A Practical Guide to Fair Lending Success

GBA - Compliance School
May 2016

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Show of Hands
(What is Your Role?)

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First Couple Thoughts… Doctor

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First Couple Thoughts… Cheerleader

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First Couple Thoughts…
Realtor

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First Couple Thoughts…
Football Player

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First Couple Thoughts…
Commercial Lender

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First Couple Thoughts…
Car Salesman

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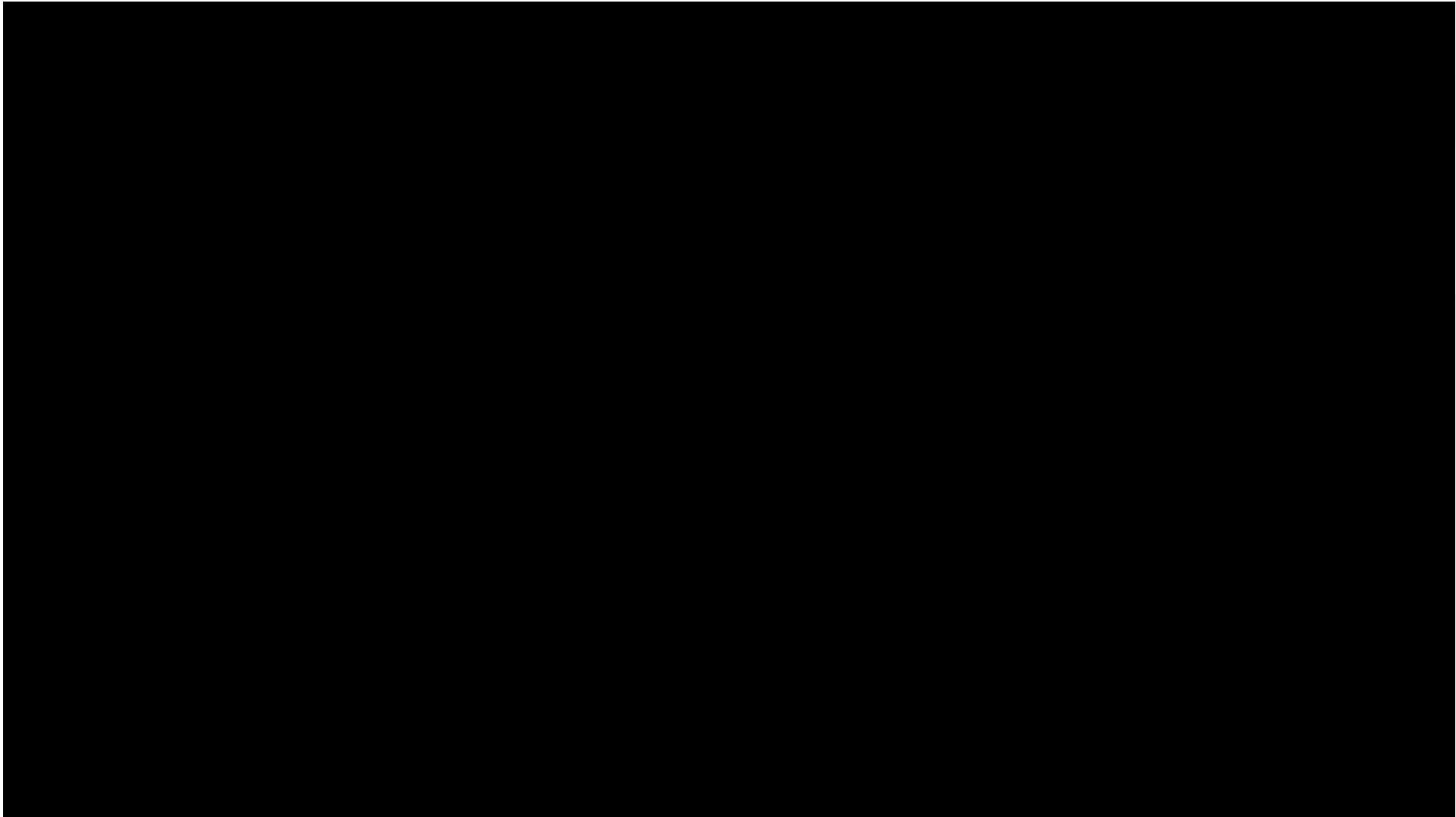
First Couple Thoughts…
Dekalb County?

First Couple Thoughts…
Athens, Georgia?

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First Couple Thoughts…
Vidalia, Georgia?

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Americans...

- Generous
- Optimistic
- Hardworking

- Materialistic
- Ignorant of all countries and cultures beyond their own
- Gun-loving
- Environmental Unconsciousness
- Arrogance
- Quick to Use Force

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Stereotypes

- Defined as an over-generalized belief about a particular group.
- Simplify: We use stereotypes to simplify our world. They reduce the amount of thinking we have to do when we meet or interact with new people.
- Disadvantage: The use of stereotypes and generalizations can makes us ignore differences between individuals.
- Can be both positive or negative.

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Bottom Line

If you're willing to accept that stereotypes exist, you're willing to accept that your institution may have fair lending risk.

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Conclusion #0

Stereotypes are everywhere.

We employ stereotypes to consume our complex world. They may also bring fair lending risk to your organization.

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What We'll Cover Today

- Quick Visit: Today's Regulatory Landscape
- Stopping the Insanity
- Fair Lending Overview
- Georgia – Unique Fair Lending Issues!
- 7 Key Fair Lending Risks
  – Qualitative and Quantitative Risks
- Common Fair Lending Tripwires
- Team Work for Fair Lending

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Today's Regulatory Compliance Environment

TODAY'S REGULATORY COMPLIANCE LANDSCAPE

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Today's Compliance Realities

- Time is Limited.

- Resources are Constrained.

- Teamwork is Essential.

- Compliance is Complex & Evolving.

- Risks are Real.

- Consequences are Serious.

In today's compliance environment, it's more important than ever to understand your compliance risks and prioritize your focal points. Neglecting compliance can be costly in time, reputation and resources.

Tip: Try thinking about compliance less like boxes to be checked, and more like "resource protection."

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Regulatory Compliance…

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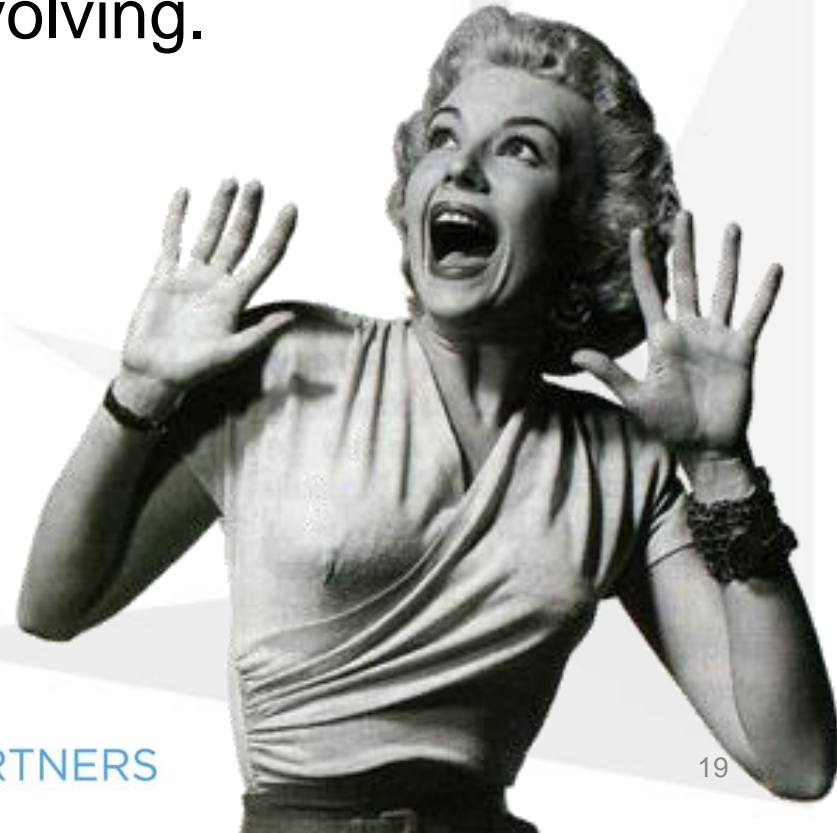
…Can Feel Like Whack-A-Mole!

Effective Complaint Management

Increased Cyber Threats

BSA/AML

CFPB Impact and Rules Changes – TRID Anyone? HMDA Plus?

Servicing

HMDA Data Integrity

Third-Party Vendor Management

UDAAP

Fair Lending

(Mortgage and Non-Mortgage)

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State of Overwhelm in Compliance

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"STOP THE INSANITY"

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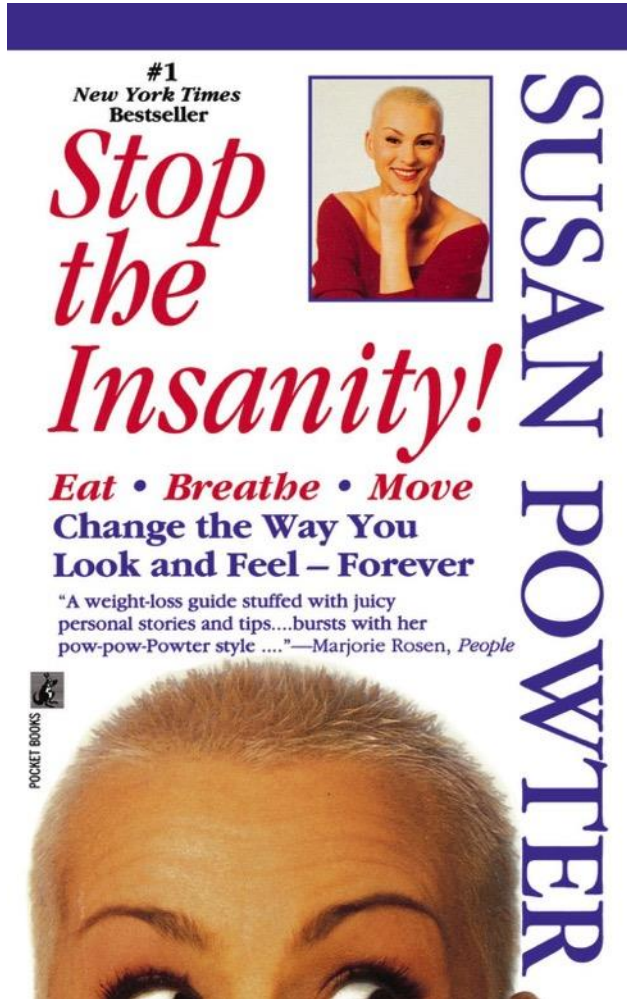
There is a Road Map to Sanity

Manage Overwhelm

Sheer volume of compliance work.

