



**High Cost Lending on Indian Reservations – Watch
Out if You Are Buying a Home**

A Survey Report and Data Analysis by NAIHC and NCRC

June 2003

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Introduction and Summary

In the Spring of 2003, the National American Indian Housing Council (NAIHC) and the National Community Reinvestment Coalition (NCRC) conducted a survey to generate perspectives from officials on Indian reservations regarding the extent of predatory lending. The survey results paint a troubling picture concerning the magnitude of abusive and high-cost lending targeted particularly to first-time homebuyers. The Bush Administration has proclaimed a goal of increasing minority homeownership by 5.5 million families by 2010. A good place for the Bush Administration to start is working with tribal representatives to combat predatory lending and to promote affordable home mortgage lending on tribal land.

Key Findings from the Survey Include:

- Of the 37 survey respondents, 52.9% believed that lenders discriminated on the basis of race. When asked what type of discrimination occurred, 35.1% thought that lenders steered borrowers to high rate loans when borrowers qualified for lower interest rates. A much lower percentage believed that discrimination resulted in outright rejections. While access to lending may be increasing, the loan received is likely to be high-cost, according to tribal representatives.
- A majority of survey respondents (54%) indicated that consumers on tribal lands received high rate loans with interest rates of 9% or more. When survey respondents had specific examples of rates, the average rate reported was 15.3% and the highest rate reported was 30%.
- When asked about whom predators targeted, 35% of survey respondents reported that first-time homebuyers were targets and 32.4% responded that purchasers of mobile or manufactured homes were abused. These percentages were much higher than for any of the other demographic groups (including the elderly, females, or borrowers refinancing loans) that were categories on the question regarding targeting.
- Abusive manufactured home lending was also the most frequently mentioned predatory practice, cited by 48.6% of survey respondents. In contrast, only 3 or 8.1% of survey respondents reported that tribal members were victims of home improvement scams.

- Tribal representatives reported a greater extent of predatory lending practices and foreclosures on reservations with a larger percentage of fee-simple land and a lower percentage of trust land. When reservations consider conversions of land status from trust to more private forms of ownership, they should consider enacting additional protections against predatory lending.

A number of tribes including the Chippewa, the Choctaw, the Sioux, and the Acoma in 15 states responded to the survey. Most of the 37 survey respondents were either housing counselors, administrators of housing programs, or executive directors of housing authorities. Although a survey of this nature is not a precise scientific instrument that claims to be statistically representative, it is gathering the insights and perspectives of professionals knowledgeable about the quality and affordability of housing on Indian reservations. As such, its findings merit further investigation and policy interventions, particularly to the reservations reporting the greatest extent of predatory lending.

Detailed Survey Results and Data Analysis

The survey form and a spreadsheet capturing survey responses are below in addition to a HMDA data analysis of high-cost lending in Indian Country. This section of the report comments on each survey response.

Question 1 – The Extent of Predatory Lending

A great majority of survey respondents, almost 70 percent, indicated that predatory lending was either a big problem or somewhat of a problem on Indian reservations. The survey results likely understate how many respondents believe predatory lending is a significant problem because the survey did not have a category between “Big problem” and “Somewhat of a problem.” A considerable range exists between “Big” and “Somewhat” of a problem. Future surveys could include the choice “A Problem” or ask for responses on a scale of 1 to 10 with 10 being the greatest problem and one being no problem.

Geographical Distribution of Predatory Lending

The geographical breakdown of the extent of predatory lending reveals that New Mexico, South Dakota, and North Dakota reservations are likely to confront the greatest amount of predatory lending. Of the three respondents from New Mexico, two answered that predatory lending is a big problem and one indicated it was somewhat of a problem. In reservations spanning South and North Dakota, two respondents reported that predatory

lending was a big problem and two reported it was somewhat of a problem. Respondents from New Mexico and, North and South Dakota constituted four of the five respondents who said that predatory lending was a big problem.

In contrast, three respondents from California reported that predatory lending was somewhat of a problem and four reported it was not a problem. Likewise, four respondents in Michigan indicated that predatory lending was somewhat of a problem and one reported it was not a problem.

