



The CRA and Fair Lending Performance of Financial Institutions in the City of Philadelphia

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National Community Reinvestment Coalition

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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

NCRC's comprehensive analysis of home lending, small business lending, and branching patterns reveals commendable CRA (Community Reinvestment Act) and fair lending performance of banks receiving City deposits, but also suggests that gaps remain in equitable access to credit and banking services. The City's program of requiring CRA goal statements from banks receiving City deposits (City depositories) has boosted their performance in making home loans and branches available to working class and minority communities. City depositories, however, need to improve their performance in small business lending. On the positive side, most of the City depositories have a higher share or percent of all home loans in nine target neighborhoods (including those designated as Empowerment Zone status) than they do across the entire City. In other words, most of the City depositories are focusing on making loans to a greater extent than their peers on the target neighborhoods.

This report analyzes 2003 HMDA (Home Mortgage Disclosure Act) data and CRA small business data. The 2004 HMDA and small business data recently became available after analysis had commenced with the 2003 data. NCRC will be conducting another comprehensive report for the City of Philadelphia with the 2004 data.

Trends in Prime and Subprime Lending

The study analyzes trends in prime and subprime lending in the City and the suburbs. While disparities in prime and subprime lending are most pronounced in the City, disparities are nevertheless significant in the suburbs.

Prime loans are loans made at prevailing interest rates to borrowers with good credit histories. Subprime loans, in contrast, are loans with rates higher than prevailing rates made to borrowers with credit blemishes. The higher rates compensate lenders for the added risks of lending to borrowers with credit blemishes. While responsible subprime lending serves credit needs, public policy concerns arise when certain groups in the population receive a disproportionate amount of subprime loans. When subprime lending crowds out prime lending in traditionally underserved communities, price discrimination and other predatory and deceptive practices become more likely as residents face fewer product choices.

- In the City of Philadelphia, African-Americans comprised about 40.7 percent of the city's population. They only received about 19.2 percent of all prime single family loans (home purchase, home improvement, and refinance) but received 36.7 percent of all subprime loans during 2003 (see Table 3).
- In the City, subprime lenders issued 17.8 percent of all single family loans made to African-Americans but only 7.8 percent of the loans made to Whites. In other words, African-Americans were 2.27 times more likely to receive subprime loans than whites. This is a greater likelihood than low- and moderate-income borrowers receiving subprime loans relative to middle- and upper-income

borrowers. When separately analyzing home purchase, refinance, and home improvement loans, racial disparities remain greater than income disparities. Given that minority borrowers include a mix of income groups (and are not just low- and moderate-income families), it would be reasonable to expect a different outcome, that is, disparities being greater by income than race.

- Disparities are also significant in the suburbs. Of the single family loans issued in the suburbs, 9.8 percent and 4.9 percent of the loans issued to Hispanics and whites, respectively, were subprime. Hispanics were twice as likely as whites residing in the suburbs to receive subprime loans (see Table 4).
- The similarity among prime and subprime lending patterns was lending to investors owning but not residing in single family homes. Investor owned single family properties have been a significant issue in cities across the country. Both prime and subprime lenders are most likely to make loans to investors that are middle- and upper-income and that are purchasing properties in low- and moderate-income neighborhoods. For example, prime lenders made 75 percent of their single family loans to middle- and upper-income investors and 67.6 percent of their loans to investors for properties in low- and moderate-income neighborhoods during 2003. While the volume of loans to non-occupant investors remains much lower than the volume of loans to owner-occupants, the lending trends to investors bears watching (see Table 5).

Performance of City Depositories in Home Lending

NCRC compared and ranked the CRA and fair lending performance of City depositories on all single family lending and on home purchase, refinance, and home improvement lending separately. NCRC used 17 indicators of performance including the percent of loans issued to minorities, low- and moderate-income borrowers, and women; the market share of loans issued to minority and low- and moderate-income neighborhoods; and denial disparity ratios comparing denial rates to whites and minorities. NCRC examined the prime lending affiliates of the City depositories against all other prime lenders. Subprime specialists among the affiliates of the City depositories were few in number.

- The seven banks receiving City deposits include Bank of America, Citizens, Commerce Bank, PNC, Mellon, Wachovia and United Bank of Philadelphia. Together, these lenders made about 20 percent of the home loans in the City and owned about 57 percent of the bank branches in the City during 2003. By utilizing their large presence in the market and working with the City, these seven banks have an opportunity to be market leaders and thereby encourage all financial institutions to increase loans to traditionally underserved communities.
- The City depositories performed well overall in all single family lending (home purchase, refinance, and home improvement lending combined). More than half of the City depositories exceeded the performance of all other prime lenders in

Philadelphia on 15 of 17 indicators or on 88.2 percent of the CRA and fair lending performance measures (see Table 14).

- Within lending types, City depositories performed the best on home improvement lending. More than half of City depositories exceeded the performance of their peers on 16 of the 17 indicators or 94 percent of the time. Home improvement lending appears to drive much of the overall success in single family lending performance (see Table 14).
- City depositories are not as successful in home purchase and refinance lending. More than half of City depositories exceeded the CRA and fair lending performance of their peers on just 8 of the 17 indicators or 47 percent of the time for home purchase and refinance lending (see Table 14).
- City depositories and all other lenders need to increase their percent of prime lending to African-Americans and minority and low- and moderate-income communities. The gap between the percent of prime loans and the percent of the City's population (and percent of the City's owner-occupied housing units) was wide for these borrowers (and neighborhoods) (see Table 14).
- Relative to other lenders in the City, City depositories lag in the percent of single family loans issued to Asians (see Table 14).

Small Business Lending

Disparities are significant for small business lending. City depositories also have more difficulty competing against their peers in small business lending relative to home lending.

- During 2003, the portion of all small business loans made in low-income census tracts was 21.9 percent, but the portion of the City's small businesses located in low-income tracts was 28.4 percent (see Table 17). Likewise, the portion of small business loans in minority tracts (greater than 50 percent of the population is minority) was 34.8 percent, but the portion of the City's businesses that was in minority tracts was about 45.0 percent (see Table 18).
- In the City of Philadelphia, smallest businesses with less than \$1 million in revenue made up 58.1 percent of all small businesses but received only 32.3 percent of the small business loans issued in the City. A similarly stark difference occurred in the suburbs (see Table 19).
- On the small business CRA performance measures, more than half of the City depositories exceeded the performance of other lenders in the City on just 40 percent of the indicators. This is a significant difference from the home lending performance where more than half of the City depositories exceeded peer performance on the majority of indicators (see Table 21).

- City depositories struggled on the indicators measuring success in serving small businesses in low- and moderate-income tracts but performed well in serving the smallest businesses with less than \$1 million in revenues (see Tables 20 and 21).

Branching Patterns

- The performance of City depositories in placing branches in minority and low- and moderate-income census tracts is to be applauded. Four of the seven City depositories located a higher percent of their branches in minority neighborhoods than all lenders, as a group (which placed 22.4 percent of their branches in minority tracts at year end 2003; see Tables 22 and 23).
- Likewise four of the seven City depositories located a greater portion of their branches in low- and moderate-income tracts than all lenders (53.6 percent of all lender branches were in low- and moderate-income tracts; see Table 22).
- In general, the City depositories that performed better on the home, small business and branching analyses were City depositories that have been in the Philadelphia market the longest and/or have more extensive branch networks.

Neighborhood Analysis

- NCRC conducted detailed home and small business lending analysis of nine target neighborhoods in the City. Three of the neighborhoods are empowerment zones and six others are targeted for redevelopment by Community Development Corporations (CDCs). These neighborhoods are heavily African-American or Hispanic, and are all low-income except for one moderate-income neighborhood.
- Again, the performance of City depositories is commendable. Four of the six City depositories analyzed on the neighborhood level had a higher share or percent of home loans made in these neighborhoods than they did across the City (see Table 25).
- Overall, however, access to credit needs to improve in the target neighborhoods. In the City as a whole, the ratio of loans to owner-occupied units was 13.2 percent in 2003. In other words, lenders made loans to about 13 percent of all owner-occupied units. In the target neighborhoods, the ratio was generally below 4 percent (see Table 24).
- The gaps in small business lending are not as great for the nine target neighborhoods, but they are still significant. In the City overall, banks and thrifts made loans to 11.2 percent of the small businesses with revenues of less than \$1 million. In one of the neighborhoods, the ratio was a bit higher at 11.3 percent. In five neighborhoods, however, the ratio was 7 percent or less (see Table 26).

Quality Control

Before releasing this study, NCRC provided copies to the banks analyzed in this report as well as City officials. Following the method established by the Government Accountability Office, NCRC believed that the rigor and fairness of the study would be enhanced by sharing it with key stakeholders and asking them to offer their comments and insights. While NCRC did not make all the changes suggested by the various stakeholders, we very much appreciated their perspectives and comments, which did improve the quality of the report.

Recommendations

Philadelphia's program requiring City depositories to issue annual CRA goals has made a valuable contribution to increasing access to credit and bank branches to minority and low- and moderate-income communities. The City depositories generally perform well on CRA and fair lending indicators of performance. The commendable performance overall allows stakeholders to focus on specific areas of inconsistencies or weaknesses, which is a more achievable assignment than starting from a situation of lackluster performance and non-responsiveness to credit needs.

NCRC's specific recommendations are:

- City and suburban leaders should work together to address lending disparities and unmet credit needs. Disparities in prime and subprime lending cuts across urban and suburban jurisdictions. In addition, small businesses with revenues under \$1 million and businesses located in minority and low- and moderate-income census tracts have unmet credit needs in both the City and suburbs.
- The City should ask for the census tract location of small business loans made by the City depositories. While federal law would prohibit the City from asking for the race and gender of small business borrowers, federal law and CRA regulations do not prohibit the City from asking for the census tract location of small business loans. Since City depositories have more difficulty in competing against their peers in small business than home lending, the additional data disclosure would help close the gap in their competitiveness as well as closing credit gaps in minority and low- and moderate-income neighborhoods, including the nine target neighborhoods. Some stakeholders expressed concern that banks receiving City deposits may be placed at a competitive disadvantage if the City required them to release data on a census tract level while other banks doing business in the City did not have to report this data. One possible response to this concern is for the City to require the depositories to report the data to the City but the City would keep the data confidential. Even confidential data received by the City would be

valuable for planning purposes and would help the City identify credit needs with more precision.¹

- Within home lending, City depositories need to focus more on reaching traditionally underserved borrowers in home purchase and refinance lending. City depositories currently have strong performance in home improvement lending, but not as good CRA and fair lending performance in home purchase and refinance lending. As one of the oldest cities in the nation, Philadelphia has an aging housing stock. It is commendable that the City depositories perform well in making home improvement lending available to traditionally underserved borrowers and communities. While maintaining their performance in home improvement lending, the challenge is now to improve CRA and fair lending performance in home purchase and refinance lending. Specifically, the City of Philadelphia has embarked on a Neighborhood Transformation Initiative, which has involved the development of alternatives to abusive lending, the refinancing of predatory loans, and housing counseling. City depositories should expand their cooperation and involvement with the City's Neighborhood Transformation Initiative and seek ways to increase their home purchase and refinance lending by working with the City's Initiative.
- The City should monitor trends in home lending to investors in minority and low- and moderate-income neighborhoods. Should more investor opportunities be made available to low- and moderate-income families that may wish to invest in housing in low- and moderate-income neighborhoods? Alternatively, should more emphasis be placed upon lending to owner-occupants in minority and low- and moderate-income neighborhoods? It is beyond the scope of this study to assess the quality of investor owned housing stock in minority and working class neighborhoods. Nevertheless, it is appropriate to raise these questions now while lending to investor, non-occupants is manageable in the sense that it growing but is not surging in leaps and bounds to high levels.
- The City should commission annual studies such as this one to measure fair lending performance of City depositories and all lenders doing business in the City. The CRA goal statements should include more detail, requiring lenders to compare themselves against their peers and discussing how they intend to match or exceed peer lender performance on a variety of CRA and fair lending measures. When banks receive City deposits, the City should expect them to exceed their peers in serving City neighborhoods on most CRA and fair lending measures of performance.
- The City should advocate for continued enhancements in the lending data provided by the federal government. Firstly, the City should ask Congress and the federal regulators to reverse the recent decision to eliminate small business

¹ The federal banking agencies themselves proposed requiring the dissemination of small business data on a census tract level in the spring of 2004 but then withdrew this proposal as part of the recent changes to the CRA regulation.

data reporting by banks and thrifts with assets between \$250 million and \$1 billion. In addition, the City should ask the federal government to require disclosure of small business data on a census tract level, to require reporting of the race and gender of small business borrowers, and to include more precise reporting of the revenue size of the small business borrowers.² Regarding HMDA data disclosure, the City should applaud the recent decision by the Federal Reserve Board to include price information for subprime loans but should advocate for pricing data for all loans and for the disclosure of key underwriting variables such as credit scores and loan-to-value ratios.

Comparison of Single Family Lending Trends in Suburbs to City of Philadelphia

Single Family Lending to Minorities in City and Suburbs

NCRC compared single family lending trends in the City and County in Philadelphia with trends in the four suburban counties (Bucks, Chester, Delaware, Montgomery) located in Pennsylvania that comprised the Philadelphia metropolitan area. Single family refers to refinance, home purchase, and home improvement lending combined. For the year 2003, disparities in access to prime loans appear to be greater in the City than the suburban counties, however, disparities are also prevalent in the suburban part of the metropolitan area.

In the suburbs, African-Americans received 8.2 percent of subprime loans but only 2.7 percent of the prime loans during 2003. According to the 2000 census, African-Americans were 7.2 percent of the suburbs' households. They therefore received a percent of subprime loans commensurate with their share of the suburban population but received a share of prime loans that was considerably less than their share of the population (see Table 4a and Chart 2). In the City and County of Philadelphia, African-Americans comprised 40.7 percent of the households, and received 19.2 percent of the prime loans and 36.7 percent of the subprime single-family loans (see Table 3a and Chart 1). The disparities in the share of loans and the share of the population appear to be more significant in the City due to the much greater number and percent of African-American households. But in both the City and suburbs, the African-American percent of prime loans was about half their percent of the population. In contrast, they received a share of subprime loans that was commensurate with their share of the population.

² Some of the stakeholders reviewing draft versions of this report commented that the small business data analysis did not account for loans in which the revenue size of the small business is unknown when calculating what percentage of the small business loans were made to small businesses with revenues less than \$1 million. NCRC reviewed the CRA regulations, the Interagency Q&A document, and consulted with federal regulatory officials. There is no publicly available data on how many loans were made to small businesses with revenue size unknown. This data should be made publicly available as well as some additional revenue size categories of small businesses. The smallest of the small businesses have revenues considerably under \$1 million; it would be valuable to have data revealing lending trends to these businesses.

Fair lending analysis for other minority groups such as Hispanics and Asians is more meaningful for the City since these groups are relatively small percentages of the suburban households and have a larger presence in the City. For example, Hispanics comprised just 1.6 percent of the suburban households, and received 1 percent of the prime and 2 percent of the subprime single family loans in 2003 (see Table 4a and Chart 2). In the City, Hispanics were 6.5 percent of the households, and received 5.6 percent of the prime loans and 5.5 percent of the subprime loans. Asians actually enjoyed a larger percentage of prime than subprime loans. At 3.5 percent of the City's households, Asians were issued 5.9 percent of the prime loans and just 2.9 percent of the subprime loans (see Table 3a and Chart 1). A similar trend occurred in the suburbs, where Asians reaped a higher percentage of prime than subprime loans. In sum, African-Americans residing in the suburbs and City experienced significantly more disparities than other minority groups in the portion of prime and subprime loans received.

Market share analysis reinforces the conclusion that fair lending disparities for single family lending are the most pressing for African-Americans in both the City and suburbs. Market share analysis compares the percent or share of all loans issued by subprime and prime lenders to minorities and other protected classes relative to whites and other unprotected classes. Minorities and other protected classes are more likely to receive subprime loans when subprime lenders have a larger market share of loans issued to minorities and other protected classes than to whites and other unprotected classes.

In the City, subprime lenders issued 17.8 percent of all loans made to African-Americans but only 7.8 percent of loans made to Whites. In other words, African-Americans were 2.27 times more likely to receive subprime loans than Whites (17.8 percent subprime market share to African-Americans divided by the 7.8 subprime market share to whites) (see Table 3a and Chart 1). In the suburbs, subprime lenders issued 14.5 percent of all single family loans to African-Americans but only 4.9 percent of single family loans made to Whites. African-Americans residing in the suburbs were 2.98 times more likely than whites to receive subprime loans. Interestingly, the other significant market share disparity involves Hispanics living in the suburbs. Of the single family loans issued in the suburbs, 9.8 percent and 4.9 percent of the loans issued to Hispanics and whites, respectively, were subprime. Hispanics were twice as likely as whites residing in the suburbs to receive subprime loans (see Table 4a and Chart 2).

Denial disparity ratios reveal that African-Americans in the city and suburbs experienced the highest denial disparities, but that Hispanics also experienced significant denial disparity ratios during 2003. In the City, African-Americans were denied prime loans 38 percent of the time while whites were denied prime loans just 14.3 percent of the time. African-Americans were denied 2.66 times more often than whites (38 percent divided by 14.3 percent). In contrast, the African-American to white subprime denial disparity ratio was just 1.28. Subprime lenders have overall higher denial rates than prime lenders, but the disparities in the denial rates tend to be less (see Table 3a and Chart 1).

In the suburbs, African-Americans are denied 21.8 percent of the time for prime loans and whites are denied 7.3 percent of the time (see Table 4a and Chart 2). African-

Americans are denied 2.97 times as often as whites for prime loans, but just 1.53 times for subprime loans. Hispanics are 2.23 times more likely to be denied prime loans in the City, and are 1.8 times more likely to be denied prime loans in the suburbs (see Table 3a and Chart 1). If prime lenders work to reduce their denial disparity ratios, then it will be possible for prime lenders to gain some market share from subprime lenders and make higher percentages of their loans to minorities.

Single Family Lending to Low- and Moderate-Income Borrowers in the City and Suburbs

Low- and moderate-income borrowers receive a share of prime single family loans that is lower than their share of the household population but receive a share of subprime loans higher than their share of the household population in both the City and suburbs. In the City of Philadelphia, low- and moderate-income (LMI) households (with up to 80 percent of area median income) comprise 57.4 percent of the City's households. LMI borrowers received 51.3 percent of the prime single family loans and 64.4 percent of the subprime single family loans issued in the City (see Table 3c and Chart 4). In the suburbs, LMI households constituted 29 percent of all the households. They received 20.8 percent of the prime single family loans but 33.1 percent of the subprime loans in 2003.

Subprime lenders had a higher market share to LMI borrowers than to middle- and upper-income (MUI) borrowers in both the City and the suburbs. Subprime lenders issued 14.9 percent of the single family loans to urban LMI borrowers but made just 9.3 of the loans to MUI borrowers (see Table 3c and Chart 4). The subprime market share to LMI borrowers is 1.61 times greater than their market share to MUI borrowers. In other words, LMI borrowers are 1.61 times more likely than MUI borrowers to receive a subprime loan. In the suburbs, subprime lenders made 10.8 percent of the loans to LMI borrowers but just 6 percent of the loans to MUI borrowers (see Table 4c). LMI borrowers in the suburbs are 1.79 times more likely than MUI borrowers to receive a subprime loan.

In the suburbs, subprime market share to LMI borrowers relative to MUI borrowers is lower than their market share to Hispanics relative to whites and to African-Americans relative to Whites. In the City, subprime market share to LMI borrowers relative to MUI borrowers is lower than their market share to African-Americans relative to whites. The fact that subprime relative market share to minorities is often higher than their market share to LMI borrowers suggests that lending disparities by race are larger than disparities by income. Given that minority borrowers include a mix of income groups and are not solely LMI, it would be reasonable to expect disparities by race to be less than disparities by income. This expectation is reinforced by the importance of income and the ability to repay in loan underwriting decisions.³ The larger disparities by race

³ Differences in creditworthiness are often cited as one explanation for lending disparities by race. Yet, previous research including NCRC's *Broken Credit System* report (available via <http://www.ncrc.org>) and papers co-authored by Federal Reserve economists have found that even controlling for creditworthiness, disparities by race remain in Philadelphia and several other large metropolitan areas. See Paul S. Calem, Kevin Gillen, and Susan Wachter, *The Neighborhood Distribution of Subprime Mortgage Lending*, October 30, 2002. See also Paul S. Calem, Jonathan E. Hershaff, and Susan M. Wachter, *Neighborhood Patterns of*

suggests that lenders, community groups, and public officials should work together to intensify efforts to reduce racial disparities in lending.

Denial disparity analysis also suggests that disparities by race should be reduced since they are larger than disparities by income. In the City, prime lenders denied LMI applicants 30.9 percent of the time and MUI applicants 16 percent of the time. LMI applicants are denied 1.93 times more often than MUI applicants (see Table 3c and Chart 4). As stated above, African-American applicants for prime loans are denied 2.66 times more often than white applicants. In the suburbs, LMI applicants for prime loans are denied 15.3 percent of the time while MUI applicants are denied 7.5 percent of the time. LMI applicants are denied 2.04 times more often than MUI applicants (see Table 4c and Chart 4). In contrast, suburban African-American applicants were denied 2.97 times more often than white applicants.

Single Family Lending by Minority Level of Census Tracts

In the City, significant disparities are present when considering single family lending by minority level of census tracts. Substantially minority census tracts (more than 50 percent of residents are minority) contained 49 percent of the owner-occupied housing units in the City, but residents of these neighborhoods received just 25.3 percent of prime loans but 44.2 percent of subprime loans (see Table 3b, Chart 3 and Maps 1 and 3). In contrast, non-minority tracts (less than 50 percent of residents are minority) contained 51 percent of the owner-occupied housing stock but received 74.7 percent of the prime single family loans and just 55.8 percent of the subprime loans. In the suburbs, the presence of substantially minority census tracts is small; these tracts contained just 2.56 percent of the owner-occupied housing units (see Table 4b and Chart 3). Yet, even in the suburbs disparities occurred by minority level of census tracts. These tracts received just 0.7 percent of the prime loans and 2.9 percent of the subprime loans during 2003.

Market share and denial disparity analyses also suggest significant lending disparities by race of neighborhood. In the City, subprime lenders made 19.5 percent of all loans in substantially minority tracts and only 9.4 percent of loans in non-minority tracts (see Table 3b and Chart 3). Residents of minority tracts were 2 times more likely than residents of non-minority tracts to receive a subprime loan. The likelihood was even higher (3.26 times) for suburban residents of minority tracts to receive subprime loans relative to their counterparts in non-minority tracts. The prime denial disparity ratio for residents of minority tracts relative to non-minority tracts was higher at 3.38 in the suburbs versus 2.26 in the City.

Single Family Lending by Income Level of Census Tracts

In the City, the great majority of owner-occupied housing units (68 percent) are in LMI census tracts. In the suburbs, the portion in LMI tracts is much smaller at 6.29 percent of

Subprime Lending: Evidence from Disparate Cities, in Fannie Mae Foundation's Housing Policy Debate, Volume 15, Issue 3, 2004 pp. 603-622.

all owner-occupied housing units.⁴ Disparities in lending by income level of tracts are more noticeable in the City, but they are also present in the suburbs. In the City, LMI tracts received a much smaller portion of single family prime loans (46.5 percent) than their portion of owner-occupied housing units (68 percent) (see Table 3d, Chart 5, Maps 2 and 4). The percent of subprime loans (60.8 percent) is closer to the percent of owner-occupied housing units in LMI tracts. In the suburbs, residents of LMI tracts received 2.9 percent of prime single family loans and 7.7 percent of subprime loans (see Table 4c and Chart 5). The portion of prime loans is considerably smaller than the portion of owner-occupied housing units in suburban LMI tracts while the portion of subprime loans is similar to the portion of owner-occupied housing units.

Subprime lenders claimed a market share of 15.4 percent of all loans in LMI urban tracts while they had a market share of just 9.3 percent in MUI tracts (see Table 3d and Chart 5). Residents of LMI urban tracts were 1.67 times more likely to receive subprime loans than residents of MUI tracts. This likelihood of receiving subprime loans is lower than the likelihood (of 2.07) in substantially minority tracts versus non-minority tracts. In the suburbs, subprime lenders issued 15.9 percent of all loans in LMI tracts but just 6.4 percent in MUI tracts (see Table 4d). Residents of LMI suburban tracts are 2.48 times more likely to receive subprime loans than residents of MUI tracts. Again, residents of substantially minority suburban tracts are more likely relative than residents of non-minority tracts to receive subprime loans than residents of LMI tracts relative to MUI tracts.

Residents of urban LMI tracts are rejected for loans 31 percent of the time by prime lenders while residents of MUI tracts are declined 14.7 percent of the time (see Table 3d and Chart 5). LMI tract inhabitants are 2.1 times more likely to be rejected than those of MUI tracts. The subprime denial disparity ratio is lower at 1.17, but the rates of rejection are higher (48.6 percent of LMI tract residents are rejected versus 41.5 percent of MUI residents). Likewise, in the suburbs LMI tract residents are 2.44 times more likely to be denied prime loans than MUI residents and are 1.36 times more likely to be denied subprime loans than MUI residents (see Table 4).

Single Family Lending by Gender

In both the City and suburbs, males fare slightly better than females but joint applications submitted by males and females together fare the best. Joint applicants are the least likely to receive subprime loans and have the lowest denial rates. In the City, males received 30.7 percent of prime loans and 34.7 percent of subprime loans (see Table 3e and Chart 6). Women received a higher percent of subprime loans (40 percent) relative to prime loans (31.4 percent) than males. Joint applicants, in contrast, received a considerably lower percentage of subprime loans (25.3 percent) than prime loans (37.8 percent). In the suburbs, the trends are similar with both female and male borrowers

⁴ One reason for the much higher percentages of owner-occupied housing units in LMI tracts in the City relative to the suburbs is that the CRA definition of LMI are incomes up to 80 percent of the metropolitan area median income. Due to lower absolute income levels in the City, more census tracts have median incomes that are 80 percent or lower than the metropolitan area income.

receiving a higher portion of subprime than prime loans but joint applicants receiving a higher portion of prime than subprime loans (see Table 4e).

In the City and the suburbs, subprime market share of loans made to males and females are very similar, but the subprime market share to joint applicants is lower. For instance, subprime lenders made 12.7 percent of all single family loans to urban males, 14.1 percent of loans to urban females, but just 7.9 percent to joint applicants. Similarly, joint applicants fare the best when considering denial rates. In the city, males, females, and joint applicants are denied prime loans 23.3 percent, 26 percent, and 15.5 percent of the time, respectively (see Table 3c). Interestingly, males do not generally have better lending outcomes than women in the Philadelphia area when considering prime and subprime lending trends. The clear advantage accrues to male and female applicants when they apply together and combine income and assets.

Lending Trends to Non-Occupant Investors as Compared to Owner-Occupants in the City of Philadelphia

Several articles have commented recently about the increase in lending to investors who do not occupy the homes they purchase. The commentaries remark about how the record low interest rates, the rapid appreciation of housing values, and a myriad of new underwriting flexibilities has stimulated a surge of lending to investors. Across the nation, 8.1 percent of single family loans during 2003 were issued to investors that did not reside in the homes for which they received loans.

In the City and County of Philadelphia, the portion of loans made to investor non-occupants was somewhat higher than for the nation, as a whole. According to the 2003 data on all single family lending (home purchase, refinance, and home improvement), 11.8 percent of the loans in the City were issued to non-occupant investors (see Table 6). Likewise, 11.4 percent of the prime loans were issued to non-occupant investors and a slightly higher portion (14.7 percent) of subprime loans were issued to non-occupant investors.

Subprime lenders have a higher market share to non-occupant investors than owner-occupants. In the City, subprime lenders made 12.2 percent of the loans to borrowers that reside in their homes while they made 15.8 percent of the single family loans to investor non-occupants. It is possible that a higher portion of investor non-occupants are taking riskier and higher priced loans than owner-occupants.

Financial institutions make a greater percentage of prime and subprime loans to middle- and upper-income (MUI) investor non-occupants for homes in low- and moderate-income (LMI) and minority neighborhoods. In 2003, prime lenders issued 51.3 percent and 48.7 percent of their single family loans to LMI and MUI owner-occupants, respectively. In contrast, prime lenders made 24.6 percent and 75.4 percent of their non-occupant loans to LMI and MUI non-occupant investors, respectively (see Table 5c). The same trend holds true for subprime lenders making a much greater percentage of their loans to MUI investors relative to MUI owner-occupants.

In contrast to the trends for borrowers, lending institutions issued a larger percentage of their loans to non-occupant investors in LMI neighborhoods. Prime lenders made 67.6 percent of their loans to non-occupant investors for homes in LMI neighborhoods but just 46.5 percent of their loans to owner-occupants in LMI neighborhoods. Likewise, subprime lenders made 80.8 percent of their single family loans to investor non-occupants in LMI neighborhoods but just 60.8 percent of their loans to owner-occupants in LMI neighborhoods (see Tables 5c and 3c). Similarly, prime lenders made 41.4 percent of their loans to investors holding property in substantially minority census tracts and 25.3 percent of the loans to owner-occupants for homes in substantially minority census tracts.

Lending institutions made a greater portion of their loans to non-occupant male investors than female investors. During 2003, prime lenders issued 49.8 percent of their loans for non-occupant investors to males, 17.9 percent to females, and 32.3 percent to joint applicants (males and females applying jointly for loans) (see Table 5e). In contrast, prime lenders issued 30.7 percent of their loans for owner-occupants to males, 31.4 percent to females, and 37.8 to joint applicants (see Table 3e).

The disparity in subprime market shares tends to be higher for owner-occupied lending, but not by large margins. For example, subprime lenders made 19.5 percent of all the loans in substantially minority neighborhoods and 9.4 percent of the loans to owner-occupants in non-minority census tracts (see Tables 3b and 5b). This is a market share disparity of 2.07, meaning that owner-occupants in minority neighborhoods are 2.07 times more likely to receive subprime loans than owner-occupants in non-minority neighborhoods. Subprime lenders made 20.3 percent of the loans to non-occupant investors in minority neighborhoods and 12.3 percent of the loans to non-occupant investors in non-minority neighborhoods. Investors holding property in minority neighborhoods were 1.64 times more likely to receive a subprime loan than investors in non-minority neighborhoods.

While the disparity subprime market share tends to be higher to owner-occupants than investors, the most significant difference in lending patterns is the propensity of both prime and subprime lenders to offer greater percentages of their loans to MUI investors holding property in LMI and minority neighborhoods than LMI investors. The larger amount of owner-occupied lending (52,591 loans) than lending to non-occupant investors (7,040) suggests that lending to non-occupant investors will not be approaching the majority of loans overall in the City or to specific neighborhoods in the near future. Nevertheless, stakeholders should assess if it is worthwhile to pursue more investor opportunities for LMI borrowers. Likewise, stakeholders should investigate the impacts of lending to investors in LMI and minority neighborhoods on the quality of the housing stock, and determine if steps should be taken to increase the amount and percentage of owner-occupied lending to these neighborhoods.

Aggregate Prime and Subprime Home Lending in Philadelphia

Before analyzing home purchase, refinance, and home improvement lending separately, it is useful to review the demographic profile of the City of Philadelphia. Demographic profiles provide important context for lending analyses.

Demographics

By Household Race

More than 56% percent of households in Philadelphia are minority households. African-American households represent 40.6% of all households, Hispanic households account for 6.5%, and Asian/Pacific Islander households make up 3.5%. White households represent 43.4% of all households (see Table1).

By Household Income

Low-income households make up the largest segment of the city's population, at 38.8% of all households. Moderate-income and middle-income households account for 18.5% and 17.4%, respectively. Upper-income households represent 25.3% of all households. Together, the percentage of households that are low- and moderate-income (LMI) is 57.4%. Middle- and upper income (MUI) households make up a combined 42.6% of all households. This report uses CRA definitions of income level, meaning that income level of households are in reference to median income levels for the Philadelphia metropolitan statistical area (MSA). Low- and moderate-income households are those with incomes of up to 80% of the MSA median income (see Table1).

By Tract Minority Level

The stock of owner-occupied units in Philadelphia is evenly split between substantially minority census tracts (greater than 50% minority population) and not-substantially minority census tracts (less than 50% minority population). Minority tracts contain 49% of owner-occupied units, and non-minority tracts have 51% (see Table1).

By Tract Income Level

A majority (68.4%) of owner-occupied housing units are located in low- and moderate income (LMI) census tracts. Twenty-five percent of units are in low-income tracts, and 43.3% are in moderate income tracts. About 32% of owner-occupied units are in middle- and upper-income tracts. 27.6% are in middle-income census tracts, and only 4% are located in upper income tracts (see Table1).

Home Purchase Lending

There were 14,504 home purchase loans originated in Philadelphia in 2003, out of 21,356 applications submitted. The great majority of the home purchase lending was prime; 13,253 loans were prime loans and 1,251 were subprime. Nevertheless, disparities by race and income emerge (see Table 7a).

Comparison of Philadelphia Demographics and Home Purchase Lending

By Race of Borrower (see Table 7a and Chart 8)

White borrowers received a higher proportion of prime home purchase loans than their household share of the population (54.4% of prime loans vs. 43.4% of households). Subprime lenders made 48.8% of home purchase loans to white borrowers.

Hispanic borrowers received a higher share of prime home purchase loans than the percentage of households they represent in the city (8.9% of prime loans vs. 6.5% of the population). Hispanic borrowers received 6.9% of subprime home purchase loans.

Asian borrowers received a higher share of prime home purchase loans than the portion of households they represent (11% of prime loans vs. 3.5% of households). Asian borrowers received 6.3% of subprime home purchase loans.

African-American borrowers received a substantially lower percentage of prime home purchase loans than their share of total households (23.4% of prime loans vs. 40.7% of households). However, subprime lenders made nearly 35% of their home purchase loans to African-American borrowers. Subprime lenders issued a portion of their home purchase loans that is 1.48 times greater than the portion of prime loans made to African-Americans (35% divided by 23.4% of prime loans).

By Income of Borrower (see Table 7c and Chart 9)

Low- to moderate-income (LMI) borrowers received 64.3% of prime home purchase loans, and 69.5% of subprime home purchase loans during 2003. Both these figures are higher than the percentage of LMI households in the city, which is 57.4%.

Middle- to upper-income (MUI) borrowers received 35.7% of prime home purchase loans and 30.5% of subprime loans. MUI households make up 42.6% of households in Philadelphia.

By Tract Minority Level (see Table 7b)

Prime lenders made 27.4% of their home purchase loans in substantially minority census tracts. For comparison, nearly half (49%) of the county's owner occupied housing units are in minority tracts. Subprime lenders originated almost 40% of their home purchase loans in minority tracts. The proportion of subprime loans in substantially minority tracts is nearly 1.5 times the proportion of prime loans in substantially minority tracts (39.7% divided by 27.4%).

By Tract Income Level (see Table 7d)

About 56% of prime home purchase loans and 64.3% of subprime home purchase loans were made in low- to moderate-income (LMI) census tracts. About 68% of owner occupied housing units are found in LMI tracts.

In middle- to upper-income (MUI) tracts, prime lenders made 43.5% of their home purchase loans, and subprime lenders made 35.7% of their home purchase loans. MUI tracts contain 31.7% of owner occupied units.

Market Share Analysis of Home Purchase Lending

Market share analysis compares the share of loans made by prime and subprime lenders to different categories of borrowers. Disparities occur when subprime lenders issue a higher share or percent of home purchase loans to minorities and/or other protected classes than to whites and/or other unprotected classes. When disparities occur, the frequency or likelihood of receiving subprime loans increases for protected classes relative to unprotected classes.

By Race of Borrower (see Table 7a and Chart 8)

Of all home purchase loans to white borrowers in 2003, 93.1% were prime loans and 6.9% were subprime. For African-American borrowers, 89% of home purchase loans were prime loans, and 11% were subprime. Therefore, the ratio of the subprime market share of African-Americans to the subprime market share of whites would equal 1.58. This means that African-American borrowers received subprime loans more than one and a half time as frequently as white borrowers.

By Tract Minority Level (see Table 7b)

Of the home purchase loans to borrowers in substantially minority census tracts, 87.9% were prime loans and 12.1% were subprime during 2003. In non-substantially minority census tracts, 92.7% of home purchase loans received were prime loans and 7.3% were subprime. Therefore, the resulting subprime market share ratio shows that borrowers in minority tracts received subprime loans more than 1.6 times as frequently as borrowers in non-minority tracts.

By Income of Borrower (see Table 7c and Chart 9)

Of all home purchase loans to low- and moderate-income (LMI) borrowers, 90.8% were prime loans and 9.2% were subprime. For middle- and upper-income (MUI) borrowers, 92.5% of home purchase loans were prime loans and 7.5% were subprime. LMI borrowers received subprime loans 1.24 times as frequently as MUI borrowers.

By Tract Income Level (see Table 7d)

Of all home purchase loans made in LMI census tracts, 90.3% were prime loans and 9.7% were subprime. In MUI tracts, 92.8% were prime loans and 7.2% were subprime. The resulting subprime market share ratio shows that subprime loans occur 1.35 times more frequently in LMI tracts than MUI tracts.

By Gender (see Table 7e)

Of all home purchase loans made to male borrowers and of all loans made to female borrowers, about 90% were prime loans and 10% were subprime. For borrowers applying jointly, 95.4% of home purchase loans were prime loans and 4.6% were

subprime. Male or female borrowers were 2.15 times more likely than joint-applicant borrowers to receive a subprime loan.

Denial Disparities in Home Purchase Lending

In 2003, there were 18,095 applications for prime home purchase loans and 1,984 of these applications (11%) were denied. For subprime home purchase loans, there were 3,261 applications, of which 919 (28.2%) were denied.

By Race of Applicant (see Table 7a and Chart 8)

African-American applicants were denied prime home purchase loans 16.1% of the time and 32.1% of subprime applications were denied. Hispanic applicants were denied home purchase loans in 10.1% of prime applications and 25.3% of subprime applications. White applicants were denied 7% of the time for prime home purchase loans and 23% of the time for subprime loans.

A comparison of the rates of denial shows that African-American applicants were denied prime home purchase loans 2.3 times more frequently than whites (16.1% denial rate for African-Americans divided by a 7% denial rate for whites). African-Americans were denied subprime loans 1.4 times more often than whites. Additionally, Hispanics were denied prime home purchase loans 1.44 times more frequently than white applicants. Asian applicants were denied prime home purchase loans 1.32 times more often than whites.

By Tract Minority Level (see Table 7c)

Applications for prime home purchase loans in substantially minority census tracts were denied 17.3% of the time. Subprime applications were denied 32.9% of the time. Applications for prime home purchase loans from tracts that are not substantially minority census tracts had a denial rate of 8.1%. Subprime home purchase applications from non-minority tracts were denied 23.8% of the time.

Applications for prime home purchase loans in substantially minority census tracts were denied 2.13 times more frequently than application for loans in non-minority tracts. For subprime loans, applications in substantially minority tracts were denied 1.38 times more often than applications from non-minority tracts.

By Income of Borrower (see Table 7c and Chart 9)

Low- to moderate-income applicants were denied prime home purchase loans 12.3% of the time. Subprime applications from LMI applicants were denied at a rate of 29.8%. Middle- to upper-income applicants were denied prime home purchase loans in 8% of applications and were denied subprime loans 25.2% of the time.

LMI applicants were denied prime home purchase loans 1.54 times more frequently than MUI applicants. In the case of subprime loans, LMI applicants were denied loans 1.18 times more often than MUI applicants.

By Tract Income Level (see Table 7d)

Applications for prime home purchase loans from low- to moderate income tracts were denied 13.4% of the time. For subprime applications, applications from LMI tracts were denied 30.3% of the time. Prime applications from middle- to upper-income census tracts were denied at a rate of 7.4%. For subprime loans, MUI tracts had a rate of denial of 23.7% of applications.

Applications from LMI tracts were denied for prime home purchase loans 1.82 times more frequently than application in MUI tracts. For subprime loans, LMI tract applications were denied 1.28 times more often than in MUI tracts.

By Gender (see Table 7e)

Denial rates were similar for males and females applicants, with prime home purchase applications showing a denial rate of 11.1%. For subprime loans, male and female applicants were each denied 27.9% of the time. Joint applicants were denied prime home purchase loans and subprime home purchase loans 6.9% and 25.8% of the time, respectively.

Female applicants and male applicants were both denied prime home purchase loans 1.6 times more frequently than joint applicants. For subprime loans there was little disparity in denial rates between male, female, and joint applicants.

Refinance Lending in the City of Philadelphia

There were 32,576 refinance loans originated in Philadelphia in 2003, out of 75,059 applications submitted.

Comparison of Philadelphia Demographics and Refinance Lending

By Race of Borrower (see Table 8a and Chart 10)

White borrowers received a percentage of prime refinance loans that is greater than their share of the population in the county (73.4% of prime refinance loans vs. 43.4% of households). In the subprime market, white borrowers received 53.1% of refinance loans.

Hispanic borrowers received four percent of prime refinance loans, whereas they make up 6.5% of households. Hispanic borrowers received five percent of subprime refinance loans.

Asian borrowers received 3.6% of prime refinance loans and 2.0% of subprime refinance loans. Asian households represent 3.5% of households in Philadelphia County.

African-American borrowers received a substantially lower proportion of prime refinance loans than their share of the population. Sixteen percent of prime refinance loans originated went to African-Americans, whereas African-Americans account for 40.7% of households in the county. African-Americans received 34.3% of subprime refinance

loans. The proportion of all subprime refinance loans received by African-American borrowers is nearly 2.1 times greater than the percentage of prime refinance loans received by African-Americans (34.3% divided by 16.4%).

By Income of Borrower (see Table 8c and Chart 11)

Low- to moderate-income (LMI) borrowers received 44.3% of prime refinance loans, while LMI households make up 57.4% of all households in the county. LMI borrowers received 62% of subprime refinance loans. The proportion of subprime refinance loans received by LMI borrowers is 1.4 times greater than the proportion of prime refinance loans granted (62% divided by 44.3%).

Middle- to upper-income (MUI) borrowers were the recipients of 55.7% of prime refinance loans and 38% of subprime refinance loans. MUI households account for 42.6% of all households.

By Tract Minority Level (see Table 8b)

The percentage of prime refinance loans in substantially minority tracts is far below the percentage of the owner occupied housing stock found in such areas. About 24% of prime refinance loans were in substantially minority census tracts, whereas 49% of owner occupied housing units in Philadelphia County are located in minority census tracts. In contrast, 43.8% of subprime refinance loans were originated in minority tracts. The proportion of subprime refinance loans originated in substantially minority tracts is 1.86 times greater than the percentage of prime loans originated in minority tracts (43.8% divided by 24%).

Approximately 77% of prime refinance loans and 56.2% of subprime refinance loans were originated in non-substantially minority census tracts. Fifty one percent of owner occupied housing units are located in non-minority tracts.

By Tract Income Level (see Table 8c)

More than 40% of prime refinance loans were originated in low- to moderate-income (LMI) census tracts, while 58.8% of subprime refinance loans were originated in LMI tracts. In Philadelphia County, 68.3% of owner-occupied housing units are found in LMI census tracts.

In middle- to upper-income (MUI) census tracts, 59.4% of prime refinance loans and 41.2% of subprime refinance loans were originated. In comparison, 31.7% of owner occupied housing units are located in MUI census tracts.

Market Share Analysis of Refinance Lending in Philadelphia

By Race of Borrower (see Table 8a and Chart 10)

Of all refinance loans to African-American borrowers, 78% were prime loans and 22% were subprime. For Hispanic borrowers, the prime/subprime break down is 85.4% to 14.6%. Asian borrowers received 93.1% prime refinance loans and 6.9% subprime loans. White borrowers received 91.1% prime refinance loans and 8.9% subprime loans.

Minority borrowers received subprime loans 2.2 times more frequently than white borrowers (19.2% of refinance loans for minorities that were subprime divided by 8.9% of the refinance loans for whites that were subprime). This disparity is even greater for African-American borrowers, which received subprime loans nearly 2.5 times as often as whites. Hispanics borrowers received subprime loans 1.6 times more often than whites. Asian borrowers received subprime loans 0.78 times less often than white borrowers.

By Tract Minority Level (see Table 8b)

Nearly 76% of refinance loans in substantially minority census tracts were prime loans and 24.2% were subprime. In non-substantially minority tracts, the break down of refinance lending is 88.8% prime loans and 11.2% subprime. Borrowers in minority census tracts receive subprime refinance loans nearly 2.2 times as frequently as borrowers in non-minority tracts.

By Income of Borrower (see Table 8c and Chart 11)

Of all refinance loans to low- to moderate-income (LMI) borrowers, 80.4% were prime loans and 19.6% were subprime. For middle- to upper-income (MUI) borrowers, 89.4% were prime loans and 10.6% were subprime. The percentage of subprime refinance loans to LMI borrowers subprime is 1.85 times greater than the percentage of subprime loans to MUI borrowers.

By Tract Income Level (see Table 8d)

About 80% of refinance loans in low- to moderate-income (LMI) census tracts were prime loans and 19.9% were subprime loans. In middle- to upper-income tracts, the percentage of prime refinance loans is 89.4% and subprime loans account for 10.6%. Borrowers in LMI census tracts were nearly 1.9 times more likely to receive subprime loans than borrowers in MUI tracts.

By Gender (see Table 8e)

Of all refinance loans to male borrowers, 84.5% were prime loans and 15.5% were subprime. For female borrowers, the break down is 83% prime loans and 17% subprime. Borrowers applying jointly for refinancing received prime loans 90.5% of the time and subprime loans 9.5% of the time. Compared to joint borrowers, female applicants receive subprime refinance loans 1.8 times as frequently.

Denial Disparities in Refinance Lending in the City of Philadelphia

In 2003, there were 46,856 applications for prime refinance loans, of which 10,432 (22.3%) were denied. For subprime refinance loans there were 28,203 applications, of which 13,349 (47.3%) were denied.

By Race of Applicant (see Table 8a and Chart 10)

African-American applicants were denied refinance loans 37.3% of the time by prime lenders and 52% of the time by subprime lenders. Hispanic applicants were denied refinance loans for 33.5% of applications by prime lenders and for 48% of application by

subprime lenders. Asian applicants were denied by prime lenders 23.7% of the time and by subprime lenders 49.2% of the time. White applicants were denied on 13.7% of applications to prime lenders and were denied on 41.6% of applications to subprime lenders.

There is a large disparity between the denial rates of white and minority applicants, especially in the prime market. Minority applicants are denied at a rate 2.5 times greater than white applicants (minority prime denial rate of 28.7% divided by white denial rate of 13.7%). Specifically, African-American applicants faced prime denial rates 2.7 times greater than whites. Hispanic applicants are denied 2.44 times more frequently than whites. Asians are more than 1.7 times more likely to be denied than white applicants.

By Tract Minority Level (see Table 8b)

Applicants in substantially minority census tracts were denied refinance loans 35.7% of the time by prime lenders and 51.1% of the time by subprime lenders. Sixteen percent of applicants in non-substantially minority census tracts were denied by prime lenders and 43.3% were denied by subprime lenders.

Applicants in minority tracts were denied prime refinance loans 2.2 times more frequently than applicants in non-minority tracts. For subprime loans, the disparity is smaller, with minority tract applicants denied 1.2 times more often than applicants in non-minority tracts.

By Income of Applicant (see Table 8c and Chart 11)

Low- to moderate-income (LMI) applicants were denied prime refinance loans at a rate of 31.4%. LMI applicants were denied subprime refinance loans 50% of the time. Middle- to upper-income (MUI) borrowers were denied prime refinance loans 16.1% of the time and were denied subprime loans 42.9% of the time.

LMI applicants were denied refinance loans nearly twice as often as MUI applicants for prime loans and 1.17 times as often for subprime loans.

By Tract Income Level (see Table 8d)

Applicants in low- to moderate-income (LMI) census tracts were denied refinance loans at a rate of 30.7% by prime lenders and 49.4% by subprime lenders. Applicants in middle- to upper-income (MUI) tracts were denied 14.4% of the time by prime lenders and 43.0% of the time by subprime lenders.

Applicants in LMI tracts were more than 2.1 times more likely to be denied prime refinance loans than applicants in MUI census tracts. In the case of subprime refinance loans, applicants in LMI tracts were denied 1.15 times more often than in MUI tracts.

By Gender (see Table 8e)

Denial rates for applicants seeking subprime loans were nearly identical for male, female, and joint applicants (49.0%, 49.8%, 48.1% respectively). For prime refinance loans,

male applicants were denied 22.6% of the time and females were denied 24.2% of the time. Applicants applying jointly were denied 15.6% of the time by prime lenders.

Female applicants were denied prime refinance loans nearly 1.6 times more often than joint applicants. Male applicants were denied prime refinance loans 1.45 times more frequently than joint applicants.

Home Improvement Lending in the City of Philadelphia

There were 5,511 home improvement loans originated in Philadelphia County in 2003, out of 15,599 applications submitted. More than 5,000 of these loans were prime loans and 423 were subprime. Home improvement loans were denied at a higher rate than either home purchase or refinance loans, with more than 47% of all applications denied.

In the prime home improvement lending market, there appears to be large disparities between white and minority borrowers. African-American borrowers were the recipients of 22.3% of prime home improvement loans, but make up 40.7% of total households. White borrowers received 67% of prime home improvement lending, while white households account for 44% of the households in the City (see Table 9a and Chart 12).

Substantially minority census tracts have a lower percentage of home improvement loans originated than their share of the housing stock. Minority census tracts hold 49% of the owner occupied housing units in the City, but only 30.2% of prime home improvement loans were made in minority tracts (see Table 9b). Nearly 70% of prime home improvement loans were made in non-minority tracts. Non-substantially minority tracts account for 51% of the owner occupied housing stock.