Develop Priorities

Priorities: Allow you to focus, with confidence.

STOP
THINK
OBSERVE
PROCEED

Risk Assessment

Build awareness. Clear view of variables.
Identify and focus on areas with highest risk.

Alignment

Agree on the controls needed to ensure
efficient, effective operations.

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Conclusion #1

There is too much going on in the world of compliance. YOU MUST PRIORITIZE in a way that is ALIGNED WITH EXECUTIVE MANAGEMENT.

Risk Assessments should help identify your biggest areas of risk!

A Quick Intro to Fair Lending Compliance

FAIR LENDING OVERVIEW

Fair Lending is one of the *Hottest* Topics

What is Fair Lending

Here are two of the most simplistic definitions of Fair Lending:

- Dodd-Frank Act: "Fair, equitable and nondiscriminatory access to credit for consumers."

- ECOA: "A creditor shall not discriminate against any applicant on a prohibited basis regarding any aspect of a credit transaction."

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3 Types of Illegal Discrimination

- **Overt Evidence of Disparate Treatment**
  - When a lender openly discriminates on a prohibited basis or expresses a discriminatory preference. There is overt evidence of discrimination even when a lender expresses, but does not act on, a discriminatory preference.
  - *Example: Statements that indicate a discriminatory preference event if it is not acted upon. "We don't like to lend to Methodists."*

- **Comparative Evidence of Disparate Treatment**
  - When a lender treats similarly situated credit applicant differently based on one of the prohibited bases (during underwriting, pricing, and/or assistance). Does not require any showing the treatment was motivated by prejudice or a conscious intention to discriminate beyond the difference in treatment itself.
  - *Example: Assisting non-minority couple with adverse information on their credit report…while denying a minority with a similar issue without offering the same level of assistance.*
  - *Example: Offer a credit card limit of $1,000 to applicants age 21 and less. Offer credit card limit of $2,000 for applicants above age 21.*

- **Disparate Impact (Upheld by the Supreme Court – 6/25/15)**
  - When a lender applies a racially (or otherwise) neutral policy or practice equally to all credit applicants but the policy or practice disproportionately excludes or burdens certain persons on a prohibited basis. Also known as the "Effects Test."
  - When an Agency finds that a lender's policy or practice has a disparate impact, the next step is to seek to determine whether the policy or practice is justified by "business necessity."
  - *Example: No residential loans for less than $400,000. This policy might exclude a high number of applicants from who have lower income levels or lower home values. The uneven effect of the policy is called disparate impact.*

Fair Lending Risk at Every Stage of Credit Transaction

Marketing Risk

Steering Risk

Pricing Risk

Current

Delinquent

Servicing & Loss Mitigation Risk

Approvals

Denials

Redlining Risk

Underwriting Risk

Fair Lending Umbrella

Fair Lending

Principle laws that <u>govern</u> Fair Lending

- Fair Housing Act (FHA)
- Equal Credit Opportunity Act (ECOA)

Principle laws that <u>monitor</u> Fair Lending

- Home Mortgage Disclosure Act (HMDA)
- Community Reinvestment Act (CRA)

Prohibited Basis Characteristics

Equal Credit Opportunity Act

- Marital Status
- Age
- Receipt of Income from public assistance programs
- Exercise of rights under the CCPA (Consumer Credit Protection Act)

ECOA & Fair Housing Act

- Race or Color
- Religion
- National Origin
- Gender or Sex

Fair Housing Act

- Handicap
- Familial Status

Examples of Prohibited Practices

A Lender May Not Because of a Prohibited Basis Characteristic:

– Fail to provide or provide **different information or services** regarding any aspect of the lending process;

– Either **discourage or selectively encourage** individuals who inquire or apply for credit; or

– Refuse to extend credit or use **different standards in determining whether to extend credit**.

– Adjust or **vary the terms** of credit offered;

– Use **different standards to evaluate collateral**;

– Treat a borrower **differently in servicing** a loan or invoking default remedies

Disparate Impact Theory Upheld

- In June, SCOTUS upheld the concept of disparate impact.

- This holds financial institutions accountable for understanding where **and** why disparities exist. However, there are limits on how the regulators can review.
  - The regulators shouldn't pursue or make accusations against a bank based only on data.

- With disparate impact upheld, fair lending is back squarely in the regulators' cross-hairs.

Conclusion #2

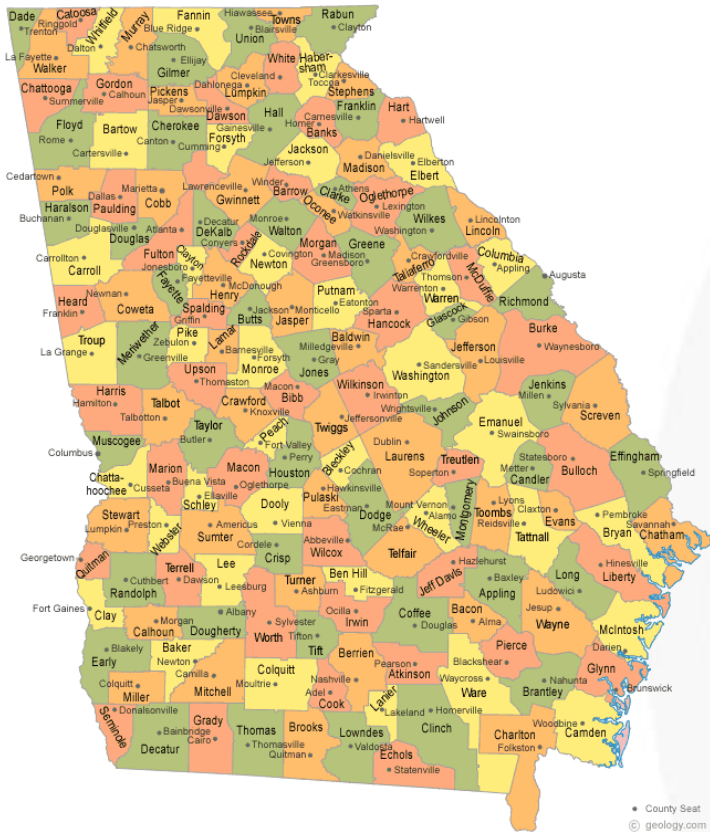Fair Lending is not going to fade in the background. It is a political hot potato.

You must proactively address Fair Lending.

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Focal Points

GEORGIA – UNIQUE FAIR LENDING ISSUES

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Georgia: Is Different!

US Census

	USA		Georgia	
	Total	**Mix**	**Total**	**Mix**
2014 Population	318,857,056		10,097,343	
White	246,795,361	77.40%	6,270,450	62.10%
Black or African American	42,089,131	13.20%	3,180,663	31.50%
American Indian & Alaska	3,826,285	1.20%	50,487	0.50%
Asian	17,218,281	5.40%	383,699	3.80%
Native Hawaiian	637,714	0.20%	10,097	0.10%
Two or More Races	7,971,426	2.50%	201,947	2.00%
Hispanic	55,481,128	17.40%	939,053	9.30%
Female	161,979,384	50.80%	5,169,840	51.20%
Source: www.quickfacts.census.gov				