NCRC's HMDA (Home Mortgage Disclosure Act) data analysis reveals that the perceptions of predatory lending are consistent with the geographical distribution of high-cost lending.¹ New Mexico and South Dakota exhibit among the highest disparities in high-cost lending in the nation for Native Americans. In the nation as a whole, subprime and manufactured home lenders made 19.5 percent of all the conventional home purchase loans to Native Americans in 2001, but only 9.6 percent of the loans to whites. In other words, the high-cost lender market share was 2.04 times greater to Native Americans than to whites (19.5 percent of loans to Native Americans divided by 9.6 percent of the loans to whites). In New Mexico, high-cost lenders issued an incredible 63.8 percent of the conventional purchase loans to Native Americans but only 9.6 percent to whites during 2001. The high-cost lender market share was a staggering 6.66 times greater to Native Americans than to whites in 2001, and was the highest disparity in market share over the 1998 through 2001 time period. Another way of stating this disparity is that Native Americans were 6.66 times more likely to receive a mortgage loan from a high-cost lender than a prime lender in New Mexico in 2001, the latest year for which HMDA data is available.

In South Dakota, subprime and manufactured home lenders issued 34.8 percent of the conventional purchase loans to Native Americans, but only 11.2 percent to whites during 2001. The high-cost lender market share was 3.10 times greater to Native Americans than to whites in 2001; and this was also the highest market share disparity between 1998 and 2001. In South Dakota during 2001, Native Americans were 3.1 times more likely than whites to receive a mortgage loan from a high-cost lender than a prime lender.

¹ The Department of Housing and Urban Development (HUD) has created a list of subprime and manufactured home lending specialists of the last several years. NCRC used this list in our HMDA data analysis. The data discussed in the narrative does not include a high-cost lender, the Associates, since a federal agency found that the Associates reported inaccurate HMDA data for lending to Native Americans. Tables in this report present the HMDA data including and excluding the Associates.

In contrast, high-cost lenders had a market share to Native Americans in California that was 1.49 times greater than to whites during 2001. The California disparity in 2001 was less than the national market share difference and also was the lowest market share difference from the 1998 through the 2001 time period in California. In percentage terms, high-cost lenders issued 20.2 percent of all conventional purchase loans made to Native Americans and 13.5 percent of the loans to whites during 2001.

Michigan is closer to the national market share levels than California but still considerably below New Mexico and South Dakota levels. During 2001, high-cost lenders made 19 percent of all loans to Native Americans and only 7.7 percent to whites. The high-cost lender market share to Native Americans was 2.46 times greater than to whites.

Overall, the data analysis confirms the impressions of survey respondents in New Mexico, South Dakota, Michigan, and California. It makes sense that survey respondents would indicate that the incidence of predatory lending is greater in the states where high-cost lenders have their greatest share of the market to Native Americans, both in absolute terms and relative to whites.

Question 2 – Experience with Foreclosure

A high number of respondents indicated that they knew of someone who had his or her home foreclosed due to predatory lending. Thirteen of 37 respondents or 35.1 percent knew of someone who had their homes foreclosed and one respondent was foreclosed himself or herself because of predatory lending.

Question 3 – Accepted High Interest Rate Loan

A majority of survey respondents (54 percent) indicated that either themselves or someone they knew in the tribe had accepted a high-interest-rate loan of 9 percent or higher. Of these respondents, nine were sure of the specific rate, and eleven were not sure of the specific rate but believed it was above 9 percent.

The nine survey respondents who knew the specific rate reported an average rate of 15.3 percent and a median rate of 12 percent. The highest rate reported was an incredible 30 percent.

For the survey, NAIHC and NCRC chose 9 percent as a threshold rate defining high-cost lending because this rate is 3 percentage points higher than 6 percent, or the prime market

rate for most of this year and a considerable portion of last year. The Federal Reserve Board has found that most subprime loans are 3 to 4 percentage points greater than the prime rate.

Question 4 – Reasons for High Rate Loans

Buying a home was the reason cited most often (by 32 percent of the respondents) for taking out a high-cost loan. The next most frequent reason was paying off credit card bills. In contrast to inner city areas, tribal reservations do not seem to be subjected to a large amount of high-cost home improvement lending. Only 1 survey respondent indicated that someone on the tribal land had taken out a high-cost loan to make home repairs.

Question 5 – Discrimination Occurring

As stated above, a majority of the survey respondents believed that discrimination on the basis of race occurred on tribal lands. Eighteen tribal officials or 52.9 percent answering this question thought that discrimination on the basis of race occurred while 8 others were not sure. In contrast, nine respondents or 28.1 percent thought that discrimination on the basis of gender occurred and 20.6 percent believed that discrimination on the basis of age occurred.