The subprime segment of the home improvement market accounted for just 7.3% of all home improvement loans. Of all home improvement loans to African-American borrowers, 18.6% were subprime loans (see Table 9a and Chart 12). Of home improvement loans to white borrowers, 2.9% were subprime loans. The subprime market share of blacks was nearly 6.4 times greater than the white subprime market share.

Ranking of Banks Receiving City Deposits on Home Loans

Introduction

The City of Philadelphia asked NCRC to provide a comprehensive analysis and comparison of the CRA and fair lending performance of lending institutions receiving City deposits. The seven institutions receiving City deposits include Fleet/Bank of America, Wachovia, PNC, Citizens, Commerce, Mellon, and United Bank of Philadelphia (see Table 16 and methodology section regarding affiliates used for the analysis). For this analysis, NCRC ranked institutions on 17 measures of lending performance including percent of loans to various groups of borrowers, denial disparity ratios, and ratios of market shares to different groups of borrowers and communities. A complete description of the indicators is contained in the methodology section of the

report. NCRC did not rank United Bank of Philadelphia or Mellon against the other lenders due to the low number of loans for these institutions in 2003 (see Table 15). However, United Bank's and Mellon's performance on the indicators is displayed in the tables accompanying the report. In addition, Bank of America is excluded from the home improvement ranking because it made only one home improvement loan during 2003.

The ranking analysis is conducted for all single family lending considered together, and for home purchase, refinance, and home improvement lending separately. The analysis is conducted for prime affiliates of the lending institutions receiving City deposits. For the year 2003, NCRC found only one affiliate of a lender identified by the Department of Housing and Urban Development as a subprime specialist; lending amounts of this affiliate in the City were incidental. Fleet and Bank of America were included as separate institutions in 2003 since they merged in 2004.

Lenders receiving the lowest score overall performed better on our analysis. A score of "1" means the lending institution performed best on an indicator of performance such as percent of loans to minorities. A score of "6" means the institution performed the worst on an indicator or came in "last" place on an indicator. Therefore, the worst possible score is 102 (or 17 indicators multiplied by 6, which is the worst score on an indicator). The best possible score is 17 (or 17 indicators multiplied by 1, which is the best score on an indicator).

All Single Family Lending

The overall ranks for all prime single family lending in order from top to bottom is:

Fleet
Wachovia
PNC
Citizens Bank
Bank of America
Commerce Bank

All of the lenders made more than 500 single family loans in the City during 2003, except for Bank of America, which made 245 loans (see Table 10). Fleet and PNC made more than 1,000 loans each, and Wachovia and Citizens made more than 2,000 loans each. Combined, the banks receiving City deposits made 9,122 single family loans in the City during 2003 or 19.8 percent of all loans made in the City. The considerable lending volumes of these banks are commendable. Their significant market share provides the potential for the City to influence overall access to credit for traditionally underserved borrowers. If the City and these lenders can work together to increase the portion of loans banks receiving City deposits issue to traditionally underserved borrowers, it may also be possible to increase lending to underserved borrowers by other major lenders in the City. In other words, the City and the banks receiving City deposits have the potential to act as leaders of the market, directing the entire market to make more safe and sound loans to traditionally underserved populations.

The inverse performances of Fleet and Bank of America (1st and 5th in the rankings) are a significant issue for the City and stakeholders. Will Bank of America make a commitment to maintain Fleet's significant lending volumes in the City and relative success in serving traditionally underserved borrowers?

Single Family Lending to Minorities (see Table 10, Chart 13 and Maps 5, 7, 9, 11, 13, and 15)

Wachovia performed the best on the indicator of lending to all minorities, issuing 47.6 percent of its single family loans to minorities in the City during 2003. While this is a lower percent than the portion of City households that are minority (56.6 percent) it is significantly higher than the percent of loans (33.1 percent) made by all prime lenders, as a group, to minorities. Likewise, PNC made a commendable 45.3 percent of its loans to minorities. On the other end of performance on this indicator, Commerce Bank and Bank of American issued just 25 percent and 22.4 percent of their loans, respectively, to minorities.

PNC and Wachovia performed the best regarding the portion of their loans to African-Americans. Both lenders issued about 29 percent of their prime loans during 2003 to African-Americans. Just like lending to all minorities, none of the lenders made a percent of loans that was commensurate with the portion of African-Americans in the City (40.7 percent of the City's households are African-American). Four of the six lenders receiving the City's deposits issued a percentage of loans to African-Americans greater than all prime lenders, as a group. All prime lenders, as a group, made 19.2 percent of their loans to African-Americans. Only Commerce Bank and Bank of America issued a lower percentage of their loans to African-Americans than all lenders, as a group.

Lenders receiving City deposits and all lenders doing business in the City of Philadelphia were more successful in reaching Hispanics than African-Americans. Hispanics constituted 6.5 percent of the City's households and all lenders, as a group, made 5.6 percent of their loans to Hispanics. Wachovia (11.5 percent of their loans to Hispanics) and Fleet Bank (8.8 percent) issued a percent of their single family prime loans to Hispanics that was greater than the percent of Hispanics in the City's population. PNC and Citizens both made about 6 percent of their loans to Hispanics, which is commensurate with the Hispanic share of the City's households. Commerce and Bank of America, in contrast, issued a percent of their loans that was smaller than the percent of loans made by all lenders doing business in the City and the percent of the City's households that were Hispanic.

Banks receiving City deposits were about as successful in making loans in proportion to the Asian as the Hispanic population. Asians comprised 3.5 percent of the City's households. All prime lenders, as a group, made 5.9 percent of their loans to Asians. Likewise, Fleet (at 6.4 percent) made a percent of loans that exceeded the Asian share of the City's households, but Fleet was the only bank receiving deposits from the City to

exceed the all lender benchmark of 5.9 percent. All of other banks receiving deposits from the City, with the exception of Wachovia, issued a percent of loans commensurate with the Asian share of the City's households.

Another measure of performance in reaching minority borrowers is comparing a lender's market share to minority borrowers versus its market share to White borrowers. The top performer in this regard is Wachovia, whose share of all loans made to minorities is 1.83 times greater than its share of all single family loans issued to whites. Similarly, PNC's and Fleet's market share to minority borrowers were 1.67 and 1.42 times greater than their market share to white borrowers, respectively. On the other end of the scale in this performance measure, Commerce Bank's market share of all minority loans issued in the City was only about two thirds of its market share of loans issued to Whites. Likewise, Bank of America's minority borrower market share was 0.58 times its White market share.

Single Family Lending to Low- and Moderate-Income Borrowers (see Table 10, Chart 13 and Maps 6, 8, 10, 12, 14 and 16)

Low- and moderate-income households were 57.4 percent of the City's households. Two of the lenders in the ranking analysis, Wachovia and Fleet made a portion of their single family loans (61 percent) during 2003 that exceeded the LMI household percent of the City's households. Two additional lenders receiving City deposits issued a percent of loans to LMI households that was greater than the percent of single family loans made by all lenders, as a group (of 51.3 percent). PNC and Citizens issued 54.1 percent and 52 percent of their single family loans, respectively, to LMI borrowers. On the other end of the scale, Commerce Bank and Bank of America made just 47.2 percent and 46.9 percent of their loans to LMI borrowers, respectively, during 2003.

On the LMI borrower market share indicator, Wachovia and Fleet were the top performers while Commerce and Citizens lagged their peers receiving City deposits. Wachovia's and Fleet's market share of all loans made to LMI borrowers were about 1.51 times their market share of loans made to middle- and upper-income (MUI) borrowers in the City. In contrast, Commerce Bank's and Bank of America's market shares to LMI borrowers were 85 percent and 84 percent, respectively, of their market share to MUI borrowers.

Single Family Lending to Females (see Table 10 and Chart 13)

All prime lenders, as a group, made 31.4 percent of their loans to females. All banks receiving City deposits exceed the all lender benchmark except Bank of America, which made 30.6 percent of its loans to females. The best performers were PNC (at 37 percent of its loans to females), Fleet (35.7 percent), and Citizens Bank (at 34.5 percent).

Single Family Lending to Minority and Low- and Moderate-Income Neighborhoods (see Table 10 and Chart 13)

Substantially minority census tracts contain 49 percent of the City's owner-occupied housing units. All prime lenders, as a group, do not come close to lending in proportion to the minority tract share of owner-occupied housing units. All prime lenders made just 25.3 percent of their loans in these tracts. Fortunately, four of the six lenders in the ranking analysis made a higher percent of their single family loans in minority tracts than all lenders, as a group. Leading the way were PNC and Wachovia that issued about 40 percent of their single family prime loans in minority neighborhoods. On the other end of scale of performance, Commerce and Bank of America made 22.4 percent and 15.5 percent of their loans in minority tracts in the City during 2003.

PNC and Wachovia also set the pace on the minority tract market share indicator. PNC's and Wachovia's market share of all loans issued in minority tracts were about twice as great as their market share of all loans made in non-minority tracts. In contrast, Commerce Bank's and Bank of America's share of loans in minority tracts was 85 percent and 54 percent of their share of loans in non-minority tracts, respectively.

More than two thirds of the owner-occupied housing units are in LMI census tracts (68.3 percent) but all prime lenders, as a group, issued just 46.5 percent of their single family loans in LMI tracts. Wachovia's, Fleet's, and PNC's share of loans in LMI tracts came the closest to the percent of owner-occupied units – these lenders issued 60.7 percent, 59 percent, and 57.3 percent of their single family loans in LMI tracts, respectively, during 2003. Five of the six lenders in the ranking analysis exceeded the all lender benchmark of 46.5 percent of loans in LMI tracts.

Wachovia, Fleet, and PNC had a market share of all loans in LMI tracts that was greater than 1.5 times their market share of all loans in MUI tracts. Only Bank of America had a market share in LMI tracts that was less than its market share in MUI tracts.

Denial Disparity Ratios (see Table 10 and Chart 13)

NCRC constructed five performance measures involving denial disparity ratios. A denial disparity ratio compares the white denial rate and denial rates of various minority groups. The five measures in this analysis include the disparity ratio of all minorities compared to whites, African-Americans compared to whites, Hispanics compared to whites, Asians compared to whites, and minority census tracts compared to white census tracts.

All prime lenders in the City and County of Philadelphia denied minorities 2.36 times more often than whites during 2003. All banks receiving city deposits had lower denial disparity ratios than all prime lenders, as a group. Bank of America and Fleet did the best on this indicator, denying minorities about 1.5 times as often as whites. PNC lagged the other banks in the ranking analysis, denying minorities twice as often as whites; but PNC was still better than all lenders, as a group, on this indicator.

Within minority groups, African-Americans experienced the highest denial rates relative to whites. African-Americans were denied single family loans 2.66 times more often than whites. In contrast, Hispanics and borrowers residing in minority neighborhoods were denied 2.23 times and 2.26 times as often as whites, respectively. Asians were the least likely to be denied relative to whites. Asians were denied 1.36 times as often as whites.

As with denial disparity ratios comparing all minorities versus whites, the banks receiving deposits from the City had narrower denial disparity ratios to African-Americans and whites than all lenders, as a group. Again, Bank of America and Fleet did the best on this indicator, denying African-Americans 1.57 and 1.67 times as often as whites, respectively. Commerce and PNC lagged the other lenders, denying African-Americans about twice as often as whites. The trend in comparing denial rates for Hispanics was similar to that for African-Americans in that banks receiving City deposits had narrower denial rates than all lenders doing business in the City of Philadelphia. In contrast, three banks receiving City deposits (Wachovia, PNC, and Commerce) had higher denial disparity ratios for Asians compared to whites than all lenders, as a group.

The banks receiving City deposits performed well when considering the denial rates for residents of minority neighborhoods compared to the denial rates for white neighborhoods during 2003. All prime lenders, as a group, denied residents from minority tracts 2.26 times more often than those from white census tracts. Bank of America, among the six lenders in the analysis, was in last place, but this bank's denial disparity ratio of 2.14 was still better than the all lender ratio. The two banks receiving City deposits at the top of the rankings were Fleet at 1.46 and Citizens at 1.58.

Summary

Compared to all lenders, as a group, banks receiving City deposits generally performed well on the CRA and fair lending indicators. For the vast majority of indicators, two thirds (four of the six) banks receiving City deposits performed better than all lenders, as a group, doing business in Philadelphia. On 11 indicators of performance comparing percent of loans to borrowers and denial ratios, four or more banks receiving City deposits exceeded the performance of all lenders, as a group. Interestingly, the two indicators on which three or fewer of the banks receiving City deposits performed better than all lenders were indicators measuring performance in serving Asians (percent of loans and denial disparity ratios). On the four indicators measuring the banks' market share of loans to traditionally underserved borrowers as compared to whites and affluent borrowers, four or more banks receiving City deposits exceeded the threshold performance levels. The threshold level was a ratio of one, meaning that the bank's market share of loans to the traditionally underserved borrower group was at least equal to its market share of loans to the white or affluent borrower group.

Banks receiving City deposits did not perform as well when comparing performance against the City's demographic profile than when comparing performance against all other prime lenders. The gaps between the percent of loans and the percent of the City's

households or owner occupied housing units were wide for the banks receiving City deposits and all lenders, as a group, for African-Americans, and for minority and low- and moderate-income neighborhoods.

Home Purchase, Refinance, and Home Improvement Lending Compared

Banks receiving deposits from the City performed best on home improvement lending, compared to home purchase and refinance lending. All lenders, including banks receiving City deposits, had the most difficulties with refinance lending in terms of offering a percentage of loans to groups of borrowers that was commensurate with their share of the City's population.

For both home purchase and refinance lending, more than half the banks receiving city deposits (four of the six lenders) exceeded the performance of all lenders, as a group, or had market share ratios exceeding minimal thresholds on 8 of 17 indicators of performance (see Table 14). In other words, more than half of the banks receiving City deposits performed better than all other prime lenders in the City on just 47 percent of the indicators. The banks receiving City deposits had the most difficult time with the four market share indicators. For both home purchase and refinance lending, more than half the banks receiving City deposits had a market share of loans to traditionally underserved borrowers exceeding their market share to white or affluent borrowers in just one of the four cases.

The performance of banks receiving City deposits is considerably better in home improvement lending when compared to other lenders than in home purchase and refinance lending. More than half the banks receiving City deposits exceeded the performance of all lenders, as a group, or had favorable performance on the market share indicators on 16 of the 17 indicators or 94.1 percent of the time. The only indicator for home improvement lending in which less than half of the banks receiving City deposits performed better than all lenders was percent of loans to Asians (see Table 13).

In terms of offering loans in proportion to the City's population of various borrower groups, banks receiving City deposits fared the worst in refinance lending. For example, 57.4 percent of the City's households were low- and moderate-income (LMI). All six banks receiving City deposits made greater than 57.4 percent of their home purchase loans to LMI borrowers. Fleet and Citizens made a very high 83.8 percent and 75.9 percent, respectively, of their loans to LMI borrowers. Likewise, three of the banks receiving City deposits made a higher percent of their home improvement loans to LMI borrowers than the portion of the City's households that are LMI. In contrast, just one of the banks receiving City deposits made a percentage of refinance loans (Wachovia at 59.9 percent) that equaled or exceeded the percent of the City's households that are LMI (see Table 12).

In the City, more than two thirds of the owner-occupied housing stock (68.3 percent) is in LMI census tracts. All lenders, as group, issued 56.5 percent, 52.2 percent, and only 40.6 percent of their home purchase, home improvement, and refinance loans, respectively, in

LMI tracts. The two banks receiving the best scores on the LMI tract indicator issued more than 70 percent of their home purchase loans to LMI tracts, more than 64 percent of their home improvement loans in LMI tracts, but just 53 of their refinance loans in these tracts.

Likewise, while African-Americans are 40.7 percent of the City's households, all lenders, as a group, issued between 22 to 23 percent of their home purchase and home improvement loans to African-Americans, but just 16.4 percent of their refinance loans to these households. The top two banks for home purchase lending on the African-American indicator were PNC and Fleet, making 38.8 and 32.7 percent, respectively to African-Americans. The top two banks for home improvement lending on the African-American indicator were Citizens and PNC, issuing 37.3 percent and 32 percent of their home improvement loans to African-Americans, respectively. In contrast, the top two lenders in refinance lending, Wachovia and PNC, issued just 31.5 percent and 27.1 percent of their refinance loans, respectively to African-Americans.

Lender performance in reaching the top rankings is often not consistent across the different types of loans. Fleet, for example, was the top lender on home purchase lending, the second ranked lender on refinance lending, but the fifth lender on home improvement lending. Similarly, Wachovia was the top lender for refinance and home improvement lending, but was the sixth ranked lender for home purchase lending.

Lenders are more consistent when it comes to scoring in the middle or bottom ranks. PNC, for example, is the second ranked lender for home purchase lending and the third ranked lender for refinance and home improvement lending. Citizens comes in third or fourth place, except for home improvement lending where it is second. Commerce and Bank of America generally occupy the bottom rankings (see Table 14).

Small Business Lending in Philadelphia

In the City

Disparities by Income Level of Neighborhood

In the case of low income census tracts, the percent of loans to small businesses was lower than the percent of small businesses which were located in those census tracts. The percent of all small business loans made in low income census tracts was 21.91%, whereas the percent of all small businesses in low income census tracts was 28.38% (In the analysis, loans in tracts with income levels unknown were excluded so that comparisons between the portion of loans and small businesses in tracts of different income levels could be made with more precision). Ideally these proportions would be more similar, with the percent of loans to these areas increasing to match the percent of businesses (see Table 17 and Chart 14).

For businesses with less than \$1 million dollars in revenues, this trend continued for low income census tracts as well as for moderate income census tracts. Approximately

19.94% of all loans to small businesses with \$1 million or less in revenues went to low – income census tracts, while 27.68% of these businesses were located in low-income tracts. For these “smaller” businesses in moderate income tracts the percentage of loans they received was 33.78% and the portion of businesses with revenues less than \$1 million they represented was 35.46% (see Table 17 and Chart 14).

Disparities by Minority Level of Neighborhood

The difference between the proportion of loans to all small businesses in minority (50% or more of the residents are minority) census tracts and the proportion of all small businesses in those tracts was even more pronounced than for low- and moderate-income (LMI) census tracts. The percent of all small businesses in minority tracts was 44.98%, while only 34.79% of all small business loans were made in minority tracts (see Table 18 and Chart 14). This is a difference of about 10 percentage points. This trend was greater for businesses with less than \$1 million in revenues. For these businesses in minority tracts the difference in proportion was a little greater than 12 percentage points (45.3 percent of businesses with revenues under \$1 million as opposed to 32.9 percent of the loans; see Table 18 and Chart 14).

Disparities by Revenue Size of Small Business

In the City of Philadelphia small businesses with revenues less than \$1 million made up 58.11% of all small businesses, yet they only received 32.25% of all small business loans (see Table 19 and Chart 15). Businesses this small are already at a disadvantage even without being located in a low income or minority neighborhood.⁵

In the Suburbs

Disparities by Income Level of Neighborhood

In LMI census tracts the proportion of all small businesses was again higher than the proportion of small business loans in these areas, although the difference was about 2 percentage points. This trend repeated for small businesses with less than \$1 million in revenues as well. One reason for the smaller disparity in the suburbs than the City is the relatively small portion of businesses in LMI tracts; only 8% of all suburban small businesses are in LMI tracts, while about 92% are in middle- and upper-income (MUI) tracts (see Table 17 and Chart 14).

⁵ The CRA regulations permit lenders not to report whether they made loans to small businesses with less than \$1 million in revenue if they did not consider revenue size of the small businesses in loan underwriting decisions. The data therefore includes loans in which the revenue size of the business is unknown. Despite this limitation, it is instructive to compare lenders on how well they are reaching businesses with revenues under \$1 million. This exercise will hopefully encourage all the banks receiving city deposits to report whether the revenue size of the small business is greater or less than \$1 million for all of their loans.

Disparities by Minority Level of Neighborhood

For all small businesses as well as small businesses with less than \$1 million in revenues in minority census tracts, the disparity was less than 2 percentage points. Using all small businesses for example, the percent of small businesses in minority tracts was 2.94%, while the percent of all small business loans to minority tracts was 1.74% (see Table 18 and Chart 14).

Disparities by Revenue Size of Small Business

In the suburbs of Philadelphia small businesses with less than \$1 million in revenues made up 61.40% of all the small businesses, but only received about 32% of all small business loans (see Table 18 and Chart 14). This disparity was even more pronounced than in the city of Philadelphia.

Comparing the City to the Suburbs

Disparities by Income Level of Neighborhood

The recurring trend in both suburban and urban Philadelphia was that the portion of small business loans in LMI areas was less than the portion of small businesses in LMI areas. This trend was more severe in the urban part of Philadelphia.

Disparities by Minority Level of Neighborhood

A disproportionately small amount of lending in minority census tracts was common in both the City and the suburbs of Philadelphia. However, this disparity was much more severe in the City of Philadelphia, which may be partly a result of a much larger portion of businesses located in the urban minority census tracts.

Ranking of Banks Receiving City Deposits on Small Business Lending

NCRC used five different performance measures regarding small business lending to rank seven banks. These banks were Bank of America, Fleet, Citizens, PNC, Commerce, Mellon and Wachovia. The seven banks were ranked for every criterion, and then an overall rank was created based on the sum of the five different rankings. See the Table immediately below.

Criteria	Bank of America	Fleet	Citizens	PNC	Commerce	Mellon	Wachovia
% of loans in LMI CT's	6	1	2	5	7	3	4
LMI/MUI Mkt Share Ratio	6	1	2	5	7	3	4
% of SB loans <\$100,000	1	2	4	3	7	6	5
% Loans to SB <\$1 mill rev	1	2	3	5	4	7	6
SB Loans/loans to biz<\$1 mill rev mkt sh ratio	1	2	3	5	4	7	6
Score	15	8	14	23	29	26	25
Overall Rank	3	1	2	4	7	6	5

The first criterion was the percent of each lender's total small business loans that went to small businesses in low-and moderate-income census tracts. For all lenders, the percent of all small business loans that went to small businesses in LMI tracts was about 57.53%, and just three of the lenders we analyzed made a greater portion of their loans to businesses in LMI tracts. Commerce Bank and Bank of America lagged in this criterion, with 42.91% and 47.5%, respectively, of their loans going to small businesses in LMI tracts. PNC, at 52.4%, was also behind the all lender benchmark. Fleet and Citizens Bank performed the best. Fleet made 66.56% of their loans in LMI census tracts, while Citizens made 60.55% of their loans in LMI tracts (see Table 20 and Chart 16).

The second criterion was the LMI/MUI market share ratio. This measures the ratio of the institution's share of all small business loans made in LMI census tracts divided by the institution's share of all small business loans made in MUI census tracts. If the ratio is greater than 1, the institution is making more of an effort to lend to businesses in LMI tracts than MUI tracts. If the ratio is less than 1, the institution is focusing its efforts more on businesses in MUI tracts than LMI tracts. Commerce Bank and Bank of America fell behind the pack on this criterion, with ratios of 0.55 and 0.67. The banks that performed the best on the LMI/MUI market share ratio were Fleet and Citizens bank. Fleet had a ratio of 1.47 and Citizens had a ratio of 1.13. In Fleet's case, the lender made 3.5% of all the small business loans in LMI tracts while it made 2.38% of all the loans in MUI tracts (see Table 20 and Chart 16). The market share ratio is therefore 3.5% divided by 2.38% or 1.47.

NCRC used the percent of all small business loans made by the institution which were less than \$100,000 in size as the third performance measure. Since these types of loans are often made to the smallest businesses, this performance measure was included as a means of testing an institution's record of reaching the smallest businesses.⁶ More than 92% of the loans issued by banks and thrifts in Philadelphia were in amounts of under \$100,000. Only 44.88% of Commerce's loans were for \$100,000 or less. Mellon was next with just 68.82% of its small business loans being \$100,000 or less. Lenders in the middle of the pack on this indicator were PNC at 81.5% and Citizens at 80.5%. Bank of America, followed by Fleet, excelled in making loans under \$100,000. For both institutions, nearly 100% of their small business loans were \$100,000 or less (see Table 20 and Chart 16).

The fourth criterion for the ranking analysis was the percent of a bank's small business loans that went to small businesses with less than \$1 million in revenues. In the City of Philadelphia, 58.11% of all small businesses have less than \$1 million in revenues. The percent of all small business loans that went to small businesses with less than \$1 million in revenues was 32.25% (see Table 19 and Chart 15). All but two of the seven banks receiving City deposits exceeded the percent of loans made by all lenders and the percent of the City's small businesses that have revenues less than \$1 million. The two which did not do this were Wachovia and Mellon Bank. Wachovia made only 16.14% of its small

⁶ CRA exams likewise use loans of \$100,000 or less as an indicator of a bank's record of serving the smallest businesses.

business loans to businesses with revenues less than \$1 million. Mellon Bank made zero out of its 93 loans to businesses with less than \$1 million in revenues. The top performing banks were Bank of America and Fleet Bank which made 78.75% and 60.86% of their loans to businesses with less than \$1 million in revenues, respectively (see Table 20 and Chart 16).

Similar to the LMI/MUI market share ratio, NCRC used a market share ratio comparing an institution's market share of loans to small businesses with revenues less than \$1 million to the institution's market share of loans to all small businesses. If this ratio is greater than 1, the institution is making more of an effort to lend to businesses with less than \$1 million in revenues than all types of small businesses. If the ratio is less than 1, the institution is focusing its efforts more on generally on all small businesses. Again, Wachovia and Mellon Bank lagged their peers on this indicator. Mellon, because it made no loans to small businesses with \$1 million in revenues or less, had a ratio of 0. Wachovia had a ratio of 0.50. The rest of their peers had ratios that were higher than 1.75. Bank of America and Fleet surpassed their peers with ratios of 2.44 and 1.89, respectively (see Table 20 and Chart 16).

Summary of Lender Rankings

In descending order of performance, NCRC ranks the banks receiving City deposits on five indicators of CRA performance:

Fleet
Citizens
Bank of America
PNC
Wachovia
Mellon
Commerce

United Bank of Philadelphia was not included in the analysis because they did not report CRA small business data.

Overall, the banks receiving City deposits did better relative to all lenders in home lending and lagged in small business lending. For small business lending just like home lending, NCRC calculated how many banks receiving City deposits exceeded their peers in the percent of loans to various categories of small businesses or how many banks had a market share ratios greater than one, indicating more of an effort to traditionally underserved small businesses. More than half of banks receiving City deposits exceeded the performance of all lenders or had market share ratios of greater than one on two of the five indicators of performance or just 40 percent of the time. For all single family home lending, more than half the banks receiving City deposits scored above threshold levels on the great majority of indicators.

While the small business ranking involved fewer indicators than home lending, the difference in performance between home and small business lending is still striking.⁷ For example, just three of the seven lenders performed better than threshold levels on the percent of small business loans in LMI tracts and on the LMI/MUI market share ratio measure. Only two of the banks receiving City deposits exceeded the percent of small business loans under \$100,000 made by all lenders (see Table 20 and Chart 16). The banks receiving City deposits did perform well on the two indicators measuring loans made to businesses with less than \$1 million in revenue. The challenge is to improve performance in reaching businesses in LMI tracts and offering loans of under \$100,000.

Branching Analysis

Branches in Minority Census Tracts

Using the FDIC database on branches, NCRC calculates that the banks receiving City deposits had a majority of the bank branches in the City as of year end 2003. The banks receiving City deposits had 182 branches or 56.7 percent of the 321 branches located in the City and County of Philadelphia (see Table 22 and Chart 17). Given their large market share of total city branches, it is encouraging that the banks receiving City deposits tend to place a higher portion of their branches than all other lenders in low- and moderate-income (LMI) and minority census tracts.

The total number of branches of each of the banks receiving City deposits ranges from 60 for Citizens Bank and 54 for Wachovia to 5 for United Bank of Philadelphia and 2 for Mellon Bank. PNC has 39 branches while Commerce and Fleet had 11 branches each (see Table 22 and Chart 17).

All banks and thrifts placed 22.4 percent of their branches in substantially minority census tracts (more than 50 percent of residents are minority). Four of the seven banks receiving City deposits had a higher percent of their branches in minority tracts. United Bank of Philadelphia located four of their branches or 80 percent of their branches in minority tracts. Wachovia, Citizens Bank, and PNC Bank each had significant numbers of overall branches and placed between 25 to 29 percent of their branches in minority census tracts. Commerce and Fleet each had just 11 branches in the City and Mellon had 2; none of these lenders located branches in substantially minority tracts (see Table 23 and Chart 17).

Banks overall did not place branches in minority census tracts in proportion to the presence of minority tracts in the City. About 52 percent of the City's census tracts were substantially minority and they contained 49 percent of the owner-occupied housing units. All lenders, as a group, located just 22.4 percent of their branches in these tracts. The difference between the portion of all lender branches and the portion of census tracts that are substantially minority was 29.8 percentage points (see Table 23 and Chart 17). Four of the banks receiving City deposits (United Bank of Philadelphia, Wachovia,

⁷ Fewer indicators of performance were used for small business lending because the CRA small business data is not as detailed as the HMDA data.

Citizens and PNC) exhibited narrower disparities in terms of percentage points in the portion of their branches in minority tracts and the portion of City tracts that were minority.

Branching in Low- and Moderate-Income Tracts

The majority of the banks receiving City deposits (four of the seven banks) had a higher percent of branches in low- and moderate-income (LMI) tracts than all banks and thrifts doing business in the City. Of the 321 total bank and thrift branches in the City as of year end 2003, 53.6 percent of them were in LMI tracts. United Bank of Philadelphia, Wachovia Bank, Citizens Bank, and Commerce Bank placed 60 percent, 59.3 percent, 56.7 percent, and 54.5 percent of their branches, respectively, in LMI tracts. PNC with 51.3 percent of its 39 branches in LMI tracts was just under the all lender benchmark (see Table 22 and Chart 17).

Banks did not place branches in proportion to the portion of census tracts that are LMI, but the majority of banks receiving City deposits were more successful than all lenders, as a group, in serving LMI neighborhoods. LMI census tracts constituted about 70.4 percent of the census tracts in the City and contained 68.3 percent of the owner-occupied housing units. All lenders, as a group, located about 53.6 percent of their branches in LMI tracts. The gap between the percent of branches and the percent of census tracts that were LMI was 16.9 percentage points. Four of the seven lenders receiving City deposits had a narrower gap. For example, Wachovia had 54 branches in the City, and the gap between the percent of its branches in LMI tracts and the portion of tracts that were LMI was just 11.2 percent. Likewise, the 60 branch Citizens Bank had a gap of just 13.8 percentage points. On the other end of the scale, Fleet had a gap of 34 percentage points, but Fleet had relatively few branches in the City (11 as of year end 2003; see Table 22 and Chart 17).

Summary of Performance

Overall, the majority of banks receiving City deposits located a higher percentage of their branches in LMI and minority census tracts than all banks and thrifts serving Philadelphia. The banks receiving City deposits that trailed the all lender benchmark were those that had relatively few branches in the City as of year end 2003. These banks included Commerce Bank and Fleet with 11 branches each, and Mellon with just 2 branches (see Table 22 and Chart 17). If these banks expand their branching network, they have opportunities to improve both their relative and absolute presence in minority and working class communities by locating branches in these communities.

There was also a rough correlation between the branching presence of banks receiving City deposits and their performance on CRA and fair lending indicators. In home lending, in particular, NCRC found that the majority of banks receiving City deposits performed better than all lenders, as a group, in reaching traditionally underserved borrowers and communities. Similarly, the majority of banks receiving City deposits had a larger branch presence (as a proportion of their total branch network) in low- and

moderate-income and minority neighborhoods. Branches appear to matter in lending to and serving minority and low- and moderate-income communities.

Neighborhood Analysis

In addition to evaluating lending in the City of Philadelphia, as a whole, NCRC analyzed lender performance and demographic data in specific neighborhoods within Philadelphia. Neighborhood boundaries were provided by the Philadelphia Association of Community Development Corporations and city agency information on Empowerment Zones. NCRC investigated home and small business lending patterns in these neighborhoods. Since small business lending data for individual lenders is not available on a census tract level from the Federal government, we were not able to review small business lending performance on a lender level in these neighborhoods.

These minority and low- and moderate-income neighborhoods are areas in which community development corporations (CDCs) and Empowerment Zones have been established in order to rebuild and revitalize that local community. These neighborhoods and the census tracts which comprise them are listed below:

- Association of Puerto Ricans on the March (APM) – 156
- Hispanic Association of Contractors & Enterprises (HACE) – 175, 176.01, 176.02, 195
- Allegheny West Foundation (AWF) – 170, 171, 172, 173
- Ogontz Avenue Revitalization Committee (OARC) – 262, 263.01, 263.02, 264, 265, 266, 267
- Project Home – 151, 152, 168, 169.01
- Peoples' Emergency Center (People's) – 90, 91, 108, 109
- American Street Empowerment Zone – 144, 156, 157, 162, 163
- North Central Empowerment Zone – 140, 141, 147, 148, 165
- West Philadelphia Empowerment Zone – 105, 111

Demographic Data

APM

The Association of Puerto Ricans on the March (APM), located in northeastern Philadelphia, is comprised of 76.5% Hispanic households and 13.9% African-American households. With a median income of 31.2% of MSA (metropolitan statistical area) median income⁸, APM is a low-income census tract and has 289 owner-occupied housing units. In 2003, there were 125 small businesses in the neighborhood, of which 57 were businesses with revenues under \$1 million.

⁸ CRA Wiz, produced by PCI Services, Inc., calculates the median income as a percent of MSA median income for each neighborhood by dividing the Weighted Average Median Family Income of Tracts by the Weighted Average of MSA Median Family Income.

HACE

Comprised of 4,022 owner-occupied housing units in four census tracts, the Hispanic Association of Contractors & Enterprises (HACE) is the poorest of the nine neighborhoods. It is a low-income neighborhood, with a median income of 20.7% of MSA median income. HACE is also made up of 74.8% Hispanic households and 19.3% African-American households. There were also 1,094 small businesses in the area, 613 of which had revenues under \$1 million.

AWF

Allegheny West Foundation (AWF) is a predominantly African-American neighborhood, with 94.1% African-American households and only 1% Hispanic households. Located in north Philadelphia, it has 4,584 owner-occupied housing units and a median income of 39.8% of MSA median income. AWF holds 1,042 small businesses, 587 of which have revenues under \$1 million.

OARC

With seven census tracts, the Ogontz Avenue Revitalization Corporation (OARC) is the largest of the selected neighborhoods. It has 11,794 owner-occupied housing units and 95.7% of its households are African-American. With a median income of 64.9% of MSA median income, it is the only moderate-income neighborhood of the nine selected. Of the 1,826 small businesses in OARC, 1,149 have revenues under \$1 million.

Project Home

In Project Home, which is south of AWF, 98.4% households are African-American. These four census tracts also hold 3,894 owner-occupied housing units and have a median income of 29% of MSA median income, making it a low-income neighborhood. There are 810 small businesses in Project Home, 492 of which have revenues under \$1 million.

People's

People's Emergency Center (People's) is comprised of 64.6% African-American households and 2.5% Hispanic households. It has a median income of 31.1% of MSA median income and has 1,445 owner-occupied housing units. Of the 745 small businesses in the neighborhood, 450 have revenues under \$1 million.

American Street Empowerment Zone

The largest of the three empowerment zones, American Street Empowerment Zone holds 2,165 owner-occupied housing units and is comprised of 65.6% Hispanic households and 17.3% African-American households. It has a median income of 31.5% of MSA median

income and is made up of five census tracts. There are 1,276 small businesses in American Street EZ, 690 of which have revenues under \$1 million.

North Central Empowerment Zone

Approximately 90.3% households in the North Central Empowerment Zone are African-American, while 5.0% are Hispanic. The neighborhood holds 1,339 owner-occupied housing units and has a median income of 28.1% of MSA median income. North Central EZ also holds 1,194 small businesses, 697 of which have revenues under \$1 million.

West Philadelphia Street Empowerment Zone

West Philadelphia Empowerment Zone holds 1,399 owner-occupied housing units in its two census tracts. West Philadelphia EZ is comprised of 95.3% African-American households and 0.8% Hispanic households. It is also a low-income neighborhood, with a median income of 35.1% of MSA median income. Of the 570 small businesses in West Philadelphia EZ, 308 have revenues under \$1 million.

City of Philadelphia

Comparatively, the City of Philadelphia holds 349,651 owner-occupied housing units and has a median income of 57.4% of MSA median income. The City is also comprised of 40.7% African-American households and 6.5% Hispanic households. In Philadelphia there are 106,365 small businesses, 61,811 of which have revenues under \$1 million (see Table 24).

Home Lending in Neighborhoods: Aggregate Lender Analysis

Using 2003 HMDA data, NCRC analyzed all single family lending (home purchase, home improvement and refinance loans, combined) by all lenders, as a group.

Percent of Subprime Lending

In each of the nine selected neighborhoods, NCRC compared the percent of all single-family subprime loans. Lenders made the most subprime loans, 310 or 25.1% of all single-family loans, in OARC, which is the largest neighborhood of the nine and is 95.7% African-American. In AWF, approximately 23.3%, or 30, of all single-family loans were subprime. Comparatively, in the City of Philadelphia, 12.2%, or 6,434, of all single-family loans were subprime. Overall, lenders made a higher proportion of subprime loans in eight of the nine CDC neighborhoods than they made in the City of Philadelphia. APM was the only area in which no subprime loans were made; however, lenders only made two all single-family prime loans overall in APM (see Table 24).

Comparing Neighborhoods' Percent of City Loans to Neighborhoods' Percent of City Owner-Occupied Housing Units

The nine selected neighborhoods received a disproportionately small percent of the City's prime and subprime loans compared to the percent of the City's owner-occupied housing units they comprise. For example, HACE represents 1.2% (or 4,022) of the City's owner-occupied housing units; however, it received 0.2% (or 103) and 0.3% (or 20) of the prime and subprime loans, respectively, issued in Philadelphia. Similarly, the American Street EZ holds 0.6% (or 2,165) of the City's owner-occupied housing units but was issued 0.2% (or 77) and 0.3% (or 19) of the prime and subprime loans, respectively, in Philadelphia (see Table 24).

Are Home Loans Reaching Borrowers?

Directly comparing the number of prime and subprime loans in a neighborhood to the number of owner-occupied housing units in the same neighborhood may help indicate if loans are reaching the borrowers in need. Using this method, we found that in the City of Philadelphia, there were 13.2 prime all-single family loans for every 100 owner-occupied housing units. Looking at the selected neighborhoods, OARC performed the best as it received 7.8 prime loans and 2.6 subprime loans for every 100 owner-occupied housing units in the neighborhood. Project Home performed the worse with this ratio, as there were 0.7 prime loans and 0 subprime loans for every 100 owner-occupied housing units in the neighborhood. All the nine neighborhoods' ratios of loans to owner-occupied units were lower than for the City, as a whole (see Table 24 and Chart 18).

Home Lending in Neighborhoods: Lender-by-Lender Analysis

Using 2003 HMDA data, NCRC analyzed home purchase, refinance, home improvement, and all single-family lending combined for the six previously selected lenders in the nine CDC neighborhoods.

All Single Family Lending – Neighborhood by Neighborhood

All lenders issued two loans in the APM neighborhood. However, by making one of those two loans, Fleet made the most all single-family loans compared to the other five lenders analyzed. APM is a predominantly Hispanic neighborhood and is the smallest community analyzed of the nine CDC neighborhoods (see Table 25).

In HACE, a predominantly Hispanic neighborhood, Wachovia made 37 single-family loans, which was the most of all of the six lenders. Wachovia also made the highest percentage of loans to Hispanics out of its six peers in this neighborhood, with 86.5% of loans going to Hispanic borrowers. Comparatively, all lenders in HACE made 61.8% of their loans to Hispanic borrowers (loan data to borrowers by race not shown on tables).

Citizens performed the best out of the six lenders in AWF, as they issued 16 of the 129 all single-family loans made in AWF. While Citizens made the highest number of loans to all borrowers in AWF, PNC made the highest percent of loans to African-Americans in AWF – 87.5% (Although PNC made only 7 loans to African-American borrowers in AWF, PNC's high percent of loans to African-Americans may reflect an effective

technique for reaching minority borrowers). All lenders in AWF, as a comparison, made 73.6% to African-American borrowers (loan data to borrowers by race not shown on tables).

In the predominately African-American neighborhood of OARC, Wachovia made 77 of the 1,233 all single-family loans issued in 2003, making it the largest lender of the six reviewed. With 85.7% of its loans made to African-Americans, Wachovia also reached the largest percent of the neighborhood's minority borrowers (loan data to borrowers by race not shown on tables).

With 12 out of the 86 all single-family loans made in Project Home, Citizens made the most number of loans of its peers receiving city deposits. Wachovia, however, made 100% of its loans to African-Americans, and in doing so performed 26.4 percentage points better than all lenders issuing loans to African-Americans in the neighborhood (Although Wachovia made only 6 loans to African-American borrowers in Project Home, its high percent of loans to African-Americans may reflect an effective technique for reaching minorities; loan data to borrowers by race not shown on tables).

Of the six lenders in People's neighborhood, Citizens made the most number of loans, 16, out of the 116 all single-family loans issued. However, lending to minorities in the neighborhood could greatly improve. While 64.6% of its households are African-American and 2.5% are Hispanic, all lenders in the area made only 27.6% of their loans to African-Americans and 1.7% of their loans to Hispanics (loan data to borrowers by race not shown on tables).

With 15 loans issued in the American Street EZ, Wachovia made the most number of all single-family loans of the reviewed lenders to this predominately Hispanic neighborhood. However, with 77.8% of its loans to Hispanic borrowers, Citizens led its peers in lending to the neighborhood's minority borrowers (Although Citizens made only 7 loans to Hispanic borrowers in American Street EZ, its high percent of loans to Hispanics may reflect an effective technique for reaching minority borrowers; loan data to borrowers by race not shown on tables).

In the North Central EZ, which has 90.3% African-American households, Fleet made 12 of the 53 all single-family loans issued. This was the most out of all the six lenders observed.

All lenders, as a group, made 39 all single-family loans in the West Philadelphia EZ. Of the 39 loans, Citizens made 9, which was the most number of loans of the reviewed lenders. The households in West Philadelphia EZ are 95.3% African-American.

All Single-Family Lending – Lender Performances across All Nine Neighborhoods Combined

Analyzing the percent of loans lenders made to the nine neighborhoods combined, NCRC found that PNC and Wachovia performed the best out of the six lenders in the nine

communities. For example, of the 1,698 all single-family loans PNC made in Philadelphia, 110, or 6.5%, were made in the nine minority neighborhoods. Similarly, Wachovia made 154 loans in the neighborhoods, combined, compared to its 2,403 all single-family loans in Philadelphia, which represented 6.4% of its portfolio. In comparison, all lenders made approximately 3.6% of its all single-family loans in the minority neighborhoods. NCRC also applauds Citizens and Fleet for making 5.2% and 3.9% of its loans to these selected neighborhoods (see Table 25).

Comparatively, Bank of America and Commerce Bank performed the worst of these lenders in the selected neighborhoods. For example, of the 245 all single-family loans Bank of America made in Philadelphia, only 2, or 0.8%, were made in these nine minority neighborhoods. Of the 548 all single-family loans Commerce made in Philadelphia, only 7, or 1.3% were made in these nine minority neighborhoods (see Table 25).

NCRC also found that four of the six banks had a higher share or percent of loans in the nine neighborhoods combined than in the City of Philadelphia. NCRC applauds Wachovia, Citizens, PNC, and Fleet for making 8.2%, 8.0%, 5.9%, and 2.8% of the loans in the nine neighborhoods, respectively. In the City of Philadelphia, Wachovia, Citizens, PNC, and Fleet made 4.6%, 5.5%, 3.2%, and 2.6% of the loans, respectively (see Table 25).

Home Purchase Lending – Lender Performance in the Nine Neighborhoods

Only after borrowers purchase homes can they seek other types of home loans, such as home improvement and refinance loans. Therefore, as home purchase lending is the building block for wealth in any community, it is important to separately review this category of lending.

In HACE, AWF, Project Home, American Street EZ, and North Central EZ, Fleet led the lenders in providing the most number of home purchase loans. For example, Fleet made 7 home purchase loans in North Central EZ and 7 home purchase loans in AWF, making up 36.8% and 21.2% of all loans in these areas. Of the six lenders, Fleet also had the largest share of its portfolio in the nine neighborhoods (see Table 25).

Comparatively, Bank of America and PNC did not issue any home purchase loans in any of the nine neighborhoods observed. And Commerce, with only two home purchase loans, issued a very small share of its portfolio to these neighborhoods.

Refinance Lending – Lender Performance in the Nine Neighborhoods

In making 107 refinance loans in the neighborhoods combined, Wachovia made the largest number of refinance loans when compared to the other five lenders. Looking the neighborhoods individually, Wachovia led the way in most number of refinance loans in HACE, AWF, OARC, Project Home, and American Street EZ. For example, Wachovia made 60 refinance loans in OARC, a predominately African-American community. And

in HACE, Wachovia issued 19 refinance loans, whereas the other lenders made one or zero loans in this neighborhood (see Table 25).

Home Improvement Lending – Lender Performance in the Nine Neighborhoods

In all nine neighborhoods combined, Citizens made 73 home improvement loans, the most number of its peers. When the communities were reviewed individually Citizens also made the largest number of home improvement loans in six of the nine neighborhoods. In Project Home, for instance, Citizens made 9 home improvement loans (see Table 25).

Small Business Lending in the Neighborhoods: Aggregate Lender Analysis

For this analysis, NCRC evaluated small business loans by all lenders, as a group, in the nine neighborhoods for 2003. As mentioned previously, the federal government does not provide small business loan data on a census tract level for individual lenders.

Small Business Lending Volumes in the Neighborhoods

Out of the nine neighborhoods, lenders issued the most small business loans, 243 and 230, in the American Street EZ, a predominantly Hispanic neighborhood, and OARC, a predominantly African-America neighborhood. With 24 and 68 loans each, APM and the West Philadelphia EZ received the fewest small business loans (see Table 26).

Lenders also performed the best in OARC and the American Street EZ in issuing loans to small businesses with revenues under \$1 million; they issued 74 and 66 loans to small businesses with revenues under \$1 million in these two neighborhoods, respectively. Comparatively, lenders issued the least number of loans to small businesses with revenues under \$1 million in APM and Project Home, making only 4 and 19 loans in each neighborhood (see Table 26).

Comparing Neighborhoods' Percent of City Loans to Neighborhoods' Percent of City Small Businesses

The CDC neighborhoods received a disproportionately small percent of the City's small business loans compared to the percent of the City's small businesses they comprise. For example, OARC represents 1.7% (or 1,826) of the City's small businesses; however, the neighborhood received only 1.1% (or 230) of the small business loans issued in the City. North Central EZ also represents 1.1% (or 697) of the City's small businesses with revenues under \$1 million but was issued 0.5% (or 32) of the loans to small businesses with revenues under \$1 million in the City of Philadelphia (see Table 26).

Are Small Business Loans Reaching Small Businesses?

Directly comparing the number of loans to the number of small businesses in a neighborhood may help indicate if banks are reaching small businesses in need. Using this method, we found that in the City of Philadelphia, there were 20.4 small business loans for every 100 small businesses. Looking at the selected neighborhoods, People's performed the best as it received 21.2 small business loans for every 100 small businesses in the neighborhood. Project Home performed the worst with this ratio, as there were only 9.1 small business loans for every 100 small businesses in the neighborhood. Overall, eight of the nine neighborhoods had a lower ratio in this category than the City of Philadelphia (see Table 26 and Chart 18).

In the City of Philadelphia, there were 11.2 small business loans to businesses with revenues under \$1 million for every 100 small businesses with revenues under \$1 million in the neighborhood. Again, People's performed the best and Project Home performed the worst in this ratio, as there were, respectively, 11.3 and 3.9 small business loans to businesses with revenues under \$1 million for every 100 small businesses with revenues under \$1 million in the neighborhoods. Overall, eight of the nine neighborhoods had a lower ratio in this category than the City of Philadelphia (see Table 26 and Chart 18).

Methodology

Sources of Data

NCRC used Home Mortgage Disclosure Act (HMDA) and CRA data on small business lending for this report. We obtained data on branches from the website of the Federal Deposit Insurance Corporation. NCRC also used CRA Wiz software produced by the PCi Corporation. CRA Wiz software is well known in the industry, used by several banks and federal agencies.

Geographical Area

NCRC analyzed lending trends in the County of Philadelphia, which is one of the counties in the metropolitan statistical area (MSA) of Philadelphia, Pennsylvania. Philadelphia is a multi-state MSA composed of counties in New Jersey and Pennsylvania. Counties in New Jersey were not considered for this analysis. The County of Philadelphia is composed of 381 census tracts. For the suburban analysis, NCRC considered the remaining four counties in the Pennsylvania part of the Philadelphia MSA. These were the counties of Bucks, Chester, Delaware, and Montgomery. These four counties contained 606 census tracts.

Loan Types for Home Lending Analysis

For the single-family home loan analysis, NCRC considered all loan types that include conventional loans and government-insured loans (FHA, VA, and FSA/RHS-backed loans). NCRC combined all loan purposes (home purchase, refinance, and home

improvement loans) for some of the analysis and also separately scrutinized trends in home purchase, refinance and home improvement lending. For most of the analysis, NCRC considered loans only to owner-occupants since part of the analysis sought to compare the portion of single family loans to the portion of owner-occupied housing units by income and minority level of census tracts. Another part of the analysis compared trends in lending to owner-occupants against investor non-occupants.