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South: Is Different!
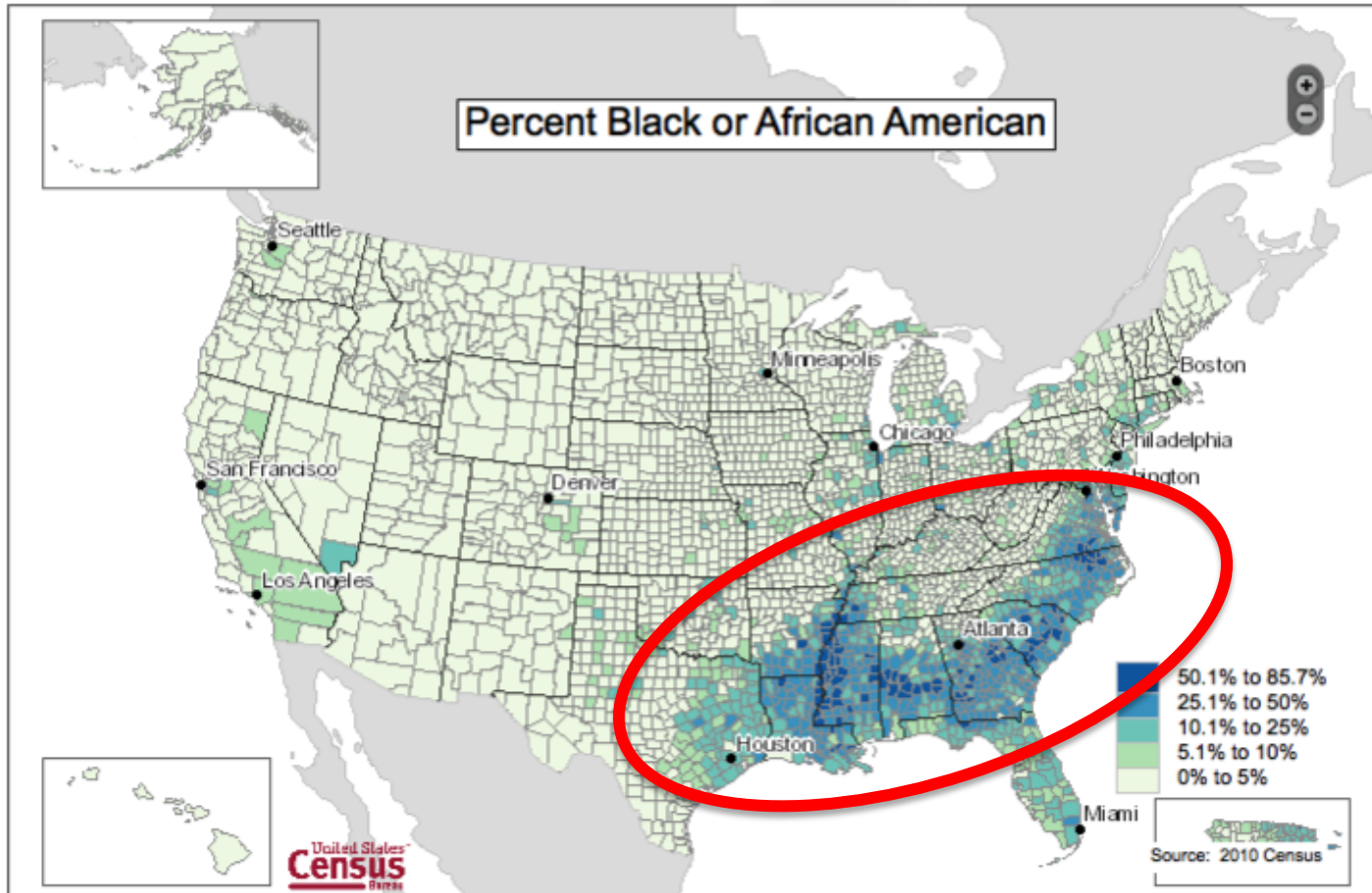
Within Georgia: Markets Are Unique!

US Census

	USA		Georgia		Hancock County		Hall County	
	Total	**Mix**	**Total**	**Mix**	**Total**	**Mix**	**Total**	**Mix**
2014 Population	318,857,056		10,097,343		8,509		190,761	
White	246,795,361	77.40%	6,270,450	62.10%	2,161	25.40%	166,534	87.30%
Black or African American	42,089,131	13.20%	3,180,663	31.50%	6,178	72.60%	15,452	8.10%
American Indian & Alaska	3,826,285	1.20%	50,487	0.50%	34	0.40%	1,717	0.90%
Asian	17,218,281	5.40%	383,699	3.80%	60	0.70%	3,815	2.00%
Native Hawaiian	637,714	0.20%	10,097	0.10%	-	0.00%	382	0.20%
Two or More Races	7,971,426	2.50%	201,947	2.00%	68	0.80%	2,861	1.50%
Hispanic	55,481,128	17.40%	939,053	9.30%	145	1.70%	52,459	27.50%
Female	161,979,384	50.80%	5,169,840	51.20%	3,914	46.00%	95,571	50.10%

Source: www.quickfacts.census.gov

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Black or African Americans

Percent Black or African American

Legend:
- 50.1% to 85.7%
- 25.1% to 50%
- 10.1% to 25%
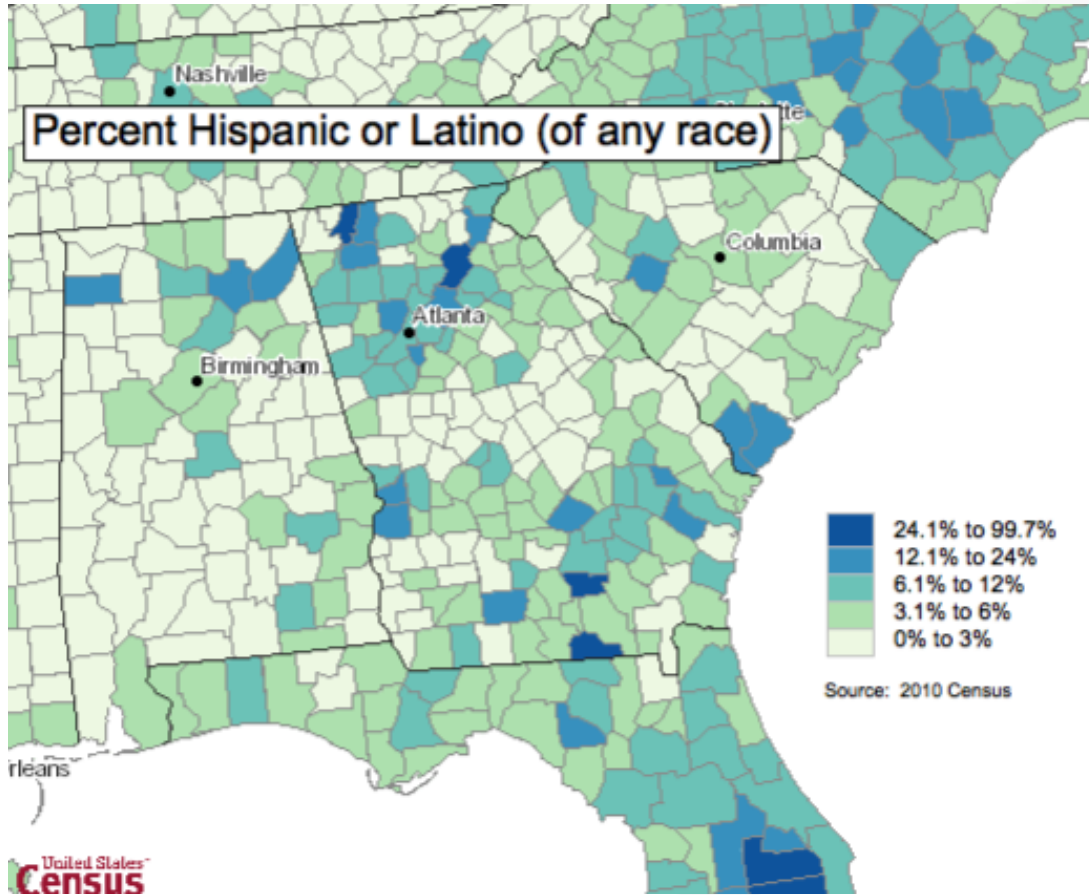- 5.1% to 10%
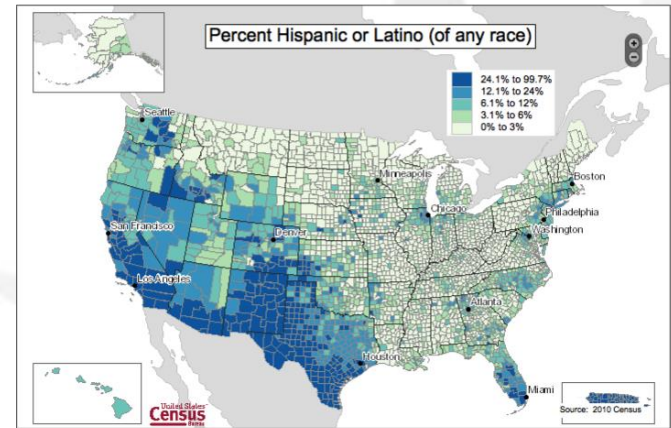- 0% to 5%
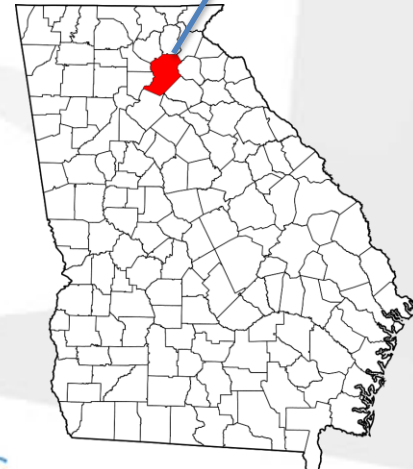
Source: 2010 Census

