CRA)-eligible initiatives
- Track lending by census tract, race, and income

Fair Lending Compliance & Monitoring

- Regularly review Home Mortgage Disclosure Act (HMDA) data for disparities
- Monitor approval, denial, and pricing outcomes by protected class
- Conduct internal fair lending risk assessments
- Ensure underwriting and pricing policies are race-neutral and transparent
- Test for algorithmic bias in automated underwriting or marketing systems
- Train all staff on ECOA, FHA, and UDAAP (Unfair, Deceptive, or Abusive Acts or Practices)
- Establish clear fair lending policies and escalation processes
- Document decisions on borderline applications for accountability



Fair Housing Lender Compliance Checklist

Staying Up to Date with Regulations

- Implement requirements of CRA Modernization Final Rule (2023)
- Identify new Retail Lending Assessment Areas
- Align product offerings with local needs and performance metrics
- Update policies to allow for Special Purpose Credit Programs (SPCPs)
- Monitor CFPB, HUD, and DOJ updates on redlining, digital discrimination, and bias
- Review vendor and fintech partnerships for compliance risks
- Ensure compliance with digital accessibility standards (ADA, FHA)

Documentation & Transparency

- Maintain records of all lending decisions and justifications
- Make fair lending statement publicly available
- Report CRA and HMDA data accurately and on time
- Track and report community outreach and investment impacts
- Prepare documentation for regulatory audits or examinations