Most HMDA loans are made to specific groups of borrowers (such as African-Americans) or to specific neighborhoods (such as low-income census tracts). There are some HMDA reported loans for which the characteristics of borrowers or neighborhoods are unknown. We excluded these loans from the analysis.

Within each category of borrowers and neighborhoods, NCRC did not include the following loans in the analysis:

- For Applicant Race: did not include “Not Provided” or “Not Applicable”
- For Applicant Income: did not include “Income Not Available”
- For Applicant Gender: did not include “Not Applicable”, but did include “joint”
- For Tract Characteristics: when considering lending by income level of tracts, did not include loans for which income of tracts was not available.

Hence, totaling loans by race will yield a different total from adding up loans by gender. Generally speaking, NCRC used the totals for loans to tracts by minority levels in the narrative when referring to loan totals. Loans by minority level of census tracts usually captures all the loans made in a geographical area because there are fewer loans with borrower characteristics unknown.

Identification of Prime and Subprime Lenders

In order to classify loans as subprime, NCRC used a list of subprime and manufactured home lenders developed by HUD. Since HMDA data for 2003 does not have information on the Annual Percentage Rate (APR) or other loan terms and conditions, HUD developed its list by complementing data analysis with interviews of lending institutions and a literature search. As an additional step, HUD called the lenders on its list and asked them if they considered themselves subprime and manufactured home specialists. Generally speaking, a lender was included on the list if more than 50 percent of the loans in its portfolio were subprime or manufactured home.⁹

Until more information on loan terms and conditions was available in HMDA data (price information for subprime loans was in the 2004 HMDA data which was released in late

⁹ HUD itself admits that the list is not complete. A number of institutions considered to be prime specialists make a significant number of subprime loans, even if 50 percent or more of their loans are not subprime. Also, the list may not be complete due to name changes and omissions. HUD refines its lists on an annual basis and also corrects mistakes on previous years' lists. HUD's web page (<http://www.huduser.org/datasets/manu.html>) has more information about the lists and has copies of the lists.

summer of 2005), HUD's list was a valuable resource for conducting subprime and manufactured home loan analysis. Although the list is incomplete, it still captures significant differences in lending behavior as revealed by this report and a substantial body of research.

In the analysis for the city and suburbs of Philadelphia, NCRC used loans classified as subprime and prime. NCRC excluded loans made by manufactured home loan specialists due to the low volumes of manufactured lending in the City and suburbs.

Home Loan Ranking Analysis

The first step in the ranking analysis was to identify the affiliates of the banks receiving City deposits. NCRC used two resources: the National Information Center (NIC) database on the web page of the Federal Financial Institutions Examination Council and CRA exams. The NIC lists HMDA reporters of bank holding companies by year. For the 2003 data analysis, NCRC asked the NIC database for all HMDA reporting affiliates as of year end 2003. NCRC then cross-referenced this list with CRA exams. NCRC excluded subprime affiliates for the ranking analysis due to nominal lending levels of the one subprime affiliate identified.

The following is a description of the CRA and fair lending indicators of performance used in the study:

1. Percent of loans to Minority Borrowers – This indicator measures the percent of a financial institution's loans to all minorities.
2. Percent of loans to African-Americans – This indicator measures the percent of a financial institution's loans that are made to African-Americans. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to African-Americans.
3. Percent of loans to Hispanics – This indicator measures the percent of a financial institution's loans that are made to Hispanics.
4. Percent of loans to Asians – This indicator measures the percent of a financial institution's loans that are made to Asians.
5. Percent of Loans to Low- and Moderate-Income (LMI) Borrowers – This indicator measures the percent of a financial institution's loans that is made to LMI borrowers. Another way to think of this indicator is the share of a lender's portfolio devoted to LMI borrowers. Low- and moderate-income definitions conform to CRA definitions. Borrowers with incomes up to 50 percent of area median income are low-income. Borrowers with incomes between 51 to 80 percent of median income are moderate-income.

6. Percent of Loans to Women - This indicator measures the percent of a financial institution's loans that are made to women. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to women.
7. Percent of Loans to Minority Tracts - This indicator measures the percent of a financial institution's loans that are made to residents of substantially minority census tracts. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to residents of substantially minority census tracts. A census tract is defined as substantially minority if more than 50 percent of the population is minority.
8. Percent of Loans to LMI tracts - This indicator measures the percent of a financial institution's loans that are made to residents of LMI census tracts. Another way to think about this indicator is the portion of the institution's loan portfolio devoted to residents of LMI census tracts.
9. Minority Borrower Denial Disparity Ratio - This indicator divides the minority denial rate by the white denial rate. Higher ratios are worse. Higher ratios indicate that a lender is denying minorities at higher rates relative to whites.
10. African-American Denial Disparity Ratio – This indicator divides the African-American denial rate by the white denial rate. Higher ratios are worse. Higher ratios indicate that a lender is denying African-Americans at higher rates relative to whites.
11. Hispanic Denial Disparity Ratio – This indicator divides the Hispanic denial rate by the white denial rate.
12. Asian Denial Disparity Ratio – This indicator divides the Asian denial rate by the white denial rate.
13. Minority Tract Denial Disparity Ratio – This indicator divides the denial rate for applicants from minority tracts (more than 50 percent of the tract population is minority) by the denial rate for applicants from white tracts.
14. Ratio of LMI (low- and moderate-income) to MUI (middle- and upper-income) Market Share to Borrowers – Market share measures an institution's share of all the loans made by all financial institutions in a geographical area to a certain demographic group. The LMI and MUI market share ratio indicator measures the ratio of the institution's share of all loans made to LMI borrowers divided by the institution's share of all loans made to MUI borrowers. If an institution's share of the LMI market is larger than its share to the MUI market, the institution is making more of an effort to lend to LMI borrowers than MUI borrowers. The LMI and MUI market share ratio indicator will then be greater than one. In contrast, if an institution is making a greater effort to lend to MUI borrowers than LMI borrowers, this market share ratio indicator will be less than one.

15. Ratio of Minority Borrower Market Share to White Borrower Market Share – This indicator is a ratio of a bank’s market share to minority borrowers divided by its market share to white borrowers.

16. Ratio of LMI and MUI Market Share by Tracts - Market share measures the institution’s share of all the loans made by all financial institutions in a geographical area to a certain census tract category. The LMI and MUI market share ratio indicator measures the ratio of the institution’s share of all loans made to LMI census tracts divided by the institution’s share of all loans made to MUI census tracts. If an institution’s share of the LMI market is larger than its share to the MUI market, the institution is making more of an effort to lend to LMI tracts than MUI tracts. The LMI and MUI market share indicator will then greater than one. In contrast, if an institution is making a greater effort to lend to MUI tracts than LMI tracts, this market share ratio indicator will be less than one.

17. Ratio of Market Share in Minority and White Tracts – This indicator is a ratio of a bank’s market share in minority tracts divided by its market share in white tracts.

Small Business Lending Analysis

NCRC analyzed loans to small businesses and excluded purchases of small business loans. In other words, NCRC excluded secondary market activity (financial institutions purchasing loans from banks or thrifts) from the small business lending analysis.

NCRC excluded loans when the income level of the census tract is unknown because the analysis sought to make precise comparisons between the portion of small businesses and the portion of loans in census tracts of various income levels. According to the Interagency Question and Answer document on CRA, banks must report the state, MSA, and county but not the census tract if the small business borrower had a post office box or rural route number. For these cases the census tract location was reported as “NA” for not available. In Philadelphia County, approximately 332 small business loans in 2003 fell under the category. Another 539 loans were made in census tracts that could be identified but the income level of the census tract was unknown. The income level of a census tract can be unknown if the census tract is sparsely populated, making the calculation of a median income level difficult. In total, 871 (less than 4%) of all small business loans in the City were not included in the total number of loans in NCRC’s analysis.

The small business lending analysis ranked the banks receiving City deposits against each other. The performance indicators were discussed above.

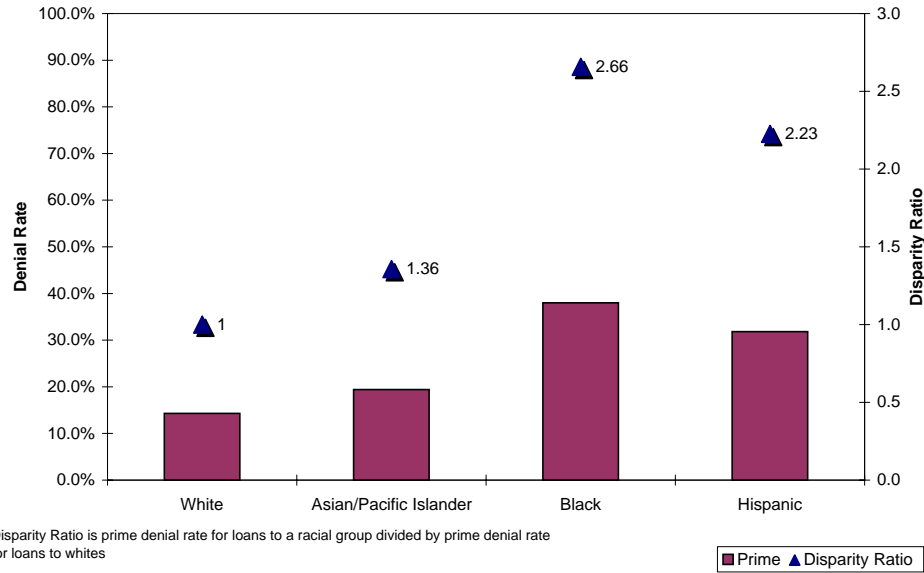
Appendices

Appendix 1: Charts

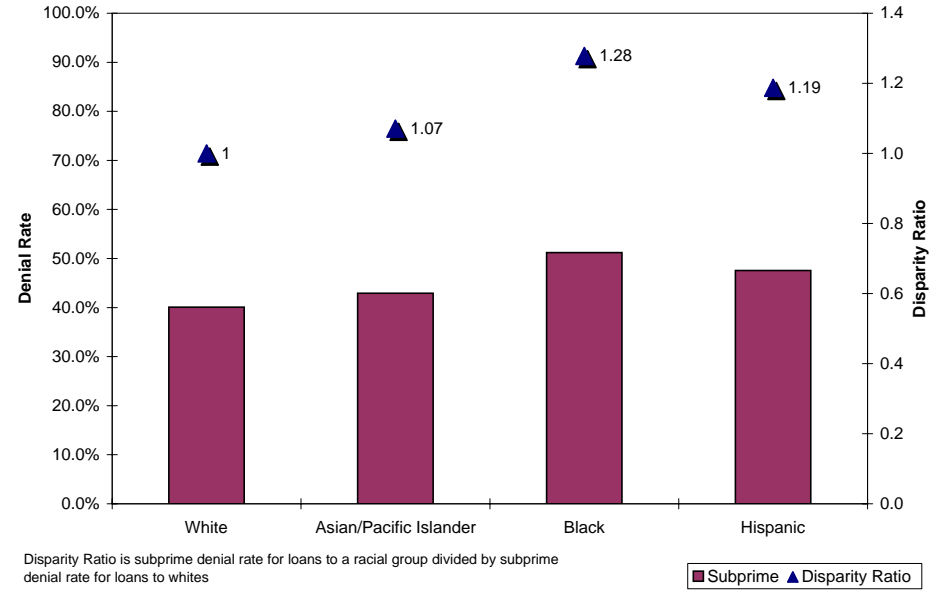
- Chart 1: All Single Family Lending to Owner-occupants by Race of Borrower, City of Philadelphia
- Chart 2: All Single Family Lending to Owner-occupants by Race of Borrower, Suburbs
- Chart 3: All Single Family Lending to Owner-occupants by Minority Level of Census Tract, City of Philadelphia and Suburbs
- Chart 4: All Single Family Lending to Owner-occupants by Income of Borrower, City of Philadelphia and Suburbs
- Chart 5: All Single Family Lending to Owner-occupants by Income Level of Census Tract, City of Philadelphia and Suburbs
- Chart 6: All Single Family Lending to Owner-occupants by Gender, City of Philadelphia and Suburbs
- Chart 7: Home Purchase Lending to Owner-occupants by Income of Borrower, City of Philadelphia
- Chart 8: Home Purchase Lending to Owner-occupants by Race of Borrower, City of Philadelphia
- Chart 9: Refinance Lending to Owner-occupants by Income of Borrower, City of Philadelphia
- Chart 10: Refinance Lending to Owner-occupants by Race of Borrower, City of Philadelphia
- Chart 11: Home Improvement Lending to Owner-occupants by Income of Borrower, City of Philadelphia
- Chart 12: Home Improvement Lending to Owner-occupants by Race of Borrower, City of Philadelphia
- Chart 13: All Single Family Lending Ranking Analysis, City of Philadelphia
- Chart 14: Small Business Lending by Income of Census Tract, City of Philadelphia and Suburbs
- Chart 15: Analysis of Small Business Lending by Size of Small Business, City of Philadelphia and Suburbs
- Chart 16: Analysis of Small Business Lending of Banks Receiving City Deposits, Philadelphia City.
- Chart 17: Analysis of Bank Branching by Banks with City Deposits
- Chart 18: Neighborhood Analysis

Chart 1: All Single Family Lending by Race of Borrower, City of Philadelphia

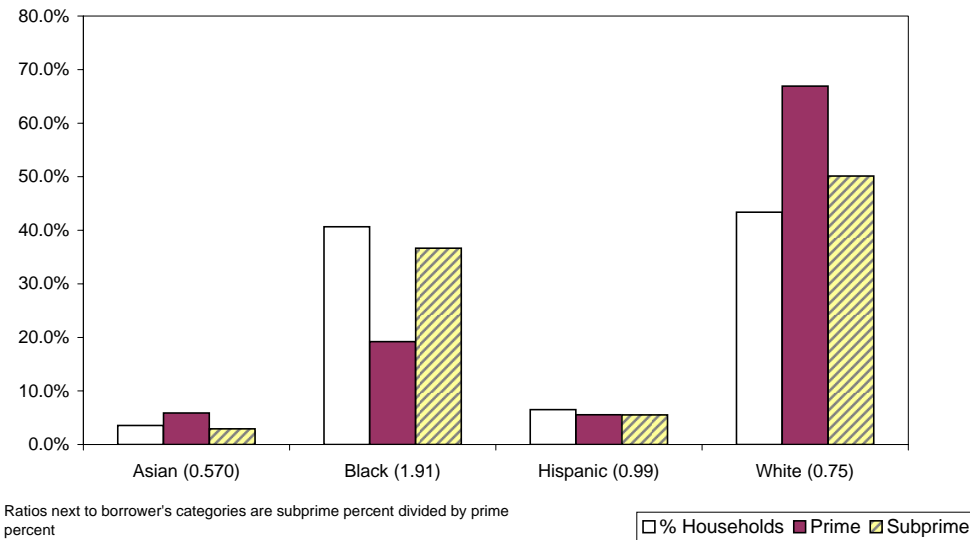
Prime Denial Rates and Disparity Ratios



Subprime Denial Rates and Disparity Ratios



Percent of Loans Compared to Percent of Households



Subprime Market Share of Loans

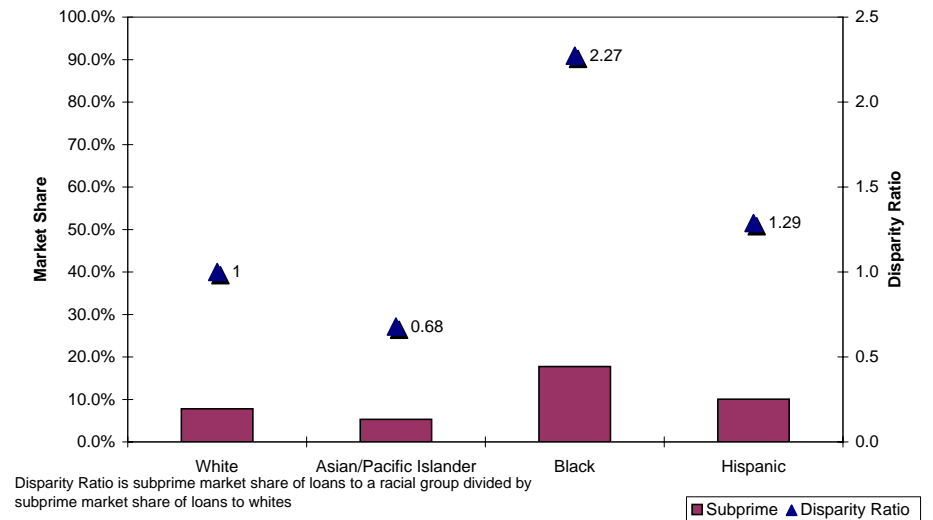
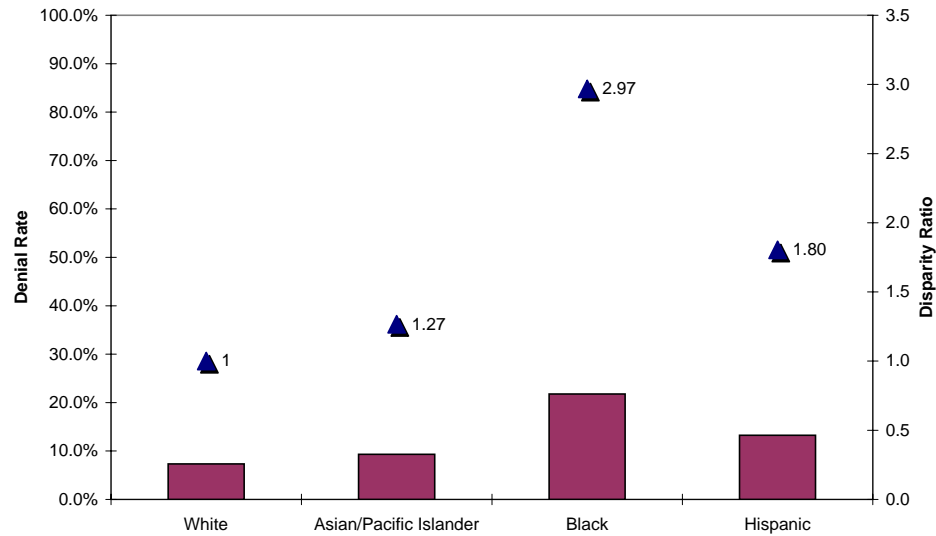


Chart 2: All Single Family Lending by Race of Borrower, Suburbs

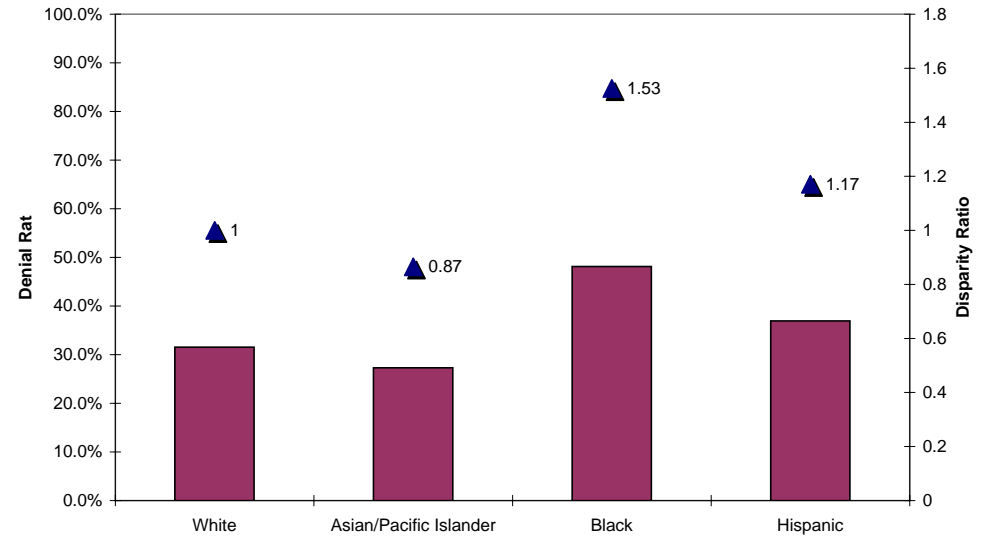
Prime Denial Rates and Disparity Ratios



Disparity Ratio is prime denial rate for loans to a racial group divided by prime denial rate for loans to whites

■ Prime ▲ Disparity Ratio

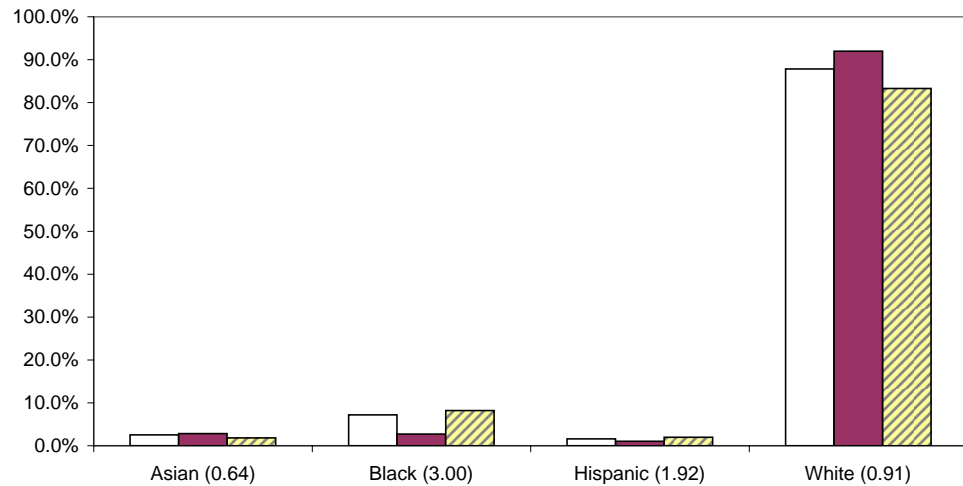
Subprime Denial Rates and Disparity Ratios



Disparity Ratio is subprime denial rate for loans to a racial group divided by subprime denial rate for loans to whites

■ Subprime ▲ Disparity Ratio

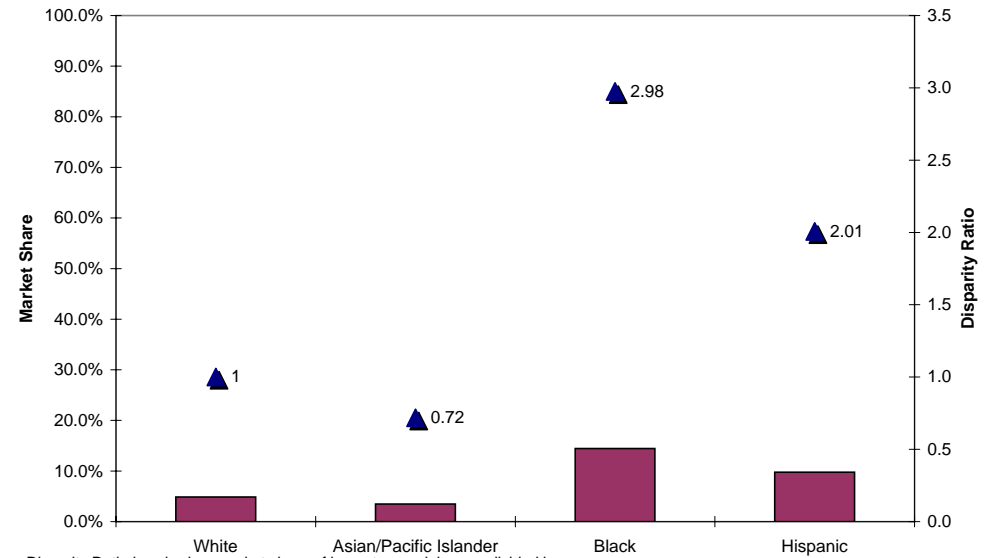
Percent of Loans Compared to Percent of Households



Ratios next to borrower's categories are subprime percent divided by prime percent

□ % Households ■ Prime ▨ Subprime

Subprime Market Share of Loans

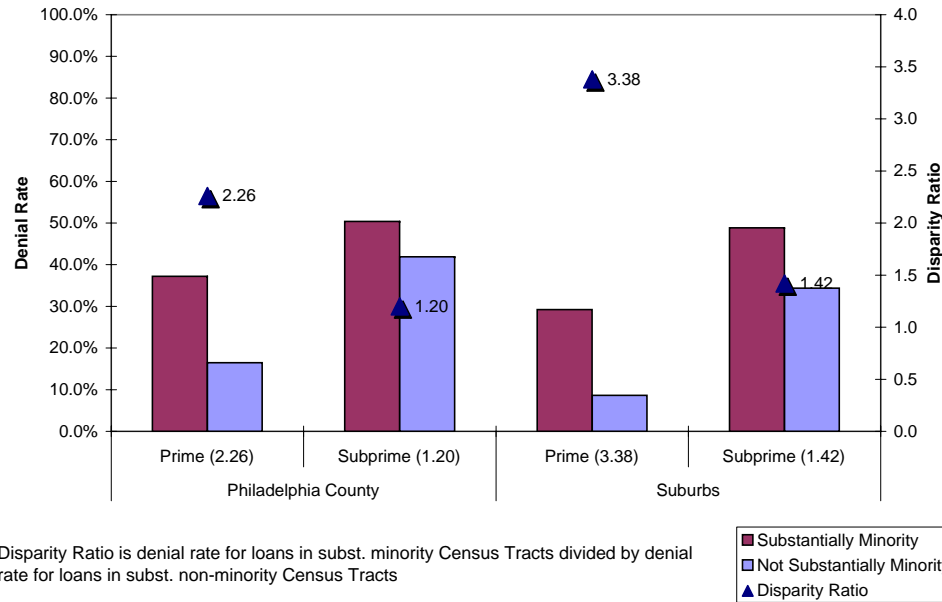


Disparity Ratio is subprime market share of loans to a racial group divided by subprime market share of loans to whites

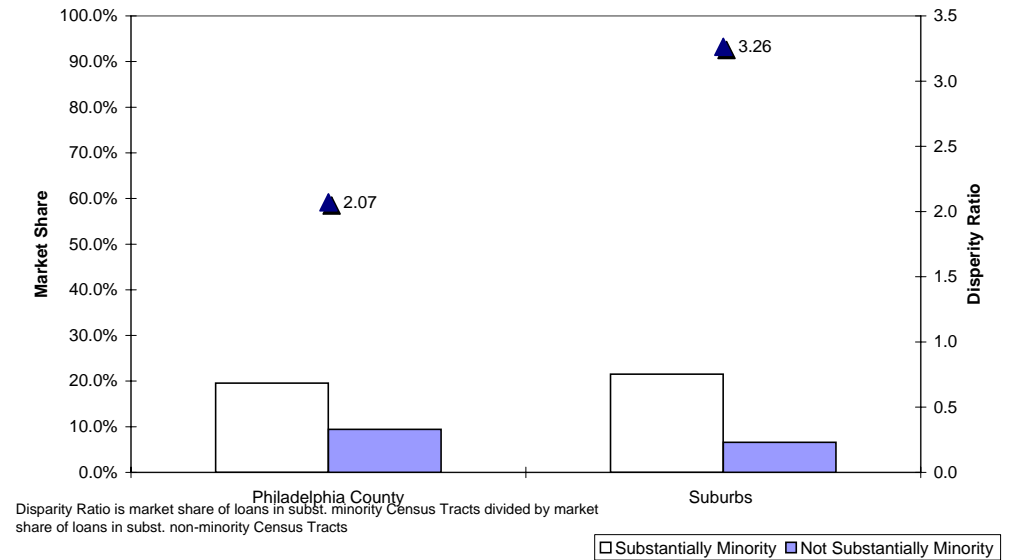
■ Subprime ▲ Disparity Ratio

Chart 3: All Single Family Lending by Minority Level of Census Tract, City of Philadelphia and Suburbs

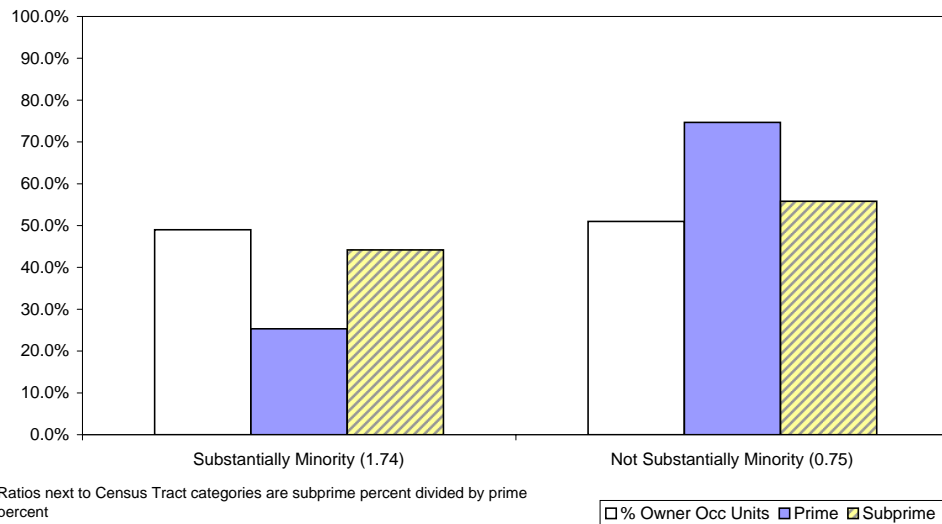
Denial Rate and Disparity Ratios



Subprime Market Share of Loans



Percent of Loans Compared to Percent of Owner Occupied Units, Philadelphia County



Percent of Loans Compared to Percent of Owner Occupied Units, Suburbs

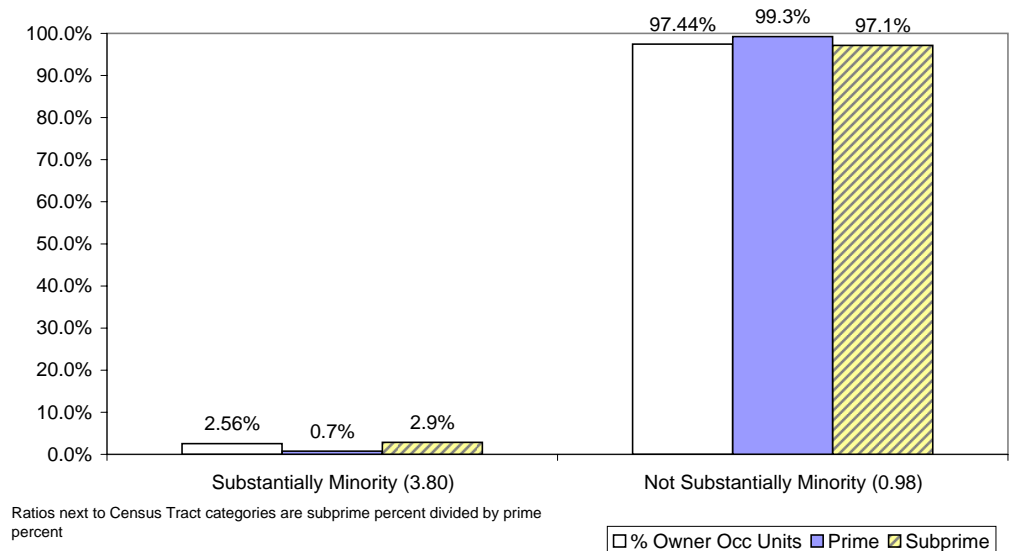
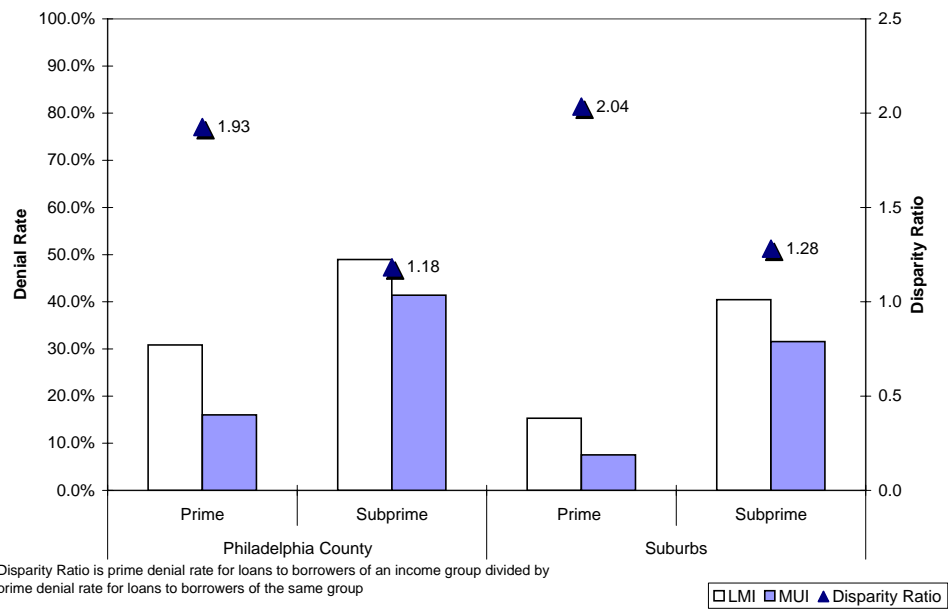
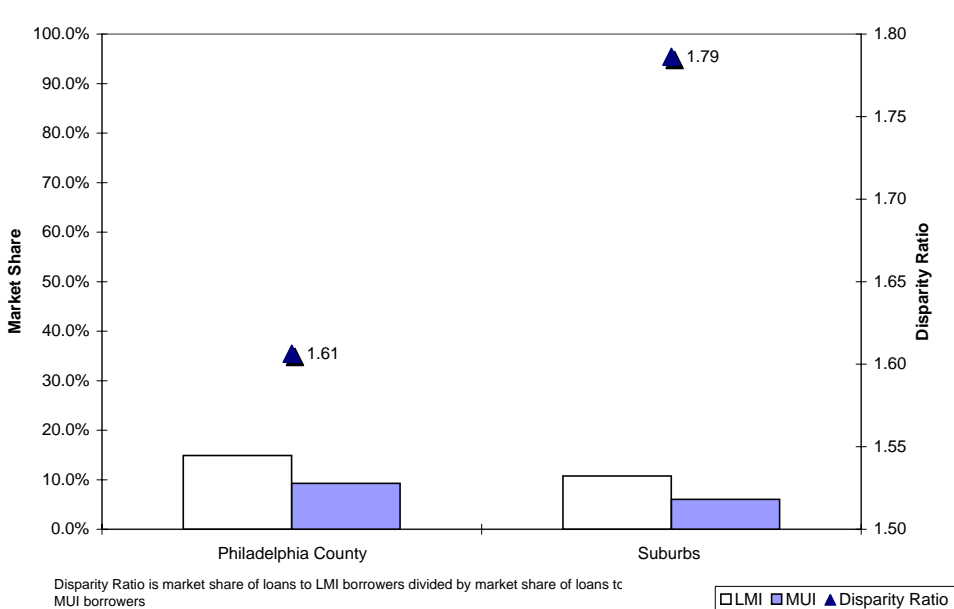


Chart 4: All Single Family Lending by Income of Borrower, City of Philadelphia and Suburbs

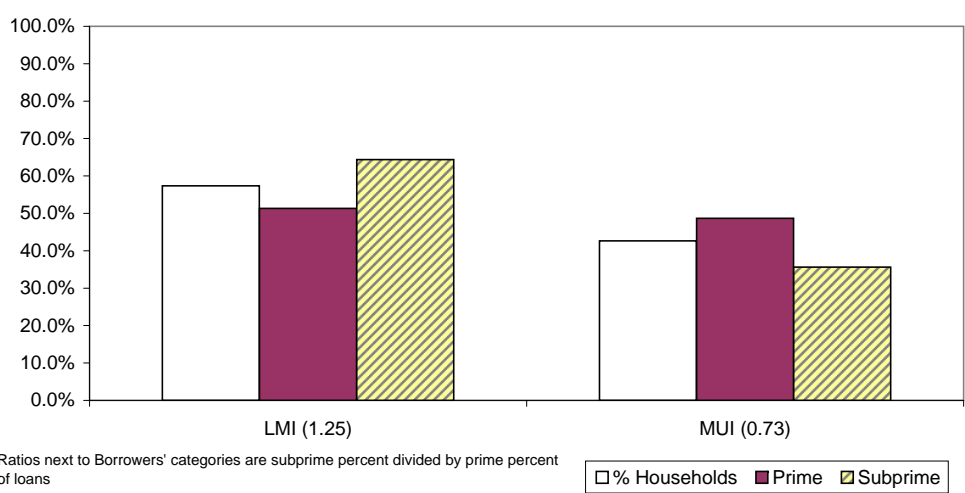
Denial Rate and Disparity Ratios



Subprime Market Share of Loans



Percent of Loans Compared to Percent of Households, Philadelphia County



Percent of Loans Compared to Percent of Households, Suburbs

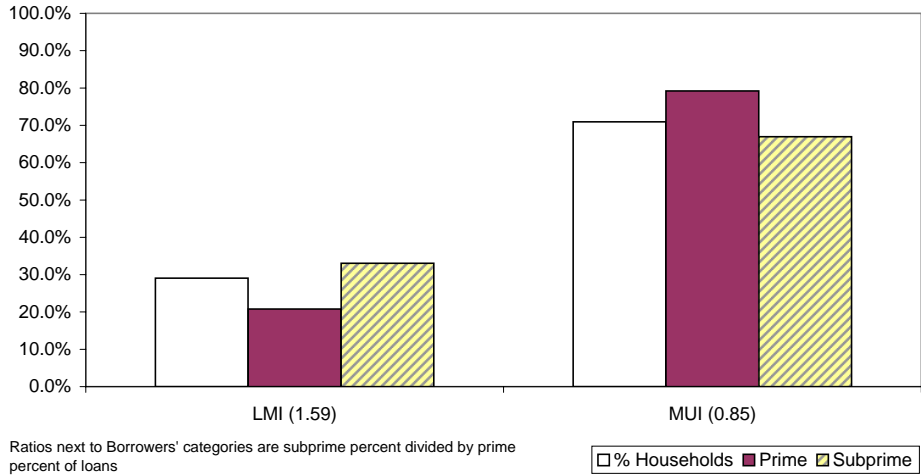
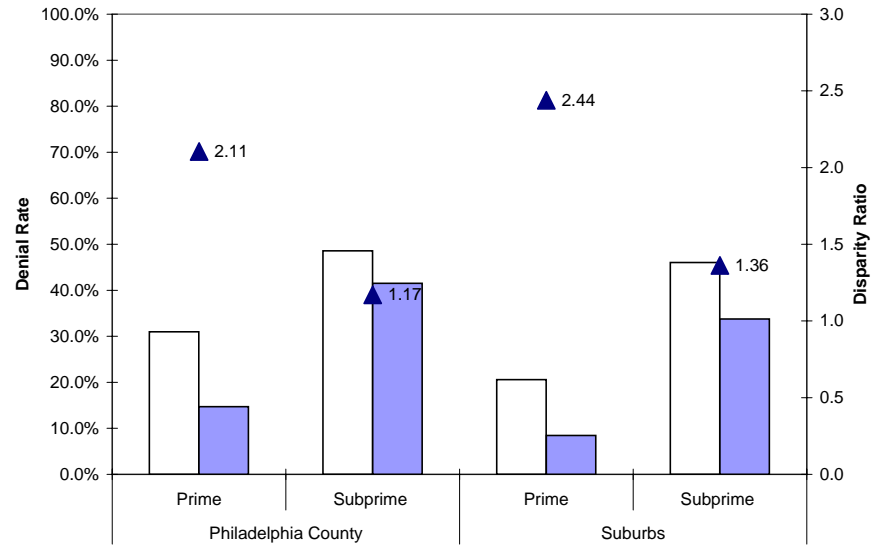


Chart 5: All Single Family Lending by Income Level of Census Tract, City of Philadelphia and Suburbs

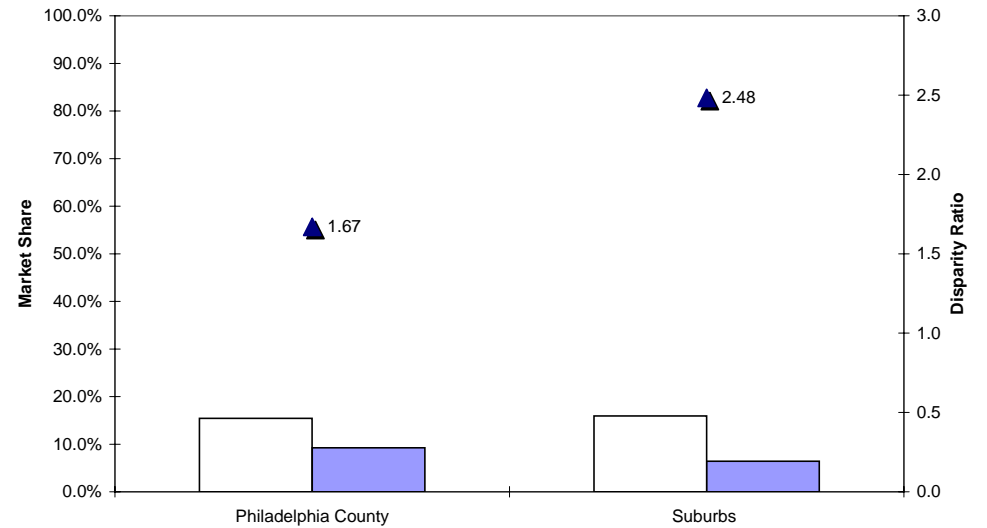
Denial Rate and Disparity Ratios



Disparity Ratio is denial rate for loans in LMI Census Tracts divided by denial rate for loans in MUI Census Tracts

□ LMI ■ MUI ▲ Disparity Ratio

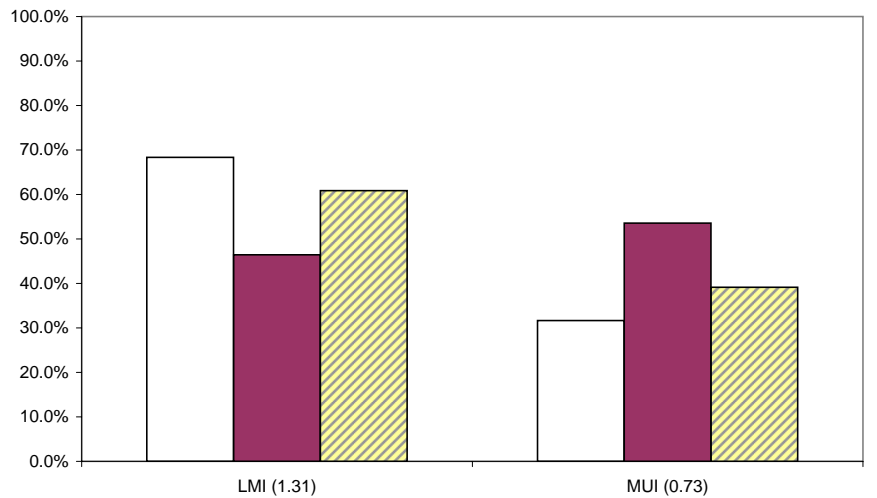
Subprime Market Share of Loans



Disparity Ratio is market share of loans in LMI Census Tracts divided by market share of loans in MUI Census Tracts

□ LMI ■ MUI ▲ Disparity Ratio

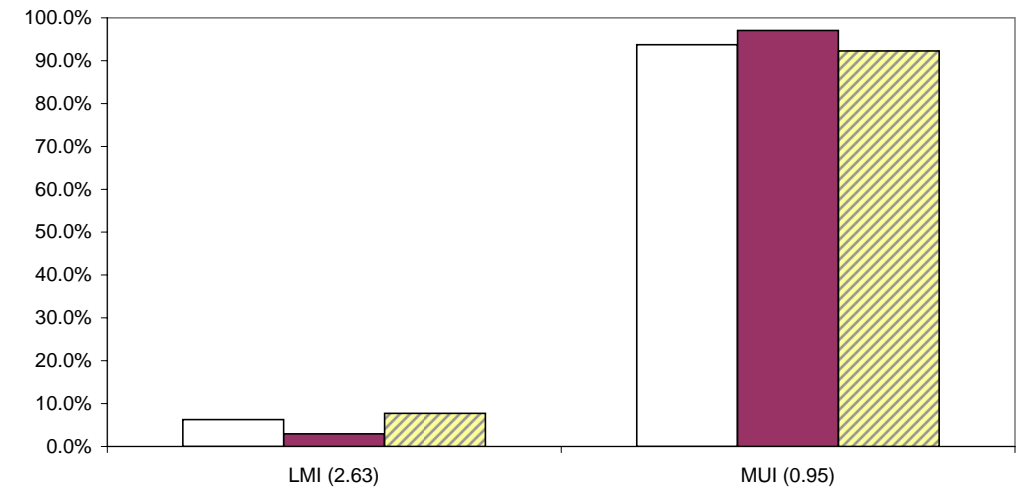
Percent of Loans Compared to Percent of Owner Occupied Units, Philadelphia County



Ratios next to Census Tract income category are subprime percent divided by prime percent of loans

□ % Owner Occ Units ■ Prime ▨ Subprime

Percent of Loans Compared to Percent of Owner Occupied Units, Suburbs

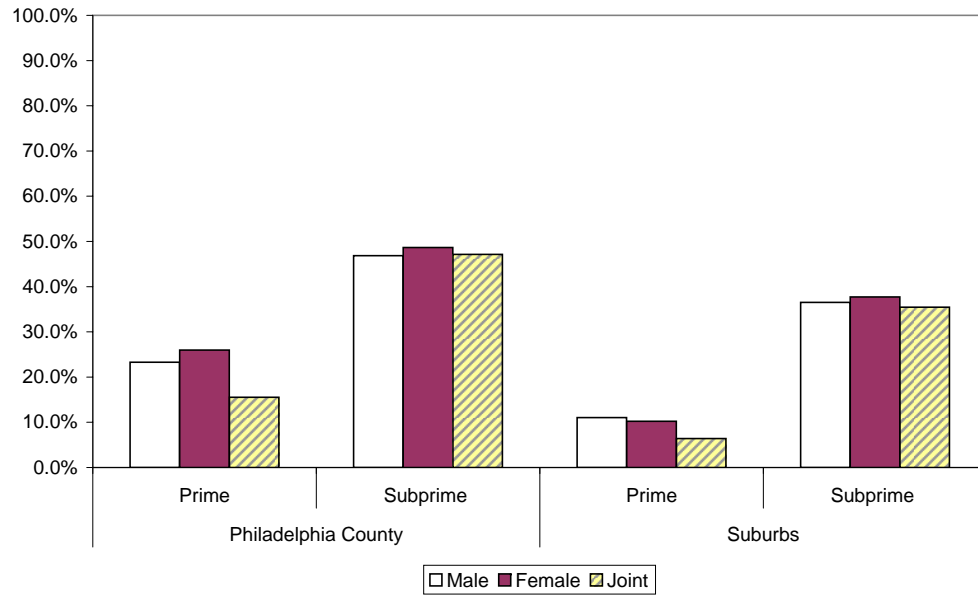


Ratios next to Census Tract income category are subprime percent divided by prime percent of loans