74% - Hancock County
67% - Dougherty County
66% - Clayton County

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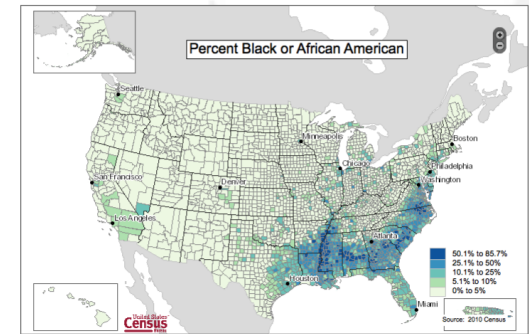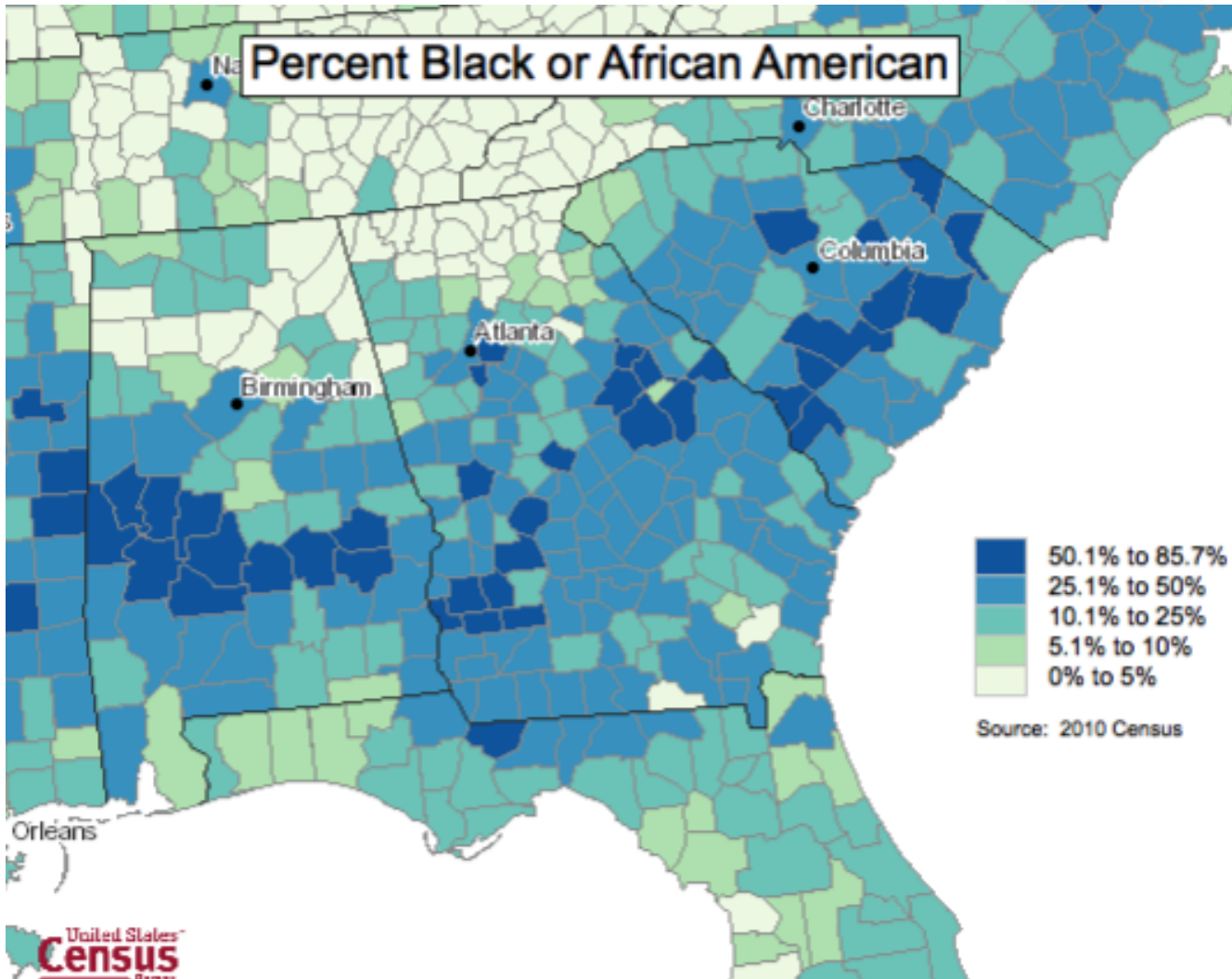
Hispanics In Georgia

32% - Whitfield County

29% - Echols County

28% - Hall County

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Growth Rates

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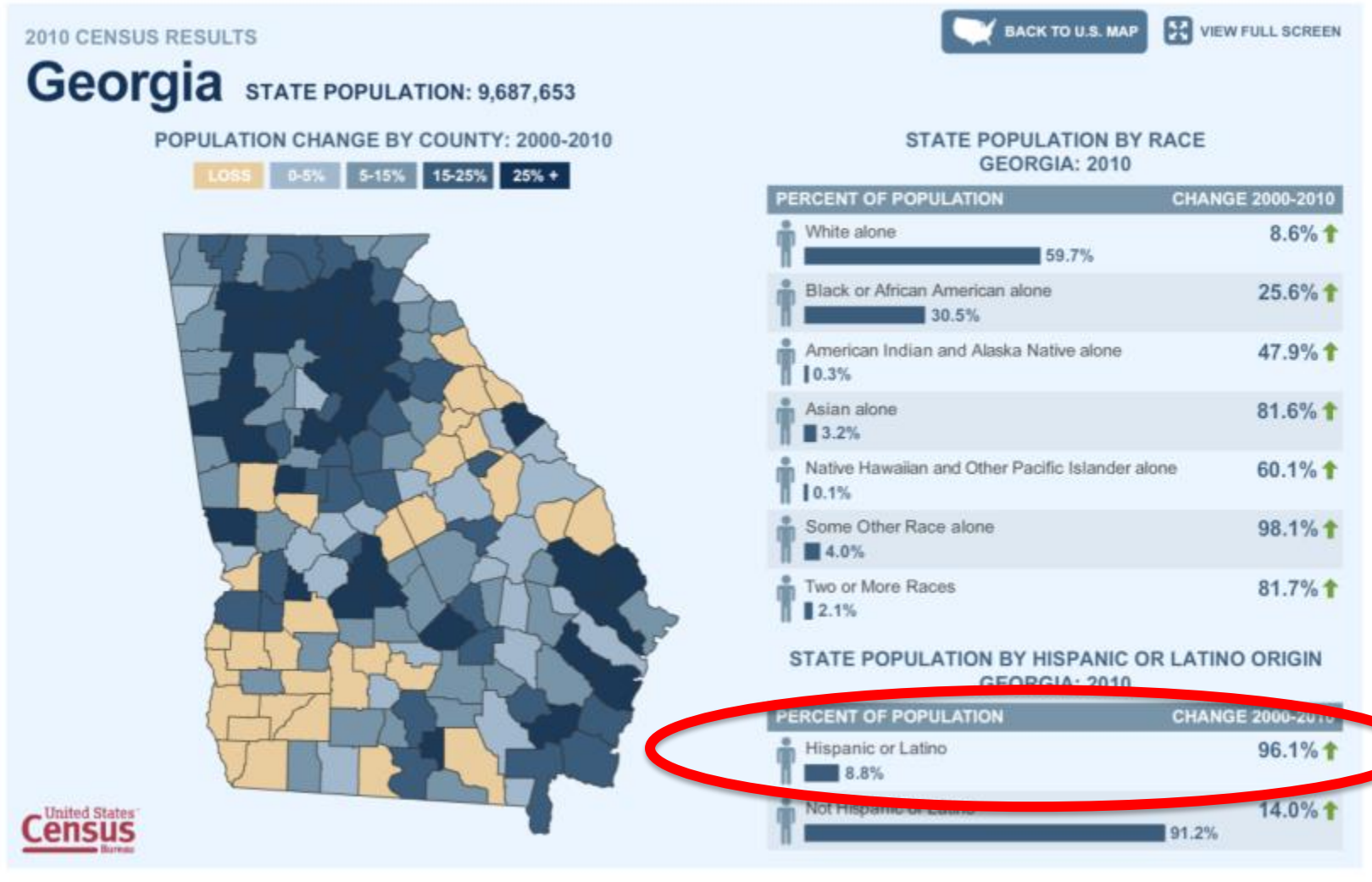
Georgia Poverty Rates

| Georgia | Hancock | | Press | < | | > |

Poverty in the United States, 1960-2010

Legend: Hancock County, Georgia, United States

Hancock County 2010	
Total Population	7,761
Population in Poverty	2,435
Poverty Rate	31.4%

Georgia 2010	
Highest Estimated Poverty Rates	
Clay County	47.7
Echols County	36.3
Calhoun County	36.1
Baker County	35.8
Clarke County	34.9
Lowest Estimated Poverty Rates	
Forsyth County	6.7
Fayette County	6.7
Columbia County	8.0
Cherokee County	8.4
Harris County	8.4

Poverty Rates

	1960	1970	1980	1990	2000	2010
United States	22.1	13.7	12.4	13.1	12.4	14.9
Georgia	39.0	20.7	16.6	14.7	13.0	17.4
Hancock County	72.5	47.8	39.3	30.1	29.4	31.4

Georgia 2010

Poverty Rate	Counties	%	Population	%	Legend
Less than 10%	6	3.8	683,835	7.2	
10% to less than 20%	58	36.5	6,182,776	65.4	
20% to less than 30%	80	50.3	2,164,380	22.9	
30% to less than 40%	14	8.8	414,286	4.4	
40% to less than 50%	1	0.6	3,116	0.03	
Total	159	100	9,448,393	100	

