

**CREDIT UNION
AS OF
FAIR LENDING QUESTIONNAIRE**

(Completed By)

Fair Lending Compliance Policy/Program
1. Does the Credit Union have a fair lending compliance program policies and/or procedures? If so, provide a copy of the policies and/or procedures
2. Does the Credit Union include fair lending requirements in other lending policies and/or procedures? If so, provide examples.
3. Is the Credit union required to file Home Mortgage Disclosure Act (HMDA) data? If so, does the Credit Union have HMDA policies and/or procedures? Please provide last HMDA data.
Fair Lending Monitoring Process
4. Does the Credit Union have an internal compliance department? If yes, discuss how the compliance department ensures fair lending law compliance.
5. Does the Credit Union have a secondary review process for lending decisions? If so, summarize that process.
6. Does the Supervisory Committee play a role in the lending review or fair lending oversight process? If so, summarize the role of the Supervisory Committee in the lending review or fair lending oversight process.
7. Does the Credit Union obtain an audit or review of its fair lending program? If so, please provide latest audit.
8. Does the Credit Union perform a fair lending risk assessment? If so, send a copy of the overview of your most recent risk assessment and summarize any actions taken as a result of the risk assessment.
9. If the Credit Union is required to collect HMDA data, does the Credit Union verify the accuracy of its HMDA data? If so, summarize the verification process.
10. If the Credit Union is required to collect HMDA data, does the Credit Union use it to evaluate or monitor its loan programs?

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11. Does the Credit Union conduct fair lending statistical analysis? If so describe the extent to the analysis, including lines of business, products, or other areas that the Credit Union analyzed and the results.
Fair Lending Training Program
12. Does the Credit Union have a fair lending training policy and/or procedures? If so, provide a copy of the polices and/or procedures.
13. How many loan officers does the Credit Union employ?
14. How does the Credit Union provide fair lending training to staff, loan officers, and officials? If staff has different training requirements, please describe the training requirements for the various positions. (examples: teller, CFO, loan officers)
Lending Marketing Program
15. Does the Credit Union have a marketing policy and/or procedures? If so, provide a copy of the policies and/or procedures?
16. Does the Credit Union advertise its loan products? If so, provide three examples of the Credit Union's marketing materials or advertisement published or provided to members?
17. Does the Credit Union place advertisements in a language other than English? If so, provide a list of languages, the media used (TV, newspaper, etc) how management determines which members will receive the advertisements; and three recent examples of the advertisements.
18. If the Credit Union is required to collect HMDA data, does the Credit Union use it to develop its marketing plan? (e.g., to determine what type of advertising is most effective or the target audience)
Other Related Lending Policies and Procedures
<u>Collections</u>
19. Does the Credit Union have debt collections policies and/or procedures? If so, summarize how the policies and/or procedures ensure fair lending law compliance.

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20. Does the Credit Union have loan modification policies and/or procedures? If so, summarize how the policies and/or procedures ensure fair lending law compliance.
21. Does the Credit Union have risk-based collection (i.e. contacting members with delinquent loans based on high loan to value ratios or poor credit scores)? If so, summarize the procedures.
22. To what extent does the Credit Union rely on third parties for underwriting decisions? What fair lending monitoring and controls are in place with respect to third parties?
<u>Member Complaints:</u>
23. Did the Credit Union receive any verbal or written fair-lending related complaints during the last two years? If so, summarize the complaints and how management resolved them.
24. Were there any lawsuits claiming discrimination against the Credit Union or management in the last two years? If so, summarize the nature and alleged cause of each lawsuit and any actions management has taken or plans to take as a result of the complaint.
<u>Miscellaneous</u>
25. What is the Credit Union's approval or denial volume during the prior calendar year for all consumer and residential real estate loans?
Real Estate Loans:
2019- out of real estate loans were approved, %
2018- out of real estate loans were approved, %
2017- out of real estate loans were approved, %
Consumer Loans:
2019- out of consumer loans were approved, %
2018- out of consumer loans were approved, %
2017- out of consumer loans were approved, %
26. How are members notified of the Credit Union's lending decision?
27. What are the guidelines for making pricing exceptions? How are exceptions documented?
28. Describe the institution's fair lending training to loss mitigation staff regarding mortgage servicing (loss mitigation can consist of loan modifications, forbearance, short-sales, etc.).

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29. Does the Credit Union have any special purpose credit programs? If yes, please describe.			
30. Does the Credit Union's fair lending monitoring program include conducting self-tests or self-evaluations?	YES	NO	N/A
31. If self-tests/evaluations are used, describe the methodology used, scope of tests, period covered, and dates they were conducted.			
32. Does the credit union have a minimum loan amount for mortgage loans, including HELOCs? If so, what is that limit?			
33. Why does the Credit Union have a policy for a minimum loan amount for mortgage loans? What purpose does this serve?			
AUTOMATED UNDERWRITING MODELS			
34. Does the entity use models in the credit process (e.g., in underwriting, pricing, or account management)? If so, please describe.			
35. Does the entity track the expected usage of each model; the type(s) and source(s) of data used by each model; and whether the model was developed internally or by a third-party? If so, please describe how this information is tracked.			
36. How often are the entity's models validated or re-validated? Please describe the nature of validation or re-validation.			

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37. Does the entity conduct any fair lending-related review or testing of models? If so, please note the frequency and nature of such review or testing; the part(s) of the entity responsible for such review or testing; the results of the last review or testing performed; and any corrective action(s) taken.
38. Do any of the entity's models contain factors that could treat applicants differently on a prohibited basis? If so, please describe the factors, the prohibited basis, and the potential impact.
39. Does the entity evaluate the validity or performance of its models by prohibited basis group? If so, please describe.
40. Do any of the entity's models specifically include age as a criterion? If so, how does the entity ensure that the use of age is consistent with requirements in Regulation B (12 CFR 1002.6(b)(2))?
41. If the entity employs third party models in the credit process, have the models been reviewed or tested by the entity or third party for fair lending risk? If so, please describe the nature of the review or testing and any corrective action(s) taken.
42. Does the entity have policies and procedures governing model use, including when it may be appropriate to make overrides/exceptions to a model decision? If so, please describe. Please also describe any procedures for justifying, documenting, and monitoring override/exception reasons.
43. When adverse action is taken on the basis of one or more credit scoring models, what methodology is used to select the reasons why the adverse action was taken?