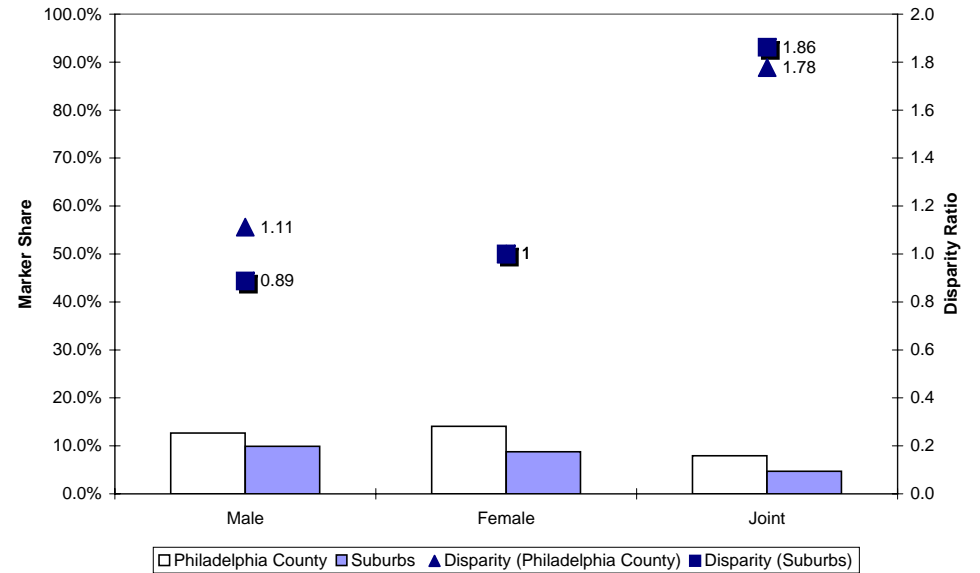
□ % Owner Occ Units ■ Prime ▨ Subprime

Chart 6: All Single Family Lending by Gender, City of Philadelphia and Suburbs

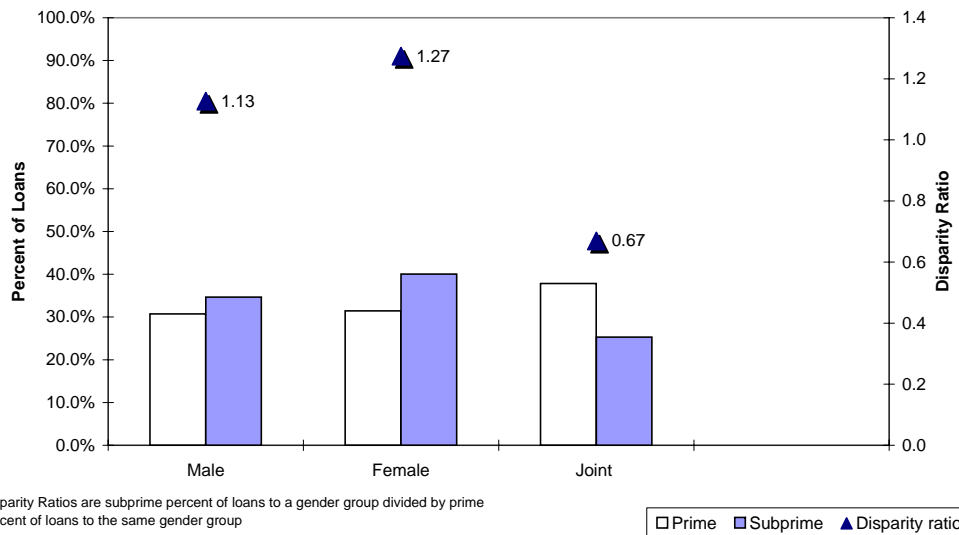
Denial Rate



Subprime Market Share of Loans

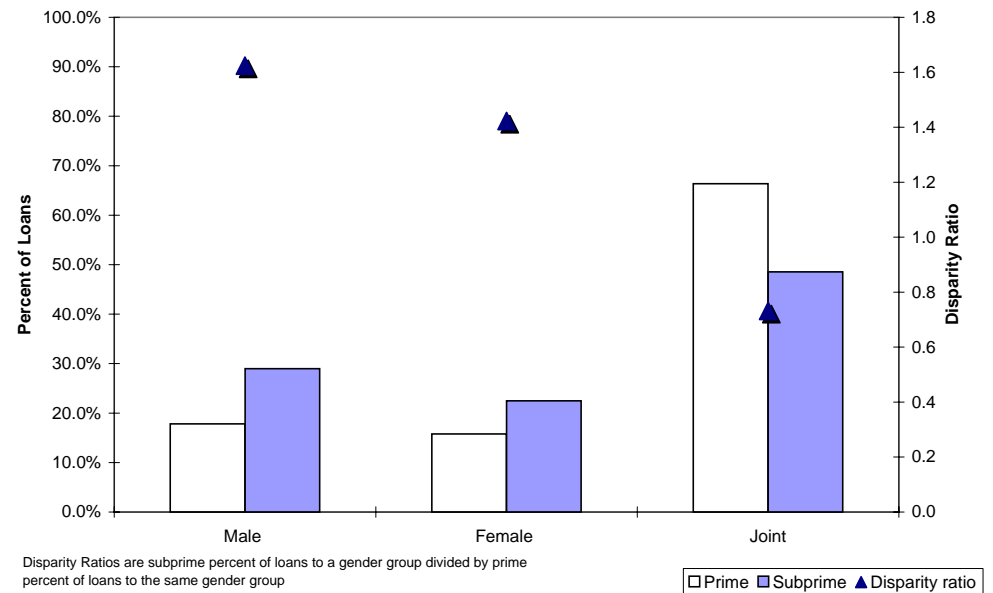


Percent of Loans to a Gender Group, Philadelphia County



Disparity Ratios are subprime percent of loans to a gender group divided by prime percent of loans to the same gender group

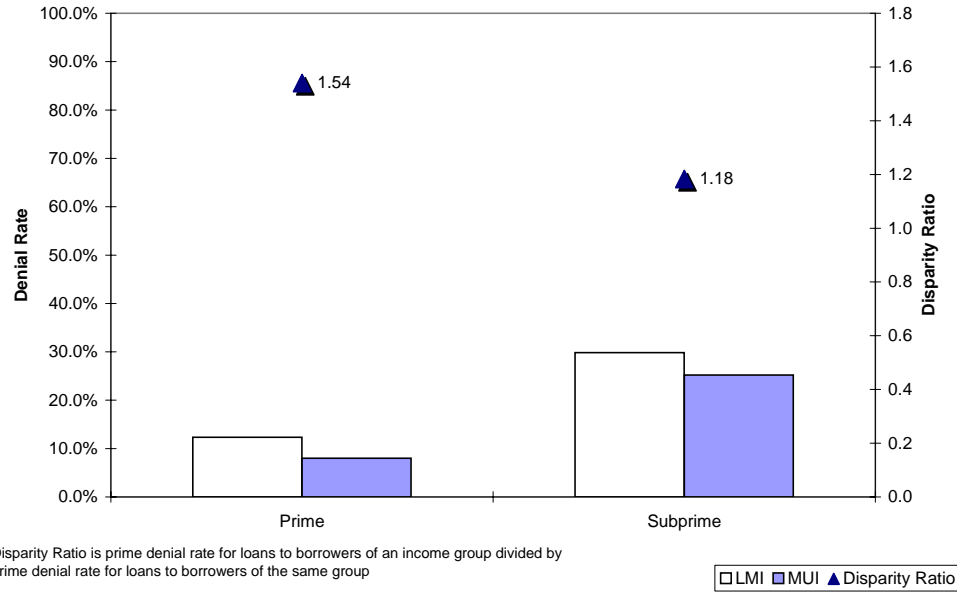
Percent of Loans to a Gender Group, Suburbs



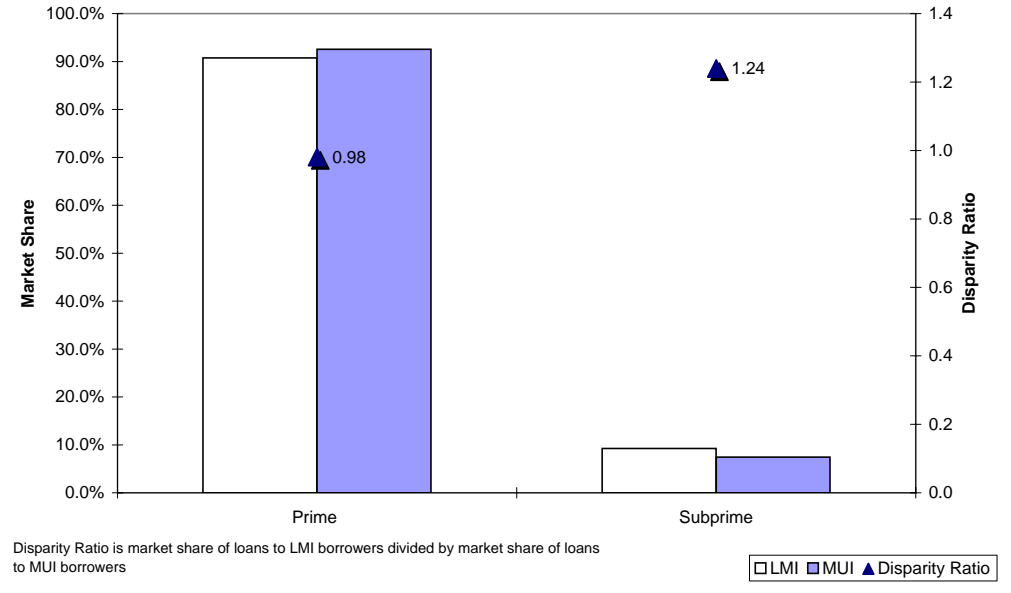
Disparity Ratios are subprime percent of loans to a gender group divided by prime percent of loans to the same gender group

Chart 7: Home Purchase Lending to Owner-occupants by Income of Borrower, City of Philadelphia

Denial Rate and Disparity Ratio



Market Share of Loans



Percent of Loans Compared to Percent of Households

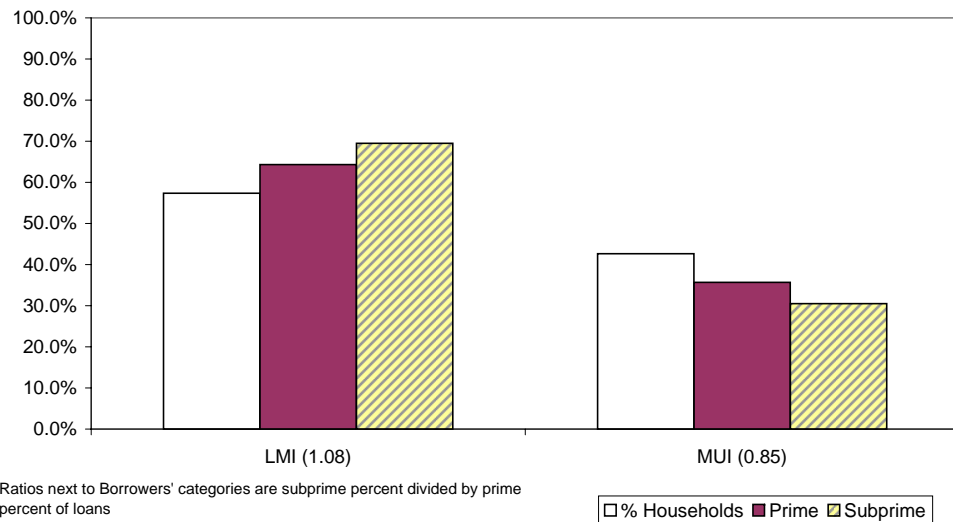
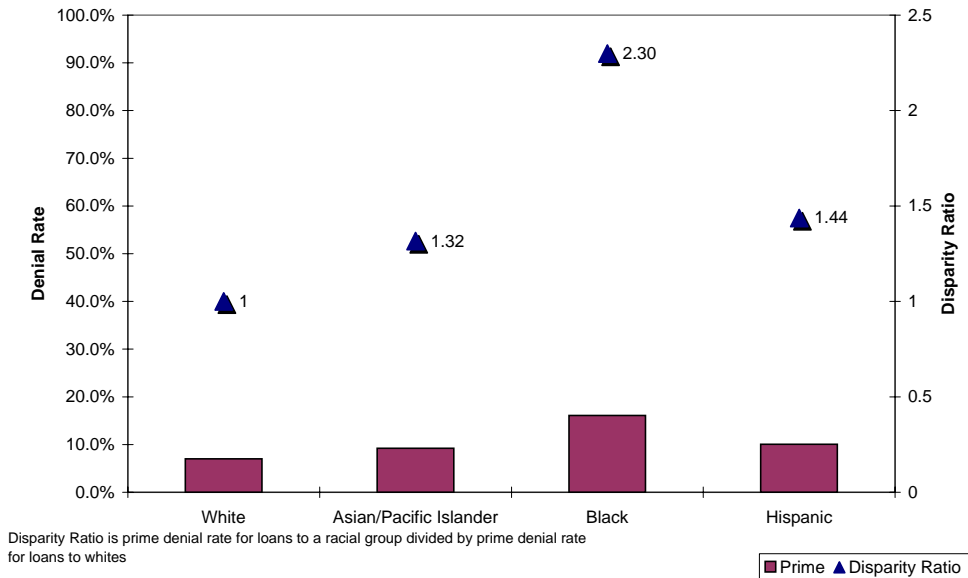
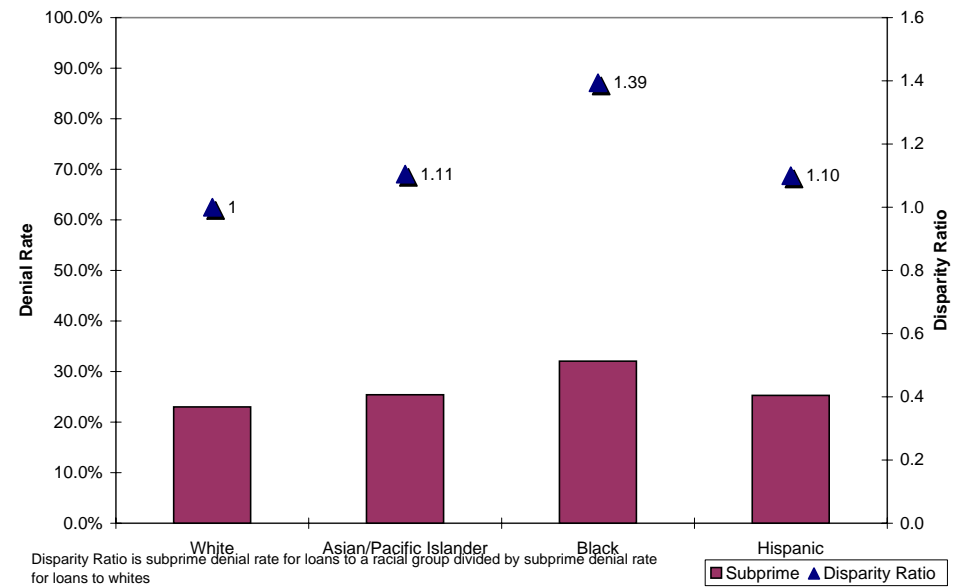


Chart 8: Home Purchase Lending to Owner-occupants by Race of Borrower, City of Philadelphia

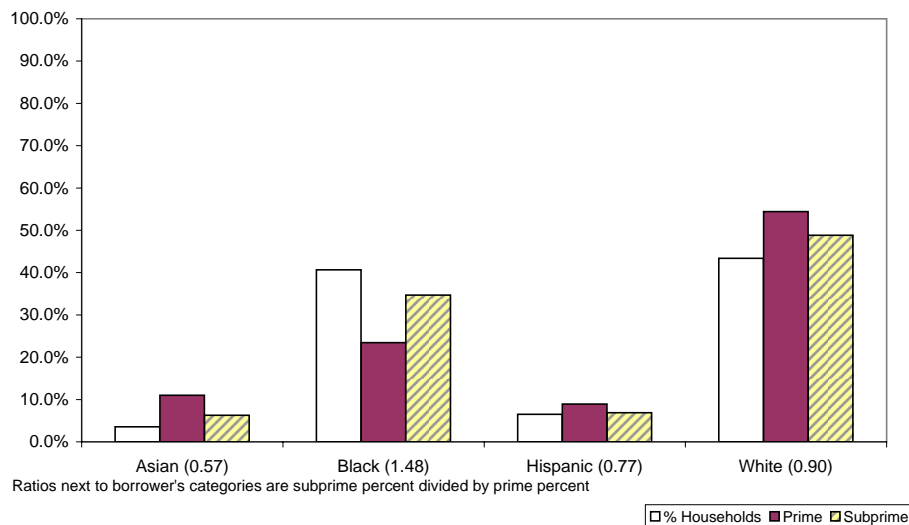
Prime Denial Rates and Disparity Ratios



Subprime Denial Rates and Disparity Ratios



Percent of Loans Compared to Percent of Households



Subprime Market Share of Loans

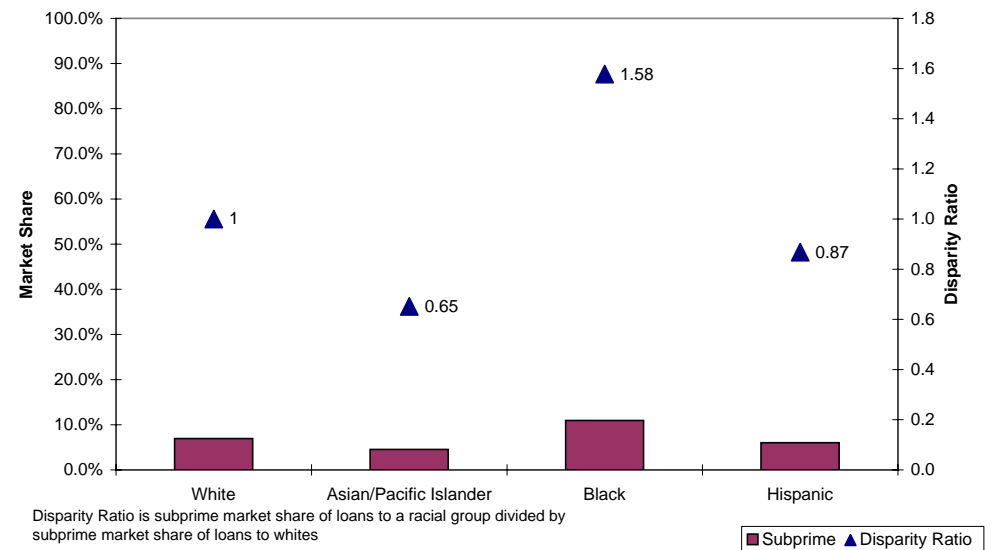
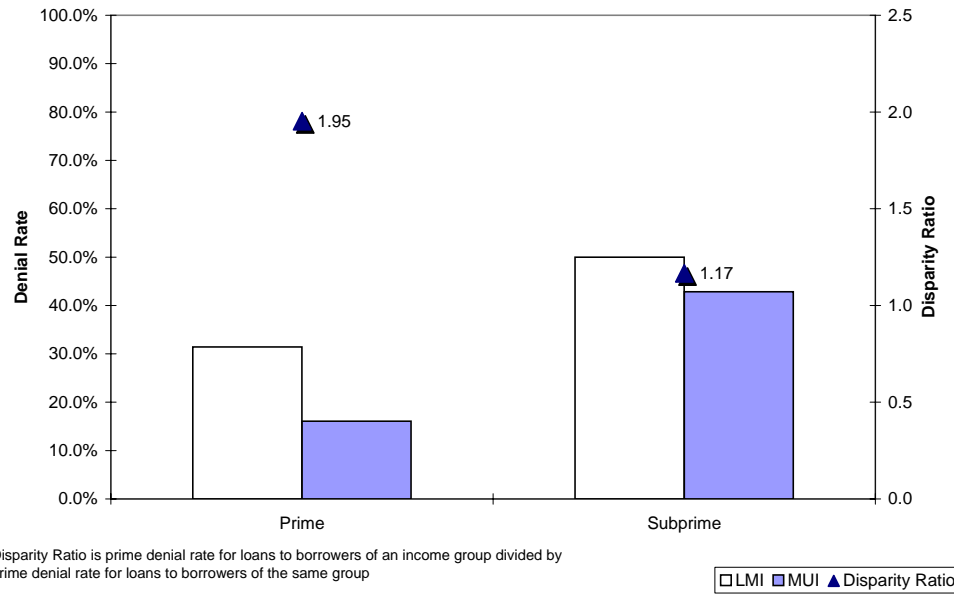
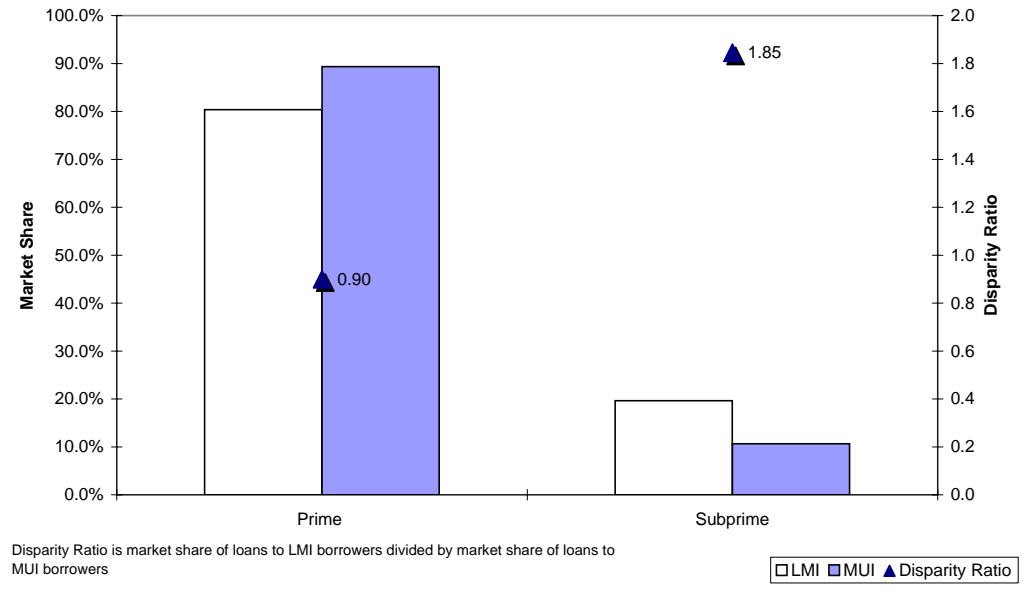


Chart 9: Refinance Lending by Income of Borrower, City of Philadelphia

Denial Rate and Disparity Ratio



Market Share of Loans



Percent of Loans Compared to Percent of Households

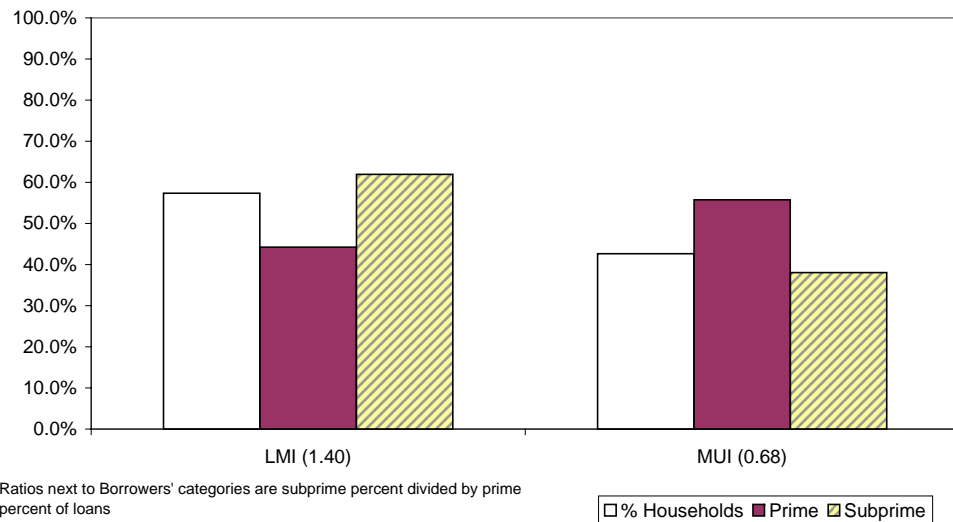
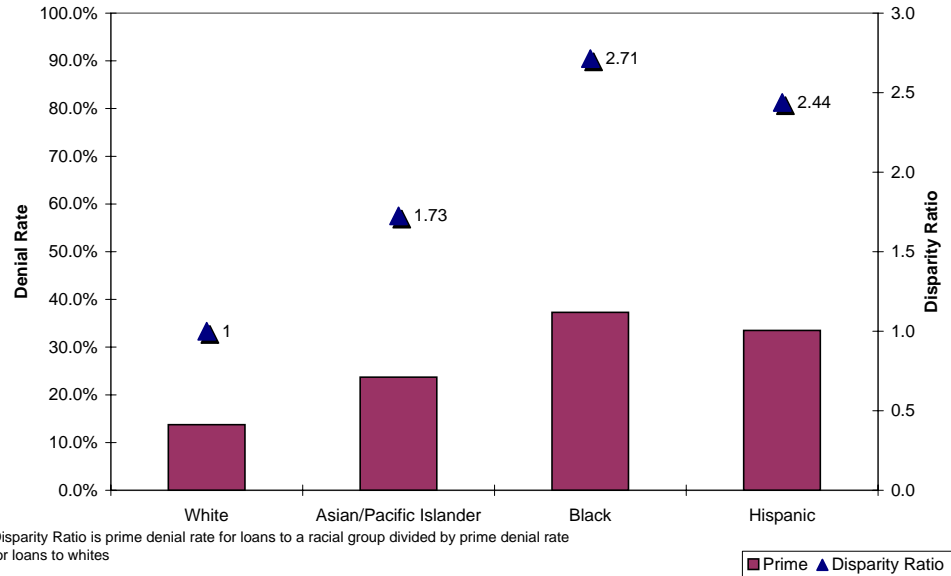
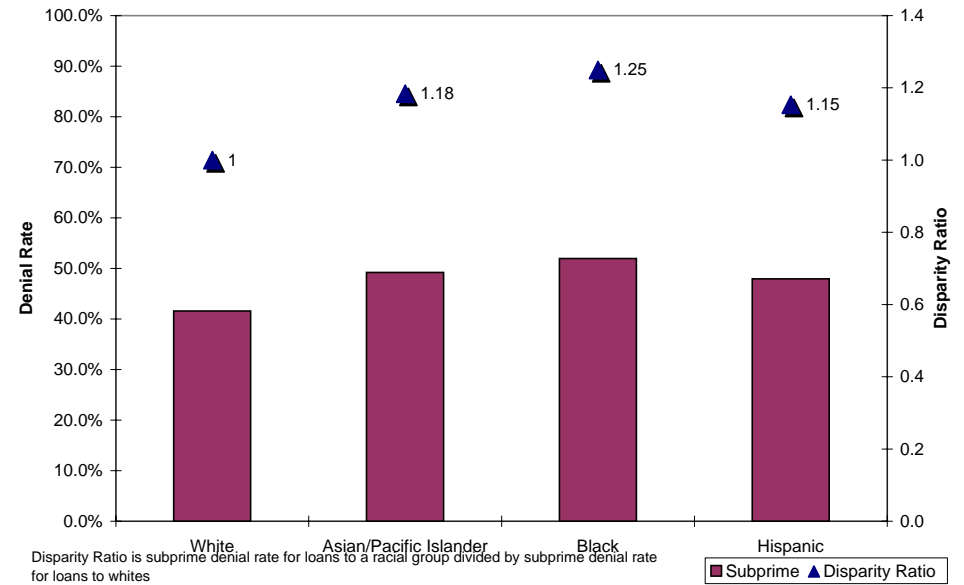


Chart 10: Refinance Lending by Race of Borrower, City of Philadelphia

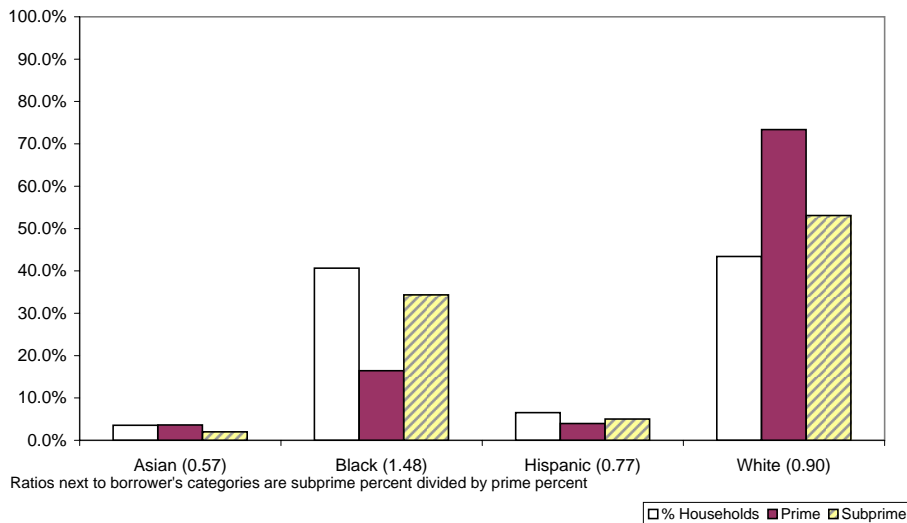
Prime Denial Rates and Disparity Ratios



Subprime Denial Rates and Disparity Ratios



Percent of Loans Compared to Percent of Households



Subprime Market Share of Loans

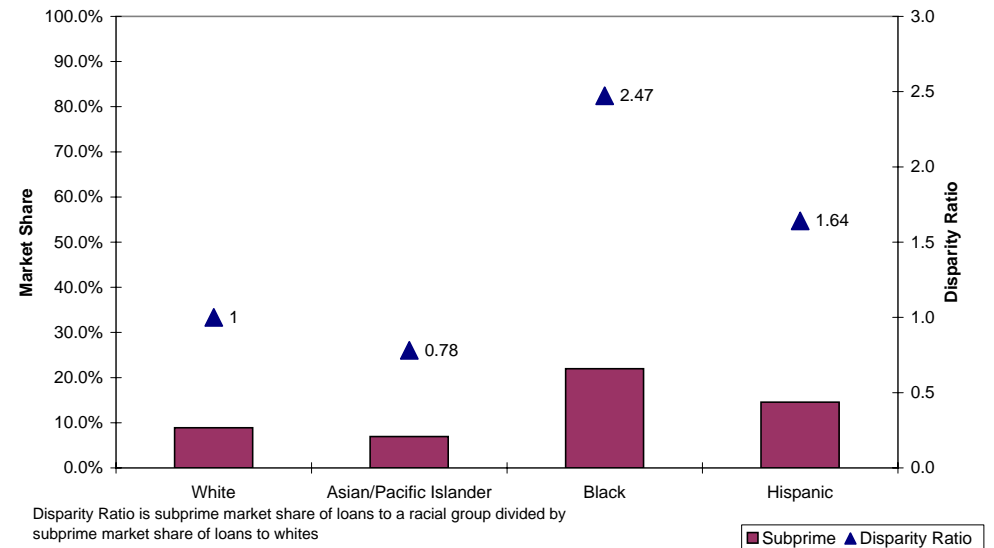
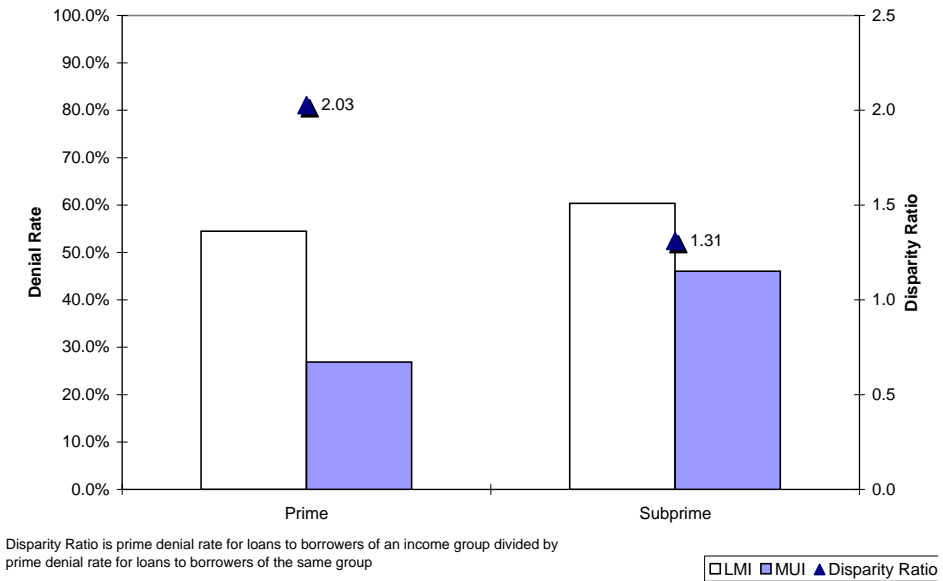
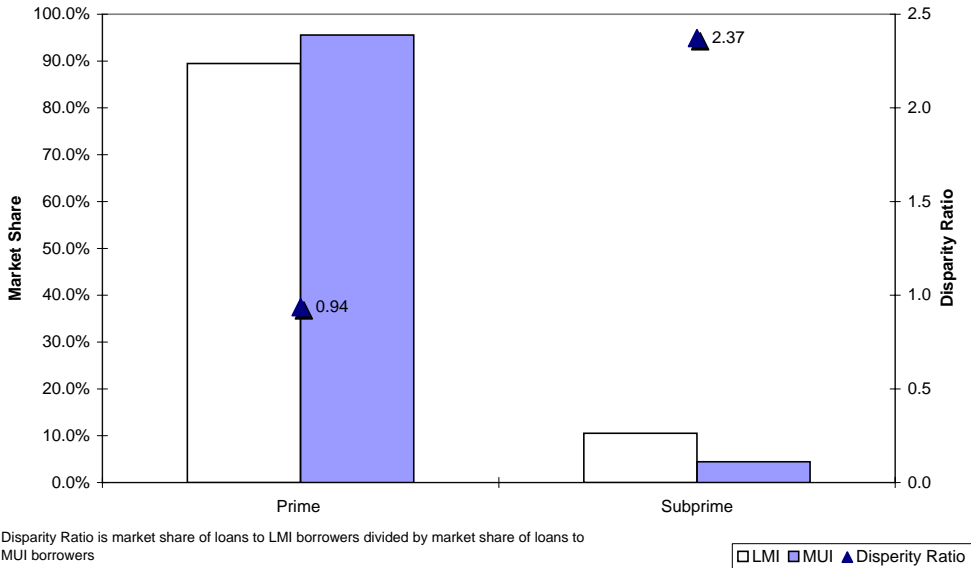


Chart 11: Home Improvement Lending to Owner-occupants by Income of Borrower, City of Philadelphia

Denial Rate and Disparity Ratio



Market Share of Loans



Percent of Loans Compared to Percent of Households

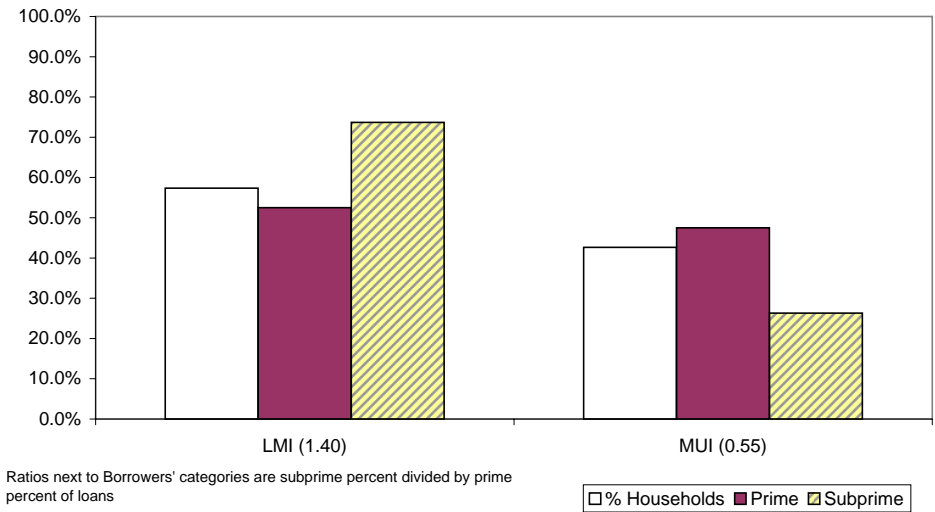
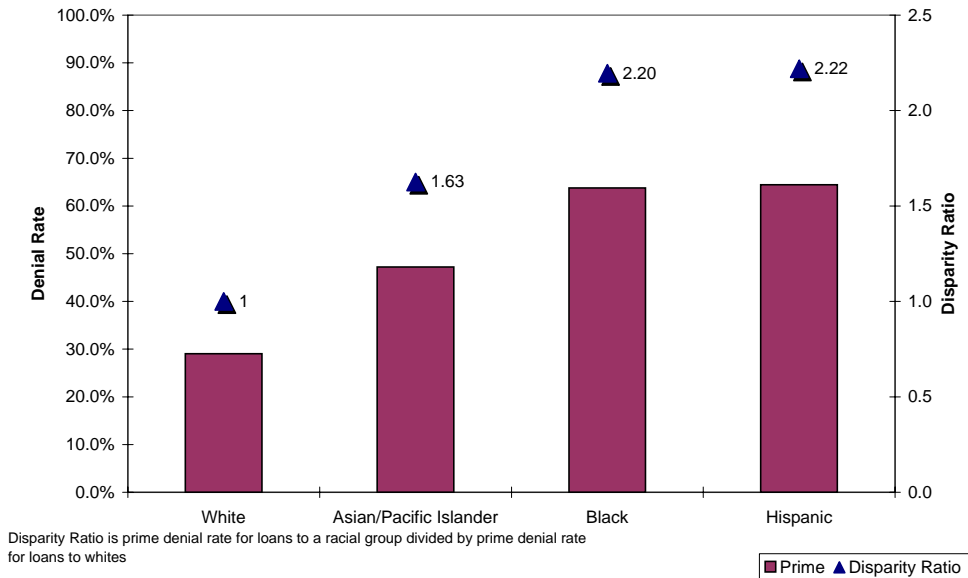
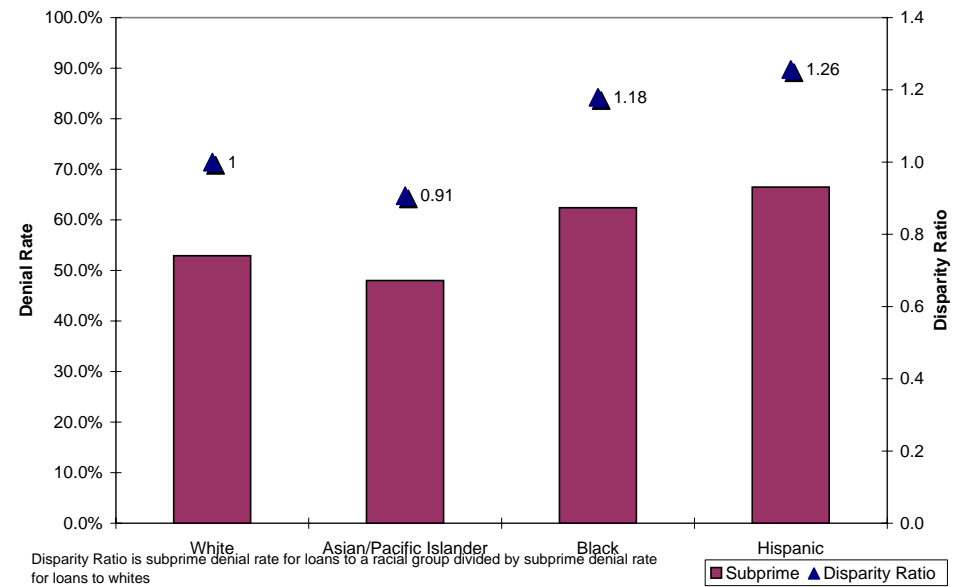


Chart 12: Home Improvement Lending to Owner-occupants by Race of Borrower, City of Philadelphia

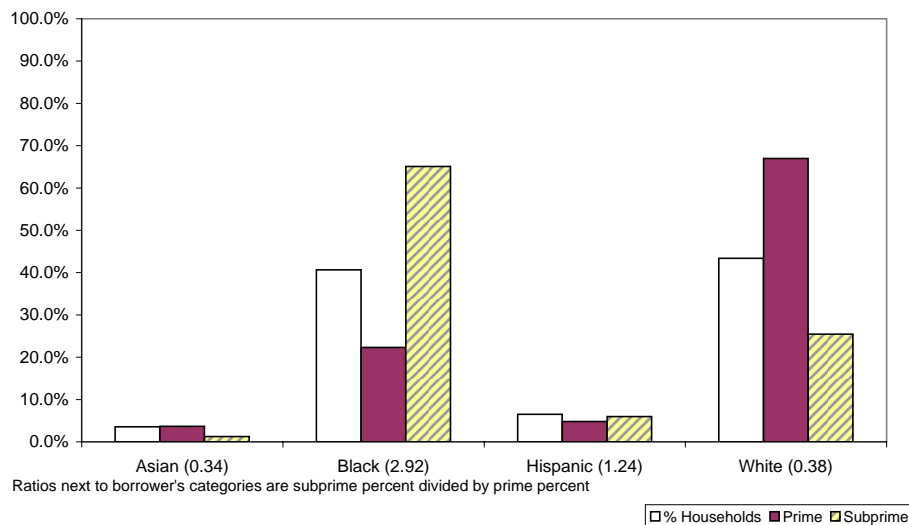
Prime Denial Rates and Disparity Ratios



Subprime Denial Rates and Disparity Ratios



Percent of Loans Compared to Percent of Households



Subprime Market Share of Loans

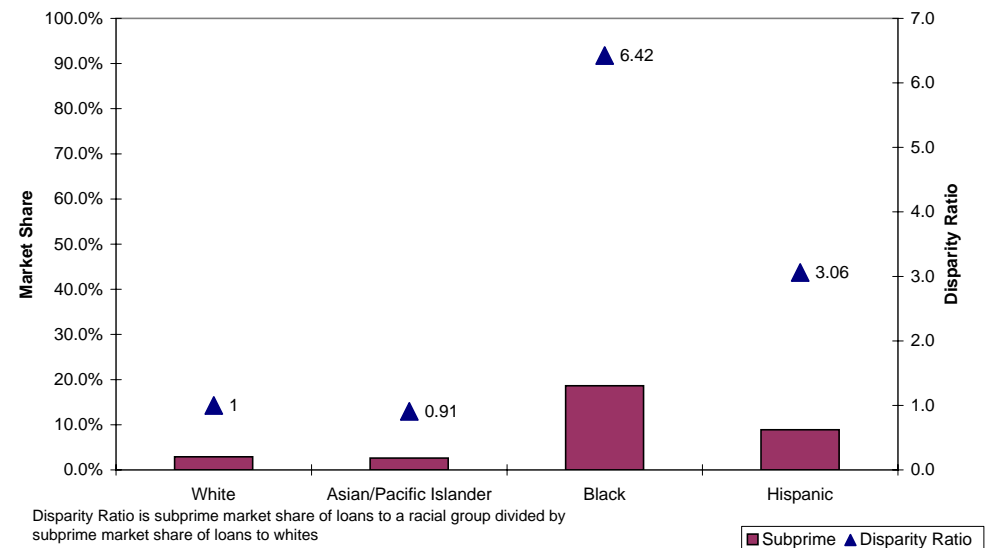
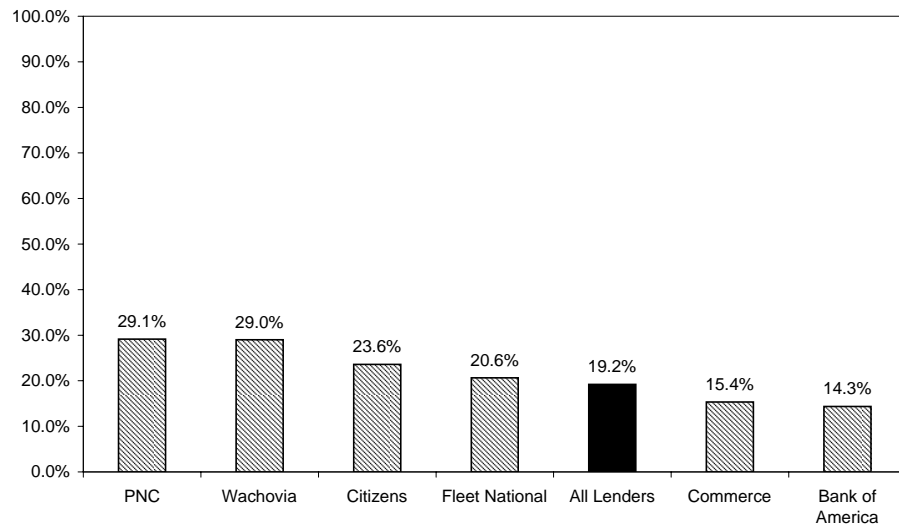
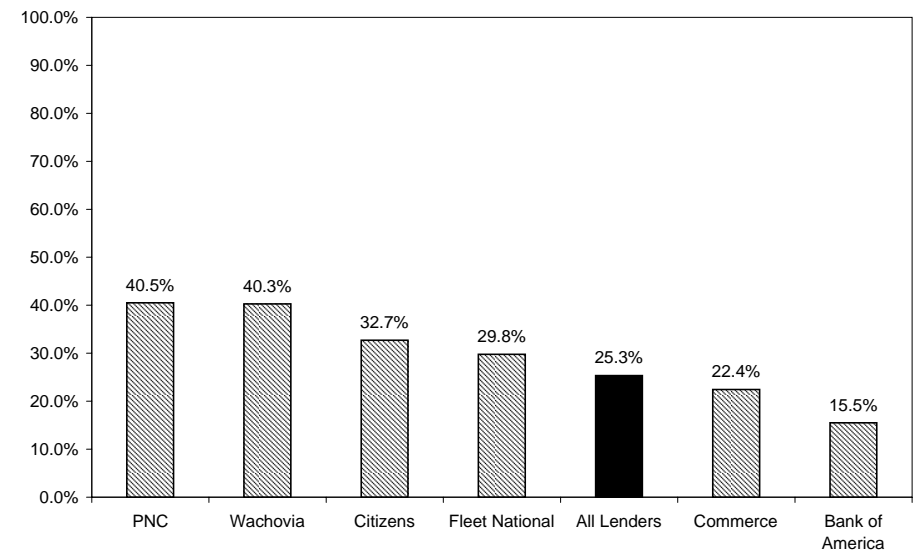


Chart 13: All Single Family Lending Ranking Analysis, City of Philadelphia

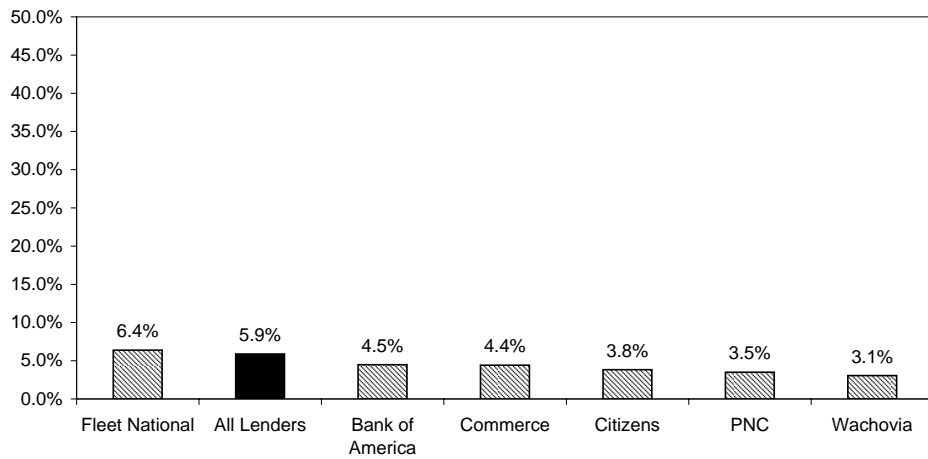
Percent of Loans to African-American Borrowers



Percent of Loans in Minority Census Tracts



Percent of Loans to Asians



Percent of Loans to LMI Borrowers

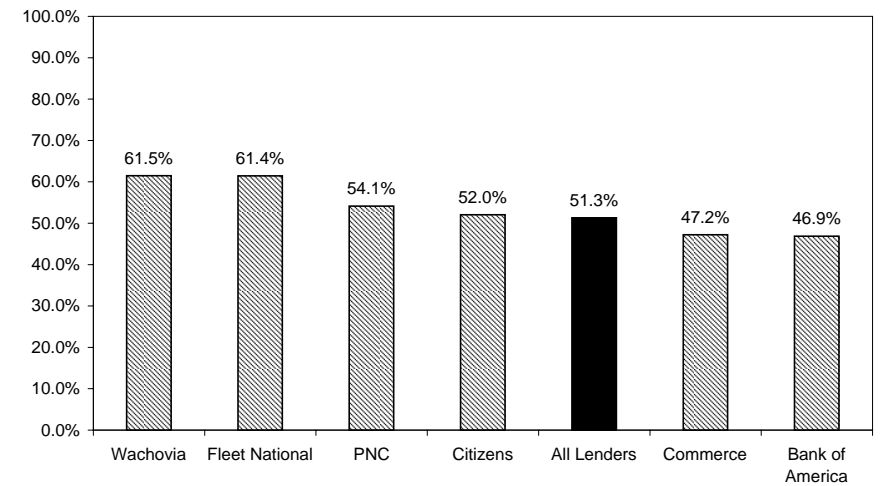
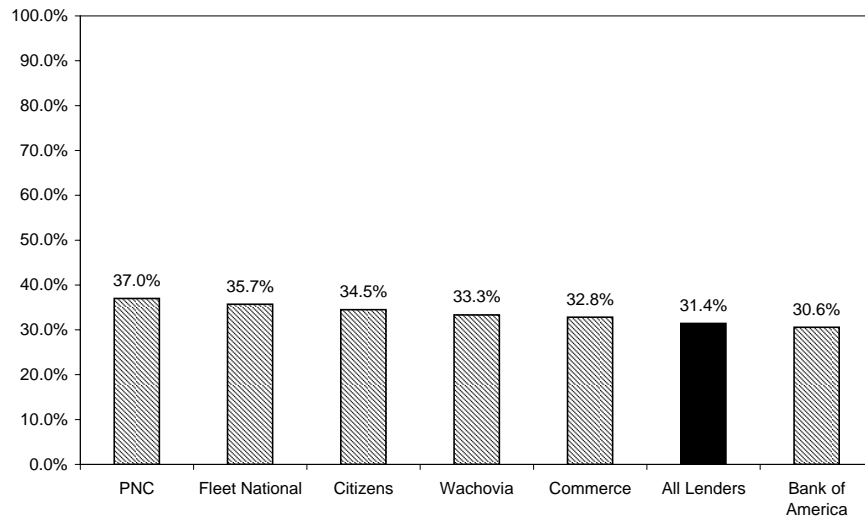
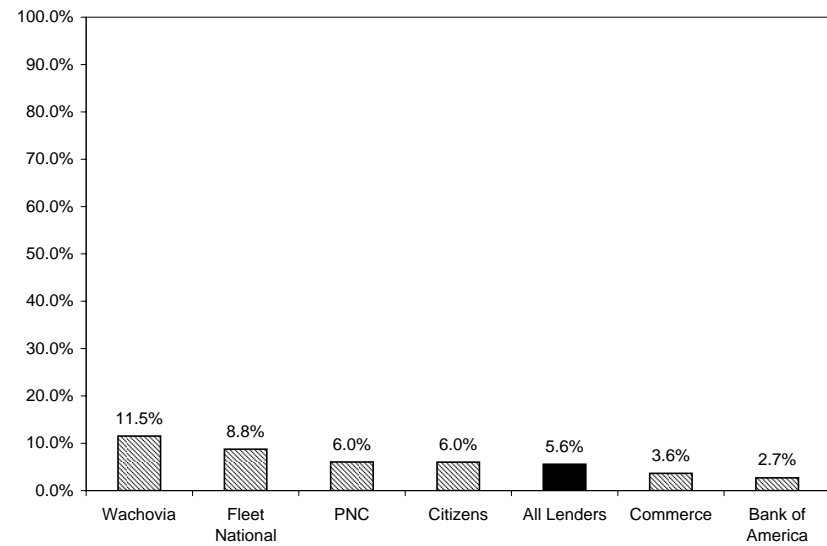