Sources: https://www.census.gov/hhes/www/poverty/data/census/1960/index.html

http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_S1701&prodType=table

Demographics vs. Poverty
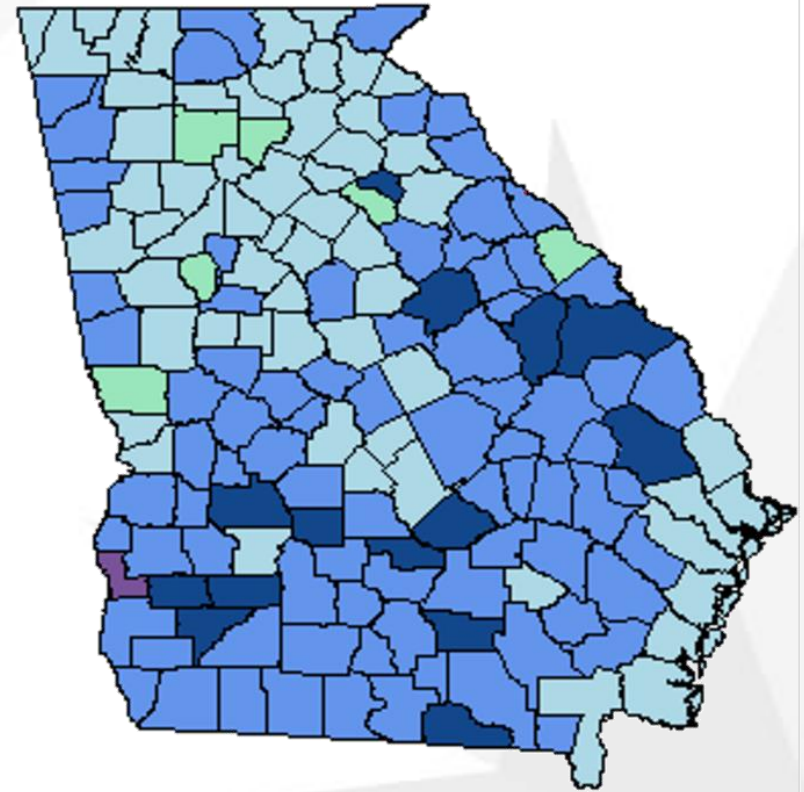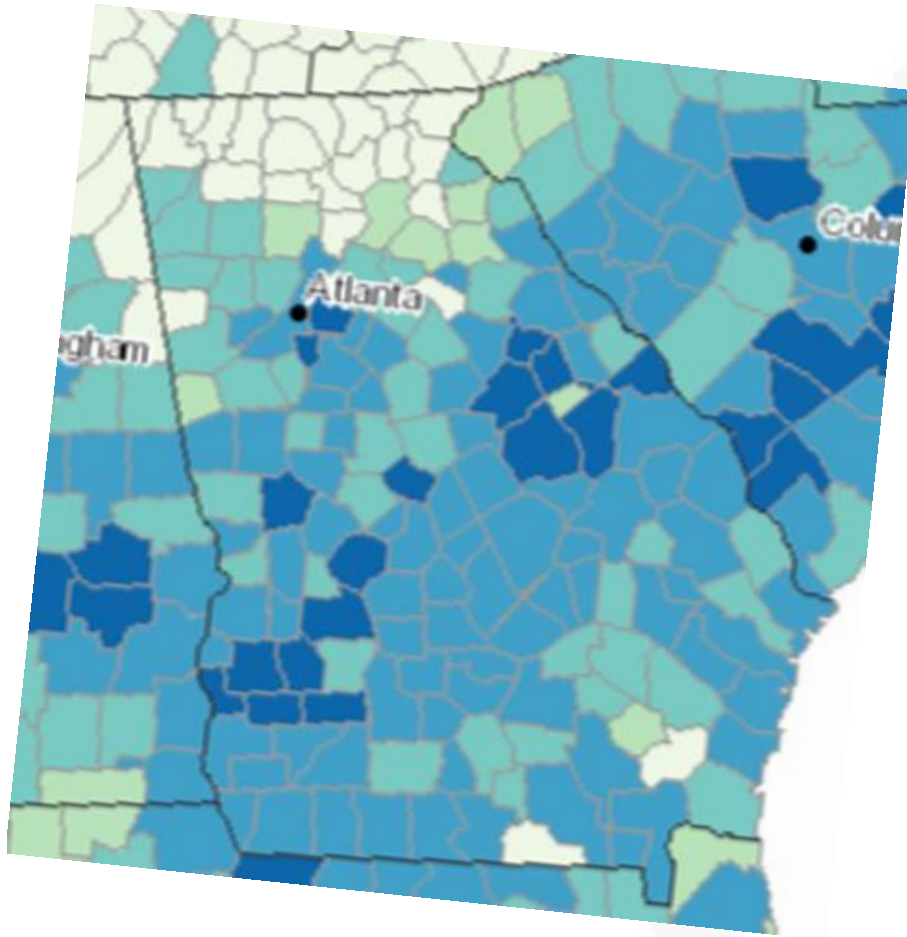
Conclusion #3

Georgia is unique. Markets within Georgia are unique.

Need to Know: How is your market unique? Does marketing understand their responsibility? Does management have a clear picture?
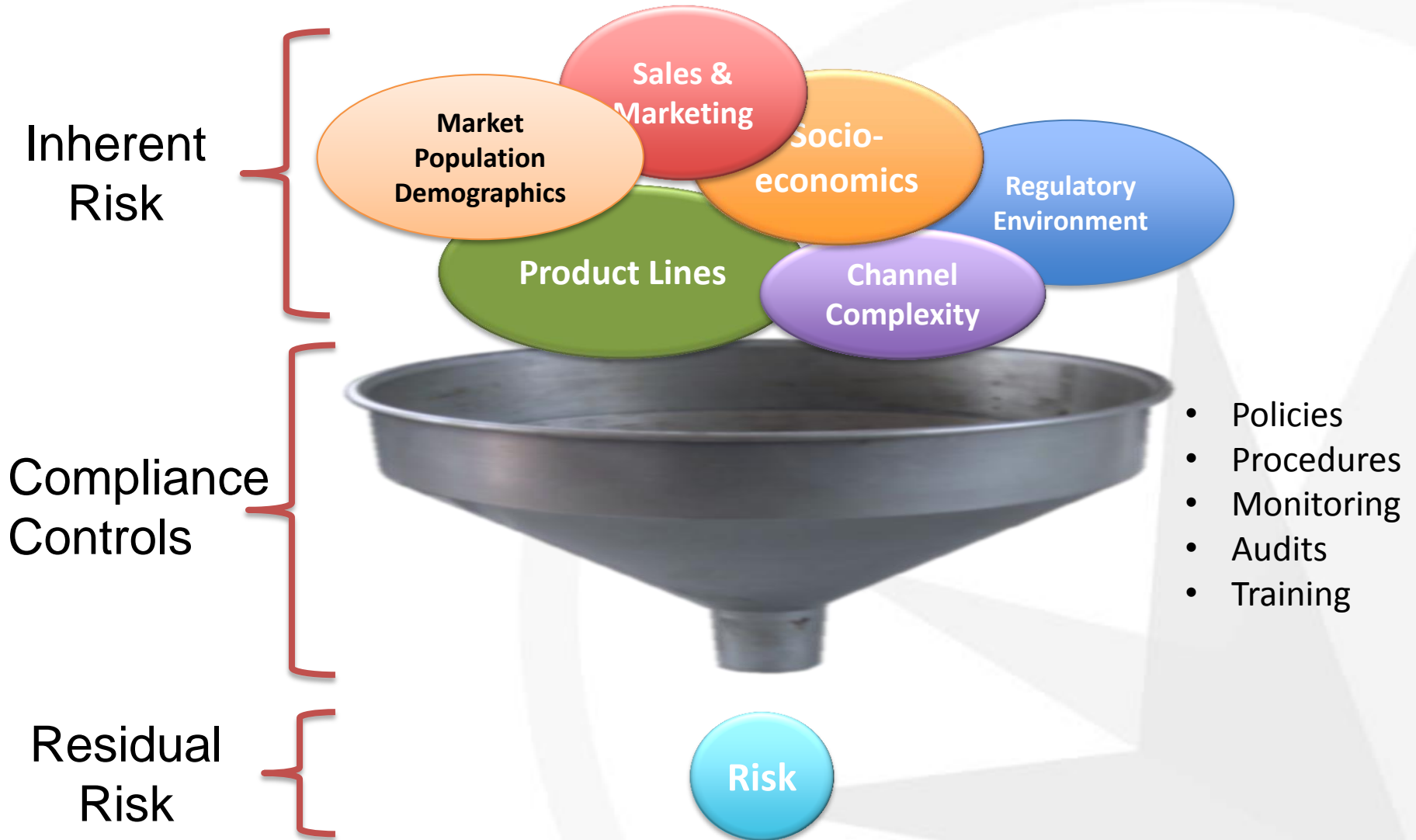
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A Quick Overview of the Core Fair Lending Risks

7 KEY FAIR LENDING RISKS & QUESTIONS

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Fair Lending Risk at Every Stage of Credit Transaction

Marketing Risk

Steering Risk

Pricing Risk

Current

Delinquent

Servicing & Loss Mitigation Risk

Approvals

Denials

Redlining Risk

Underwriting Risk

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Example of Risks in Fair Lending

Inherent Risk

- Market Population Demographics
- Sales & Marketing
- Socio-economics
- Regulatory Environment
- Product Lines
- Channel Complexity

Compliance Controls

- Policies
- Procedures
- Monitoring
- Audits
- Training

Residual Risk

- Risk

7 Primary Fair Lending Risk Areas

1. Compliance Management Risk
2. Marketing Risk
3. Steering Risk
4. Underwriting Risk
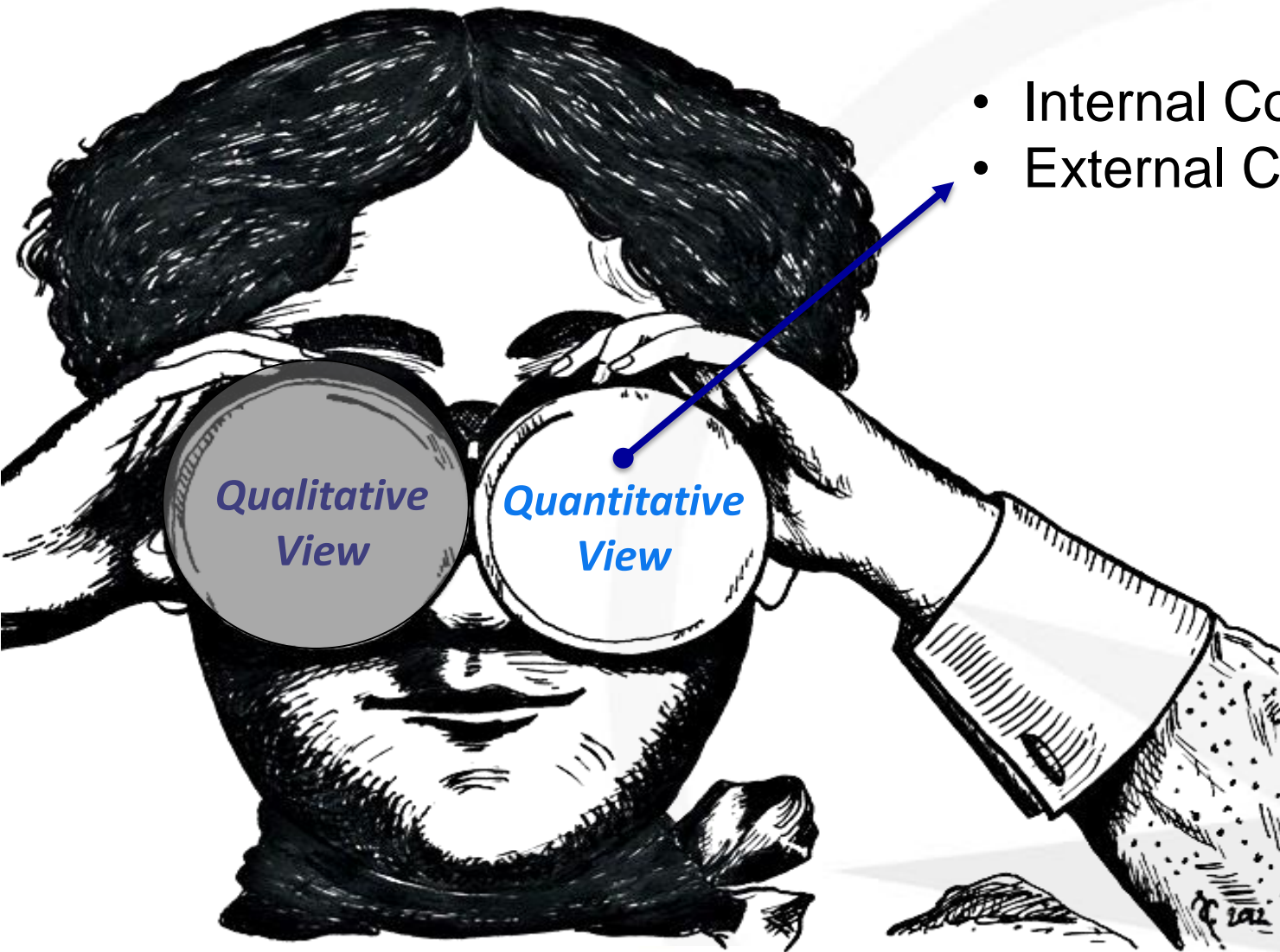5. Pricing Risk
6. Redlining Risk
7. Servicing Risk

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2 Parts of Understanding Risk

1
Qualitative View

2
Quantitative View

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Qualitative Assessment

- Evaluate Your Practices
- Industry Best Practices

Qualitative View
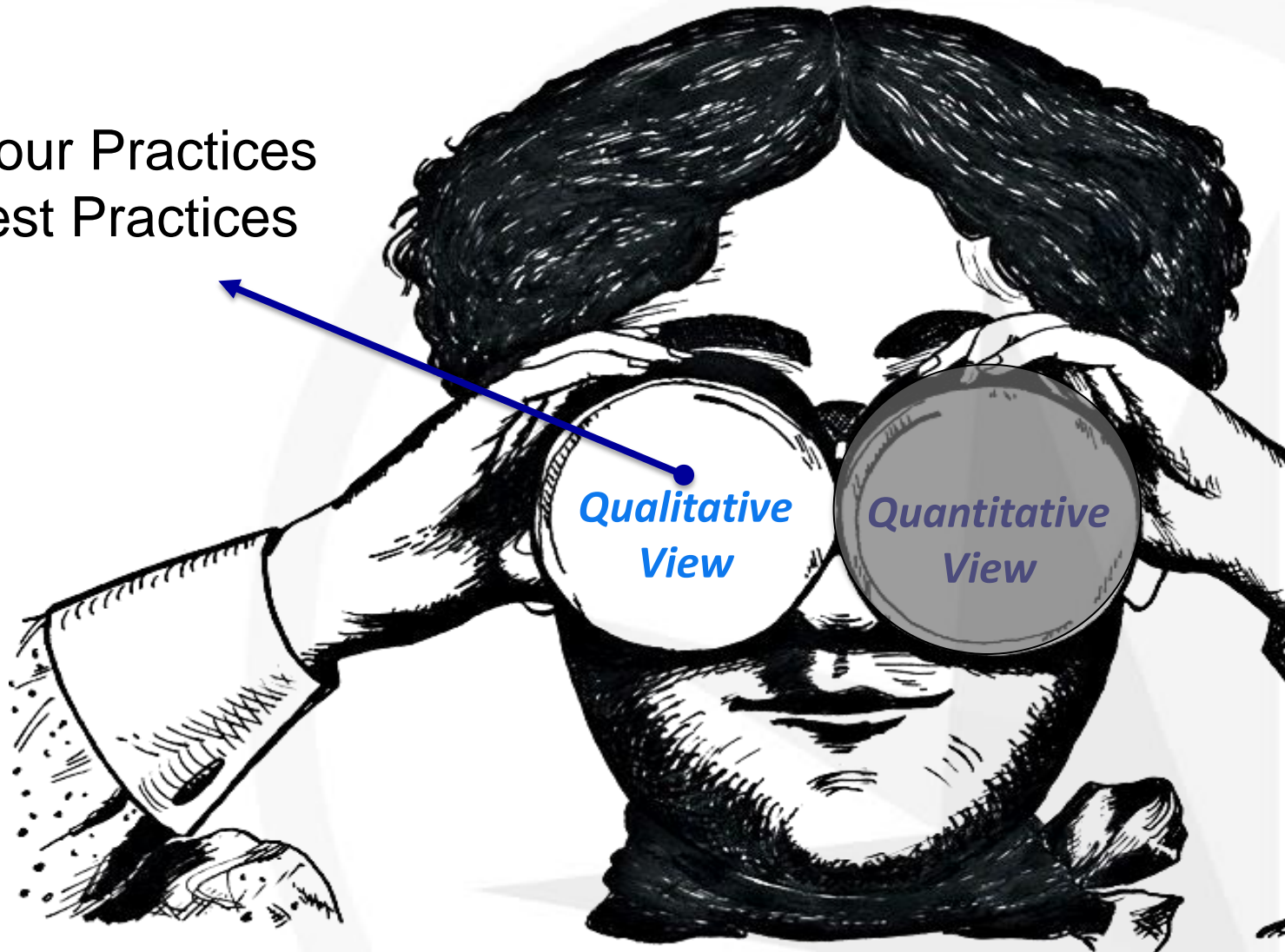
Quantitative View

Quantitative Assessment

- Internal Comparison
- External Comparisons

Qualitative View

Quantitative View

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Compliance Program Risk

Critical Question: When is the last time you conducted a fair lending risk assessment?

- Qualitative Review
  - Review Compliance Organization, Staffing, Management Involvement, Training, Record Keeping, Auditing, Policies & Procedures of the Institution's Fair Lending Compliance Systems

- Quantitative Review
  - General Monitoring Systems: Exception Reports, Audit Results, HMDA Data, Complaints, and Lending Disparities

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Marketing Risk

Critical Question: When is the last time you compared census data to your lending data (applications and originations)?

- Qualitative Review
  - Advertising:
    - Are there any marketing or advertising that would lead a reasonable person to believe that prohibited basis customers are less desirable? Collateral images exclude minority groups?
    - Advertising in media only serving non-minority areas of the market? Using mediums that are focused on non-minorities?
  - Marketing:
    - Using marketing programs or procedures that exclude one or more regions or geographies that have higher percentages of minority groups?
    - Using mail or distribution lists or other marketing techniques for pre-screened or other offerings that exclude groups of prospective borrowers on a prohibited basis?
    - Exclude geographies that have significantly higher percentages of minority group residents.
- Quantitative Review:
  - Compare the prohibited basis applicants to representation in total population of the market area. When applicable, compare prohibited basis applicants to applicable HMDA benchmark data.
  - Analysis: Financial Institution Applications vs. Census Demographics Vs. Market Benchmarks

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Steering Risk

Critical Question: When is the last time you compared product take rates been demographic groups?

- Qualitative Review:
  - Standards for sales process? Standards for referring applicants to subsidiaries, affiliates, channels, and alternative products?
  - Financial incentives to place potential borrowers?

- Quantitative Review:
  - Compare product take rates (applications and loan originations) between prohibited basis groups and control group(s)? Pay attention to products and features that have potentially negative consequences for borrowers.
  - Compare differences in the percentage of prohibited basis groups and control group(s) between lending channels.

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Underwriting Risk

Critical Question: When is the last time you evaluated your exception management program?

- Qualitative Review:
  - Presence of discretion in the underwriting process?
  - Vague or subjective underwriting criteria?
  - Clear guidance on exceptions (process for approval, reporting, guardrails, compensating factors, documentation)
- Quantitative Review:
  - Exception Frequency and Reason Codes
  - Disparities (prohibited basis groups vs. control group)
  - Processing Times (Application Date vs. Action Taken)
  - Withdrawn/Incomplete Applications
  - Approval Rates/Denial Rates/Indexed (Denial Disparity Index)

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Pricing Risk

Critical Question: When is the last time you analyzed the disparities between control group and prohibited basis group?

- Qualitative Review:
  - Presence of broad discretion in loan pricing (rate sheets and fee schedules)
  - Compensation systems for loan officers, brokers and management to charge higher prices?
  - Risk based pricing adjustments not based on objective criteria (or applied consistently)
  - Clear guidance on exceptions (process for approval, reporting, guardrails, compensating factors, documentation)
- Quantitative Review:
  - Disparities (prohibited basis groups vs. control group)
    - Incidence of rate spread (higher priced) loans
    - Disparities in pricing charged

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Redlining Risk

Critical Question: When is the last time you compared your lending in LMI Census Tracts and Majority-Minority Census Tracts?

- Qualitative Review:
  - Review lending patterns during the most recent CRA exam (concentration patterns)
  - Does CRA or Market assessment area exclude areas with high concentrations of minorities?
  - Branches in predominantly non-minority neighborhoods?
  - Is there a demarcation of loan products are made available? Redlining and Reverse Redlining.
  - Differences in services available or hours of operation (exclude geographic areas with high concentrations of minorities)?
  - Employee statements that reflect an aversion to doing business in areas with high concentrations of minority residents?