Chart 13: All Single Family Lending Ranking Analysis, City of Philadelphia

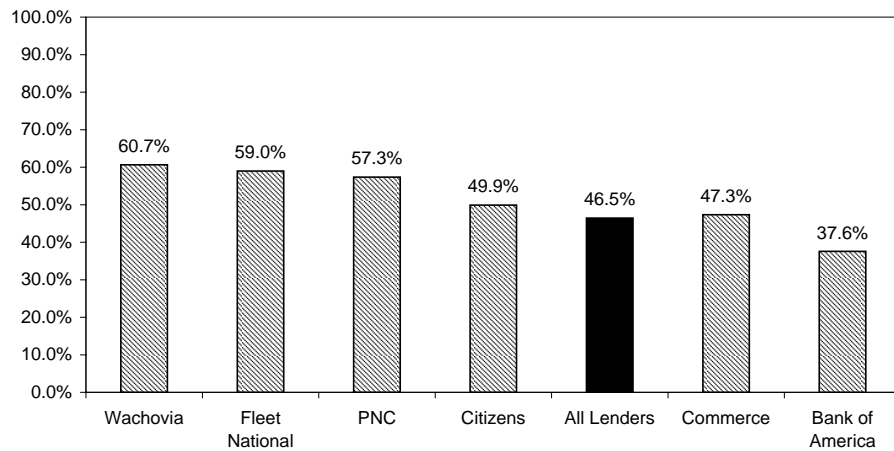
Percent of Loans to Female Borrowers



Percent of Loans to Hispanics



Percent of Loans in LMI Census Tracts



Denial Disparity Ratio by Race of Borrower

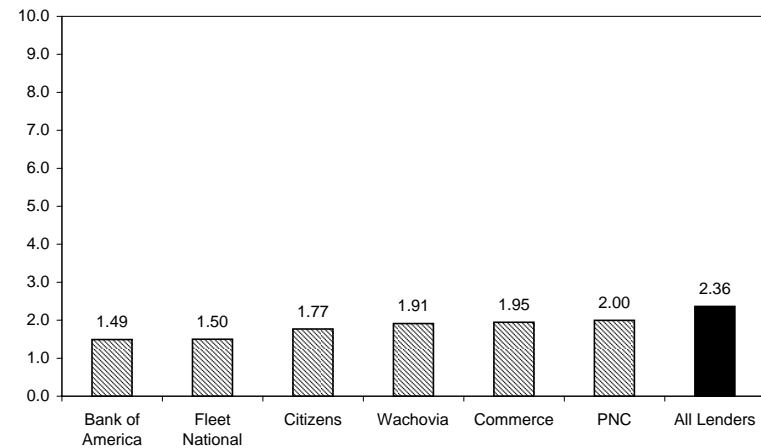
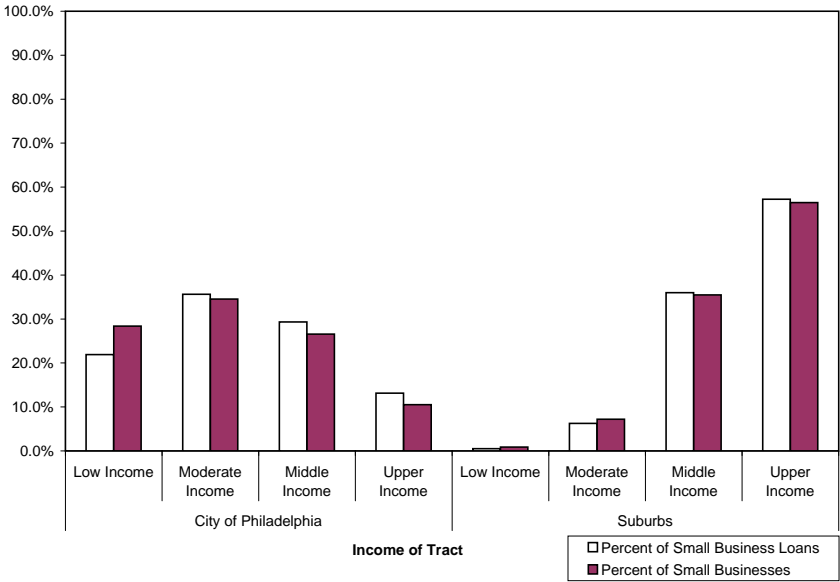
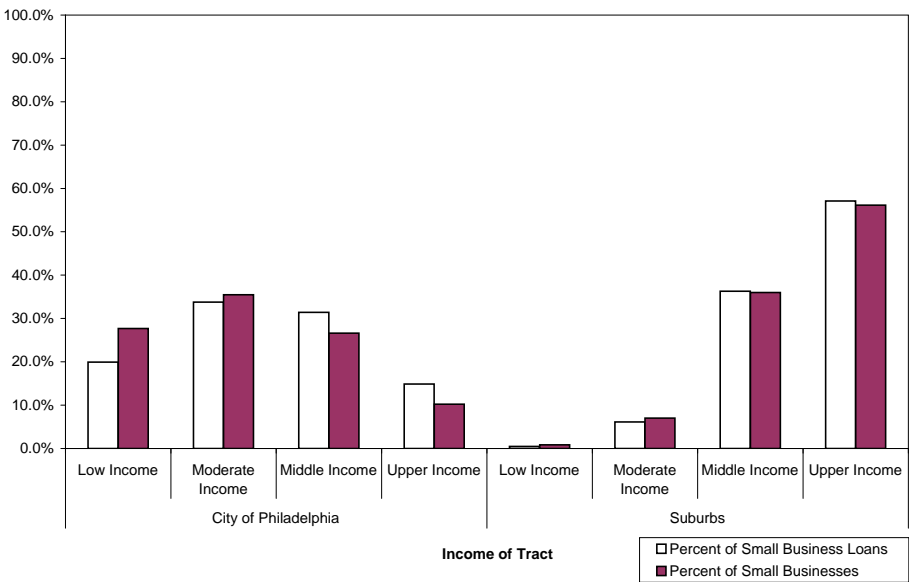


Chart 14: Small Business Lending by Income of Census Tract, City of Philadelphia and Suburbs

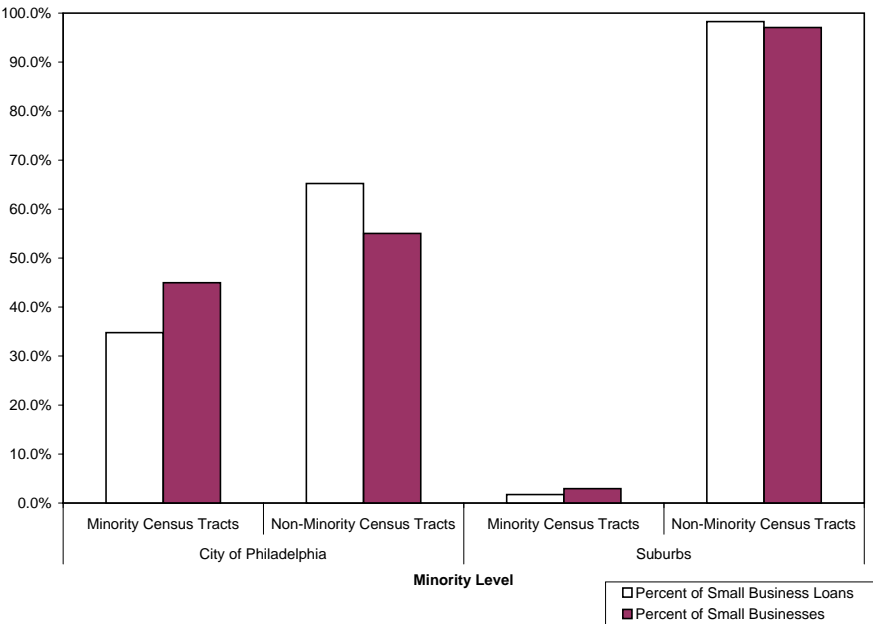
Percent of Small Business Loans
By Income of Census Tract



Percent of Small Business Loans to Businesses with
less than \$1 Million in Revenue by Income Level of Census Tract



Percent of Small Business Loans by Minority Level of Census Tract



Percent of Small Business Loans to Businesses with
less than \$1 Million in Revenue by Minority Level of Census Tract

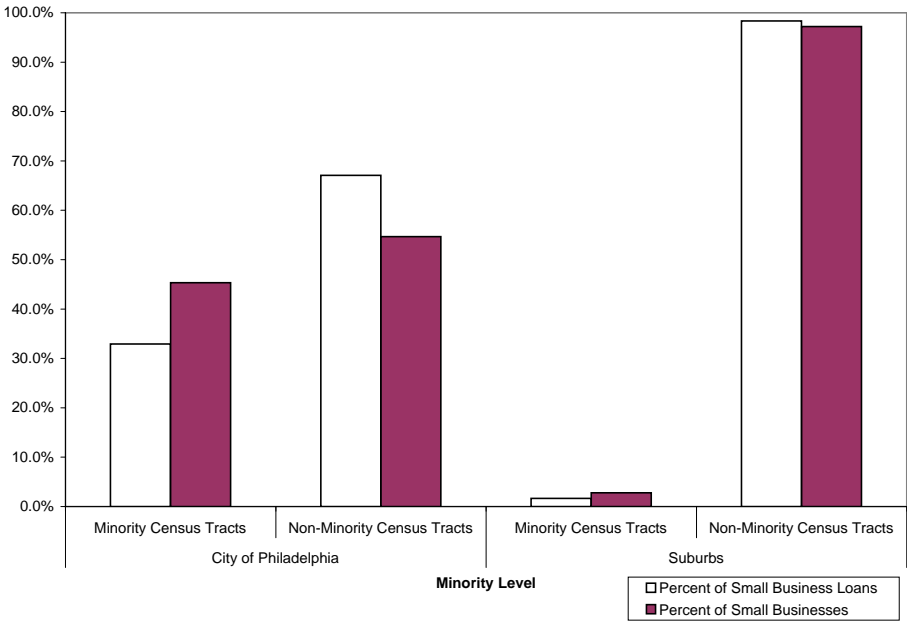


Chart 15: Analysis of Small Business Lending by Size of Small Business

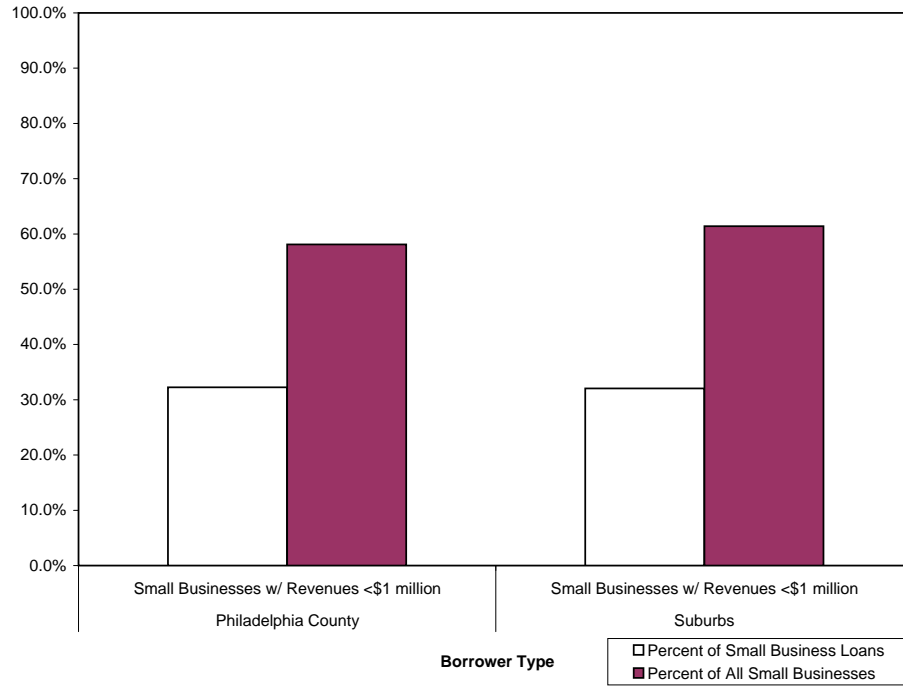
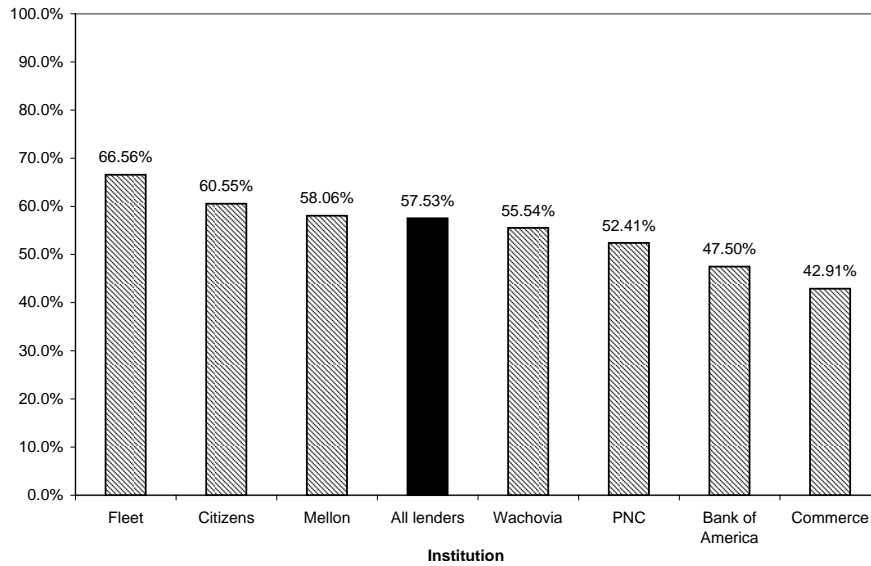
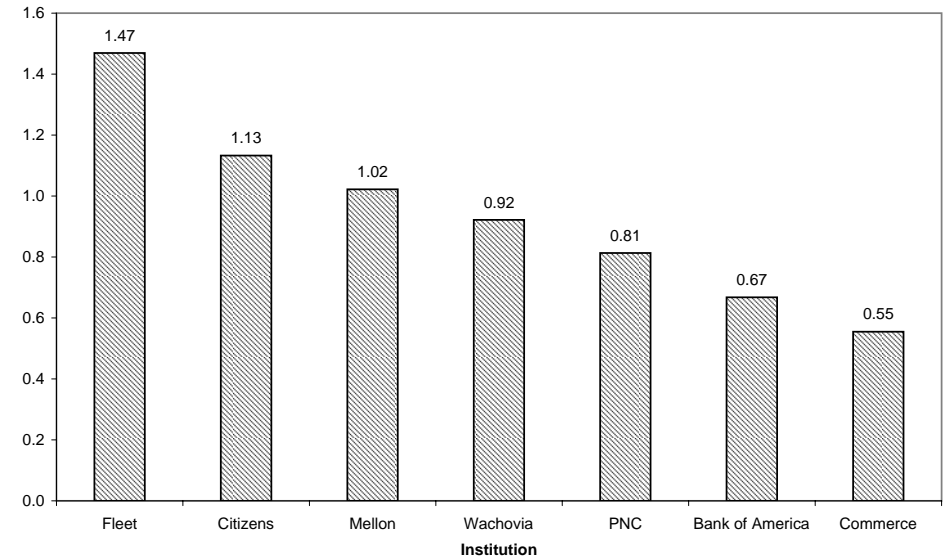


Chart 16: Analysis of Small Business Lending of Banks Receiving City Deposits, City of Philadelphia

Percent of Loans Made in LMI Census Tracts



Ratio of LMI/MUI Market Share



Percent of All Loans Under \$100,000

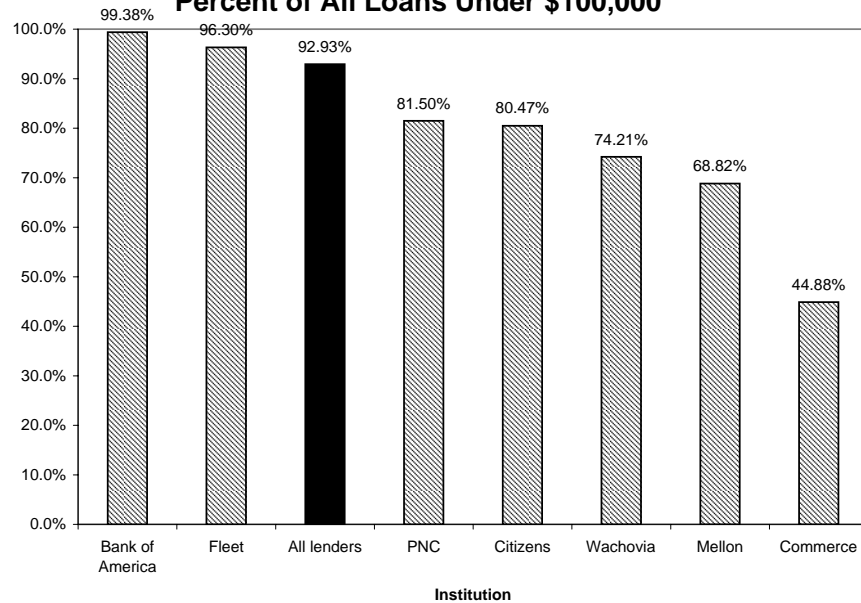


Chart 16: Analysis of Small Business Lending of Banks Receiving City Deposits, City of Philadelphia

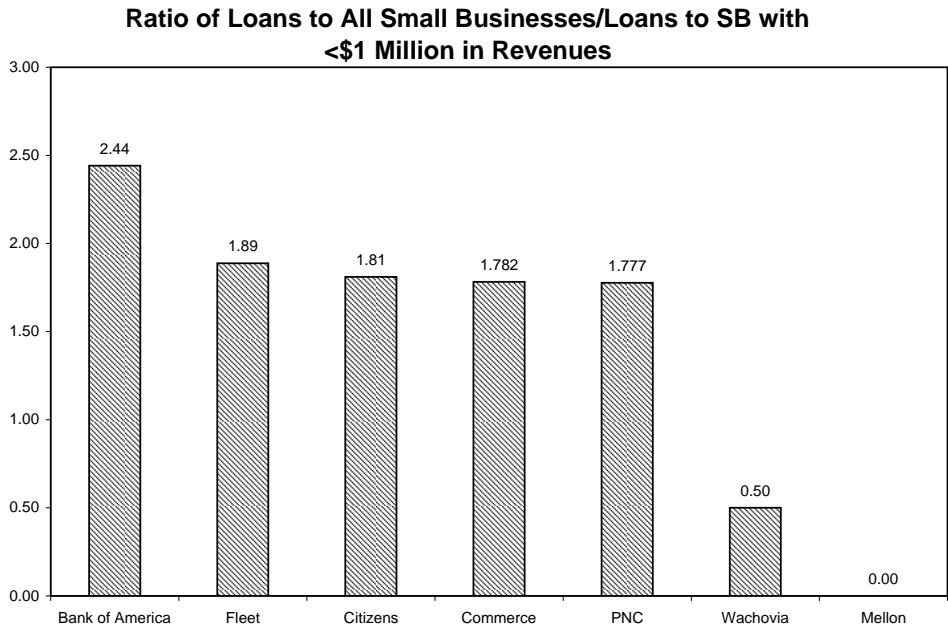
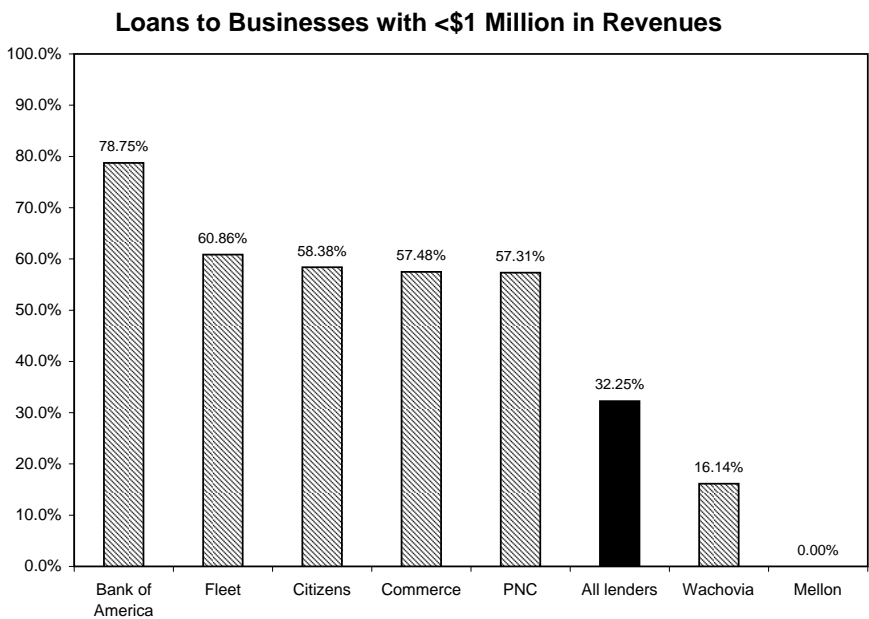
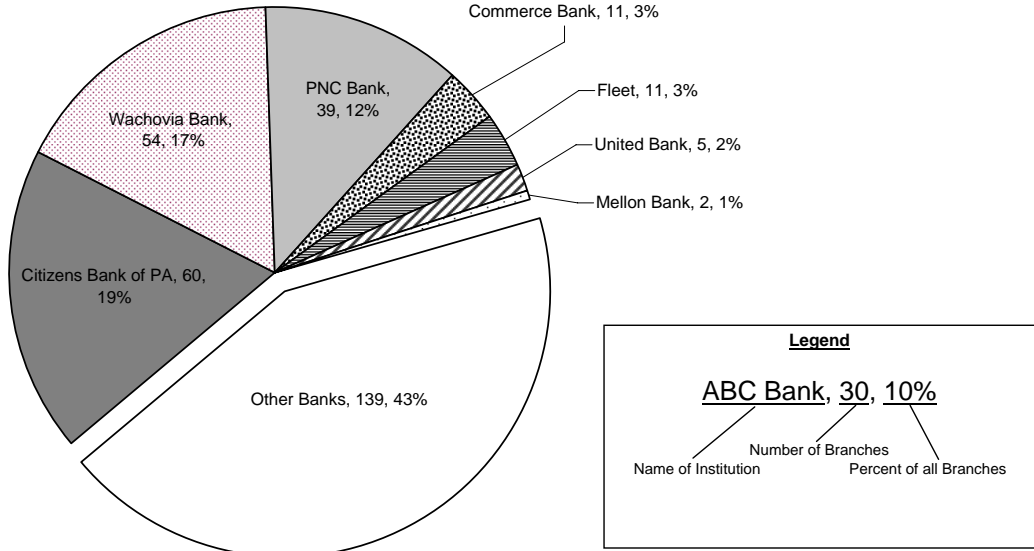
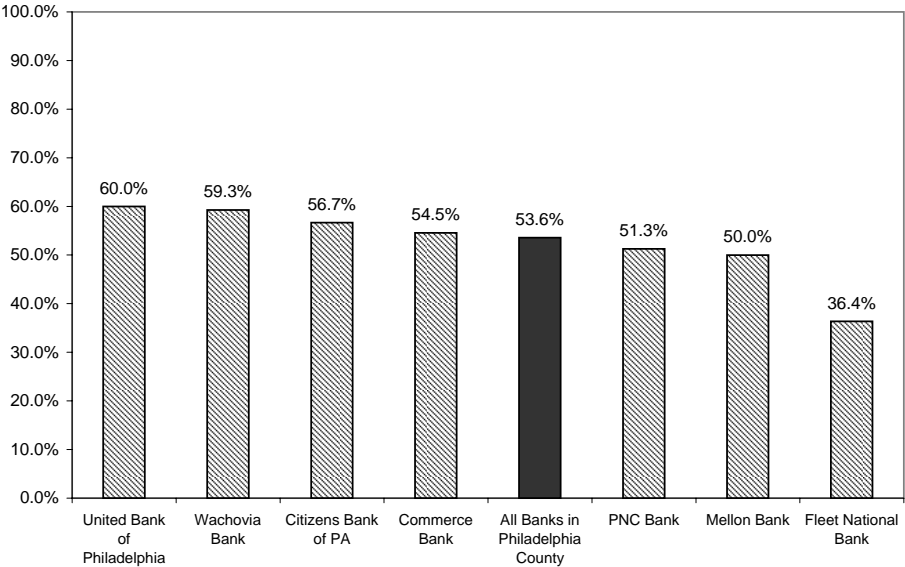


Chart 17. Analysis of Bank Branching by Banks with City Deposits

Number of Branches in the City of Philadelphia
by Institution



Percent of Branches in LMI Census Tracts



Percent of Branches in Substantially Minority Neighborhoods

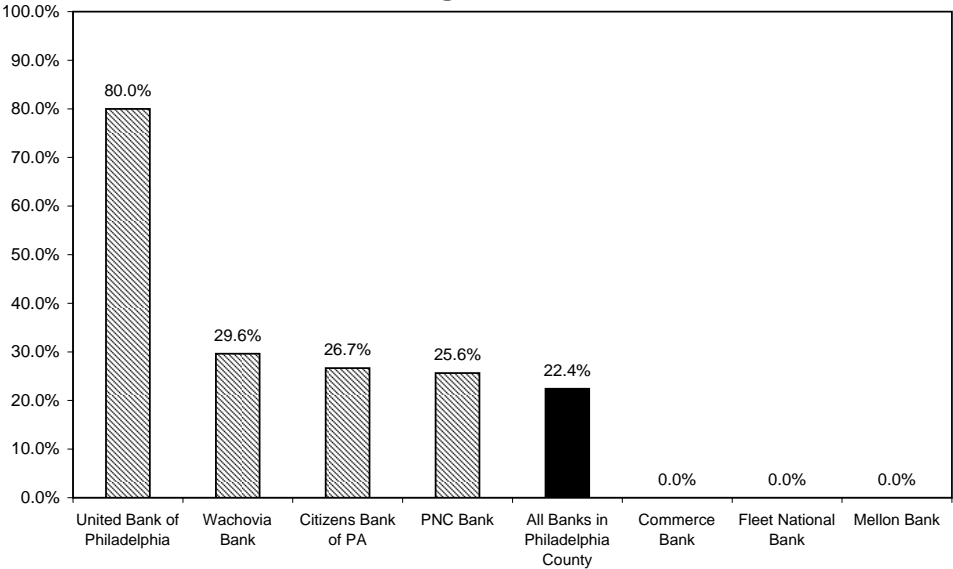
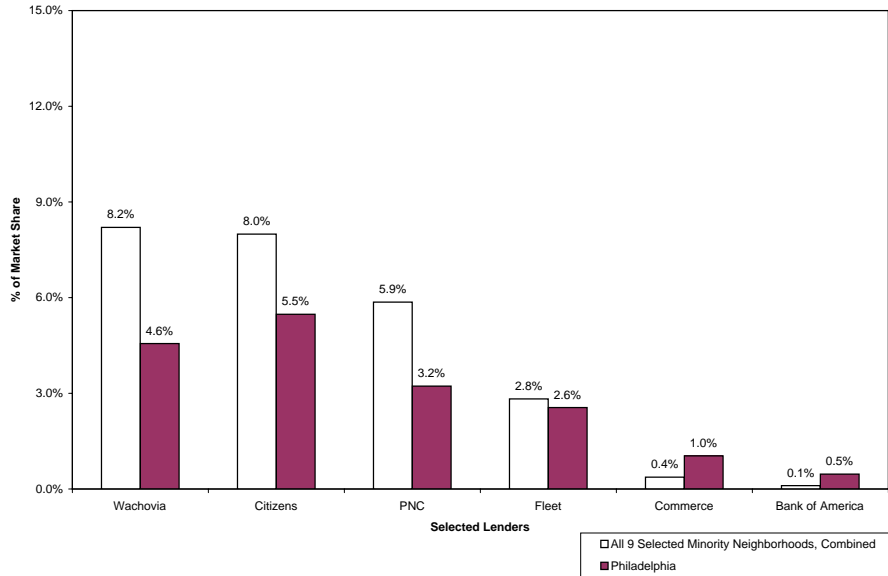
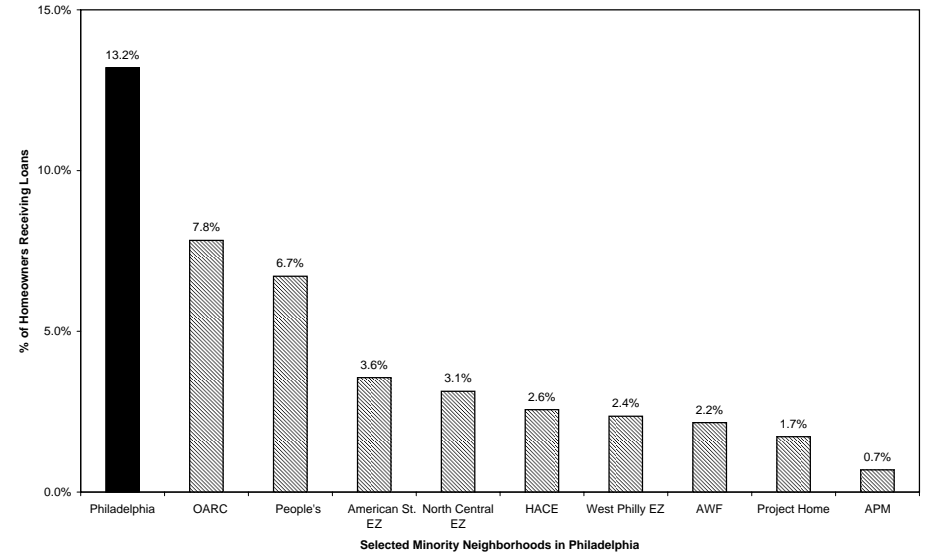


Chart 18: Neighborhood Analysis

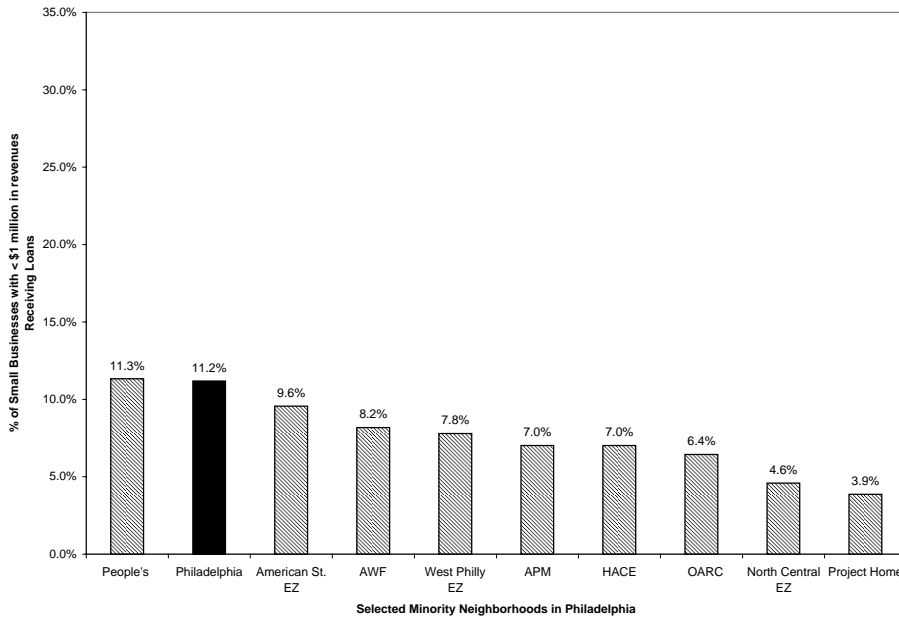
Lender Market Share for All Single-Family Lending in Target Neighborhoods vs. City of Philadelphia



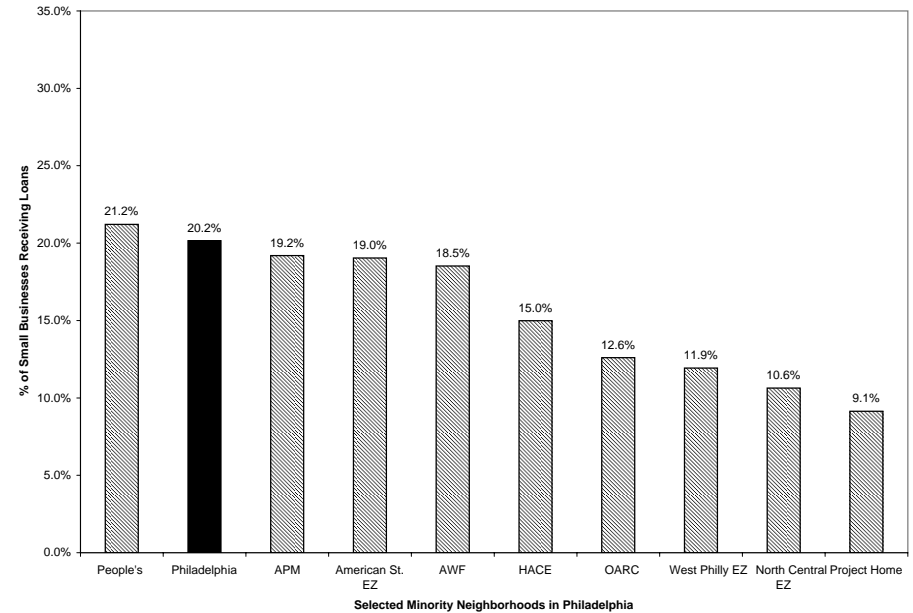
Are Loans Reaching Owner-Occupied Housing Units?



Are Loans Reaching Small Businesses with < \$1 Million in Revenues in these Neighborhoods?



Are Loans Reaching Small Businesses in these Neighborhoods?



Appendix 2: Maps

Map 1: Subprime All Single Family Lending Compared to Minority Level of Census Tract

Map 2: Subprime All Single Family Lending Compared to Income Level of Census Tract

Map 3: Prime All Single Family Lending Compared to Minority Level of Census Tract

Map 4: Prime All Single Family Lending Compared to Income Level of Census Tract

Map 5: PNC Bancorp Lending Compared to Minority Level of Census Tract

Map 6: PNC Bancorp Lending Compared to Income Level of Census Tract

Map 7: Wachovia Corporation Lending Compared to Minority Level of Census Tract

Map 8: Wachovia Corporation Lending Compared to Income Level of Census Tract

Map 9: Fleet NB Lending Compared to Minority Level of Census Tract

Map 10: Fleet NB Lending Compared to Income Level of Census Tract

Map 11: Commerce Bancorp Lending Compared to Minority Level of Census Tract

Map 12: Commerce Bancorp Lending Compared to Income Level of Census Tract

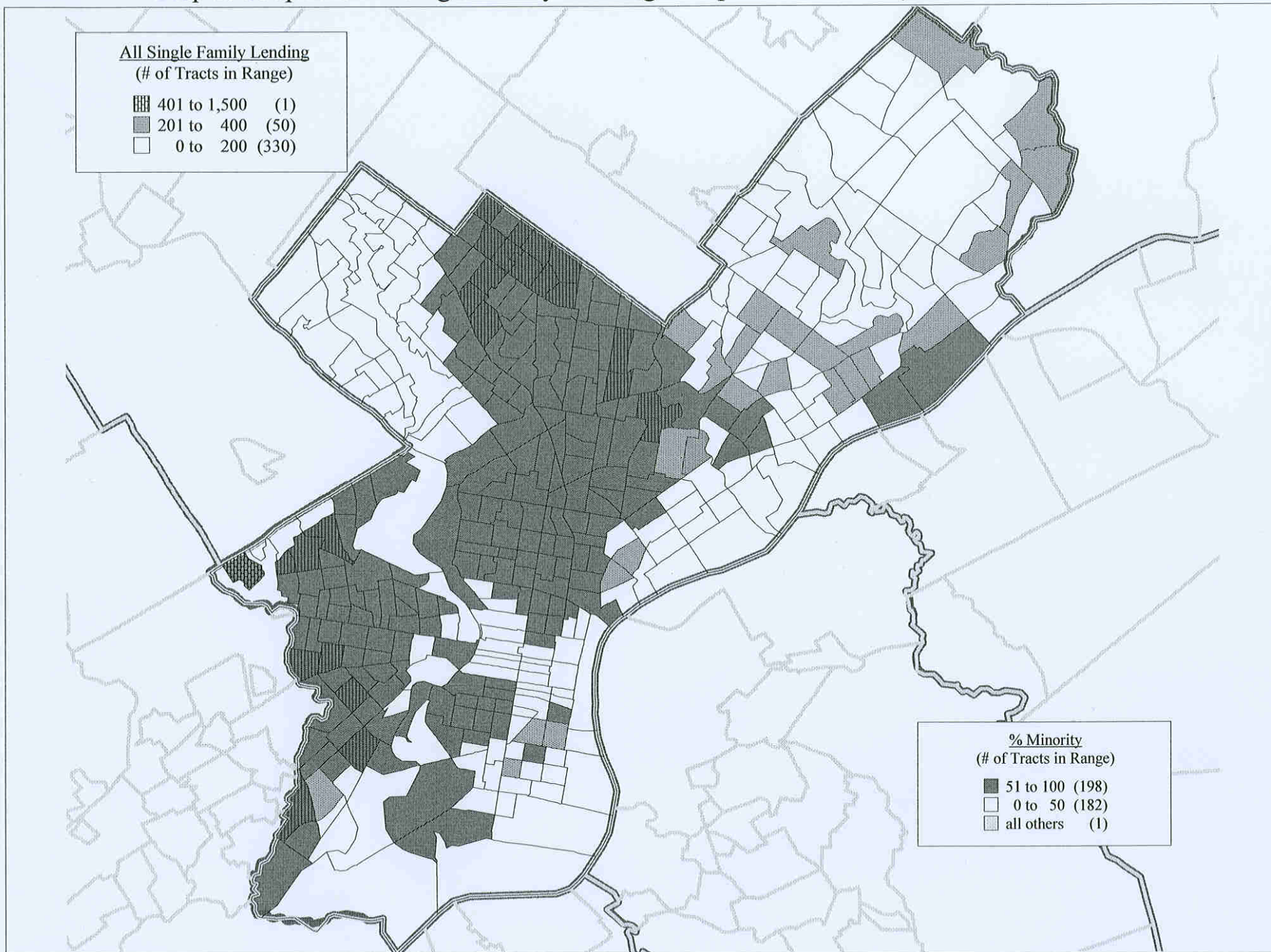
Map 13: Citizens Bank Lending Compared to Minority Level of Census Tract

Map 14: Citizens Bank Lending Compared to Income Level of Census Tract

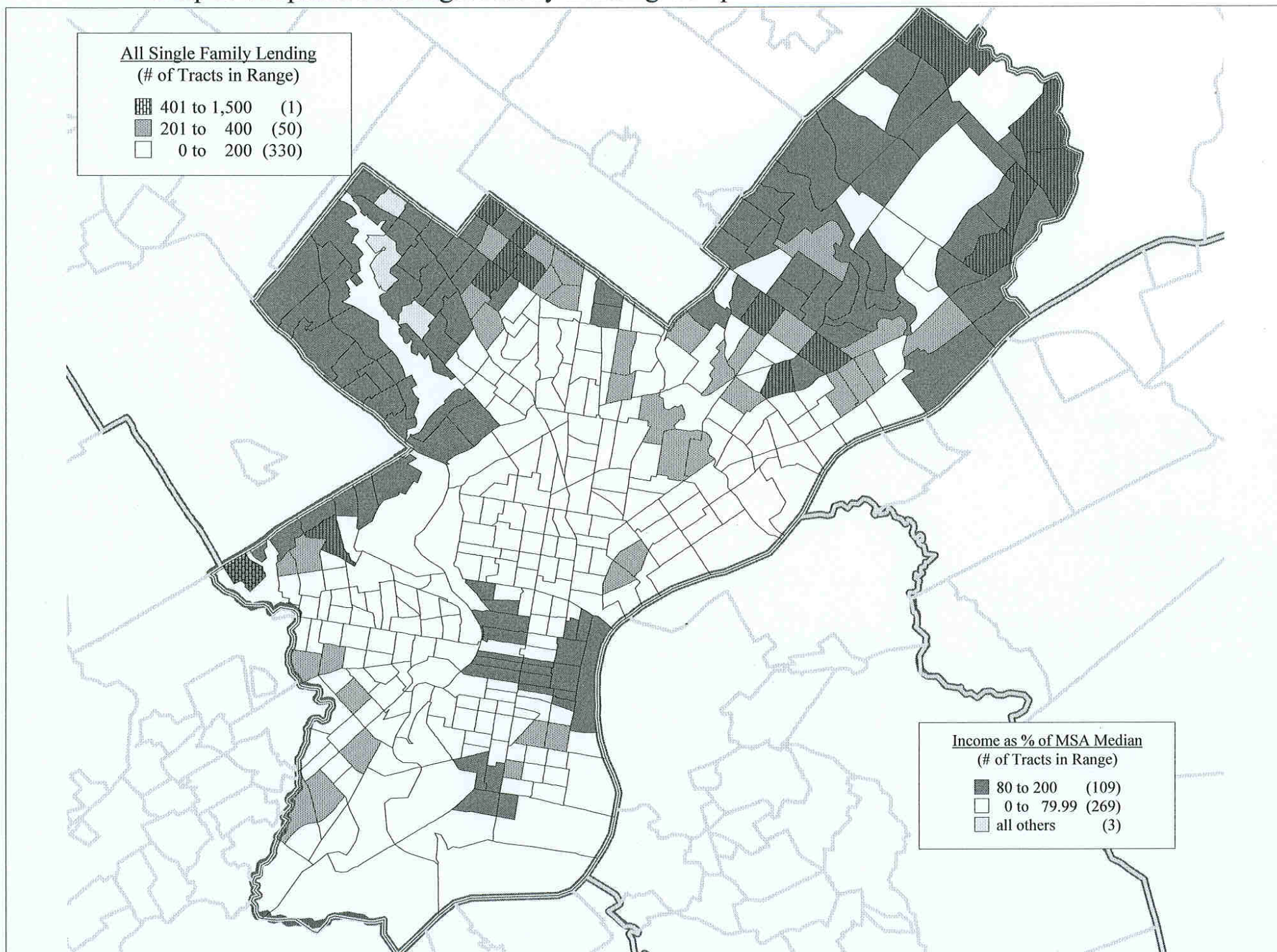
Map 15: Bank of America Lending Compared to Minority Level of Census Tract

Map 16: Bank of America Lending Compared to Income Level of Census Tract

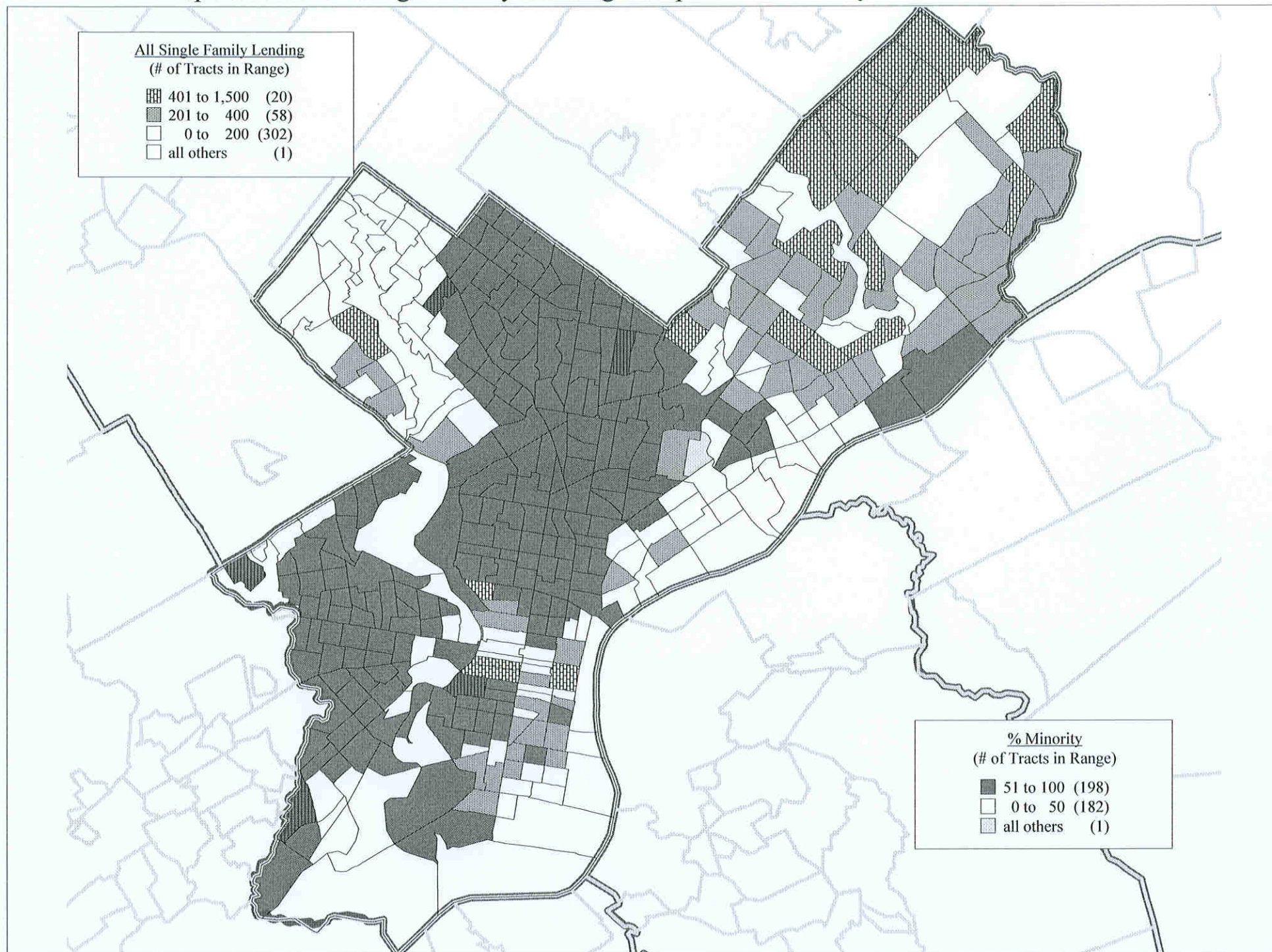
Map 1: Subprime All Single Family Lending Compared to Minority Level of Census Tract



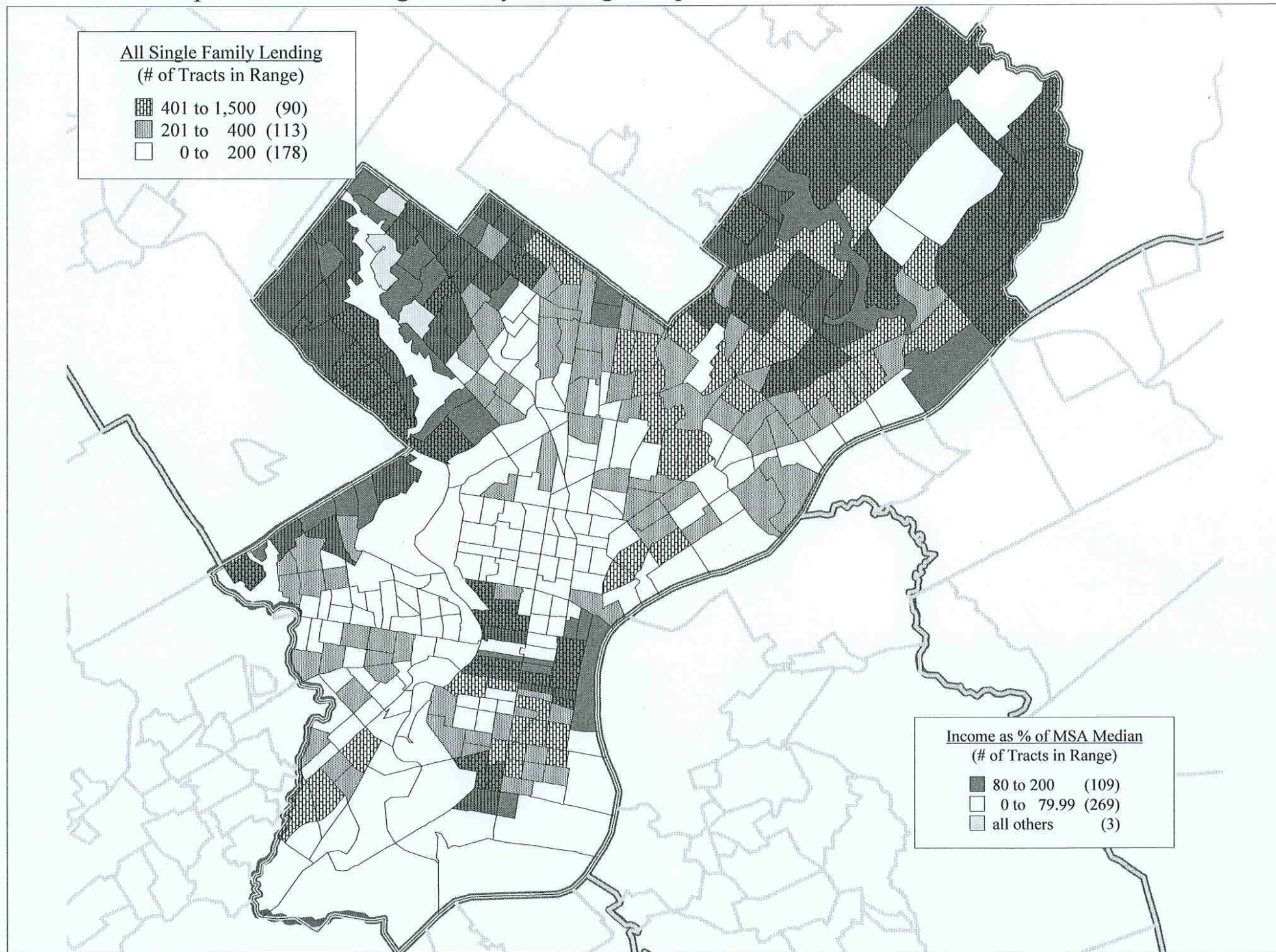
Map 2: Subprime All Single Family Lending Compared to Income Level of Census Tract