- Quantitative Review:
  - Disparities (high minority group tracts compared to tracts with low concentrations of minorities)
    - Application, Origination, Denial Rates By Tract
    - Number of rate spread originations By Tract
    - When subprime or alternative products are made available: Explore Reverse Redlining (targeting certain borrowers or areas with less advantageous products or services)
  - Look for excluding certain areas AND targeting certain areas (predatory lending with products with less favorable loan terms – sometimes called reverse redlining).

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Servicing Risk

- Qualitative Review:
  - Controls (policies, audits, monitoring) to ensure ongoing fair lending compliance (consistent treatment of similarly situated individuals)
  - Clear guidance on file documentation for policy exceptions or fee waivers (collections, late fees, etc.)
  - Discretion in determining loan servicing and loss mitigation actions
  - Compensation based on workout, loss mitigation or foreclosure strategy adopted.
  - Consumer complaints (true on all risks…especially here)
- Quantitative Review:
  - Disparities (prohibited basis groups vs. control group)
  - Disparities in loss mitigation servicing options.
  - Disparities in decision processing times.
  - Disparities in collections processes

Critical Question: When is the last time you reviewed your fee waiver policies, procedures and operating results?

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Conclusion #4

Risk Assessments don't have to be overly complicated.

You simply need to know the right questions to explore in order to gauge risk.

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Fair Lending Compliance Tips

COMMON FAIR LENDING TRIPWIRES

Common Tripwires for Fair Lending

- Complaints
  - Consider All Sources
  - Best Practice Tip: Actively Embrace and Compete for Complaints
- Discretion in Process
  - Marketing, Sales Process, Pricing, Servicing, Loss Mitigation
  - Best Practice Tip: Where discretion exists, monitor!
- Disparities in Loan Data
  - Control Group vs. Prohibited Basis Group
  - Best Practice Tip: Analyze your data. Know your numbers.

⚠ CAUTION

Tripping hazard. Watch your step.

Common Tripwires for Fair Lending

- Compensation Systems
    - Individuals rewarded based on loan terms?
    - Best Practice Tip: Have written compensation plans that outline variable compensation.
- HMDA Data Quality
    - Accuracy of LAR and Source Document (e.g., application)
    - Best Practice Tip: Conduct Independent Review of HMDA Integrity.
- Exam and Enforcement History
    - Prior Supervisory Issues Identified
    - Best Practice Tip: Formally Track, Address and Be Prepared to Report on All Findings

⚠ CAUTION
Tripping hazard. Watch your step.

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Common Tripwires for Fair Lending

- Regulation B Violations
  - Technical Violations of Reg B which implements ECOA
  - Best Practice Tip: Beware of Common Violations…proactively monitor:
    - Failure to Collect Information
    - Improperly Collecting Information
    - Poor Execution of Adverse Action Notices
      - Reasons for Adverse Action
      - Timely Adverse Action Notices
    - Improperly Requiring Spousal Signature

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Common Tripwires for Fair Lending

- Quality of Compliance Management System
  - Based on Size, Complexity and Risk Profile
  - Best Practice Tip: You Should Have…
    - Fair Lending Policy
    - Regular Training
    - Regular Review of Lending Policies
    - Ongoing Monitoring
    - Regular Analysis of Loan Data
    - Regular Risk Assessment of Products
    - Active Management Oversight

Common Tripwires for Fair Lending

- Redlining
  - Need to consider both intrabank comparisons and interbank comparisons
  - Best Practice TipReview both internal and external performance context data.

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The Two Ds of Fair Lending

Combined….these set of alarms in regards to fair lending risk:

1. Disparities
2. Discretion

Conclusion #5

We all learn from others. We can learn from their mistakes and successes. The common tripwires are built from regulator publications (supervisory reports, consent orders, presentations, etc.) and TRUPOINT's consulting work.

Pay specific attention to these common tripwires.

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Hot Spots Worth Proactively Monitoring

2 HOT TOPICS ON FAIR LENDING
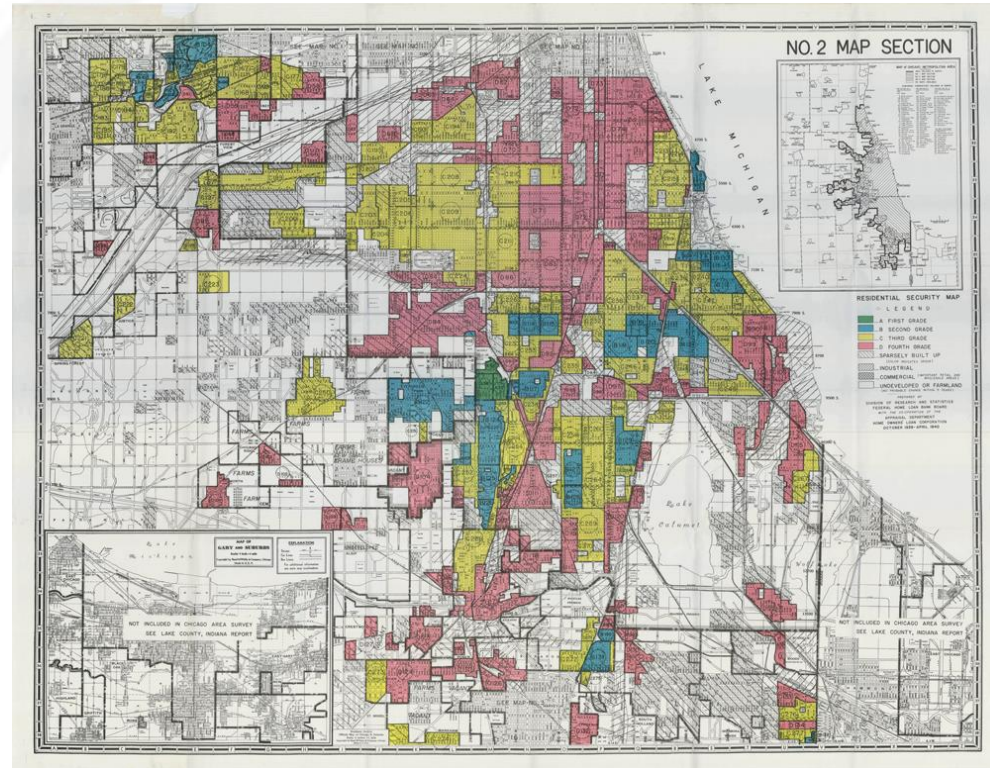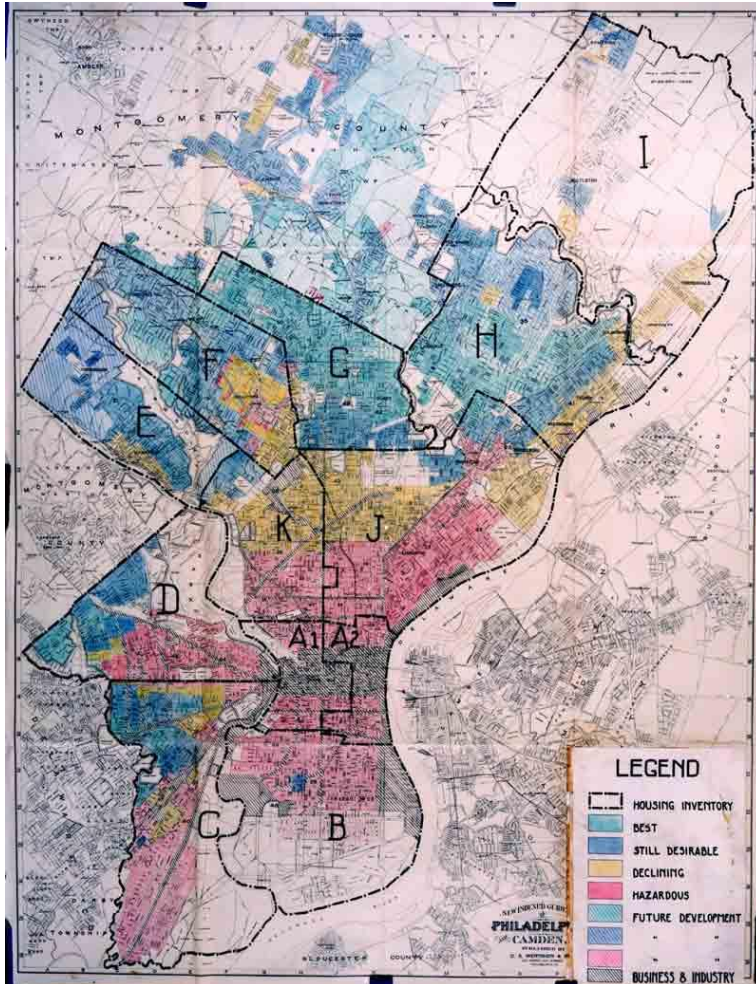
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Hot Topic: Redlining

- **Redlining** is the practice of denying services, either directly or through selectively raising prices, to residents of certain areas based on the racial or ethnic makeups of those areas.

CRA + Fair Lending

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Hot Topic: Redlining

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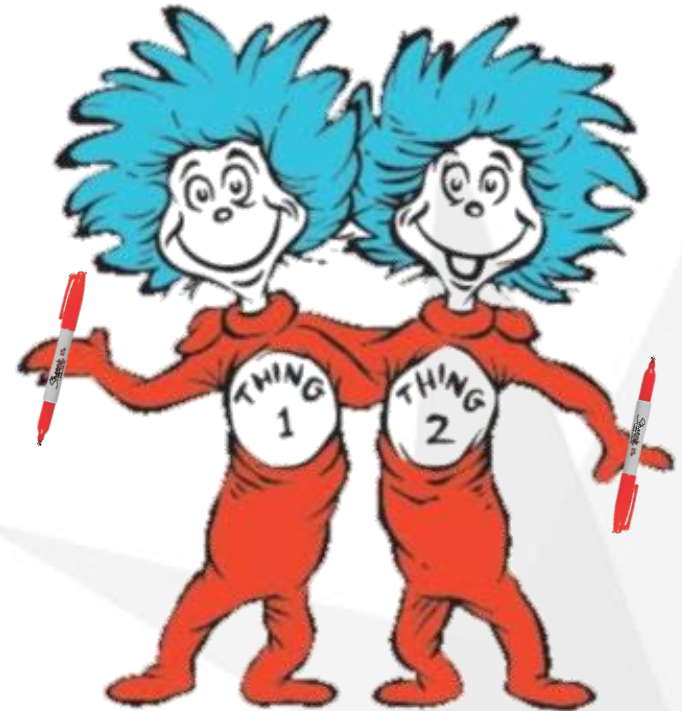
Hot Topic: HMDA Plus

- Here Comes "HMDA Plus"
- Extensive Changes
  - Types of Loans
    - Dwelling Secured Test: Home Purchases, Home Improvement, Refinance Loans
  - Pricing
    - Pricing (interest rate, points and fees, rate spreads for all loans, riskier features)
  - Loan Information
    - Channel, Property Value,
    - DTI, CLTV, AUS Results
    - Denial Reasons
    - Borrower's Age, Credit Score

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Hot Topic: HMDA Plus

- 1/1/2017
  - Definition of Financial Institution
- 1/1/2018
  - Uniform Loan Volume Threshold
  - Transactional Requirements
  - Data Points Requirements
  - Collection of Applicant Information
  - CFPB Web –Based Submission Tool
  - Modified HMDA LAR
- 1/1/2019
  - Elimination of Appendix A and Revised Procedures (Replaced with New Procedures)
- 1/1/2020
  - Quarterly Reporting Starts (Larger Originators)

Hot Topic: HMDA Plus

Should be thinking about…

- Policies
  - Detailed
- Procedures
  - Detailed
- Software
  - Workflow Analysis to Determine Impacted Software
- Training
  - Detailed

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Fair Lending Compliance Tips

SUMMARY & BEST PRACTICE TIPS

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8 Fair Lending Best Practices

1. **Conduct a Regular Risk Assessment**
   - Focus on alignment and evaluating high-risk areas
   - Double D: Discretion and Disparities
2. **Ensure top-down leadership and a "culture of compliance"**
   - Fair Lending is the Ultimate Team Sport
3. **Develop or improve written policies and procedures that comply with the spirit and technicalities of the regulations (Reg B and HMDA)**
   - Include core components, like a fair lending policy statement and a training plan.
   - Don't create policies and procedures you don't have the capacity manage!
4. **Conduct Both General and Role-Specific Training**
   - Include training for new hires, methods to test retention and reinforce learnings
   - Don't forget the Board of Directors
5. **Monitor your Lending Data, Exceptions, and Service Activity (like fee waivers, collections deferrals, and loss mitigation to determine where discrimination may exist)**
6. **Audit to Confirm Execution**
   - HMDA Scrubs, Regulation B (e.g., adverse action notices), Exception Files
7. **Aggregate activities and reporting for a more complete fair lending perspective**
   - Make it easy on Senior Management to have Optics into Fair Lending Risk
8. **Continuously review the regulatory environment**
   - Look to settlements, regulatory guidance, press releases, presentations, supervisory updates, and peer bank conversations for insights.

Conclusion #6

Adopt the best practices.

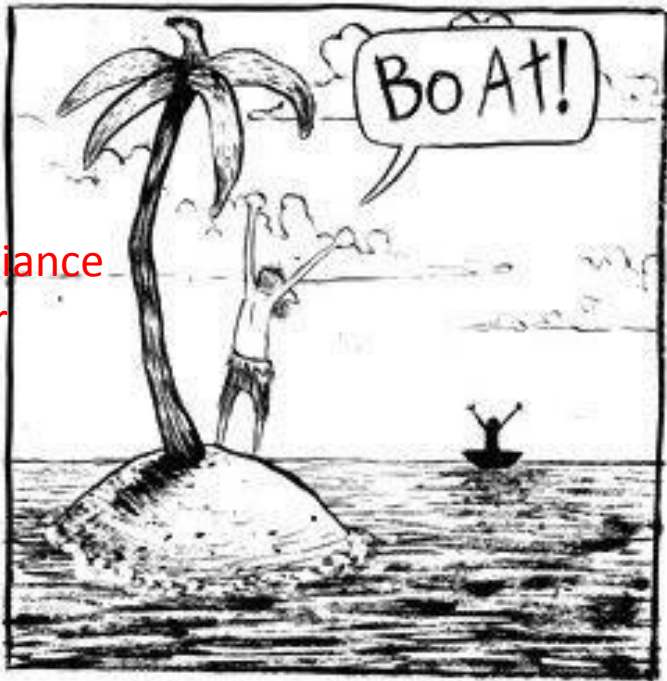Lower your bank's fair lending risk!

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Don't Underestimate The Importance of a Strong Compliance Culture

FAIR LENDING IS A TEAM SPORT

You Must Understand Different Points of View

At the bank, everyone has different points of view…
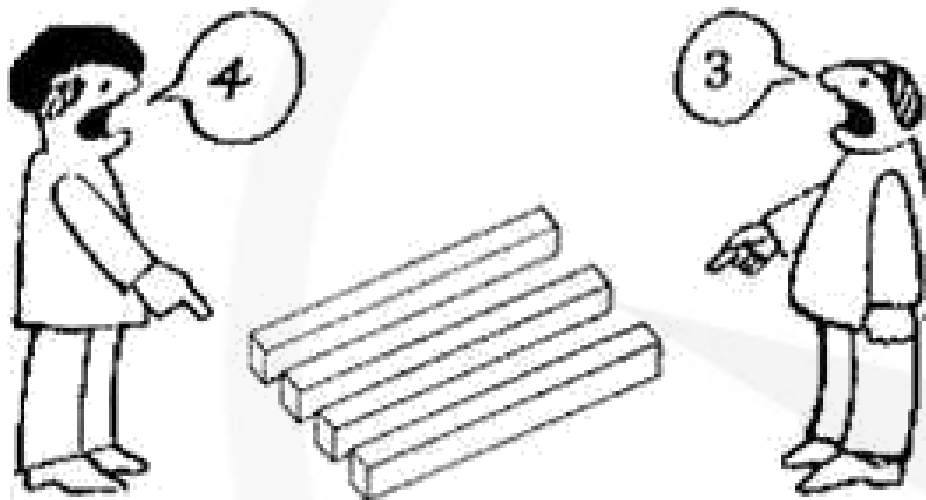
Compliance Officer

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Points of View Matter in Fair Lending

Compliance Officer

Mortgage Loan Officer

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Points of View

Compliance vs. Lenders?

*"Exceptions are bad.
They are risky!"*

*"Exceptions are necessary.
They are required!"*

Conclusion #6

Fair Lending is the ultimate team sport in Banking. It takes everyone!

To be successful: acknowledge the different points of view. Find a common ground and common goals.

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The Wrap Up!

CONCLUSIONS CONCLUDED

Conclusions Concluded…

0. Stereotypes are everywhere.
   – How do they impact your financial institution?
1. Risk Assessments can bring sanity back to your world
   – How do you prioritize your biggest areas of risk?
2. Fair Lending risk remains a popular focus of regulators and outside groups.
   – How are you helping your organization embrace it?
3. Georgia is different. It impacts approach to Fair Lending.
   – How is your market area unique? Does management understand?
4. Risk Assessments don't have to be overly complex.
   – Do you know the right questions to ask?
5. Learn from the common tripwires.
   – How does your organization effectively deal with the issues?
6. Consider the Best Practices
   – How do you currently compare?
7. Fair Lending is a Ultimate Team Sport. It is not compliance's role!
   - How do you inspire collaboration and team work?

About TRUPOINT Partners

- TRUPOINT Partners is committed to financial institution success through efficient insight.
- TRUPOINT provides compliance solutions to more than 500 financial institutions through an innovative blend of data analytics, business intelligence, and compliance expertise.
- Specialties include Fair Lending, HMDA, CRA, and UDAAP compliance, including analysis, regression, consulting and more.
- Headquartered in Charlotte, NC

Andy Barksdale, CRCM

- Andy Barksdale is a Managing Director at TRUPOINT Partners. Since starting his banking career more than 20 years ago, Mr. Barksdale has held positions that demonstrate his commitment to, and knowledge of, community banking. He has consulted with over a hundred financial institutions by analyzing their lending data; identifying the areas of risk; advising on the focal points for ongoing fair lending analysis; conducting CRA self-assessments and providing assessment-area reviews; implementing risk assessments and best-practice reviews for fair lending; delivering training; and providing confidence in preparing for upcoming examinations.

- Andy's career stated with SunTrust Banks in Atlanta after earning a bachelor's degree in finance from the University of Georgia. At SunTrust, he spent time as a commercial lender, internal loan review, and coordinated the affiliate bank relations. He also worked with Georgia National Bank in Athens, Georgia serving various roles including internal audit, compliance and loan review. Before joining TRUPOINT Partners, Andy held a variety of roles serving community banks including ten years with UVEST Financial Services in Charlotte, N.C. where he supported financial institutions by providing consulting and broker-dealer services. Today, Mr. Barksdale leads and manages TRUPOINT Partners' Professional Services Organization where the team delivers valued regulatory compliance consulting and analytic services. TRUPOINT Partners specializes in providing Fair Lending, CRA, HMDA and related compliance services to more than 500 financial institutions across the country.

- Other
  - 1989 BBA – University of Georgia
  - 1993 MBA – University of Georgia
  - Certified Regulatory Compliance Manager (CRCM)
  - Die Hard Georgia Bulldog Fan
  - Bourbon Tasting Expert

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We Can Help!

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✓ HMDA Data Analysis
✓ HMDA Data Interpretation
✓ Fair Lending Risk Mitigation
✓ HMDA Scrubs
✓ Consumer Lending Analysis
✓ Risk Assessments