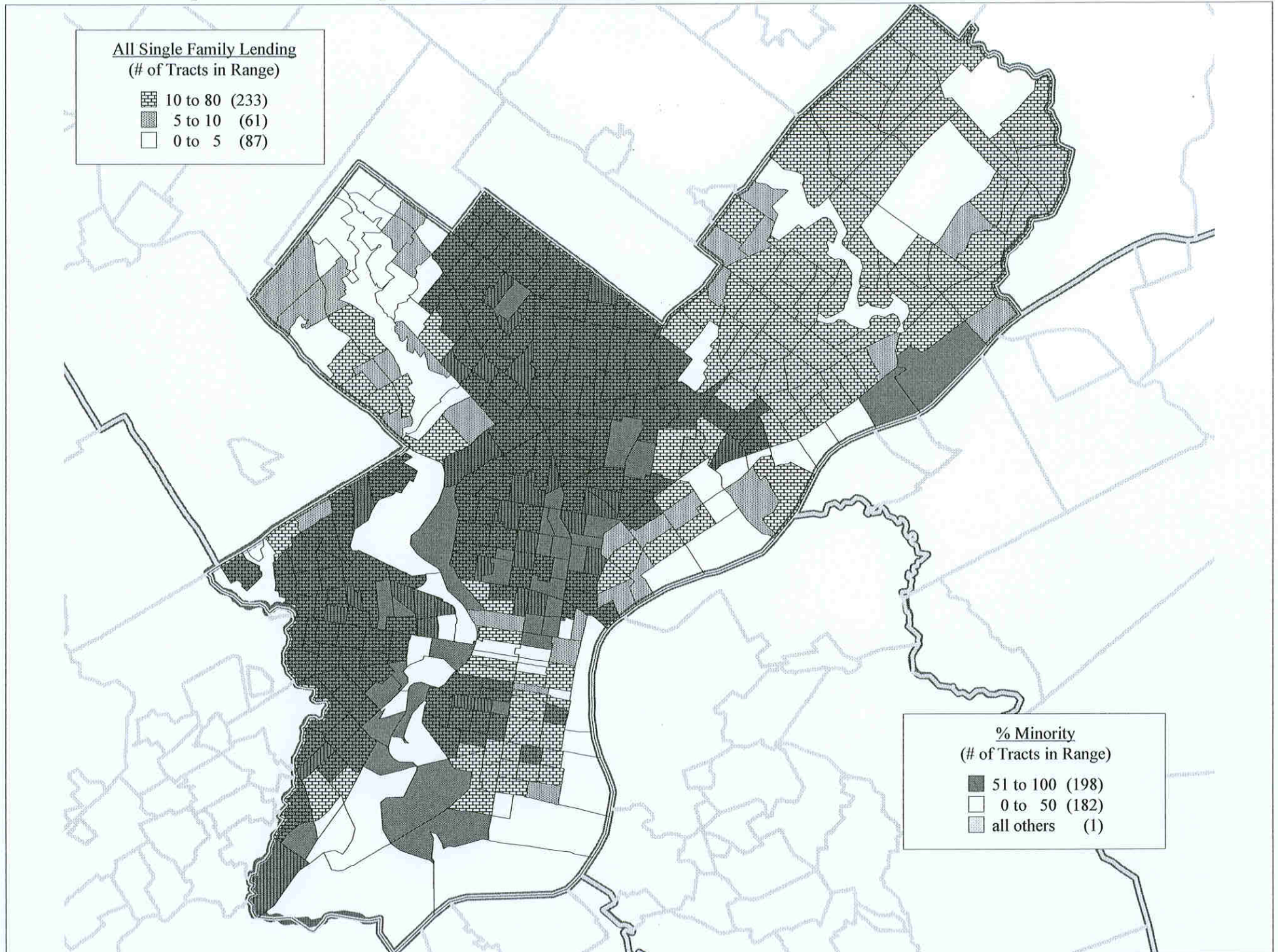
Map 3: Prime All Single Family Lending Compared to Minority Level of Census Tract



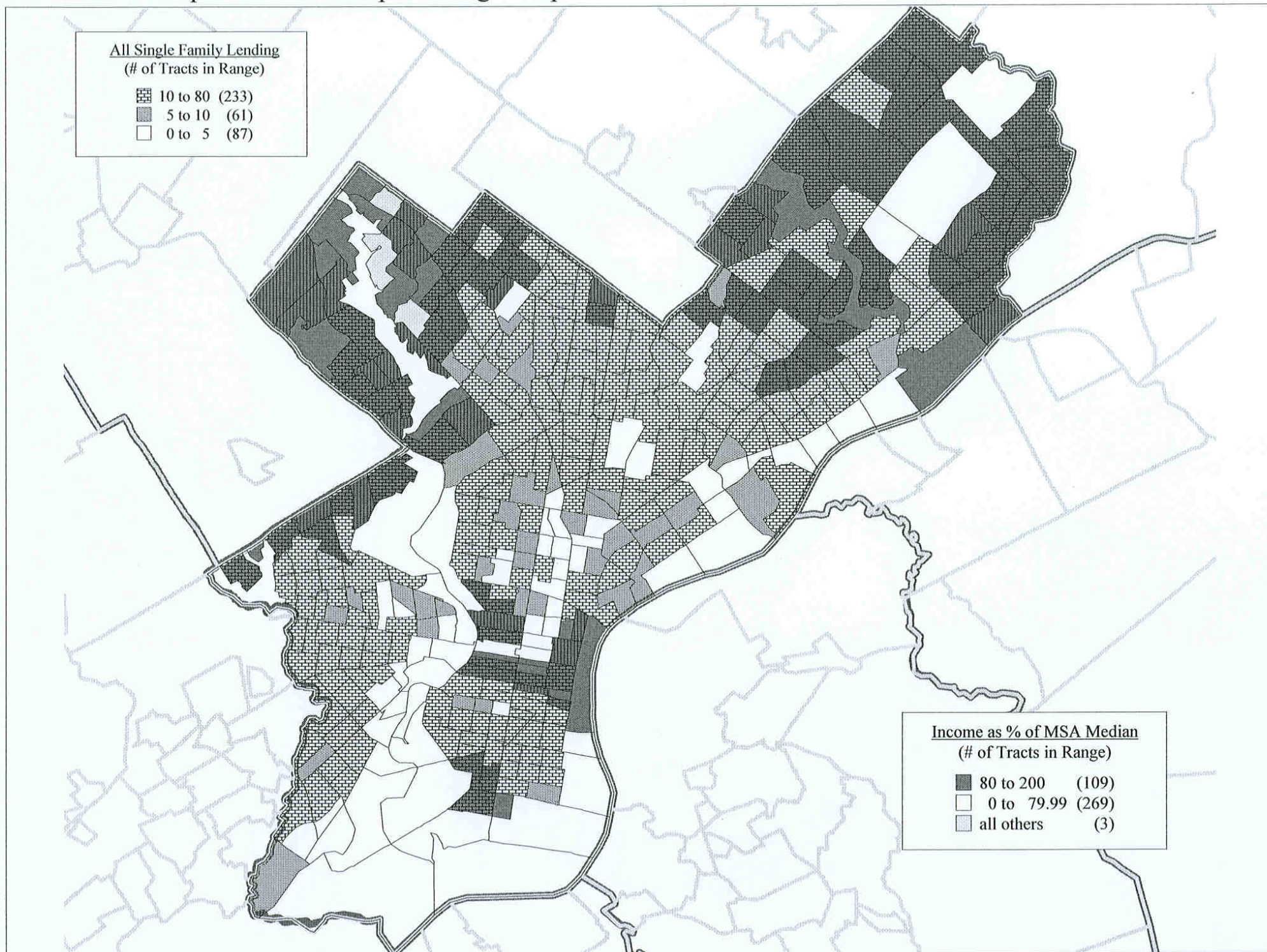
Map 4: Prime All Single Family Lending Compared to Income Level of Census Tract



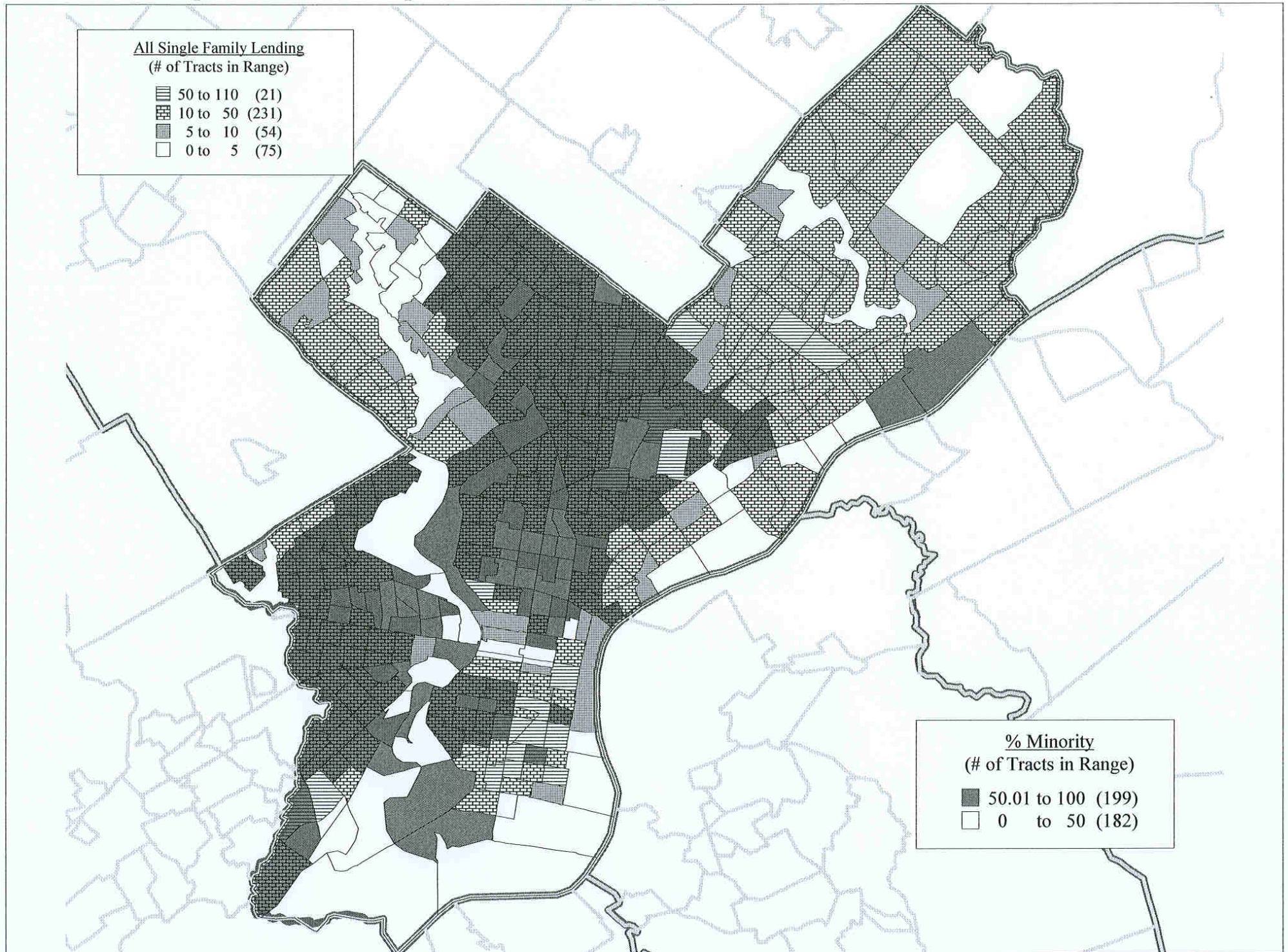
Map 5: PNC Bancorp Lending Compared to Minority Level of Census Tract



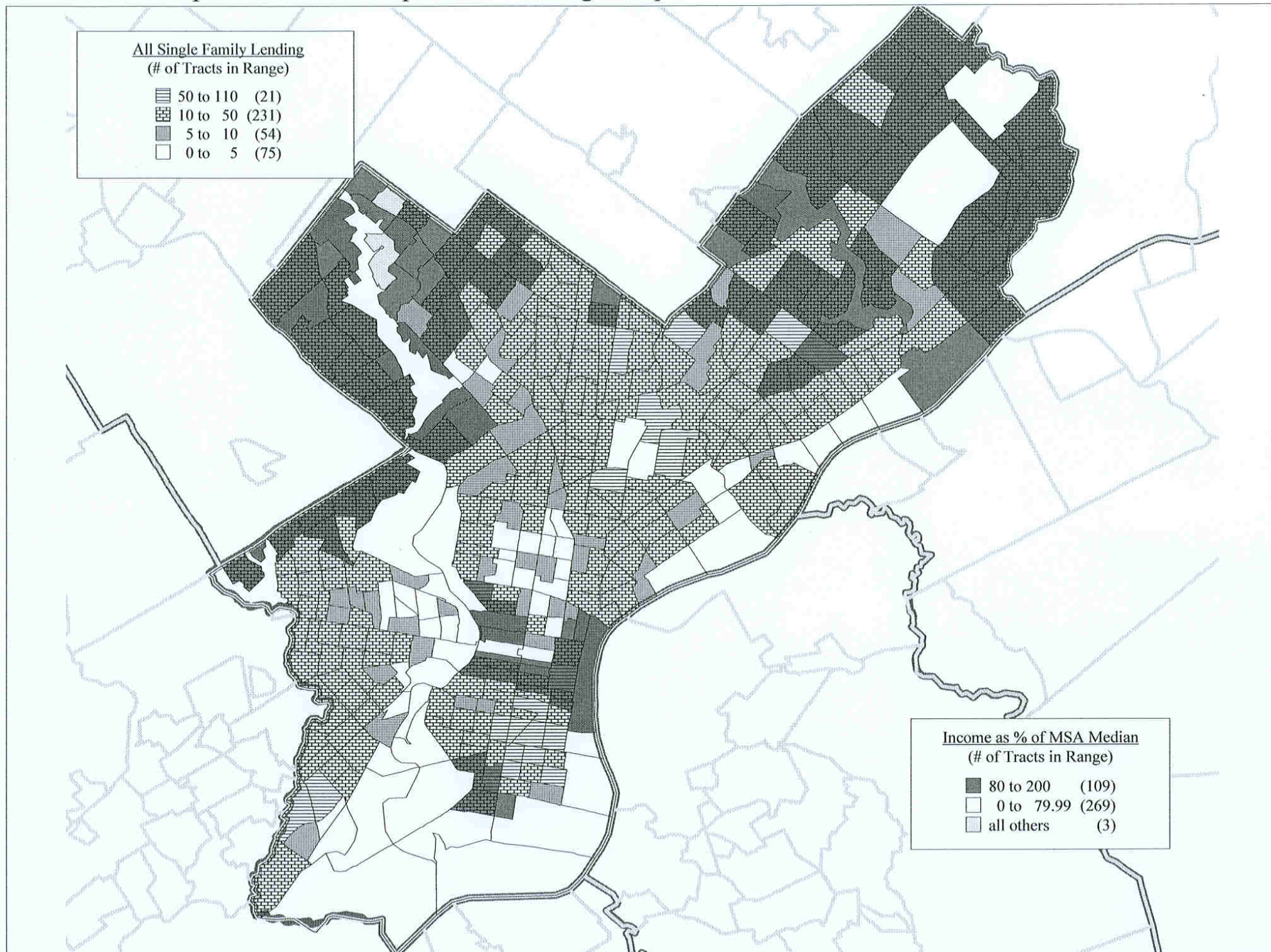
Map 6: PNC Bancorp Lending Compared to Income Level of Census Tract



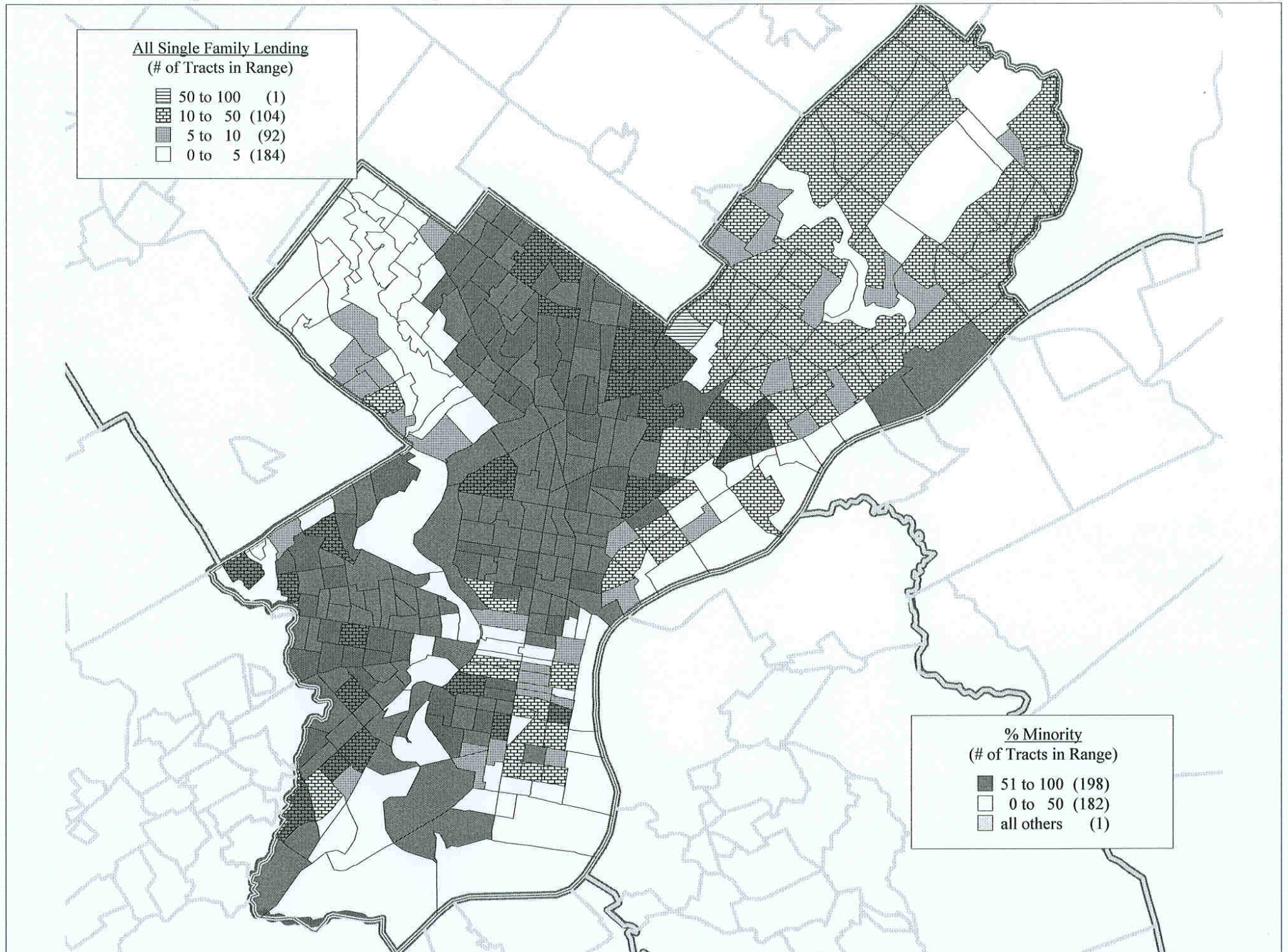
Map 7: Wachovia Corporation Lending Compared to Minority Level of Census Tract



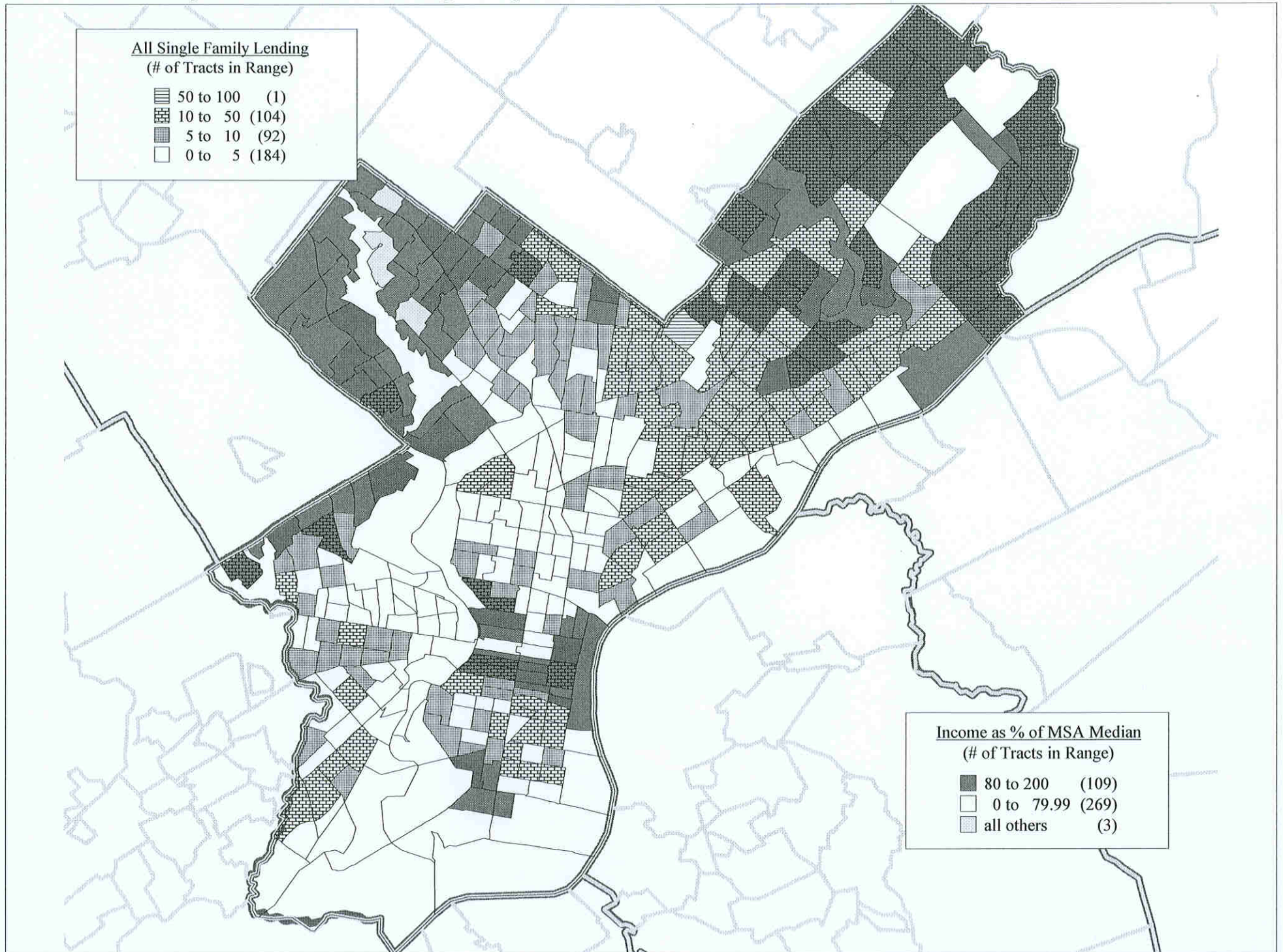
Map 8: Wachovia Corporation Lending Compared to Income Level of Census Tract



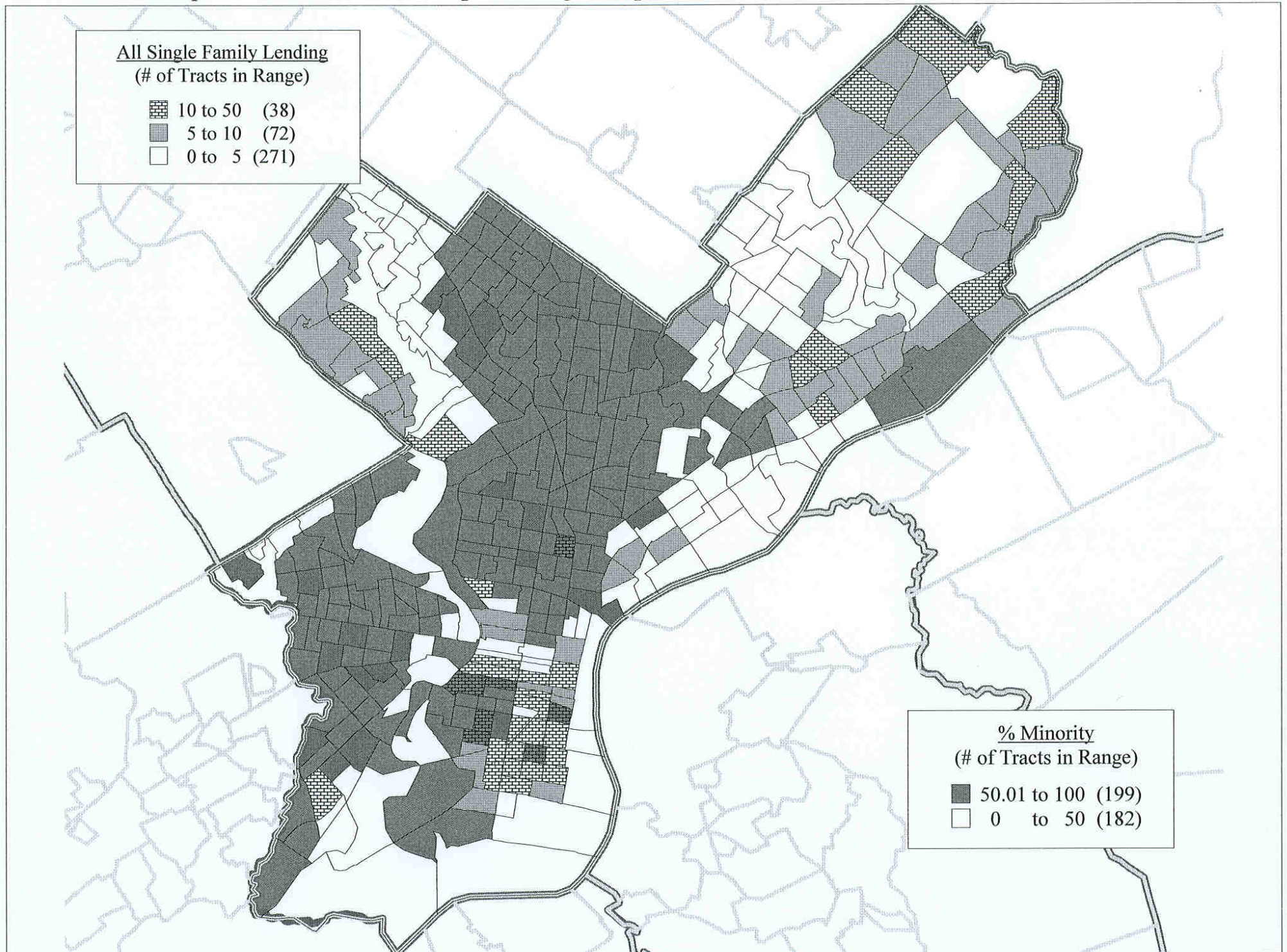
Map 9: Fleet NB Lending Compared to Minority Level of Census Tract



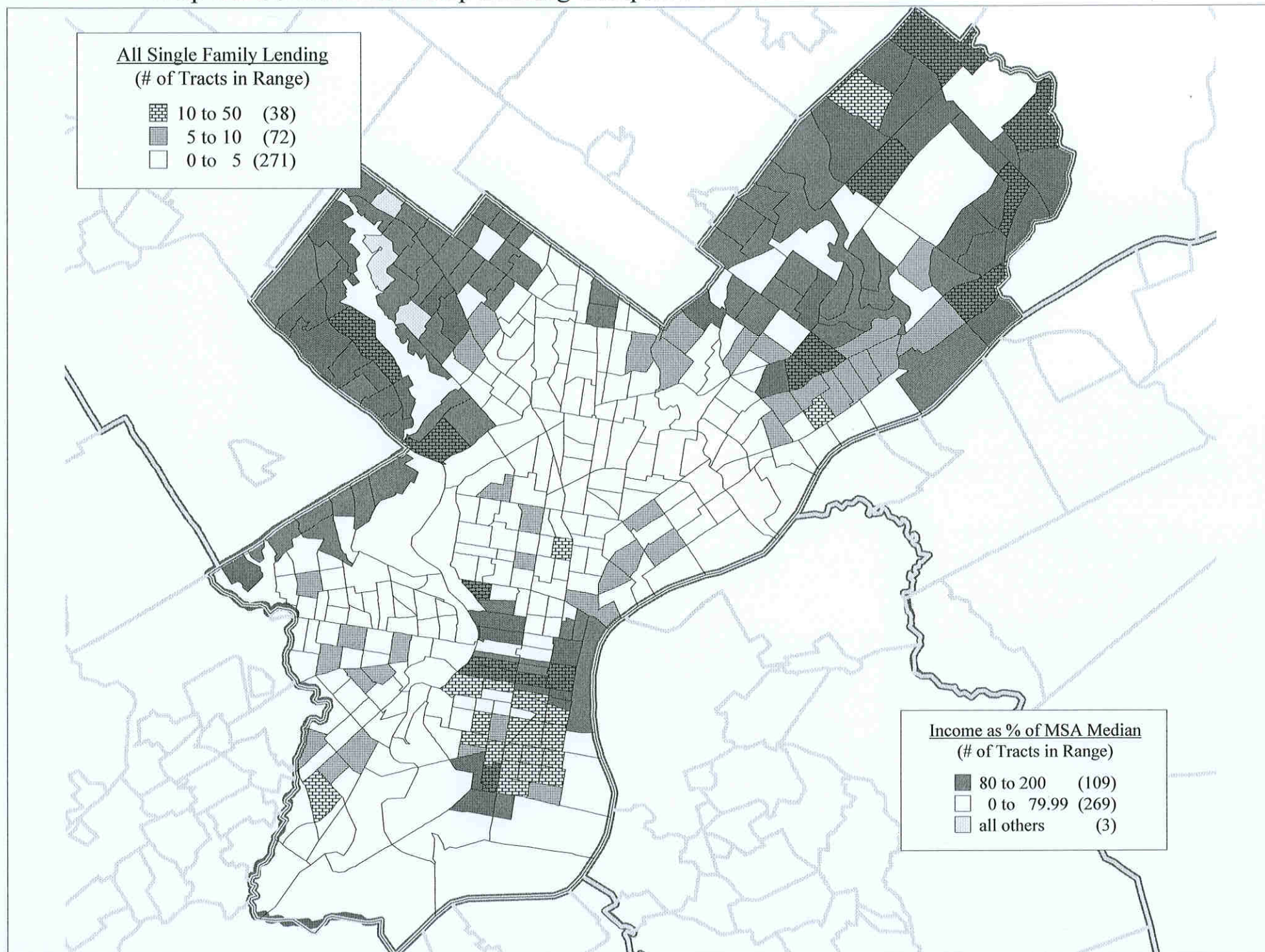
Map 10: Fleet NB Lending Compared to Income Level of Census Tract



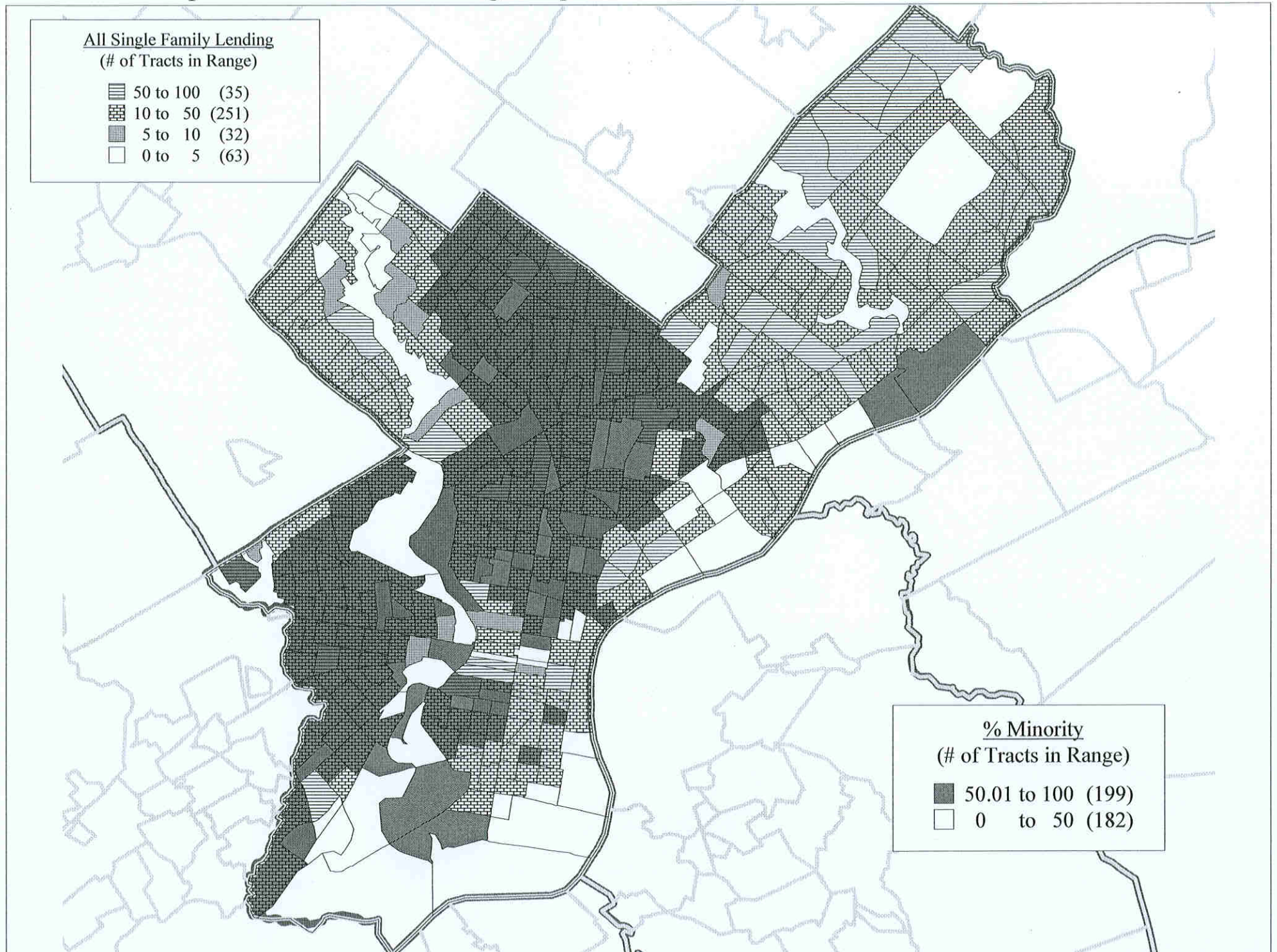
Map 11: Commerce Bancorp Lending Compared to Minority Level of Census Tract



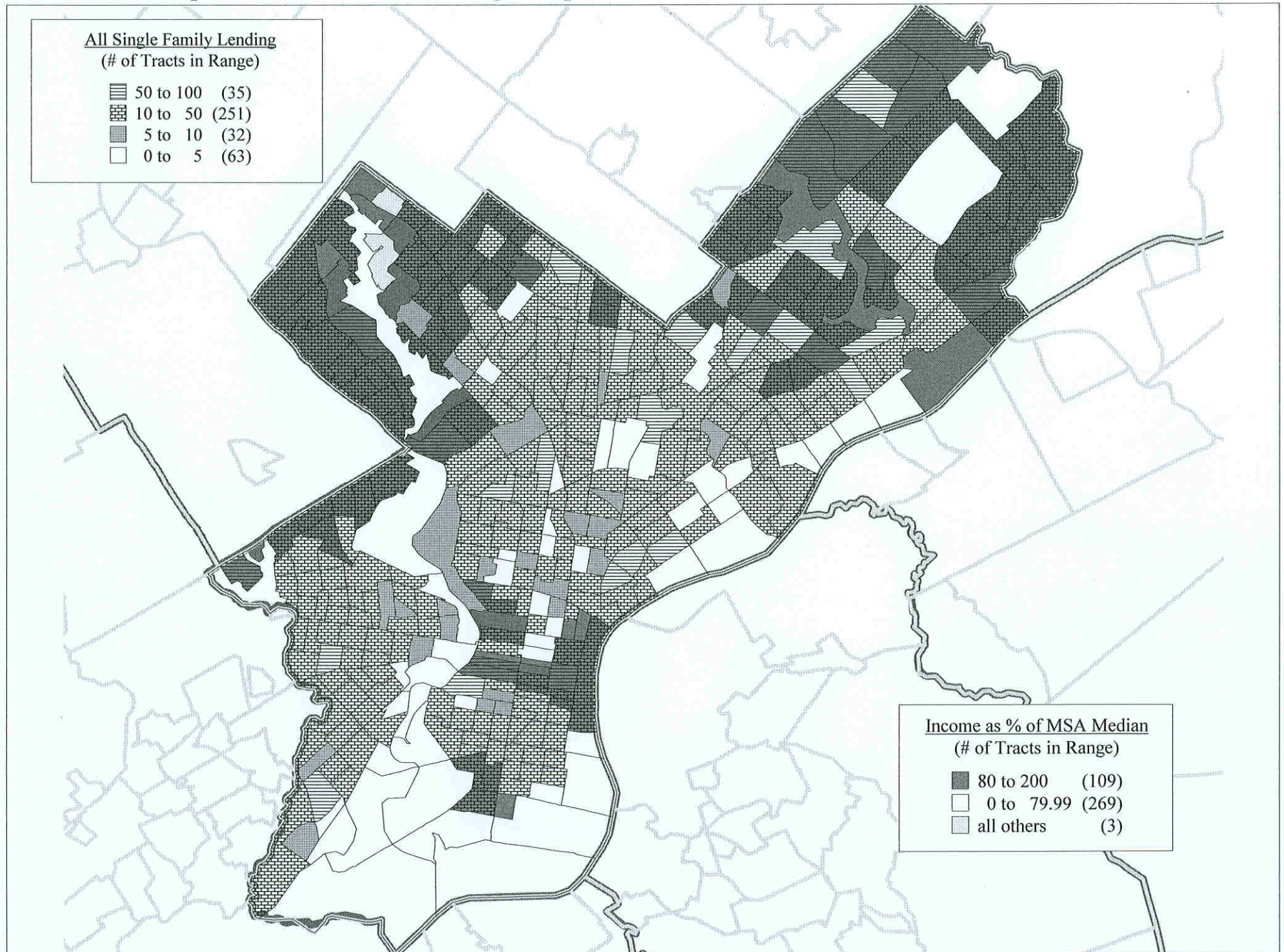
Map 12: Commerce Bancorp Lending Compared to Income Level of Census Tract



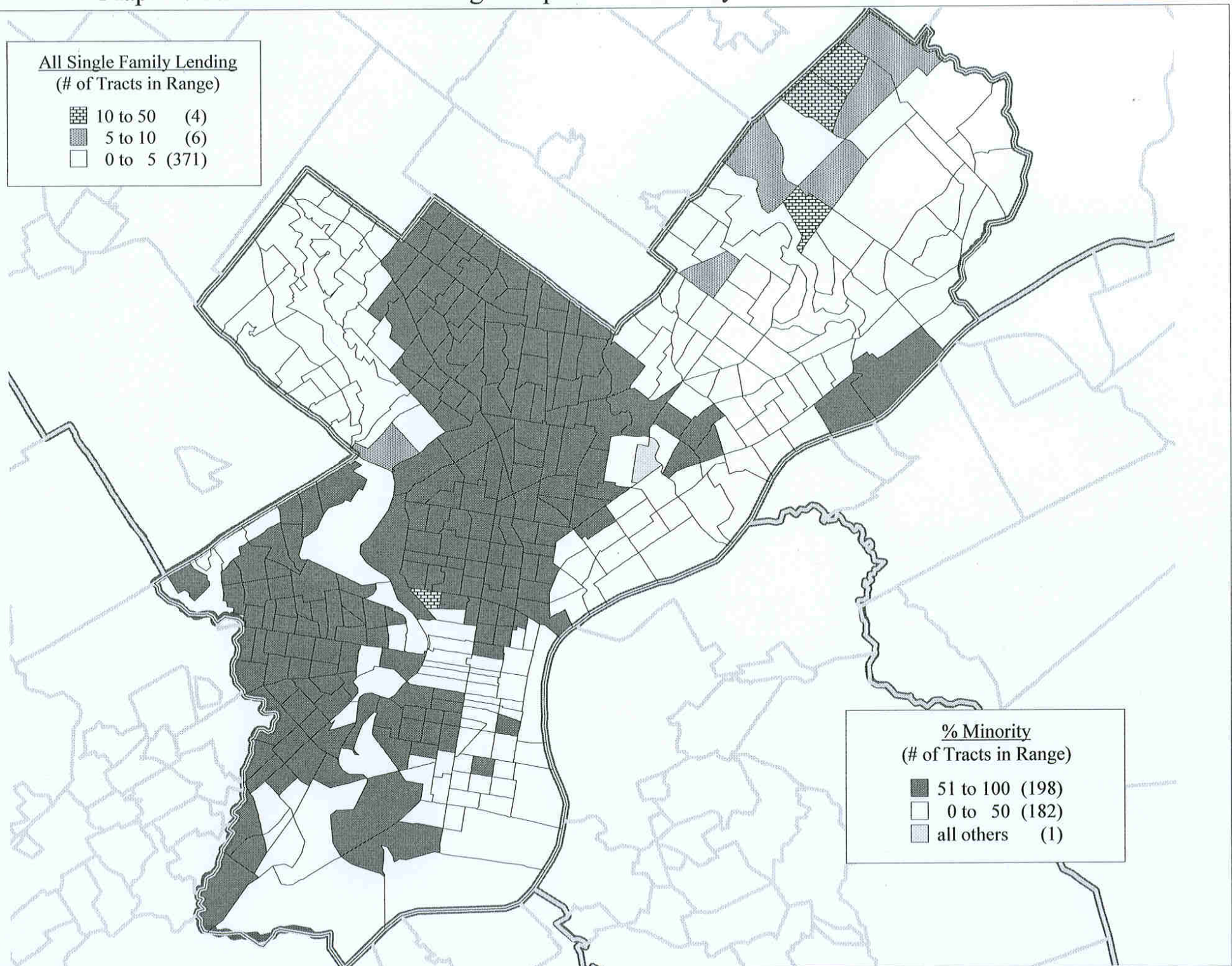
Map 13: Citizens Bank Lending Compared to Minority Level of Census Tract



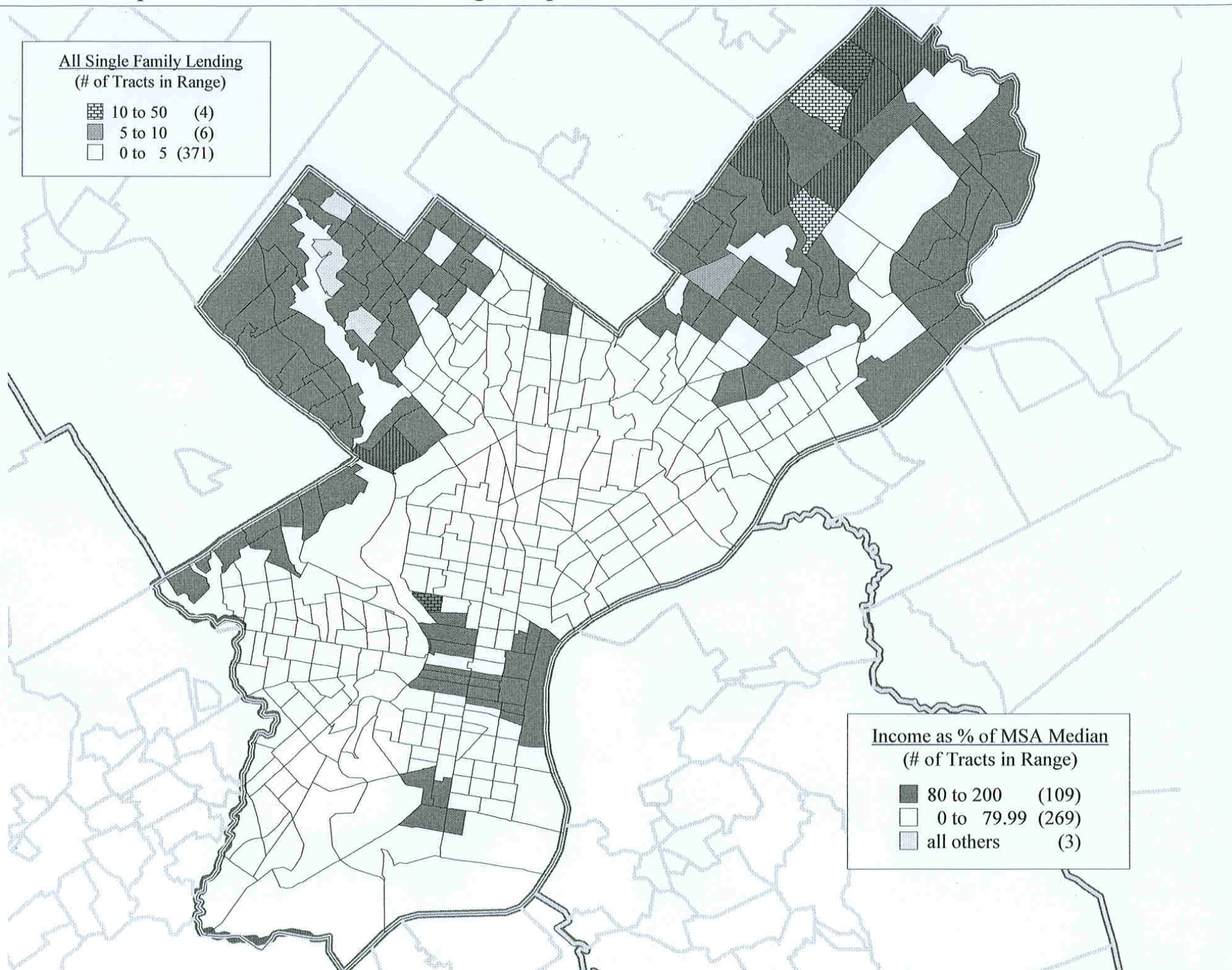
Map 14: Citizens Bank Lending Compared to Income Level of Census Tract



Map 15: Bank of America Lending Compared to Minority Level of Census Tract



Map 16: Bank of America Lending Compared to Income Level of Census Tract



Appendix 3: Tables

Table 1: Demographics of Households and Neighborhood Profiles for City of Philadelphia

Table 2: Demographics of Households and Neighborhood Profiles for Suburbs

Table 3: All Single Family Lending to Owner-occupants, City of Philadelphia

- a. By Race of Borrower
- b. By Minority Level of Census Tract
- c. By Income of Borrower
- d. By Income Level of Census Tract
- e. By Gender

Table 4: All Single Family Lending to Owner-occupants, Suburbs

- a. By Race of Borrower
- b. By Minority Level of Census Tract
- c. By Income of Borrower
- d. By Income Level of Census Tract
- e. By Gender

Table 5: All Single Family Lending to Non-occupant owners, City of Philadelphia

- a. By Race of Borrower
- b. By Minority Level of Census Tract
- c. By Income of Borrower
- d. By Income Level of Census Tract
- e. By Gender

Table 6: Lending to Owner-occupants versus Non-occupant owners in the City of Philadelphia

Table 7: Home Purchase Lending to Owner-occupants, City of Philadelphia

- a. By Race of Borrower
- b. By Minority Level of Census Tract
- c. By Income of Borrower
- d. By Income Level of Census Tract
- e. By Gender

Table 8: Refinance Lending to Owner-occupants, City of Philadelphia

- a. By Race of Borrower
- b. By Minority Level of Census Tract
- c. By Income of Borrower
- d. By Income Level of Census Tract

e. By Gender

Table 9: Home Improvement Lending to Owner-occupants, City of Philadelphia

a. By Race of Borrower

b. By Minority Level of Census Tract

c. By Income of Borrower

d. By Income Level of Census Tract

e. By Gender

Table 10: Home Lending Ranking Analysis – All Single Family Loans, City of Philadelphia

Table 11: Home Lending Ranking Analysis – Home Purchase Loans, City of Philadelphia

Table 12: Home Lending Ranking Analysis – Refinance Loans, City of Philadelphia

Table 13: Home Lending Ranking Analysis – Home Improvement Loans, City of Philadelphia

Table 14: Summary of Home Lending Ranking Analysis

Table 15: Mellon Bank and United Bank Home Lending

Table 16: Affiliates Used in NCRC's Data Analysis

Table 17: Small Business Lending by Income Level of Census Tract, City of Philadelphia and Suburbs

Table 18: Small Business Lending by Minority Level of Census Tract, City of Philadelphia and Suburbs

Table 19: Small Business Lending by Revenue Size of Business, City of Philadelphia and Suburbs

Table 20: Small Business Lending Ranking Analysis

Table 21: Small Business Lending Summary

Table 22: Branching by Income Level of Census Tract, City of Philadelphia

Table 23: Branching by Minority Level of Census Tract, City of Philadelphia

Table 24: Neighborhood Home Lending Analysis, All Single Family Lending, City of Philadelphia

Table 25: Neighborhood Home Lending Analysis Lender by Lender, All Single Family Lending, City of Philadelphia

Table 26: Neighborhood Small Business Lending Analysis, City of Philadelphia

Table 1: Demographics of Households and Neighborhood Profiles for City of Philadelphia

Demographics of Households by Race of Borrower		
% of American Indian Households	0.28% # of American Indian Households	1,630
% of Asian/Pacific Islander Households	3.54% # of Asian/Pacific Islander Households	20,886
% of Afr-American Households	40.66% # of Afr-American Households	240,006
% of Hispanic Households	6.52% # of Hispanic Households	38,509
% of White Households	43.39% # of White Households	256,113
% of "Other" Households	5.61% # of "Other" Households	33,139
% of Minority Households	56.61% # of Minority Households	334,170
Total # of Households		590,283

Demographics of Owner Occupied Units by Tract Minority Level		
% in MINORITY Tracts	49.00% # in MINORITY Tracts	171,335
% in NON Minority Tracts	51.00% # in NON Minority Tracts	178,303
Total # Own Occ Units		349,638

Demographics of Households by Income of Borrower		
% of Low Income Households	38.84% # Low Income Households	229,276
% of Moderate Income Households	18.53% # of Moderate Income Households	109,355
% of Middle Income Households	17.36% # of Middle Income Households	102,462
% of Upper Income Households	25.27% # of Upper Income Households	149,190
% of LMI Households	57.37% # of LMI Households	338,631
% of MUI Households	42.63% # of MUI Households	251,652
Total # of Households		590,283

Demographics of Owner Occupied Units by Income of Tract		
% Low Income	25.03% # Low Income	87,531
% Moderate Income	43.31% # Moderate Income	151,422
% Middle Income	27.61% # Middle Income	96,549
% Upper Income	4.04% # Upper Income	14,136
% LMI	68.34% # LMI	238,953
% MUI	31.66% # MUI	110,685
Total # Own Occ Units		349,638

Table 2: Demographics of Households and Neighborhood Profiles for Suburbs

Demographics of Households by Race of Borrower		
% of American Indian Households	0.14% # of American Indian Households	1,221
% of Asian/Pacific Islander Households	2.53% # of Asian/Pacific Islander Households	22,013
% of Afr-American Households	7.20% # of Afr-American Households	62,608
% of Hispanic Households	1.62% # of Hispanic Households	14,060
% of White Households	87.84% # of White Households	763,703
% of "Other" Households	0.55% # of "Other" Households	4,799
% of Minority Households	12.16% # of Minority Households	105,722
Total # of Households		869,425

Demographics of Owner Occupied Units by Tract Minority Level		
% in MINORITY Tracts	2.56% # in MINORITY Tracts	16,574
% in NON Minority Tracts	97.44% # in NON Minority Tracts	631,633
Total # Own Occ Units		648,207

Demographics of Households by Income of Borrower		
% of Low Income Households	15.54% # Low Income Households	135,139
% of Moderate Income Households	13.50% # of Moderate Income Households	117,361
% of Middle Income Households	17.50% # of Middle Income Households	152,157
% of Upper Income Households	53.46% # of Upper Income Households	464,768
% of LMI Households	29.04% # of LMI Households	252,500
% of MUI Households	70.96% # of MUI Households	616,925
Total # of Households		869,425

Demographics of Owner Occupied Units by Income of Tract		
% Low Income	0.79% # Low Income	5,134
% Moderate Income	5.50% # Moderate Income	35,632
% Middle Income	40.02% # Middle Income	259,385
% Upper Income	53.70% # Upper Income	348,056
% LMI	6.29% # LMI	40,766
% MUI	93.71% # MUI	607,441
Total # Own Occ Units		648,207

Table 3a: By Race of Borrower

Percent of All Single Family Loans Originated by Race of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
American Indian/Alaskan	0.4%	160	0.4%	142	0.4%	18
Asian/Pacific Islander	5.6%	2,414	5.9%	2,286	2.9%	128
Black	21.0%	9,063	19.2%	7,454	36.7%	1,609
Hispanic	5.6%	2,405	5.6%	2,163	5.5%	242
White	65.2%	28,184	66.9%	25,983	50.1%	2,201
Other	2.3%	999	2.1%	807	4.4%	192
All Minority	34.8%	15,041	33.1%	12,852	49.9%	2,189.00
Total**	100.0%	43,225	100.0%	38,835	100.0%	4,390.00
Asian Subprime to Prime Portfolio Share Ratio				0.50		
Black Subprime to Prime Portfolio Share Ratio				1.91		
Hispanic Subprime to Prime Portfolio Share Ratio				0.99		
White Subprime to Prime Portfolio Share Ratio				0.75		
Minority Subprime to Prime Portfolio Share Ratio				1.51		
*All loans is equal to prime loans plus subprime loans (excluding manufactured lending).						
**Excludes originations where race of borrower is Not Applicable/Not Provided						

Percent of All Single Family Loan Type Originated by Race of Borrower (as a % of total originations for a racial category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
American Indian/Alaskan	160	88.8%	142	11.3%	18
Asian/Pacific Islander	2,414	94.7%	2,286	5.3%	128
Black	9,063	82.2%	7,454	17.8%	1,609
Hispanic	2,405	89.9%	2,163	10.1%	242
White	28,184	92.2%	25,983	7.8%	2,201
Other	999	80.8%	807	19.2%	192
All Minority	15,041	85.4%	12,852	14.6%	2,189
Total*	43,225	89.8%	38,835	10.2%	4,390
Black to White Prime Market Share Ratio			0.89		
Black to White Subprime Market Share Ratio			2.27		
Hispanic to White Prime Market Share Ratio			0.98		
Hispanic to White Subprime Market Share Ratio			1.29		
Asian to White Prime Market Share Ratio			1.03		
Asian to White Subprime Market Share Ratio			0.68		
Minority to White Prime Market Share Ratio			0.93		
Minority to White Subprime Market Share Ratio			1.86		
*Excludes originations for which race of borrower is Not Applicable/Not Provided					

Percent of All Single Family Loans Denied by Race of Applicant (as a % of total applications for a racial category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
American Indian/Alaskan	33.2%	304	101	46.9%	96	45
Asian/Pacific Islander	19.4%	3,614	701	42.9%	466	200
Black	38.0%	16,164	6,140	51.2%	8,534	4,371
Hispanic	31.8%	4,107	1,307	47.6%	1,337	636
White	14.3%	37,030	5,293	40.1%	8,991	3,603
Other	29.5%	1,663	490	69.2%	1,559	1,079
All Minority	33.8%	25,852.00	8,739.00	52.8%	11,992.00	6,331.00
Total*	22.3%	62,882.00	14,032.00	47.3%	20,983.00	9,934.00
Black to White Prime Denial Ratio			2.66			
Black to White Subprime Denial Ratio			1.28			
Hispanic to White Prime Denial Ratio			2.23			
Hispanic to White Subprime Denial Ratio			1.19			
Asian to White Prime Denial Ratio			1.36			
Asian to White Subprime Denial Ratio			1.07			
Minority to White Prime Denial Ratio			2.36			
Minority to White Subprime Denial Ratio			1.32			
*Excludes applications for which race of borrower is Not Applicable/Not Provided						

Table 3: All Single Family Lending to Owner-occupants, City of Philadelphia

Table 3b: By Minority Level of Census Tract

Portfolio Share Analysis

Percent of All Single Family Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	27.6%	14,540	25.3%	11,698	44.2%	2,842
Not Substantially Minority	72.4%	38,051	74.7%	34,459	55.8%	3,592
All Tracts	100%	52,591	100%	46,157	100.0%	6,434
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			1.74			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.75			

Market Share Analysis

Percent of All Single Family Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Substantially Minority	14,540	80.5%	11,698	19.5%	2,842
Not Substantially Minority	38,051	90.6%	34,459	9.4%	3,592
All Tracts	52,591	87.8%	46,157	12.2%	6,434
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio			0.89		
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio			2.07		

Denial Disparity Ratios

Percent of All Single Family Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Percentage	Prime		Percentage	Subprime	
		Applications	Denials		Applications	Denials
Substantially Minority	37.2%	26,015	9,684	50.4%	17,811	8,971
Not Substantially Minority	16.5%	51,754	8,523	41.9%	16,409	6,873
All Tracts	23.4%	77,769	18,207	46.3%	34,220	15,844
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			2.26			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.20			

Table 3c: By Income Level of Borrower

Percent of All Single Family Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	22.5%	10,776	21.5%	9,068	29.1%	1,708
Moderate	30.5%	14,614	29.8%	12,544	35.3%	2,070
Middle	24.6%	11,808	24.9%	10,469	22.8%	1,339
Upper	22.5%	10,786	23.8%	10,032	12.8%	754
LMI	52.9%	25,390	51.3%	21,612	64.4%	3,778
MUI	47.1%	22,594	48.7%	20,501	35.6%	2,093
Total*	100.0%	47,984	100.0%	42,113	100.0%	5,871
LMI Subprime to Prime Portfolio Share Ratio 1.25						
MUI Subprime to Prime Portfolio Share Ratio 0.73						
*Excludes originations for which income of borrowers is Not Available						

Percent of All Single Family Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	10,776	84.1%	9,068	15.9%	1,708
Moderate	14,614	85.8%	12,544	14.2%	2,070
Middle	11,808	88.7%	10,469	11.3%	1,339
Upper	10,786	93.0%	10,032	7.0%	754
LMI	25,390	85.1%	21,612	14.9%	3,778
MUI	22,594	90.7%	20,501	9.3%	2,093
Total*	47,984	87.8%	42,113	12.2%	5,871
LMI to MUI Prime Market Share Ratio			0.94		
LMI to MUI Subprime Market Share Ratio			1.61		
*Excludes originations for which income of borrowers is Not Available					

Percent of All Single Family Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	38.1%	19,504	7,422	52.6%	11,856	6,232
Moderate	24.3%	21,370	5,191	45.0%	10,888	4,905
Middle	18.3%	16,371	3,003	41.4%	6,365	2,636
Upper	13.4%	14,632	1,963	41.4%	3,457	1,431
LMI	30.9%	40,874	12,613	49.0%	22,744	11,137
MUI	16.0%	31,003	4,966	41.4%	9,822	4,067
Total*	24.5%	71,877	17,579	46.7%	32,566	15,204
LMI to MUI Prime Denial Ratio 1.93 LMI to MUI Subprime Denial Ratio 1.18 *Excludes applications for which income of borrowers is Not Available						

Table 3d: By Income Level of Census Tract

Percent of All Single Family Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	9.1%	4,797	8.5%	3,924	13.6%	873
Moderate	39.1%	20,535	37.9%	17,496	47.3%	3,039
Middle	43.5%	22,856	44.6%	20,556	35.8%	2,300
Upper	8.3%	4,354	9.0%	4,137	3.4%	217
LMI	48.2%	25,332	46.5%	21,420	60.8%	3,912
MUI	51.8%	27,210	53.5%	24,693	39.2%	2,517
Total*	100.0%	52,542	100.0%	46,113	100.0%	6,429
LMI Tract Subprime to Prime Portfolio Share Ratio			1.31			
MUI Tract Subprime to Prime Portfolio Share Ratio			0.73			
*Excludes originations for which tract income level is Not Available						

Percent of All Single Family Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	4,797	81.8%	3,924	18.2%	873
Moderate	20,535	85.2%	17,496	14.8%	3,039
Middle	22,856	89.9%	20,556	10.1%	2,300
Upper	4,354	95.0%	4,137	5.0%	217
LMI	25,332	84.6%	21,420	15.4%	3,912
MUI	27,210	90.7%	24,693	9.3%	2,517
Total*	52,542	87.8%	46,113	12.2%	6,429
LMI to MUI Tract Prime Market Share Ratio			0.93		
LMI to MUI Tract Subprime Market Share Ratio			1.67		
*Excludes originations for which tract income level is Not Available					

Percent of All Single Family Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	43.2%	9,836	4,252	53.4%	6,781	3,624
Moderate	27.2%	31,643	8,603	46.6%	16,467	7,667
Middle	15.6%	30,492	4,743	42.1%	10,069	4,240
Upper	10.3%	5,684	583	34.5%	859	296
LMI	31.0%	41,479	12,855	48.6%	23,248	11,291
MUI	14.7%	36,176	5,326	41.5%	10,928	4,536
Total*	23.4%	77,655	18,181	46.3%	34,176	15,827
LMI to MUI Tract Prime Denial Ratio			2.11			
LMI to MUI Tract Subprime Denial Ratio			1.17			
*Excludes applications for which tract income level is Not Available						

Table 3e: By Gender

Percent of All Single Family Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	31.2%	15,058	30.7%	13,150	34.7%	1,908
Female	32.4%	15,650	31.4%	13,445	40.0%	2,205
Joint	36.4%	17,573	37.8%	16,180	25.3%	1,393
Total*	100.0%	48,281	100.0%	42,775	100.0%	5,506
Male Subprime to Prime Portfolio Share Ratio			1.13			
Female Subprime to Prime Portfolio Share Ratio			1.27			
Joint Subprime to Prime Portfolio Share Ratio			0.67			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of All Single Family Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	15,058	87.3%	13,150	12.7%	1,908
Female	15,650	85.9%	13,445	14.1%	2,205
Joint	17,573	92.1%	16,180	7.9%	1,393
Total*	48,281	88.6%	42,775	11.4%	5,506
Female to Male Prime Market Share Ratio			0.98		
Female to Male Subprime Market Share Ratio			1.11		
Female to Joint Prime Market Share Ratio			0.93		
Female to Joint Subprime Market Share Ratio			1.78		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of All Single Family Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	23.3%	22,026	5,127	46.9%	10,205	4,782
Female	26.0%	23,193	6,028	48.7%	11,004	5,354
Joint	15.5%	23,398	3,636	47.1%	6,377	3,005
Total*	21.6%	68,617	14,791	47.6%	27,586	13,141
Female to Male Prime Denial Ratio	1.12					
Female to Male Subprime Denial Ratio	1.04					
Female to Joint Prime Denial Ratio	1.67					
Female to Joint Sunprime Denial Ratio	1.03					
Male to Joint Prime Denial Ratio	1.50					
Male to Joint Subprime Denial Ratio	0.99					

Table 4a: By Race of Borrower

Percent of "All Single Family" Loans Denied by Race of Applicant (as a % of total applications for a racial category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
American Indian/Alaskan	20.3%	656	133	45.9%	109	50
Asian/Pacific Islander	9.3%	6,825	635	27.3%	575	157
Black	21.8%	7,736	1,686	48.1%	3,462	1,666
Hispanic	13.2%	2,536	336	36.9%	674	249
White	7.3%	203,214	14,923	31.6%	27,736	8,752
Other	12.8%	3,371	433	58.7%	2,754	1,616
All Minority	15.3%	21,124	3,223	49.4%	7,574	3,738
Total*	8.1%	224,338	18146	35.4%	35,310	12,490
Black to White Prime Denial Ratio			2.97			
Black to White Subprime Denial Ratio			1.53			
Hispanic to White Prime Denial Ratio			1.80			
Hispanic to White Subprime Denial Ratio			1.17			
Asian to White Prime Denial Ratio			1.27			
Asian to White Subprime Denial Ratio			0.87			
Minority to White Prime Denial Ratio			2.08			
Minority to White Subprime Denial Ratio			1.56			
*Excludes applications for which race of borrower is Not Applicable/Not Provided						

Table 4b: By Minority Level of Census Tract

Percent of "All Single Family" Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	0.9%	1,924	0.7%	1,510	2.9%	414
Not Substantially Minority	99.1%	213,993	99.3%	199,882	97.1%	14,111
All Tracts	100%	215,917	100%	201,392	100.0%	14,525
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			3.80			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.98			

Percent of "All Single Family" Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime Percentage	Count	Subprime Percentage	Count
Substantially Minority	1,924	78.5%	1,510	21.5%	414
Not Substantially Minority	213,993	93.4%	199,882	6.6%	14,111
All Tracts	215,917	93.3%	201392	6.7%	14525
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio		0.84			
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio		3.26			

Percent of "All Single Family" Loans Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Substantially Minority	29.2%	3,047	891	48.8%	2,990	1,460
Not Substantially Minority	8.6%	265,809	22,989	34.4%	57,889	19,896
All Tracts	8.9%	268,856	23,880	35.1%	60,879	21,356
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			3.38			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.42			

Table 4c: By Income Level of Borrower

Percent of "All Single Family" Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	5.1%	10,043	4.8%	8,877	8.4%	1,166
Moderate	16.6%	32,639	15.9%	29,210	24.7%	3,429
Middle	26.7%	52,703	26.4%	48,290	31.8%	4,413
Upper	51.6%	101,656	52.8%	96,766	35.2%	4,890
LMI	21.7%	42,682	20.8%	38,087	33.1%	4,595
MUI	78.3%	154,359	79.2%	145,056	66.9%	9,303
Total*	100.0%	197,041	100.0%	183,143	100.0%	13,898
LMI Subprime to Prime Portfolio Share Ratio			1.59			
MUI Subprime to Prime Portfolio Share Ratio			0.85			
*Excludes originations for which income of borrowers is Not Available						

Percent of "All Single Family" Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	10,043	88.4%	8,877	11.6%	1,166
Moderate	32,639	89.5%	29,210	10.5%	3,429
Middle	52,703	91.6%	48,290	8.4%	4,413
Upper	101,656	95.2%	96,766	4.8%	4,890
LMI	42,682	89.2%	38,087	10.8%	4,595
MUI	154,359	94.0%	145,056	6.0%	9,303
Total*	197,041	92.9%	183,143	7.1%	13,898
LMI to MUI Prime Market Share Ratio			0.95		
LMI to MUI Subprime Market Share Ratio			1.79		
*Excludes originations for which income of borrowers is Not Available					

Percent of "All Single Family" Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	22.8%	14,613	3,334	47.1%	7,594	3,575
Moderate	12.6%	41,166	5,202	37.1%	15,076	5,591
Middle	9.2%	64,667	5,969	32.8%	16,944	5,556
Upper	6.6%	125,383	8,321	30.4%	18,440	5,608
LMI	15.3%	55,779	8,536	40.4%	22,670	9,166
MUI	7.5%	190,050	14,290	31.6%	35,384	11,164
Total*	9.3%	245,829	22,826	35.0%	58,054	20,330
LMI to MUI Prime Denial Ratio 2.04 LMI to MUI Subprime Denial Ratio 1.28 *Excludes applications for which income of borrowers is Not Available						

Table 4d: By Income Level of Census Tract

Percent of "All Single Family" Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	0.1%	302	0.1%	216	0.6%	86
Moderate	3.1%	6,750	2.8%	5,712	7.1%	1,038
Middle	35.4%	76,323	34.5%	69,433	47.4%	6,890
Upper	61.4%	132,413	62.6%	125,904	44.8%	6,509
LMI	3.3%	7,052	2.9%	5,928	7.7%	1,124
MUI	96.7%	208,736	97.1%	195,337	92.3%	13,399
Total*	100.0%	215,788	100.0%	201,265	100.0%	14,523
LMI Tract Subprime to Prime Portfolio Share Ratio			2.63			
MUI Tract Subprime to Prime Portfolio Share Ratio			0.95			
*Excludes originations for which tract income level is Not Available						

Percent of "All Single Family" Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	302	71.5%	216	28.5%	86
Moderate	6,750	84.6%	5,712	15.4%	1,038
Middle	76,323	91.0%	69,433	9.0%	6,890
Upper	132,413	95.1%	125,904	4.9%	6,509
LMI	7,052	84.1%	5,928	15.9%	1,124
MUI	208,736	93.6%	195,337	6.4%	13,399
Total*	215,788	93.3%	201,265	6.7%	14,523
LMI to MUI Tract Prime Market Share Ratio			0.90		
LMI to MUI Tract Subprime Market Share Ratio			2.48		
*Excludes originations for which tract income level is Not Available					

Percent of "All Single Family" Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	39.3%	506	199	53.4%	741	396
Moderate	19.6%	9,278	1,815	45.1%	5,747	2,590
Middle	10.9%	95,382	10,391	36.4%	29,438	10,730
Upper	7.0%	163,483	11,456	30.6%	24,934	7,635
LMI	20.6%	9,784	2,014	46.0%	6,488	2,986
MUI	8.4%	258,865	21,847	33.8%	54,372	18,365
Total*	8.9%	268,649	23,861	35.1%	60,860	21,351
LMI to MUI Tract Prime Denial Ratio			2.44			
LMI to MUI Tract Subprime Denial Ratio			1.36			
*Excludes applications for which tract income level is Not Available						

Table 4e: By Gender

Percent of "All Single Family" Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	18.5%	37,055	17.8%	33,384	29.0%	3,671
Female	16.2%	32,424	15.8%	29,575	22.5%	2,849
Joint	65.2%	130,431	66.4%	124,276	48.6%	6,155
Total*	100.0%	199,910	100.0%	187,235	100.0%	12,675
Male Subprime to Prime Portfolio Share Ratio			1.62			
Female Subprime to Prime Portfolio Share Ratio			1.42			
Joint Subprime to Prime Portfolio Share Ratio			0.73			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of "All Single Family" Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	37,055	90.1%	33,384	9.9%	3,671
Female	32,424	91.2%	29,575	8.8%	2,849
Joint	130,431	95.3%	124,276	4.7%	6,155
Total*	199,910	93.7%	187,235	6.3%	12,675
Female to Male Prime Market Share Ratio			1.01		
Female to Male Subprime Market Share Ratio			0.89		
Female to Joint Prime Market Share Ratio			0.96		
Female to Joint Subprime Market Share Ratio			1.86		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of "All Single Family" Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	11.0%	47,063	5,197	36.5%	15,503	5,664
Female	10.2%	39,692	4,061	37.7%	11,481	4,331
Joint	6.4%	155,790	9,984	35.4%	22,436	7,953
Total*	7.9%	242,545	19,242	36.3%	49,420	17,948
Female to Male Prime Denial Ratio	0.93					
Female to Male Subprime Denial Ratio	1.03					
Female to Joint Prime Denial Ratio	1.60					
Female to Joint Subprime Denial Ratio	1.06					
Male to Joint Prime Denial Ratio	1.72					
Male to Joint Subprime Denial Ratio	1.03					

Table 5a: By Race of Borrower

Percent of All Single Family Loans Originated by Race of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
American Indian/Alaskan	0.4%	20	0.3%	15	0.6%	5
Asian/Pacific Islander	5.1%	288	5.3%	256	4.0%	32
Black	18.5%	1,048	16.5%	802	30.6%	246
Hispanic	4.3%	241	4.2%	202	4.9%	39
White	68.7%	3,891	71.2%	3,459	53.7%	432
Other	3.1%	175	2.6%	125	6.2%	50
All Minority	31.3%	1,772	28.8%	1,400	46.3%	372
Total**	100.0%	5,663	100.0%	4,859	100.0%	804
Asian Subprime to Prime Portfolio Share Ratio				0.76		
Black Subprime to Prime Portfolio Share Ratio				1.85		
Hispanic Subprime to Prime Portfolio Share Ratio				1.17		
White Subprime to Prime Portfolio Share Ratio				0.75		
Minority Subprime to Prime Portfolio Share Ratio				1.61		
*All loans is equal to prime loans plus subprime loans (excluding manufactured lending).						
**Excludes originations where race of borrower is Not Applicable/Not Provided						

Percent of All Single Family Loan Type Originated by Race of Borrower (as a % of total originations for a racial category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
American Indian/Alaskan	20	75.0%	15	25.0%	5
Asian/Pacific Islander	288	88.9%	256	11.1%	32
Black	1,048	76.5%	802	23.5%	246
Hispanic	241	83.8%	202	16.2%	39
White	3,891	88.9%	3,459	11.1%	432
Other	175	71.4%	125	28.6%	50
All Minority	1,772	79.0%	1,400	21.0%	372
Total*	5,663	85.8%	4,859	14.2%	804
Black to White Prime Market Share Ratio			0.86		
Black to White Subprime Market Share Ratio			2.11		
Hispanic to White Prime Market Share Ratio			0.94		
Hispanic to White Subprime Market Share Ratio			1.46		
Asian to White Prime Market Share Ratio			1.00		
Asian to White Subprime Market Share Ratio			1.00		
Minority to White Prime Market Share Ratio			0.89		
Minority to White Subprime Market Share Ratio			1.89		
*Excludes originations for which race of borrower is Not Applicable/Not Provided					

Percent of All Single Family Loans Denied by Race of Applicant (as a % of total applications for a racial category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
American Indian/Alaskan	37.2%	43	16	0.0%	5	0
Asian/Pacific Islander	24.3%	448	109	19.7%	76	15
Black	45.6%	2,064	942	32.0%	716	229
Hispanic	41.6%	457	190	32.4%	102	33
White	16.9%	5,108	865	24.8%	950	236
Other	31.4%	236	74	16.3%	123	20
All Minority	41.0%	3,248	1,331	29.1%	1,022	297
Total*	26.3%	8,356	2,196	27.0%	1,972	533
Black to White Prime Denial Ratio			2.70			
Black to White Subprime Denial Ratio			1.29			
Hispanic to White Prime Denial Ratio			2.46			
Hispanic to White Subprime Denial Ratio			1.30			
Asian to White Prime Denial Ratio			1.44			
Asian to White Subprime Denial Ratio			0.79			
Minority to White Prime Denial Ratio			2.42			
Minority to White Subprime Denial Ratio			1.17			
*Excludes applications for which race of borrower is Not Applicable/Not Provided						

Table 5: All Single Family Lending to Non-occupant owners, City of Philadelphia

Table 5b: By Minority Level of Census Tract

Portfolio Share Analysis

Percent of All Single Family Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	43.7%	3,079	41.4%	2,455	56.1%	624
Not Substantially Minority	56.3%	3,961	58.6%	3,473	43.9%	488
All Tracts	100%	7,040	100%	5,928	100.0%	1,112
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			1.35			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.75			

Market Share Analysis

Percent of All Single Family Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Substantially Minority	3,079	79.7%	2,455	20.3%	624
Not Substantially Minority	3,961	87.7%	3,473	12.3%	488
All Tracts	7,040	84.2%	5,928	15.8%	1,112
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio			0.91		
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio			1.64		

Denial Disparity Ratios

Percent of All Single Family Loans Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Substantially Minority	34.0%	4,969	1,689	30.2%	1,902	574
Not Substantially Minority	18.7%	5,322	996	22.5%	1,078	243
All Tracts	26.1%	10,291	2,685	27.4%	2,980	817
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			1.82			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.34			

Table 5c: By Income Level of Borrower

Percent of All Single Family Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	7.5%	476	7.4%	393	7.9%	83
Moderate	17.5%	1,116	17.2%	918	18.9%	198
Middle	24.8%	1,580	24.4%	1,300	26.8%	280
Upper	50.3%	3,205	51.0%	2,720	46.4%	485
LMI	25.0%	1,592	24.6%	1,311	26.9%	281
MUI	75.0%	4,785	75.4%	4,020	73.1%	765
Total*	100.0%	6,377	100.0%	5,331	100.0%	1,046
LMI Subprime to Prime Portfolio Share Ratio			1.09			
MUI Subprime to Prime Portfolio Share Ratio			0.97			
*Excludes originations for which income of borrowers is Not Available						

Percent of All Single Family Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	476	82.6%	393	17.4%	83
Moderate	1,116	82.3%	918	17.7%	198
Middle	1,580	82.3%	1,300	17.7%	280
Upper	3,205	84.9%	2,720	15.1%	485
LMI	1,592	82.3%	1,311	17.7%	281
MUI	4,785	84.0%	4,020	16.0%	765
Total*	6,377	83.6%	5,331	16.4%	1,046
LMI to MUI Prime Market Share Ratio			0.98		
LMI to MUI Subprime Market Share Ratio			1.10		
*Excludes originations for which income of borrowers is Not Available					

Percent of All Single Family Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	59.3%	1,440	854	35.0%	366	128
Moderate	31.1%	1,779	553	33.8%	669	226
Middle	22.0%	2,155	474	26.6%	741	197
Upper	16.0%	4,046	647	20.7%	1,027	213
LMI	43.7%	3,219	1,407	34.2%	1,035	354
MUI	18.1%	6,201	1,121	23.2%	1,768	410
Total*	26.8%	9,420	2,528	27.3%	2,803	764
LMI to MUI Prime Denial Ratio 2.42						
LMI to MUI Subprime Denial Ratio 1.47						
*Excludes applications for which income of borrowers is Not Available						

Table 5d: By Income Level of Census Tract

Percent of All Single Family Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	24.7%	1,738	23.9%	1,416	29.0%	322
Moderate	44.9%	3,161	43.7%	2,586	51.8%	575
Middle	24.9%	1,753	26.5%	1,569	16.6%	184
Upper	5.4%	381	5.9%	352	2.6%	29
LMI	69.7%	4,899	67.6%	4,002	80.8%	897
MUI	30.3%	2,134	32.4%	1,921	19.2%	213
Total*	100.0%	7,033	100.0%	5,923	100.0%	1,110
LMI Tract Subprime to Prime Portfolio Share Ratio			1.20			
MUI Tract Subprime to Prime Portfolio Share Ratio			0.59			
*Excludes originations for which tract income level is Not Available						

Percent of All Single Family Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	1,738	81.5%	1,416	18.5%	322
Moderate	3,161	81.8%	2,586	18.2%	575
Middle	1,753	89.5%	1,569	10.5%	184
Upper	381	92.4%	352	7.6%	29
LMI	4,899	81.7%	4,002	18.3%	897
MUI	2,134	90.0%	1,921	10.0%	213
Total*	7,033	84.2%	5,923	15.8%	1,110
LMI to MUI Tract Prime Market Share Ratio 0.91					
LMI to MUI Tract Subprime Market Share Ratio 1.83					
*Excludes originations for which tract income level is Not Available					

Percent of All Single Family Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	34.7%	2,930	1,018	31.1%	967	301
Moderate	26.5%	4,553	1,208	26.7%	1,471	393
Middle	17.2%	2,308	397	23.9%	481	115
Upper	11.7%	488	57	12.5%	56	7
LMI	29.7%	7,483	2,226	28.5%	2,438	694
MUI	16.2%	2,796	454	22.7%	537	122
Total*	26.1%	10,279	2,680	27.4%	2,975	816
LMI to MUI Tract Prime Denial Ratio 1.83						
LMI to MUI Tract Subprime Denial Ratio 1.25						
*Excludes applications for which tract income level is Not Available						

Table 5e: By Gender

Percent of All Single Family Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	50.8%	3,158	49.8%	2,583	56.1%	575
Female	18.9%	1,174	17.9%	931	23.7%	243
Joint	30.3%	1,882	32.3%	1,675	20.2%	207
Total*	100.0%	6,214	100.0%	5,189	100.0%	1,025
Male Subprime to Prime Portfolio Share Ratio			1.13			
Female Subprime to Prime Portfolio Share Ratio			1.32			
Joint Subprime to Prime Portfolio Share Ratio			0.63			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of All Single Family Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	3,158	81.8%	2,583	18.2%	575
Female	1,174	79.3%	931	20.7%	243
Joint	1,882	89.0%	1,675	11.0%	207
Total*	6,214	83.5%	5,189	16.5%	1,025
Female to Male Prime Market Share Ratio			0.97		
Female to Male Subprime Market Share Ratio			1.14		
Female to Joint Prime Market Share Ratio			0.89		
Female to Joint Subprime Market Share Ratio			1.88		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of All Single Family Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	26.0%	4,462	1,159	27.8%	1,426	397
Female	37.5%	2,011	755	27.7%	697	193
Joint	16.3%	2,481	405	21.7%	469	102
Total*	25.9%	8,954	2,319	26.7%	2,592	692
Female to Male Prime Denial Ratio 1.45 Female to Male Subprime Denial Ratio 0.99 Female to Joint Prime Denial Ratio 2.30 Female to Joint Subprime Denial Ratio 1.27 Male to Joint Prime Denial Ratio 1.59 Male to Joint Subprime Denial Ratio 1.28						

Table 6: Lending to Owner-occupants versus Non-occupant owners in the City of Philadelphia

Portfolio Share Analysis

	All Loans		Prime		Subprime	
	Count	Percent	Count	Percent	Count	Percent
Non-Owner Occupied	7,040	11.8%	5,928	11.4%	1,112	14.7%
Owner-Occupied	52,591	88.2%	46,157	88.6%	6,434	85.3%
Total	59,631		52,085		7,546	

Market Share Analysis

	All Loans		Prime		Subprime	
	Count	Percent	Count	Percent	Count	Percent
Non-Owner Occupied	7,040		5,928	84.2%	1,112	15.8%
Owner-Occupied	52,591		46,157	87.8%	6,434	12.2%
Total	59,631		52,085	87.3%	7,546	12.7%

Totals were based on the number of loans to census tracts of different minority levels. These totals included the most loans.

See methodology section for more details

Table 7a: By Race of Borrower

Percent of Home Purchase Loans Originated by Race of Borrower
(as a % of all originations)

**Excludes originations where race of borrower is Not Applicable/Not Provided

**Percent of Home Purchase Loan Type Originated by Race of Borrower
(as a % of total originations for a racial category)**

*Excludes originations for which race of borrower is Not Applicable/Not Provided

Percent of Home Purchase Loans Denied by Race of Applicant
(as a % of total applications for a racial category)

*Excludes applications for which race of borrower is Not Applicable/Not Provided

Table 7b: By Minority Level of Census Tract

Percent of Home Purchase Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	28.4%	4,122	27.4%	3,625	39.7%	497
Not Substantially Minority	71.6%	10,382	72.6%	9,628	60.3%	754
All Tracts	100%	14,504	100%	13,253	100.0%	1,251
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			1.45			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.83			

Percent of Home Purchase Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Substantially Minority	4,122	87.9%	3,625	12.1%	497
Not Substantially Minority	10,382	92.7%	9,628	7.3%	754
All Tracts	14,504	91.4%	13,253	8.6%	1,251
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio		0.95			
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio		1.66			

Percent of Home Purchase Loans Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Substantially Minority	17.3%	5,646	975	32.9%	1,566	515
Not Substantially Minority	8.1%	12,449	1,009	23.8%	1,695	404
All Tracts	11.0%	18,095	1,984	28.2%	3,261	919
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			2.13			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.38			

Table 7c: By Income Level of Borrower

Percent of Home Purchase Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	31.5%	4,395	31.5%	4,017	31.4%	378
Moderate	33.3%	4,647	32.8%	4,189	38.1%	458
Middle	19.7%	2,751	19.8%	2,526	18.7%	225
Upper	15.5%	2,169	15.9%	2,027	11.8%	142
LMI	64.8%	9,042	64.3%	8,206	69.5%	836
MUI	35.2%	4,920	35.7%	4,553	30.5%	367
Total*	100.0%	13,962	100.0%	12,759	100.0%	1,203
LMI Subprime to Prime Portfolio Share Ratio			1.08			
MUI Subprime to Prime Portfolio Share Ratio			0.85			
*Excludes originations for which income of borrowers is Not Available						

Percent of Home Purchase Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	4,395	91.4%	4,017	8.6%	378
Moderate	4,647	90.1%	4,189	9.9%	458
Middle	2,751	91.8%	2,526	8.2%	225
Upper	2,169	93.5%	2,027	6.5%	142
LMI	9,042	90.8%	8,206	9.2%	836
MUI	4,920	92.5%	4,553	7.5%	367
Total*	13,962	91.4%	12,759	8.6%	1,203
LMI to MUI Prime Market Share Ratio			0.98		
LMI to MUI Subprime Market Share Ratio			1.24		
*Excludes originations for which income of borrowers is Not Available					

Percent of Home Purchase Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	14.8%	5,715	847	31.4%	1,048	329
Moderate	9.8%	5,550	542	28.4%	1,148	326
Middle	9.1%	3,327	304	24.0%	567	136
Upper	6.6%	2,708	179	27.2%	357	97
LMI	12.3%	11,265	1,389	29.8%	2,196	655
MUI	8.0%	6,035	483	25.2%	924	233
Total*	10.8%	17,300	1,872	28.5%	3,120	888
LMI to MUI Prime Denial Ratio 1.54						
LMI to MUI Subprime Denial Ratio 1.18						
*Excludes applications for which income of borrowers is Not Available						

Table 7d: By Income Level of Census Tract

Percent of Home Purchase Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	10.9%	1,578	10.9%	1,438	11.2%	140
Moderate	46.3%	6,703	45.6%	6,040	53.1%	663
Middle	36.9%	5,339	37.1%	4,916	33.9%	423
Upper	6.0%	866	6.4%	844	1.8%	22
LMI	57.2%	8,281	56.5%	7,478	64.3%	803
MUI	42.8%	6,205	43.5%	5,760	35.7%	445
Total*	100.0%	14,486	100.0%	13,238	100.0%	1,248
LMI Tract Subprime to Prime Portfolio Share Ratio			1.14			
MUI Tract Subprime to Prime Portfolio Share Ratio			0.82			
*Excludes originations for which tract income level is Not Available						

Percent of Home Purchase Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	1,578	91.1%	1,438	8.9%	140
Moderate	6,703	90.1%	6,040	9.9%	663
Middle	5,339	92.1%	4,916	7.9%	423
Upper	866	97.5%	844	2.5%	22
LMI	8,281	90.3%	7,478	9.7%	803
MUI	6,205	92.8%	5,760	7.2%	445
Total*	14,486	91.4%	13,238	8.6%	1,248
LMI to MUI Tract Prime Market Share Ratio		0.97			
LMI to MUI Tract Subprime Market Share Ratio		1.35			
*Excludes originations for which tract income level is Not Available					

Percent of Home Purchase Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	20.4%	2,354	480	36.9%	575	212
Moderate	11.4%	8,298	949	28.0%	1,660	465
Middle	7.5%	6,311	473	24.6%	938	231
Upper	6.5%	1,084	71	12.0%	75	9
LMI	13.4%	10,652	1,429	30.3%	2,235	677
MUI	7.4%	7,395	544	23.7%	1,013	240
Total*	10.9%	18,047	1,973	28.2%	3,248	917
LMI to MUI Tract Prime Denial Ratio			1.82			
LMI to MUI Tract Subprime Denial Ratio			1.28			
*Excludes applications for which tract income level is Not Available						

Table 7e: By Gender

Percent of Home Purchase Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	39.4%	5,447	38.9%	4,921	44.1%	526
Female	37.4%	5,177	36.9%	4,659	43.4%	518
Joint	23.2%	3,205	24.2%	3,056	12.5%	149
Total*	100.0%	13,829	100.0%	12,636	100.0%	1,193
Male Subprime to Prime Portfolio Share Ratio			1.13			
Female Subprime to Prime Portfolio Share Ratio			1.18			
Joint Subprime to Prime Portfolio Share Ratio			0.52			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of Home Purchase Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	5,447	90.3%	4,921	9.7%	526
Female	5,177	90.0%	4,659	10.0%	518
Joint	3,205	95.4%	3,056	4.6%	149
Total*	13,829	91.4%	12,636	8.6%	1,193
Female to Male Prime Market Share Ratio			1.00		
Female to Male Subprime Market Share Ratio			1.04		
Female to Joint Prime Market Share Ratio			0.94		
Female to Joint Subprime Market Share Ratio			2.15		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of Home Purchase Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	11.1%	6,670	740	27.9%	1,332	372
Female	11.1%	6,326	700	27.9%	1,238	345
Joint	6.9%	3,877	266	25.8%	356	92
Total*	10.1%	16,873	1,706	27.6%	2,926	809
Female to Male Prime Denial Ratio	1.00					
Female to Male Subprime Denial Ratio	1.00					
Female to Joint Prime Denial Ratio	1.61					
Female to Joint Subprime Denial Ratio	1.08					
Male to Joint Prime Denial Ratio	1.62					
Male to Joint Subprime Denial Ratio	1.08					

Table 8a: By Race of Borrower

Percent of Refinance Loans Originated by Race of Borrower (as a % of all originations)	
White	75.0%
Black	15.0%
Hispanic	7.0%
Other	3.0%

Percent of Refinance Loan Type Originated by Race of Borrower (as a % of total originations for a racial category)	
ARM	10.0%
Fixed Rate	89.9%
Reverse Mortgage	0.0%
Other	0.0%
ARM	10.0%
Fixed Rate	89.9%
Reverse Mortgage	0.0%
Other	0.0%

Percent of Refinance Loans Denied by Race of Applicant (as a % of total applications for a racial category)	
White	1.0%
Black	1.0%
Hispanic	1.0%
Other	1.0%

[illegible]

Table 8: Refinance Lending to Owner-occupants, City of Philadelphia

Table 8b: By Minority Level of Census Tract

Portfolio Share Analysis

Percent of Refinance Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	26.5%	8,621	23.5%	6,536	43.8%	2,085
Not Substantially Minority	73.5%	23,955	76.5%	21,280	56.2%	2,675
All Tracts	100%	32,576	100%	27,816	100.0%	4,760
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			1.86			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.73			

Market Share Analysis

Percent of Refinance Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Substantially Minority	8,621	75.8%	6,536	24.2%	2,085
Not Substantially Minority	23,955	88.8%	21,280	11.2%	2,675
All Tracts	32,576	85.4%	27,816	14.6%	4760
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio			0.85		
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio			2.17		

Denial Disparity Ratios

Percent of Refinance Loans Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Substantially Minority	35.7%	14,490	5,176	51.1%	14,641	7,479
Not Substantially Minority	16.2%	32,366	5,256	43.3%	13,562	5,870
All Tracts	22.3%	46,856	10,432	47.3%	28,203	13,349
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			2.20			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.18			

Table 8c: By Income Level of Borrower

Percent of Refinance Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	17.6%	5,020	15.8%	3,844	27.7%	1,176
Moderate	29.3%	8,375	28.5%	6,920	34.3%	1,455
Middle	27.0%	7,710	27.4%	6,656	24.8%	1,054
Upper	26.1%	7,463	28.4%	6,902	13.2%	561
LMI	46.9%	13,395	44.3%	10,764	62.0%	2,631
MUI	53.1%	15,173	55.7%	13,558	38.0%	1,615
Total*	100.0%	28,568	100.0%	24,322	100.0%	4,246
LMI Subprime to Prime Portfolio Share Ratio			1.40			
MUI Subprime to Prime Portfolio Share Ratio			0.68			
*Excludes originations for which income of borrowers is Not Available						

Percent of Refinance Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	5,020	76.6%	3,844	23.4%	1,176
Moderate	8,375	82.6%	6,920	17.4%	1,455
Middle	7,710	86.3%	6,656	13.7%	1,054
Upper	7,463	92.5%	6,902	7.5%	561
LMI	13,395	80.4%	10,764	19.6%	2,631
MUI	15,173	89.4%	13,558	10.6%	1,615
Total*	28,568	85.1%	24,322	14.9%	4,246
LMI to MUI Prime Market Share Ratio			0.90		
LMI to MUI Subprime Market Share Ratio			1.85		
*Excludes originations for which income of borrowers is Not Available					

Percent of Refinance Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	39.9%	9,055	3,614	53.5%	9,683	5,184
Moderate	25.1%	12,221	3,070	46.1%	8,817	4,062
Middle	18.5%	10,616	1,962	42.8%	5,371	2,297
Upper	13.6%	10,028	1,359	43.0%	2,871	1,235
LMI	31.4%	21,276	6,684	50.0%	18,500	9,246
MUI	16.1%	20,644	3,321	42.9%	8,242	3,532
Total*	23.9%	41,920	10,005	47.8%	26,742	12,778
LMI to MUI Prime Denial Ratio 1.95						
LMI to MUI Subprime Denial Ratio 1.17						
*Excludes applications for which income of borrowers is Not Available						

Table 8d: By Income Level of Census Tract

Percent of Refinance Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	7.6%	2,469	6.6%	1,838	13.3%	631
Moderate	35.7%	11,618	34.0%	9,452	45.5%	2,166
Middle	46.6%	15,176	48.2%	13,400	37.3%	1,776
Upper	10.1%	3,290	11.2%	3,105	3.9%	185
LMI	43.3%	14,087	40.6%	11,290	58.8%	2,797
MUI	56.7%	18,466	59.4%	16,505	41.2%	1,961
Total*	100.0%	32,553	100.0%	27,795	100.0%	4,758
LMI Tract Subprime to Prime Portfolio Share Ratio			1.45			
MUI Tract Subprime to Prime Portfolio Share Ratio			0.69			
*Excludes originations for which tract income level is Not Available						

Percent of Refinance Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	2,469	74.4%	1,838	25.6%	631
Moderate	11,618	81.4%	9,452	18.6%	2,166
Middle	15,176	88.3%	13,400	11.7%	1,776
Upper	3,290	94.4%	3,105	5.6%	185
LMI	14,087	80.1%	11,290	19.9%	2,797
MUI	18,466	89.4%	16,505	10.6%	1,961
Total*	32,553	85.4%	27,795	14.6%	4,758
LMI to MUI Tract Prime Market Share Ratio			0.90		
LMI to MUI Tract Subprime Market Share Ratio			1.87		
*Excludes originations for which tract income level is Not Available					

Percent of Refinance Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	42.1%	4,713	1,983	53.4%	5,461	2,916
Moderate	27.7%	17,768	4,921	47.8%	13,478	6,443
Middle	15.4%	20,101	3,101	43.6%	8,511	3,707
Upper	9.8%	4,221	413	37.1%	726	269
LMI	30.7%	22,481	6,904	49.4%	18,939	9,359
MUI	14.4%	24,322	3,514	43.0%	9,237	3,976
Total*	22.3%	46,803	10,418	47.3%	28,176	13,335
LMI to MUI Tract Prime Denial Ratio			2.13			
LMI to MUI Tract Subprime Denial Ratio			1.15			
*Excludes applications for which tract income level is Not Available						

Table 8e: By Gender

Percent of Refinance Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	28.2%	8,290	27.6%	7,009	32.4%	1,281
Female	30.1%	8,838	28.9%	7,332	38.1%	1,506
Joint	41.7%	12,235	43.6%	11,072	29.4%	1,163
Total*	100.0%	29,363	100.0%	25,413	100.0%	3,950
Male Subprime to Prime Portfolio Share Ratio			1.18			
Female Subprime to Prime Portfolio Share Ratio			1.32			
Joint Subprime to Prime Portfolio Share Ratio			0.68			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of Refinance Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	8,290	84.5%	7,009	15.5%	1,281
Female	8,838	83.0%	7,332	17.0%	1,506
Joint	12,235	90.5%	11,072	9.5%	1,163
Total*	29,363	86.5%	25,413	13.5%	3,950
Female to Male Prime Market Share Ratio			0.98		
Female to Male Subprime Market Share Ratio			1.10		
Female to Joint Prime Market Share Ratio			0.92		
Female to Joint Subprime Market Share Ratio			1.79		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of Refinance Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	22.6%	11,947	2,705	49.0%	8,156	3,997
Female	24.4%	12,581	3,074	49.8%	8,717	4,341
Joint	15.6%	16,128	2,513	48.1%	5,601	2,695
Total*	20.4%	40,656	8,292	49.1%	22,474	11,033
Female to Male Prime Denial Ratio 1.08 Female to Male Subprime Denial Ratio 1.02 Female to Joint Prime Denial Ratio 1.57 Female to Joint Subprime Denial Ratio 1.03 Male to Joint Prime Denial Ratio 1.45 Male to Joint Subprime Denial Ratio 1.02						

Table 9a: By Race of Borrower

Percent of Home Improvement Loans Originated by Race of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
American Indian/Alaskan	0.3%	14	0.3%	13	0.3%	1
Asian/Pacific Islander	3.5%	152	3.7%	148	1.3%	4
Black	25.4%	1,111	22.3%	904	65.1%	207
Hispanic	4.9%	214	4.8%	195	6.0%	19
White	64.0%	2,793	67.0%	2,712	25.5%	81
Other	1.9%	83	1.9%	77	1.9%	6
All Minority	36.0%	1,574	33.0%	1,337	74.5%	237
Total**	100.0%	4,367	100.0%	4,049	100.0%	318
Asian Subprime to Prime Portfolio Share Ratio				0.34		
Black Subprime to Prime Portfolio Share Ratio				2.92		
Hispanic Subprime to Prime Portfolio Share Ratio				1.24		
White Subprime to Prime Portfolio Share Ratio				0.38		
Minority Subprime to Prime Portfolio Share Ratio				2.26		
*All loans is equal to prime loans plus subprime loans (excluding manufactured lending).						
**Excludes originations where race of borrower is Not Applicable/Not Provided						

Percent of Home Improvement Loan Type Originated by Race of Borrower (as a % of total originations for a racial category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
American Indian/Alaskan	14	92.9%	13	7.1%	1
Asian/Pacific Islander	152	97.4%	148	2.6%	4
Black	1,111	81.4%	904	18.6%	207
Hispanic	214	91.1%	195	8.9%	19
White	2,793	97.1%	2,712	2.9%	81
Other	83	92.8%	77	7.2%	6
All Minority	1,574	84.9%	1,337	15.1%	237
Total*	4,367	92.7%	4,049	7.3%	318
Black to White Prime Market Share Ratio	0.84				
Black to White Subprime Market Share Ratio	6.42				
Hispanic to White Prime Market Share Ratio	0.94				
Hispanic to White Subprime Market Share Ratio	3.06				
Asian to White Prime Market Share Ratio	1.00				
Asian to White Subprime Market Share Ratio	0.91				
Minority to White Prime Market Share Ratio	0.87				
Minority to White Subprime Market Share Ratio	5.19				
*Excludes originations for which race of borrower is Not Applicable/Not Provided					

Percent of Home Improvement Loans Denied by Race of Applicant (as a % of total applications for a racial category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
American Indian/Alaskan	54.9%	51	28	66.7%	9	6
Asian/Pacific Islander	47.2%	394	186	48.0%	25	12
Black	63.8%	3,674	2,343	62.4%	1,136	709
Hispanic	64.4%	824	531	66.5%	185	123
White	29.0%	4,941	1,435	52.9%	480	254
Other	57.6%	255	147	57.6%	66	38
All Minority	62.2%	5,198	3,235	62.5%	1,421	888
Total*	46.1%	10,139	4,670	60.1%	1,901	1,142
Black to White Prime Denial Ratio			2.20			
Black to White Subprime Denial Ratio			1.18			
Hispanic to White Prime Denial Ratio			2.22			
Hispanic to White Subprime Denial Ratio			1.26			
Asian to White Prime Denial Ratio			1.63			
Asian to White Subprime Denial Ratio			0.91			
Minority to White Prime Denial Ratio			2.14			
Minority to White Subprime Denial Ratio			1.18			
*Excludes applications for which race of borrower is Not Applicable/Not Provided						

Table 9: Home Improvement Lending to Owner-occupants, City of Philadelphia

Table 9b: By Minority Level of Census Tract

Portfolio Share Analysis

Percent of Home Improvement Loans Originated by Tract Minority Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Substantially Minority	32.6%	1,797	30.2%	1,537	61.5%	260
Not Substantially Minority	67.4%	3,714	69.8%	3,551	38.5%	163
All Tracts	100%	5,511	100%	5,088	100.0%	423
Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			2.03			
Not Subst. Minority Tract Subprime to Prime Portfolio Share Ratio			0.55			

Market Share Analysis

Percent of Home Improvement Loan Type Originated by Tract Minority Level (as a % of total originations for a tract category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Substantially Minority	1,797	85.5%	1,537	14.5%	260
Not Substantially Minority	3,714	95.6%	3,551	4.4%	163
All Tracts	5,511	92.3%	5,088	7.7%	423
Subst. Minority to Not Subst. Min. Tract Prime Market Share Ratio					
0.89					
Subst. Minority to Not Subst. Min. Tract Subprime Market Share Ratio					
3.30					

Denial Disparity Ratios

Percent of Home Improvement Loans Denied by Tract Minority Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Substantially Minority	60.1%	5,879	3,533	60.9%	1,604	977
Not Substantially Minority	32.5%	6,939	2,258	52.0%	1,152	599
All Tracts	45.2%	12,818	5,791	57.2%	2,756	1,576
Subst. Minority to Not Subst. Minority Tract Prime Denial Ratio			1.85			
Subst. Minority to Not Subst. Minority Tract Subprime Denial Ratio			1.17			

Table 9c: By Income Level of Borrower

Percent of Home Improvement Loans Originated by Income Level of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	25.0%	1,361	24.0%	1,207	36.5%	154
Moderate	29.2%	1,592	28.5%	1,435	37.2%	157
Middle	24.7%	1,347	25.6%	1,287	14.2%	60
Upper	21.2%	1,154	21.9%	1,103	12.1%	51
LMI	54.1%	2,953	52.5%	2,642	73.7%	311
MUI	45.9%	2,501	47.5%	2,390	26.3%	111
Total*	100.0%	5,454	100.0%	5,032	100.0%	422
LMI Subprime to Prime Portfolio Share Ratio			1.40			
MUI Subprime to Prime Portfolio Share Ratio			0.55			
*Excludes originations for which income of borrowers is Not Available						

Percent of Home Improvement Loan Type Originated by Income Level of Borrower (as a % of total originations for an income category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Low	1,361	88.7%	1,207	11.3%	154
Moderate	1,592	90.1%	1,435	9.9%	157
Middle	1,347	95.5%	1,287	4.5%	60
Upper	1,154	95.6%	1,103	4.4%	51
LMI	2,953	89.5%	2,642	10.5%	311
MUI	2,501	95.6%	2,390	4.4%	111
Total*	5,454	92.3%	5,032	7.7%	422
LMI to MUI Prime Market Share Ratio			0.94		
LMI to MUI Subprime Market Share Ratio			2.37		
*Excludes originations for which income of borrowers is Not Available					

Percent of Home Improvement Loans Denied by Income Level of Applicant (as a % of total applications for an income category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	62.5%	4,734	2,961	63.9%	1,125	719
Moderate	43.9%	3,599	1,579	56.0%	923	517
Middle	30.4%	2,428	737	47.5%	427	203
Upper	22.4%	1,896	425	43.2%	229	99
LMI	54.5%	8,333	4,540	60.4%	2,048	1,236
MUI	26.9%	4,324	1,162	46.0%	656	302
Total*	45.1%	12,657	5,702	56.9%	2,704	1,538
LMI to MUI Prime Denial Ratio 2.03						
LMI to MUI Subprime Denial Ratio 1.31						
*Excludes applications for which income of borrowers is Not Available						

Table 9d: By Income Level of Census Tract

Percent of Home Improvement Loans Originated by Tract Income Level (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Low	13.6%	750	12.8%	648	24.1%	102
Moderate	40.2%	2,214	39.4%	2,004	49.6%	210
Middle	42.5%	2,341	44.1%	2,240	23.9%	101
Upper	3.6%	198	3.7%	188	2.4%	10
LMI	53.9%	2,964	52.2%	2,652	73.8%	312
MUI	46.1%	2,539	47.8%	2,428	26.2%	111
Total*	100.0%	5,503	100.0%	5,080	100.0%	423
LMI Tract Subprime to Prime Portfolio Share Ratio						1.41
MUI Tract Subprime to Prime Portfolio Share Ratio						0.55
*Excludes originations for which tract income level is Not Available						

Percent of Home Improvement Loan Type Originated by Tract Income Level (as a % of total originations for a tract category)					
	Total	Prime		Subprime	
	Count	Percentage	Count	Percentage	Count
Low	750	86.4%	648	13.6%	102
Moderate	2,214	90.5%	2,004	9.5%	210
Middle	2,341	95.7%	2,240	4.3%	101
Upper	198	94.9%	188	5.1%	10
LMI	2,964	89.5%	2,652	10.5%	312
MUI	2,539	95.6%	2,428	4.4%	111
Total*	5,503	92.3%	5,080	7.7%	423
LMI to MUI Tract Prime Market Share Ratio			0.94		
LMI to MUI Tract Subprime Market Share Ratio			2.41		
*Excludes originations for which tract income level is Not Available					

Percent of Home Improvement Loans Denied by Tract Income Level (as a % of total applications for a tract category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Low	64.6%	2,769	1,789	66.6%	745	496
Moderate	49.0%	5,577	2,733	57.1%	1,329	759
Middle	28.7%	4,080	1,169	48.7%	620	302
Upper	26.1%	379	99	31.0%	58	18
LMI	54.2%	8,346	4,522	60.5%	2,074	1,255
MUI	28.4%	4,459	1,268	47.2%	678	320
Total*	45.2%	12,805	5,790	57.2%	2,752	1,575
LMI to MUI Tract Prime Denial Ratio			1.91			
LMI to MUI Tract Subprime Denial Ratio			1.28			
*Excludes applications for which tract income level is Not Available						

Table 9e: By Gender

Percent of Home Improvement Loans Originated by Gender of Borrower (as a % of all originations)						
	All		Prime		Subprime	
	Percentage	Count	Percentage	Count	Percentage	Count
Male	26.0%	1,321	25.8%	1,220	27.8%	101
Female	32.1%	1,635	30.8%	1,454	49.9%	181
Joint	41.9%	2,133	43.4%	2,052	22.3%	81
Total*	100.0%	5,089	100.0%	4,726	100.0%	363
Male Subprime to Prime Portfolio Share Ratio			1.08			
Female Subprime to Prime Portfolio Share Ratio			1.62			
Joint Subprime to Prime Portfolio Share Ratio			0.51			
*Excludes originations for which gender of borrowers is Not Applicable						

Percent of Home Improvement Loan Type Originated by Gender of Borrower (as a % of total originations for a gender category)					
	Total Count	Prime		Subprime	
		Percentage	Count	Percentage	Count
Male	1,321	92.4%	1,220	7.6%	101
Female	1,635	88.9%	1,454	11.1%	181
Joint	2,133	96.2%	2,052	3.8%	81
Total*	5,089	92.9%	4,726	7.1%	363
Female to Male Prime Market Share Ratio			0.96		
Female to Male Subprime Market Share Ratio			1.45		
Female to Joint Prime Market Share Ratio			0.92		
Female to Joint Subprime Market Share Ratio			2.92		
*Excludes originations for which gender of borrowers is Not Applicable					

Percent of Home Improvement Loans Denied by Gender of Applicant (as a % of total applications for a gender category)						
	Prime			Subprime		
	Percentage	Applications	Denials	Percentage	Applications	Denials
Male	49.3%	3,409	1,682	57.6%	717	413
Female	52.6%	4,286	2,254	63.7%	1,049	668
Joint	25.3%	3,393	857	51.9%	420	218
Total*	43.2%	11,088	4,793	59.4%	2,186	1,299
Female to Male Prime Denial Ratio 1.07 Female to Male Subprime Denial Ratio 1.11 Female to Joint Prime Denial Ratio 2.08 Female to Joint Subprime Denial Ratio 1.23 Male to Joint Prime Denial Ratio 1.95 Male to Joint Subprime Denial Ratio 1.11						

Table 10: Home Lending Ranking Analysis – All Single Family Loans, City of Philadelphia

	All Applications	All Loan Originations	% Loans to Minority Borrowers		% Loans to African Americans		% Loans to Hispanics		% Loans to Asians		% Loans to LMI Borrowers		% Loans to Female Borrowers		% Loans in Minority Tracts		% Loans in LMI Tracts	
Bank of America	341	245	22.4%	6	14.3%	6	2.7%	6	4.5%	2	46.9%	6	30.6%	6	15.5%	6	37.6%	6
Fleet National	2,380	1,344	41.2%	3	20.6%	4	8.8%	2	6.4%	1	61.4%	2	35.7%	2	29.8%	4	59.0%	2
Citizens	7,341	2,884	35.9%	4	23.6%	3	6.0%	4	3.8%	4	52.0%	4	34.5%	3	32.7%	3	49.9%	4
Commerce	1,181	548	25.0%	5	15.4%	5	3.6%	5	4.4%	3	47.2%	5	32.8%	5	22.4%	5	47.3%	5
PNC	5,317	1,698	45.3%	2	29.1%	1	6.0%	3	3.5%	5	54.1%	3	37.0%	1	40.5%	1	57.3%	3
Wachovia	6,187	2,403	47.6%	1	29.0%	2	11.5%	1	3.1%	6	61.5%	1	33.3%	4	40.3%	2	60.7%	1
All Lenders	77,769	46,157	33.1%		19.2%		5.6%		5.9%		51.3%		31.4%		25.3%		46.5%	

	All Applications	All Denials	Minority Borrower Denial Disparity Ratio	African American Denial Disparity Ratio	Hispanic Denial Disparity Ratio	Asian Denial Disparity Ratio	Minority Tract Denial Disparity Ratio	LMI Borrower Market Share/ MUI Borrower Market Share	Minority Borrower Market Share / White Borrower Market Share	LMI Tract Market Share / MUI Tract Market Share	Minority Tract Market Share / Non-Minority Tract Market Share
Bank of America	341	51	1.49 1	1.57 1	1.83 3	0.63 1	2.14 6	0.84 6	0.58 6	0.69 6	0.54 6
Fleet National	2,380	704	1.50 2	1.67 2	1.43 2	1.15 2	1.46 1	1.51 2	1.42 3	1.66 2	1.25 4
Citizens	7,341	3,455	1.77 3	1.90 3	1.40 1	1.30 3	1.58 2	1.03 4	1.13 4	1.15 4	1.43 3
Commerce	1,181	471	1.95 5	2.00 5	2.05 6	1.44 4	1.64 4	0.85 5	0.67 5	1.04 5	0.85 5
PNC	5,317	2,604	2.00 6	2.11 6	1.97 4	1.69 5	1.67 5	1.12 3	1.67 2	1.55 3	2.01 1
Wachovia	6,187	2,404	1.91 4	1.95 4	2.02 5	1.71 6	1.64 3	1.51 1	1.83 1	1.78 1	1.99 2
All Lenders	77,769	18,207	2.36	2.66	2.23	1.36	2.26	1.00	1.00	1.00	1.00

	Score	Ranking
Bank of America	80	5
Fleet National	40	1
Citizens	56	4
Commerce	82	6
PNC	54	3
Wachovia	45	2

Table 11: Home Lending Ranking Analysis – Home Purchase Loans, City of Philadelphia

	All Applications	All Loan Originations	% Loans to Minority Borrowers		% Loans to African Americans		% Loans to Hispanics		% Loans to Asians		% Loans to LMI Borrowers		% Loans to Female Borrowers		% Loans in Minority Tracts		% Loans in LMI Tracts	
Bank of America	92	63	22.6%	6	8.1%	6	3.2%	6	8.1%	1	59.7%	5	35.5%	5	12.7%	6	50.8%	6
Fleet National	595	403	60.2%	2	32.7%	2	15.5%	2	7.7%	2	83.8%	1	48.8%	1	40.4%	1	79.4%	1
Citizens	655	504	44.1%	3	25.8%	4	10.5%	4	6.6%	3	75.9%	2	47.8%	2	37.1%	3	64.7%	3
Commerce	200	139	41.8%	5	28.4%	3	7.5%	5	6.0%	5	58.2%	6	43.4%	3	33.1%	4	53.6%	4
PNC	117	54	65.3%	1	38.8%	1	18.4%	1	6.1%	4	64.8%	3	38.8%	4	38.9%	2	72.2%	2
Wachovia	689	321	42.2%	4	18.2%	5	12.4%	3	5.1%	6	62.8%	4	30.6%	6	30.2%	5	51.9%	5
All Lenders	18,095	13,253	45.6%		23.4%		8.9%		11.0%		64.3%		36.9%		27.4%		56.5%	

	All Applications	All Denials	Minority Borrower Denial Disparity Ratio		African American Denial Disparity Ratio		Hispanic Denial Disparity Ratio		Asian Denial Disparity Ratio		Minority Tract Denial Disparity Ratio		LMI Borrower Market Share/ MUI Borrower Market Share	Minority Borrower Market Share / White Borrower Market Share		LMI Tract Market Share / MUI Tract Market Share	Minority Tract Market Share / Non-Minority Tract Market Share	
Bank of America	92	20	0.51	2	0.81	2	0.00	1	0.81	4	1.52	3	0.82	5	0.35	6	0.80	6
Fleet National	595	114	1.35	4	1.79	4	0.91	4	0.25	1	1.17	2	2.88	1	1.81	2	2.96	1
Citizens	655	59	1.98	5	2.24	5	0.99	5	1.92	5	1.69	4	1.74	2	0.94	3	1.41	3
Commerce	200	24	0.46	1	0.41	1	0.61	2	0.56	2	0.91	1	0.77	6	0.86	5	0.89	4
PNC	117	40	1.22	3	1.52	3	0.69	3	0.57	3	2.46	6	1.02	3	2.25	1	2.00	2
Wachovia	689	208	2.79	6	3.17	6	1.85	6	3.24	6	2.28	5	0.94	4	0.87	4	0.83	5
All Lenders	18,095	1,984	1.89		2.30		1.44		1.32		2.13		1.00		1.00		1.00	

	Score	Ranking
Bank of America	76	5
Fleet National	32	1
Citizens	59	3
Commerce	61	4
PNC	44	2
Wachovia	85	6

Table 12: Home Lending Ranking Analysis – Refinance Loans, City of Philadelphia

	All Applications	All Loan Originations	% Loans to Minority Borrowers		% Loans to African Americans		% Loans to Hispanics		% Loans to Asians		% Loans to LMI Borrowers		% Loans to Female Borrowers		% Loans in Minority Tracts		% Loans in LMI Tracts	
Bank of America	248	181	21.9%	5	16.9%	3	1.9%	5	3.1%	5	41.7%	4	28.9%	5	16.6%	6	33.1%	6
Fleet National	1,425	815	34.6%	3	15.8%	4	6.5%	2	6.4%	1	49.9%	3	29.9%	3	25.0%	3	49.7%	3
Citizens	3,611	1,570	26.5%	4	15.4%	5	4.7%	4	3.3%	4	37.5%	6	26.8%	6	24.6%	4	37.8%	5
Commerce	396	269	17.6%	6	11.1%	6	1.5%	6	4.2%	2	38.5%	5	28.9%	4	17.8%	5	40.1%	4
PNC	3,333	1,099	43.3%	2	27.1%	2	5.0%	3	3.9%	3	51.1%	2	34.9%	1	37.8%	2	53.7%	2
Wachovia	4,449	1,798	46.6%	1	31.5%	1	9.1%	1	2.5%	6	59.9%	1	33.9%	2	40.9%	1	59.8%	1
All Lenders	46,856	27,816	26.6%		16.4%		4.0%		3.6%		44.3%		28.9%		23.5%		40.6%	

	All Applications	All Denials	Minority Borrower Denial Disparity Ratio		African American Denial Disparity Ratio		Hispanic Denial Disparity Ratio		Asian Denial Disparity Ratio		Minority Tract Denial Disparity Ratio		LMI Borrower Market Share/ MUI Borrower Market Share	Minority Borrower Market Share / White Borrower Market Share		LMI Tract Market Share / MUI Tract Market Share	Minority Tract Market Share / Non-Minority Tract Market Share	
Bank of America	248	31	2.46	5	2.26	6	3.88	6	0.00	1	2.70	6	0.90	4	0.77	5	0.72	6
Fleet National	1,425	394	1.48	1	1.57	1	1.56	2	1.35	3	1.33	1	1.25	3	1.46	3	1.44	3
Citizens	3,611	1,498	1.73	2	1.92	3	1.30	1	1.18	2	1.57	2	0.75	6	0.99	4	0.89	5
Commerce	396	64	2.53	6	1.97	4	3.86	5	2.41	6	2.22	5	0.79	5	0.59	6	0.98	4
PNC	3,333	1,540	1.97	4	2.11	5	2.02	4	1.64	5	1.69	4	1.32	2	2.10	2	1.70	2
Wachovia	4,449	1,607	1.79	3	1.86	2	1.83	3	1.59	4	1.58	3	1.88	1	2.40	1	2.18	1
All Lenders	46,856	10,432	2.50		2.71		2.44		1.73		2.20		1.00		1.00		1.00	

	Score	Ranking
Bank of America	84	5
Fleet National	42	2
Citizens	67	4
Commerce	84	5
PNC	47	3
Wachovia	33	1

Table 13: Home Lending Ranking Analysis – Home Improvement Loans, City of Philadelphia

	All Applications	All Loan Originations	% Loans to Minority Borrowers		% Loans to African Americans		% Loans to Hispanics		% Loans to Asians		% Loans to LMI Borrowers		% Loans to Female Borrowers		% Loans in Minority Tracts		% Loans in LMI Tracts	
Fleet National	360	126	34.3%	4	20.4%	4	5.6%	3	2.8%	4	51.0%	5	37.6%	3	26.2%	4	54.0%	5
Citizens	3,075	810	47.7%	2	37.3%	1	5.3%	4	2.9%	3	65.8%	2	39.9%	2	45.6%	3	64.1%	2
Commerce	585	140	22.2%	5	10.3%	5	4.0%	5	3.2%	2	53.3%	4	29.7%	5	20.7%	5	55.0%	4
PNC	1,867	545	47.1%	3	32.0%	2	6.8%	2	2.4%	5	59.1%	3	40.8%	1	46.2%	2	63.1%	3
Wachovia	1,049	284	60.9%	1	25.9%	3	26.4%	1	4.5%	1	69.7%	1	33.2%	4	47.9%	1	75.7%	1
All Lenders	12,818	5,088	33.0%		22.3%		4.8%		3.7%		52.5%		30.8%		30.2%		52.2%	

	All Applications	All Denials	Minority Borrower Denial Disparity Ratio	African American Denial Disparity Ratio	Hispanic Denial Disparity Ratio	Asian Denial Disparity Ratio	Minority Tract Denial Disparity Ratio	LMI Borrower Market Share/ MUI Borrower Market Share	Minority Borrower Market Share / White Borrower Market Share	LMI Tract Market Share / MUI Tract Market Share	Minority Tract Market Share / Non-Minority Tract Market Share
Fleet National	360	196	1.72 4	1.77 4	1.78 4	1.56 4	1.77 5	0.94 5	1.06 4	1.07 5	0.82 4
Citizens	3,075	1,898	1.52 1	1.54 1	1.44 1	1.45 3	1.34 1	1.74 2	1.85 2	1.64 2	1.93 3
Commerce	585	383	1.59 2	1.68 3	1.53 2	1.34 2	1.41 3	1.03 4	0.58 5	1.12 4	0.60 5
PNC	1,867	1,024	2.04 5	2.11 5	1.98 5	1.91 5	1.55 4	1.31 3	1.81 3	1.57 3	1.99 2
Wachovia	1,049	589	1.61 3	1.63 2	1.69 3	1.21 1	1.38 2	2.08 1	3.16 1	2.85 1	2.12 1
All Lenders	12,818	5,791	2.14	2.20	2.22	1.63	1.85	1.00	1.00	1.00	1.00

Note: Bank of America had only one HI loan and is being excluded from this analysis.

	Score	Ranking
Fleet National	71	5
Citizens	35	2
Commerce	65	4
PNC	56	3
Wachovia	28	1

Table 14: Summary of Home Lending Ranking Analysis

	All Single Family Lending	Home Purchase Lending	Refinance Lending	Home Improvement Lending
Indicator	# Banks > Threshold	# Banks > Threshold	# Banks > Threshold	# Banks > Threshold
% Loans to Minorities	4	2	3	4
% Loans to African-Americans	4	4	3	3
% Loans to Hispanics	4	4	4	4
% Loans to Asians	1	0	3	1
% Loans to LMI Borrowers	4	3	3	4
% Loans to Females	5	4	3	4
% Loans in Minority Tracts	4	5	4	3
% Loans in LMI Tracts	5	3	3	5
Minority Borrower Denial Disparity	6	4	5	5
African-Am Denial Disparity	6	5	6	5
Hispanic Denial Disparity	6	5	4	5
Asian Denial Disparity	3	4	5	4
Minority Tract Denial Disparity	6	4	4	4
LMI/MUI Borrower Market Share	4	3	3	4
Minority/White Borrower Market Share	4	2	3	4
LMI/MUI Tract Market Share	5	3	3	5
Minority/White Tract Market Share	4	5	4	3

Summary of Performance - Number of Cases in Which More than Half of Banks Exceed Threshold

	Number	Percent	Number	Percent	Number	Percent	Number	Percent
13 Indicators of Direct Comparison to All	11	84.6%	7	53.8%	7	53.8%	12	92.3%
4 Market Share Indicators	4	100.0%	1	25.0%	1	25.0%	4	100.0%
Total 17 Indicators	15	88.2%	8	47.1%	8	47.1%	16	94.1%

Lender Rankings

Rank	Name	Name	Name	Name
1	Fleet	Fleet	Wachovia	Wachovia
2	Wachovia	PNC	Fleet	Citizens
3	PNC	Citizens	PNC	PNC
4	Citizens	Commerce	Citizens	Commerce
5	Bank of America	Bank of America	Commerce & B of A	Fleet
6	Commerce	Wachovia		

Threshold is defined as excelling all prime lender benchmark. For market share measures, threshold is defined as a ratio equaling or exceeding one.

More than half of the banks - For all loan types except home improvement, more than half refers to 4 of the 6 banks. For home improvement, more than half refers to 3 of the 5 banks.

Table 15: Mellon Bank and United Bank Home Lending

Prime Loan Originations by Purpose

	Home Puchase	Home Improvement	Refinance	Total
Mellon	1	1	2	4
United Bank of Philadelphia	8	8	4	20

All Sinlge Family Prime Lending

	All Applications	All Loan Originations	% Loans to Minority Borrowers	% Loans to African Americans	% Loans to Hispanics	% Loans to Asians	% Loans to LMI Borrowers	% Loans to Female Borrowers	% Loans in Minority Tracts	% Loans in LMI Tracts
Mellon	10	4	25.0%	0.0%	0.0%	25.0%	0.0%	0.0%	0.0%	25.0%
United Bank of Philadelphia	36	20	78.9%	68.4%	5.3%	0.0%	75.0%	47.4%	70.0%	75.0%
All Lenders	77,769	46,157	33.1%	19.2%	5.6%	5.9%	51.3%	31.4%	25.3%	46.5%

	All Applications	All Denials	Minority Borrower Denial Disparity Ratio	African American Denial Disparity Ratio	Hispanic Denial Disparity Ratio	Asian Denial Disparity Ratio	Minority Tract Denial Disparity Ratio	LMI Borrower Market Share/ MUI Borrower Market Share	Minority Borrower Market Share / White Borrower Market Share	LMI Tract Market Share / MUI Tract Market Share	Minority Tract Market Share / Non-Minority Tract Market Share
Mellon	10	2	0.00	0.00	-	0.00	2.33	0.00	0.67	0.38	0.00
United Bank of Philadelphia	36	14	-	-	-	-	2.00	2.85	7.58	3.46	6.87
All Lenders	77,769	18,207	2.36	2.66	2.23	1.36	2.26	1.00	1.00	1.00	1.00

*Mellon and United Bank of Philadelphia are excluded from the institution rankings and analyzed separately because of the low number of HMDA loans made by these banks

Table 16: Affiliates Used in NCRC's Data Analysis¹

Royal Bank of Scotland Group	Used
Citizens Bank	X
Citizens Bank of Pennsylvania	X
Citizens Bank of Rhode Island	
Citizens Mortgage Corp.	X
Citizens Bank of Connecticut	X
Citizens Bank of New Hampshire	X
Citizens Bank of Massachusetts	X
PNC Bancorp	
PNC Bank, NA	X
PNC Multifamily Finance	
Somerset Trust Co.	
PNC Bank, Delaware	X
Commerce Bancorp	
Commerce Bank/Delaware, NA	X
Commerce Bank/Pennsylvania, NA	X
Commerce Bank/North	X
Commerce Bank, NA	X
Commerce Bank/Shore, NA	X
Mellon Financial Corporation	
Mellon 1 st Business Bank, NA	
Mellon Bank, NA	X
Mellon United National Bank	
Mellon Trust of New England, NA	X
FleetBoston Financial Corporation	
Fleet National Bank	X
Bank of America Corporation	
Bank of America, NA	X
Bank of America, NA - USA	X
United Bancshares	
United Bank of Philadelphia	X
Wachovia Corporation	
Wachovia Bank of Delaware, NA ²	X
Wachovia Bank, NA	X
Wachovia Bank, NA	

¹ as of 12/31/03; source National Information Center, Federal Reserve System

² Subprime affiliate; not included in analysis.

**Table 17: Small Business Lending by Income Level of Census Tract,
City of Philadelphia and Suburbs**

Small Business Lending					Small Business Lending: Loans to Small Businesses with <i>less than</i> \$1 million in revenues				
City of Philadelphia	Small Business Loans		Small Businesses		City of Philadelphia	Small Business Loans		Small Businesses	
	Count	Percent	Count	Percent		Count	Percent	Count	Percent
Low Income	4,696	21.91%	30,191	28.38%	Low Income	1,378	19.94%	17,111	27.68%
Moderate Income	7,636	35.63%	36,725	34.53%	Moderate Income	2,335	33.78%	21,920	35.46%
Middle Income	6,288	29.34%	28,258	26.57%	Middle Income	2,171	31.41%	16,449	26.61%
Upper Income	2,814	13.13%	11,191	10.52%	Upper Income	1,028	14.87%	6,331	10.24%
Total	21,434	100.00%	106,365	100.00%	Total	6,912	100.00%	61,811	100.00%
Suburbs	Count	Percent	Count	Percent	Suburbs	Count	Percent	Count	Percent
Low Income	367	0.51%	2,023	0.88%	Low Income	108	0.46%	1,172	0.83%
Moderate Income	4,545	6.26%	16,507	7.19%	Moderate Income	1,425	6.13%	9,903	7.03%
Middle Income	26,124	36.00%	81,402	35.46%	Middle Income	8,441	36.30%	50,738	36.00%
Upper Income	41,523	57.23%	129,602	56.46%	Upper Income	13,279	57.11%	79,117	56.14%
Total	72,559	100.00%	229,534	100.00%	Total	23,253	100.00%	140,930	100.00%

**Table 18: Small Business Lending by Minority Level of Census Tract,
City of Philadelphia and Suburbs**

Small Business Lending					Small Business Lending: Loans to Small Businesses with <i>less than</i> \$1 million in revenues				
City of Philadelphia	Small Business Loans		Small Businesses		City of Philadelphia	Small Business Loans		Small Businesses	
	Count	Percent	Count	Percent		Count	Percent	Count	Percent
Minority CTs	7,456	34.79%	47,844	44.98%	Minority CTs	2,276	32.93%	28,019	45.33%
Non-Minority CTs	13,978	65.21%	58,521	55.02%	Non-Minority CTs	4,636	67.07%	33,792	54.67%
Total	21,434	100.00%	106,365	100.00%	Total	6,912	100.00%	61,811	100.00%
Suburbs	Count	Percent	Count	Percent	Suburbs	Count	Percent	Count	Percent
Minority CTs	1,263	1.74%	6,748	2.94%	Minority CTs	386	1.66%	3,942	2.80%
Non-Minority CTs	71,296	98.26%	222,786	97.06%	Non-Minority CTs	22,867	98.34%	136,988	97.20%
Total	72,559	100.00%	229,534	100.00%	Total	23,253	100.00%	140,930	100.00%

**Table 19: Small Business Lending by Revenue
Size of Business,
City of Philadelphia and Suburbs**

City of Philadelphia	Small Business Loans		Small Businesses	
	Count	Percent	Count	Percent
SBs w/ Rev. <\$1 mil	6,912	32.25%	61,811	58.11%
All Small Businesses	21,434	100.00%	106,365	100.00%
Suburbs	Count	Percent	Count	Percent
SBs w/ Rev. <\$1 mil	23,253	32.05%	140,930	61.40%
All Small Businesses	72,559	100.00%	229,534	100.00%

Table 20: Small Business Lending Ranking Analysis

1 is best, 7 is worst

Percent of Loans in LMI Census Tracts				
Institution	Number of loans to LMI CT's	Number of Total Loans	Percent to LMI	Rank
Bank of America	76	160	47.50%	6
Fleet	432	649	66.56%	1
Citizens	307	507	60.55%	2
PNC	728	1389	52.41%	5
Commerce	109	254	42.91%	7
Mellon	54	93	58.06%	3
Wachovia	702	1264	55.54%	4
All lenders	12332	21434	57.53%	

Ratio of LMI/MUI Market Share				
Institution	LMI Marketshare	MUI Marketshare	Ratio: LMI/MUI	Rank
Bank of America	0.62%	0.92%	0.67	6
Fleet	3.50%	2.38%	1.47	1
Citizens	2.49%	2.20%	1.13	2
PNC	5.90%	7.26%	0.81	5
Commerce	0.88%	1.59%	0.55	7
Mellon	0.44%	0.43%	1.02	3
Wachovia	5.69%	6.17%	0.92	4

Percent of Small Business Loans under \$100,000				
Institution	Number of loans under \$100,000	Number of Total Loans	Percent of loans under \$100,000	Rank
Bank of America	159	160	99.38%	1
Fleet	625	649	96.30%	2
Citizens	408	507	80.47%	4
PNC	1,132	1,389	81.50%	3
Commerce	114	254	44.88%	7
Mellon	64	93	68.82%	6
Wachovia	938	1,264	74.21%	5
All lenders	19,919	21,434	92.93%	

Percent of Small Business Loans made to Small Businesses with Revenues <\$1 Million				
Institution	Number of loans to SB w/ Rev < \$1 mil	Number of Total Loans	Percent of loans to SB w/ Rev < \$1 mil	Rank
Bank of America	126	160	78.75%	1
Fleet	395	649	60.86%	2
Citizens	296	507	58.38%	3
PNC	796	1,389	57.31%	5
Commerce	146	254	57.48%	4
Mellon	0	93	0.00%	7
Wachovia	204	1,264	16.14%	6
All lenders	6,912	21,434	32.25%	

Ratio of Loans to All SB/Loans to SB w/ Revenues <\$1 Million				
Institution	Market Share: No. of loans to SB w/ Rev <\$1mil	Market Share: Loans to All Small Business	Ratio	Rank
Bank of America	1.82%	0.75%	2.44	1
Fleet	5.71%	3.03%	1.89	2
Citizens	4.28%	2.37%	1.81	3
PNC	11.52%	6.48%	1.777	5
Commerce	2.11%	1.19%	1.782	4
Mellon	0.00%	0.43%	0.00	7
Wachovia	2.95%	5.90%	0.50	6

Institution	Score	Overall Rank
Fleet	8	1
Citizens	14	2
Bank of America	15	3
PNC	23	4
Wachovia	25	5
Mellon	26	6
Commerce	29	7

Table 21: Small Business Lending Summary

Indicator	No. of Banks Above the Threshold	
Percent of Loans in LMI Tracts	3	
LMI/MUI Tract Market Share Ratio	3	
Percent of Loans Under \$100,000	2	
Percent of Loans to Biz <\$ 1Million in Revenues	5	
Biz<\$1 mill/All Biz Market Share Ratio	5	
Summary of Performance - Number of Cases in Which More than Half of Banks Exceed Threshold		
	Number	Percent
Total 5 Indicators	2	40.0%
NOTES		
Threshold is defined as exceeding all lender benchmarks. For market share measures, threshold is defined as a ratio equaling or exceeding one.		
More than half of the banks refers to 4 of the 7 banks.		

Table 22: Branching by Income Level of Census Tract, City of Philadelphia

Branching in LMI Tracts of Seven Largest Banks in Philadelphia*				
	Total Branches	LMI Tract	MUI Tract	Difference in % of branches in LMI tracts from % of all banks in LMI tracts
United Bank of Philadelphia	5	60.0%	40.0%	6.4%
Wachovia Bank	54	59.3%	40.7%	5.7%
Citizens Bank of PA	60	56.7%	43.3%	3.1%
Commerce Bank	11	54.5%	45.5%	1.0%
PNC Bank**	39	51.3%	41.0%	-2.3%
Mellon Bank	2	50.0%	50.0%	-3.6%
Fleet National Bank	11	36.4%	63.6%	-17.2%
All Banks in Philadelphia County	321	53.6%	43.6%	-

* Lists of branches obtained from FDIC, as of 12/31/2003

** Some branch addresses did not have a sufficient amount of information for geocoding.

Comparison of Branching and Census Tract Distribution by Income				
	Total	LMI	MUI	Difference in % of Branches in LMI Tracts from % of Tracts that are LMI
Census Tracts	379	70.4%	29.6%	-
United Bank of Philadelphia	5	60.0%	40.0%	-10.4%
Wachovia Bank	54	59.3%	40.7%	-11.2%
Citizens Bank of PA	60	56.7%	43.3%	-13.8%
Commerce Bank	11	54.5%	45.5%	-15.9%
PNC Bank	39	51.3%	41.0%	-19.2%
Mellon Bank	2	50.0%	50.0%	-20.4%
Fleet National Bank	11	36.4%	63.6%	-34.1%
All Banks in Philadelphia County	321	53.6%	43.6%	-16.9%

Table 23: Branching by Minority Level of Census Tract, City of Philadelphia

Branching in Minority Tracts of Seven Large Banks in Philadelphia*				
	Total Branches	Substantially Minority	Not Substantially Minority	Difference in % of branches in minority tracts from % of all banks in minority tracts
United Bank of Philadelphia	5	80.0%	20.0%	57.6%
Wachovia Bank	54	29.6%	70.4%	7.2%
Citizens Bank of PA	60	26.7%	73.3%	4.2%
PNC Bank**	39	25.6%	66.7%	3.2%
Commerce Bank	11	0.0%	100.0%	-22.4%
Fleet National Bank	11	0.0%	100.0%	-22.4%
Mellon Bank	2	0.0%	100.0%	-22.4%
All Banks in Philadelphia County	321	22.4%	74.8%	-

* Lists of branches obtained from FDIC, as of 12/31/2003

** Some branch addresses did not have a sufficient amount of information for geocoding.

Comparison of Branching and Census Tract Distribution by Minority Level				
	Total	Substantially Minority	Not Substantially Minority	Difference in % of Branches in LMI Tracts from % of Tracts that are LMI
Census Tracts	379	52.2%	47.8%	-
United Bank of Philadelphia	5	80.0%	20.0%	27.8%
Wachovia Bank	54	29.6%	70.4%	-22.6%
Citizens Bank of PA	60	26.7%	73.3%	-25.6%
PNC Bank	39	25.6%	66.7%	-26.6%
Commerce Bank	11	0.0%	100.0%	-52.2%
Fleet National Bank	11	0.0%	100.0%	-52.2%
Mellon Bank	2	0.0%	100.0%	-52.2%
All Banks in Philadelphia County	321	22.4%	74.8%	-29.8%

Table 24: Neighborhood Home Lending Analysis, All Single Family Lending, City of Philadelphia

	OOHU	Neighborhoods:City Data				Demographic Data			Lending Data				Are Loans Reaching OOHU?	
	# of OOHU in n'hood	% of OOHU in City	% of (Prime + Subprime) Loans made in City	% of Prime Loans made in City	% of Subprime Loans made in City	% African American Households	% Hispanic Households	% of MSA Median Income	# Prime ASF Loans	% Prime ASF Loans	# Subprime ASF Loans	% Subprime ASF Loans	# Prime ASF Loans / # OOHU in n'hood	# Subprime ASF Loans / # OOHU in n'hood
APM	289	0.1%	0.0%	0.0%	0.0%	13.9%	76.5%	31.2%	2	100.0%	0	0.0%	0.7%	0.0%
HACE	4,022	1.2%	0.2%	0.2%	0.3%	19.3%	74.8%	20.7%	103	83.7%	20	16.3%	2.6%	0.5%
AWF	4,584	1.3%	0.2%	0.2%	0.5%	94.1%	1.0%	39.8%	99	76.7%	30	23.3%	2.2%	0.7%
OARC	11,794	3.4%	2.3%	2.0%	4.8%	95.7%	0.8%	64.9%	923	74.9%	310	25.1%	7.8%	2.6%
Project Home	3,894	1.1%	0.2%	0.1%	0.3%	98.4%	0.5%	29.0%	67	77.9%	19	22.1%	1.7%	0.5%
People's	1,445	0.4%	0.2%	0.2%	0.3%	64.6%	2.5%	31.1%	97	84.3%	18	15.7%	6.7%	1.2%
American St. EZ	2,165	0.6%	0.2%	0.2%	0.3%	17.3%	65.6%	31.5%	77	80.2%	19	19.8%	3.6%	0.9%
North Central EZ	1,339	0.4%	0.1%	0.1%	0.2%	90.3%	5.0%	28.1%	42	79.2%	11	20.8%	3.1%	0.8%
West Philly EZ	1,399	0.4%	0.1%	0.1%	0.1%	95.3%	0.8%	35.1%	33	84.6%	6	15.4%	2.4%	0.4%
Philadelphia	349,651	100.0%	100.0%	100.0%	100.0%	40.7%	6.5%	57.4%	46,157	87.6%	6,434	12.2%	13.2%	1.8%

Key to Aggregate Home Lending Analysis

OOHU = Owner-Occupied Housing Units

ASF = All Single-Family Lending (which includes home purchase, refinance, and home improvement loans)

% of City OOHU = # OOHU in n'hood / # OOHU in City

% of City Prime Loans = # prime loans made in n'hood / # prime loans made in City

% of City Subprime Loans = # subprime loans made in n'hood / # subprime loans made in City

Are Prime Loans Reaching OOHU? = # prime ASF loans made in n'hood / # OOHU in n'hood

Are Subprime Loans Reaching OOHU? = # subprime ASF loans made in n'hood / # OOHU in n'hood

**Table 25: Neighborhood Home Lending Analysis Lender-by-Lender,
City of Philadelphia**

Home Purchase (HP)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0	0	0	0	0	0	1
HACE	0	3	2	0	0	3	34
AWF	0	7	0	0	0	1	33
OARC	0	6	7	0	0	10	284
Project Home	0	2	0	0	0	1	16
People's	0	0	0	0	0	1	19
American St. EZ	0	4	2	0	0	2	25
North Central EZ	0	7	2	2	0	0	19
West Philly EZ	0	0	2	0	0	0	10
All 9 CDC N'hoods Combined	0	29	15	2	0	18	441
Philadelphia	63	403	504	139	54	321	14,519

Refinance (Refi)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0	1	0	0	0	0	1
HACE	0	1	1	0	1	19	47
AWF	0	0	7	0	4	12	66
OARC	2	9	31	1	46	60	781
Project Home	0	0	3	0	4	4	46
People's	0	1	13	1	5	1	86
American St. EZ	0	3	4	0	1	9	54
North Central EZ	0	4	0	0	1	0	24
West Philly EZ	0	0	3	0	5	2	21
All 9 CDC N'hoods Combined	2	19	62	2	67	107	1,126
Philadelphia	181	815	1,570	269	1,099	1,798	32,638

Home Improvement (HI)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0	0	0	0	0	0	0
HACE	0	1	5	0	10	15	42
AWF	0	0	9	0	4	0	30
OARC	0	3	37	1	18	7	168
Project Home	0	0	9	1	3	1	24
People's	0	0	3	1	2	0	11
American St. EZ	0	0	3	0	3	4	17
North Central EZ	0	1	3	0	2	2	10
West Philly EZ	0	0	4	0	1	0	8
All 9 CDC N'hoods Combined	0	5	73	3	43	29	310
Philadelphia	1	126	810	140	545	284	5,511

**Table 25: Neighborhood Home Lending Analysis Lender-by-Lender,
City of Philadelphia**

All Single Family (ASF) Lending							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0	1	0	0	0	0	2
HACE	0	5	8	0	11	37	123
AWF	0	7	16	0	8	13	129
OARC	2	18	75	2	64	77	1,233
Project Home	0	2	12	1	7	6	86
People's	0	1	16	2	7	2	116
American St. EZ	0	7	9	0	4	15	96
North Central EZ	0	12	5	2	3	2	53
West Philly EZ	0	0	9	0	6	2	39
All 9 CDC N'hoods Combined	2	53	150	7	110	154	1,877
Philadelphia	245	1,344	2,884	548	1,698	2,403	52,668

Lender Portfolio Share for Home Purchase (# HP loans in n'hood by lender / # HP loans in city by lender)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HACE	0.0%	0.7%	0.4%	0.0%	0.0%	0.9%	0.2%
AWF	0.0%	1.7%	0.0%	0.0%	0.0%	0.3%	0.2%
OARC	0.0%	1.5%	1.4%	0.0%	0.0%	3.1%	2.0%
Project Home	0.0%	0.5%	0.0%	0.0%	0.0%	0.3%	0.1%
People's	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%
American St. EZ	0.0%	1.0%	0.4%	0.0%	0.0%	0.6%	0.2%
North Central EZ	0.0%	1.7%	0.4%	1.4%	0.0%	0.0%	0.1%
West Philly EZ	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.1%
All 9 CDC N'hoods Combined	0.0%	7.2%	3.0%	1.4%	0.0%	5.6%	3.0%
Philadelphia	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Lender Market Share for Home Purchase (# HP loans in n'hood by lender / # HP loans in n'hood by all lenders)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
HACE	0.0%	8.8%	5.9%	0.0%	0.0%	8.8%	100.0%
AWF	0.0%	21.2%	0.0%	0.0%	0.0%	3.0%	100.0%
OARC	0.0%	2.1%	2.5%	0.0%	0.0%	3.5%	100.0%
Project Home	0.0%	12.5%	0.0%	0.0%	0.0%	6.3%	100.0%
People's	0.0%	0.0%	0.0%	0.0%	0.0%	5.3%	100.0%
American St. EZ	0.0%	16.0%	8.0%	0.0%	0.0%	8.0%	100.0%
North Central EZ	0.0%	36.8%	10.5%	10.5%	0.0%	0.0%	100.0%
West Philly EZ	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	100.0%
All 9 CDC N'hoods Combined	0.0%	6.6%	3.4%	0.5%	0.0%	4.1%	100.0%
Philadelphia	0.4%	2.8%	3.5%	1.0%	0.4%	2.2%	100.0%

**Table 25: Neighborhood Home Lending Analysis Lender-by-Lender,
City of Philadelphia**

Lender Portfolio Share for All Single-Family Lending (# ASF loans in n'hood by lender / ASF loans in city by lender)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
HACE	0.0%	0.4%	0.3%	0.0%	0.6%	1.5%	0.2%
AWF	0.0%	0.5%	0.6%	0.0%	0.5%	0.5%	0.2%
OARC	0.8%	1.3%	2.6%	0.4%	3.8%	3.2%	2.3%
Project Home	0.0%	0.1%	0.4%	0.2%	0.4%	0.2%	0.2%
People's	0.0%	0.1%	0.6%	0.4%	0.4%	0.1%	0.2%
American St. EZ	0.0%	0.5%	0.3%	0.0%	0.2%	0.6%	0.2%
North Central EZ	0.0%	0.9%	0.2%	0.4%	0.2%	0.1%	0.1%
West Philly EZ	0.0%	0.0%	0.3%	0.0%	0.4%	0.1%	0.1%
All 9 CDC N'hoods Combined	0.8%	3.9%	5.2%	1.3%	6.5%	6.4%	3.6%
Philadelphia	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Lender Market Share for All Single-Family Lending (# ASF loans in n'hood by lender / # ASF loans in n'hood by all lenders)							
	Bank of America	Fleet	Citizens	Commerce	PNC	Wachovia	All Lenders
APM	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	100.0%
HACE	0.0%	4.1%	6.5%	0.0%	8.9%	30.1%	100.0%
AWF	0.0%	5.4%	12.4%	0.0%	6.2%	10.1%	100.0%
OARC	0.2%	1.5%	6.1%	0.2%	5.2%	6.2%	100.0%
Project Home	0.0%	2.3%	14.0%	1.2%	8.1%	7.0%	100.0%
People's	0.0%	0.9%	13.8%	1.7%	6.0%	1.7%	100.0%
American St. EZ	0.0%	7.3%	9.4%	0.0%	4.2%	15.6%	100.0%
North Central EZ	0.0%	22.6%	9.4%	3.8%	5.7%	3.8%	100.0%
West Philly EZ	0.0%	0.0%	23.1%	0.0%	15.4%	5.1%	100.0%
All 9 CDC N'hoods Combined	0.1%	2.8%	8.0%	0.4%	5.9%	8.2%	100.0%
Philadelphia	0.5%	2.6%	5.5%	1.0%	3.2%	4.6%	100.0%

Table 26: Neighborhood Small Business Lending Analysis, All Single Family Lending, City of Philadelphia

Lending Data										
	APM	HACE	AWF	OARC	Project Home	People's	American St. EZ	North Central EZ	West Philly EZ	Philadelphia
# of Loans to (All) Small Businesses in N'hood	24	164	193	230	74	158	243	127	68	21,434
# of Loans to Small Businesses in N'hood with < \$1 million in revenues	4	43	48	74	19	51	66	32	24	6,912

Demographic Data										
	APM	HACE	AWF	OARC	Project Home	People's	American St. EZ	North Central EZ	West Philly EZ	Philadelphia
# of (All) Small Businesses in N'hood	125	1,094	1,042	1,826	810	745	1,276	1,194	570	106,365
# of Small Businesses in N'hood with < \$1 million in revenues	57	613	587	1,149	492	450	690	697	308	61,811

Lending-to-Demographic Data Ratios										
	APM	HACE	AWF	OARC	Project Home	People's	American St. EZ	North Central EZ	West Philly EZ	Philadelphia
% of Loans to (All) Small Businesses in City	0.1%	0.8%	0.9%	1.1%	0.3%	0.7%	1.1%	0.6%	0.3%	100.0%
% of (All) Small Businesses in City	0.1%	1.0%	1.0%	1.7%	0.8%	0.7%	1.2%	1.1%	0.5%	100.0%
% of Loans to Small Businesses in City with < \$1 million in revenues	0.1%	0.6%	0.7%	1.1%	0.3%	0.7%	1.0%	0.5%	0.3%	100.0%
% of Small Businesses in City with < \$1 million in revenues	0.1%	1.0%	0.9%	1.9%	0.8%	0.7%	1.1%	1.1%	0.5%	100.0%
% of Small Businesses in N'hood Receiving Loans	19.2%	15.0%	18.5%	12.6%	9.1%	21.2%	19.0%	10.6%	11.9%	20.2%
% of Small Businesses in N'hood with < \$1 million Receiving Loans	7.0%	7.0%	8.2%	6.4%	3.9%	11.3%	9.6%	4.6%	7.8%	11.2%

Key to Lending-to-Demographic Data Ratios:

% of Loans to (All) Small Businesses in City = # of Loans to (All) Small Businesses in N'hood / # Loans to (All) Small Businesses in City

% of (All) Small Businesses in City = # (All) Small Businesses in N'hood / # (All) Small Businesses in City

% of Loans to Small Businesses in City with < \$1 million in revenues = # of Loans to Small Businesses in N'hood with < \$1 million in revenues / # of Loans to Small Businesses in City with < \$1 million in revenues

% of Small Businesses in City with < \$1 million in revenues = # of Small Businesses in N'hood with < \$1 million in revenues / # of Small Businesses in City with < \$1 million in revenues

% of Small Businesses in N'hood Receiving Loans = # of Loans to (All) Small Businesses in N'hood / # of (All) Small Businesses in N'hood

% of Small Businesses in N'hood with < \$1 million Receiving Loans = # of Loans to Small Businesses in N'hood with < \$1 million in revenues / # of Small Businesses in N'hood with < \$1 million in revenues