Question 6 – Type of Discrimination

In the early to mid-1990's, fair lending advocates and sympathetic lawmakers were primarily concerned about access discrimination, or the outright refusal to lend based on race, gender, age, or other protected classes under the Fair Housing Act or the Equal Credit Opportunity Act. In the last few years, the focus has shifted from access discrimination to price discrimination. More borrowers have access to loans, but they are paying a steep price in terms of interest rates and fees for their loans.

This survey is another indication that traditionally underserved borrowers confront a greater extent of disparities in price instead of outright rejections after the rise in subprime and manufactured home lending in the second part of the 1990's. Thirty-five percent of tribal officials believed that Native Americans received high interest rate loans when they qualify for lower rate loans. In contrast, just four respondents or 10.8 percent believed that Native Americans on reservations experienced outright rejections when they qualified for loans.

Question 7 – Targeting Certain Demographic Groups

In urban areas, advocates and researchers tend to find that elderly and minority borrowers and neighborhoods are targeted by predatory lenders offering refinance loans for the purposes of consolidating credit cards or acquiring cash to pay sudden expenses. Home improvement scams are also common. While abusive home purchase lending occurs, it tends to be less in absolute numbers and as a proportion of predatory lending than refinance lending.

In contrast to many inner city areas, Indian reservations appear to be confronted mostly by abusive lending targeted to first-time homebuyers as opposed to the elderly. More than 30 percent of tribal officials indicated that predatory lenders target first time homeowners and purchasers of mobile or manufactured homes. The next highest category of targeted borrowers were young borrowers (between the ages of 18 to 30), who are most likely to be first-time homebuyers acquiring mobile or manufactured homes. Eight survey respondents or 21.6 percent believed that abusive lenders target young borrowers while only 16.2 percent thought that the elderly were targets. Finally, tribal officials believed that female borrowers were considerably more likely to be exploited by abusive lenders than male borrowers (almost 19 percent of respondents chose female borrowers and only 2.7 percent of respondents selected male borrowers).

Question 8 – Specific Predatory Practices

This question relating to specific predatory practices also reinforces the distinctions between abusive lending on Indian reservations and predatory lending in inner city areas. Eighteen tribal representatives or 48.6 percent of respondents indicated that abusive manufactured home or mobile home lending was a predatory lending practice on Indian reservations. In contrast, only three respondents or 8.1 percent of the sample thought that home improvement scams was a practice on tribal reservations. Almost one third or 12 respondents thought the practice of making unaffordable loans occurred on Indian reservations. Interestingly, roughly equal numbers of respondents (between 5 and 7 officials) thought that excessive prepayment penalties, large downpayments, and lender harassment (calling at all hours and making in-person visits) occurred on tribal reservations. Excessive prepayment penalties and lender harassment are also common practices suffered by inner city borrowers, but large downpayments are not as frequent since inner city residents mostly experience abusive refinance and home improvement lending as opposed to home purchase lending.

Future surveys could perhaps phrase the question regarding abusive lending with more precision, asking respondents to rate the extent to which each practice occurs on a scale of 1 to 10. Also, another question could be asked whether lenders end up financing large downpayments (adding them to the loan amount) or whether borrowers come to the closing table with considerable funds for downpayments. It is difficult to imagine that low- and moderate-income borrowers come to the closing table with large sums of money for downpayments.

Question 9 – Examples of Predatory Loans

Survey respondents cited eight specific examples of predatory loans. Seven of these were home purchase loans and one was a refinance loan. The information provided on most of the loans was sparse, but the case examples still revealed striking abuses. The manufactured home lender, Conseco, appeared in four of the case examples.

One Conseco home purchase loan in Michigan made in 2001 featured an interest rate of 9.75%, fees of 10 percent, and a principal amount of \$52,000. Another Conseco loan made during 2000 in a reservation spanning North and South Dakota had an interest rate of 12 percent and required a downpayment of \$40,000, which was half of the purchase price of the property. It is astonishing that the interest rate was so high after such a large downpayment. A third Conseco home purchase loan in South Dakota had an interest rate of 17% although it was made in 2002, a year with very low rates.

A loan made in Oregon during 1994 had an interest rate of 30 percent. As of 2003, the outstanding loan amount was \$26,000, almost the entire amount of the original principal of \$34,000. Apparently, the interest rate has not been reduced.

Although these examples are relatively few in number, they suggest that lack of choices, especially in states like South Dakota where manufactured home lenders dominate, has contributed to high rate loans with exorbitant fee amounts from which there is little escape for Native American borrowers.

Question 10 – Tribal Land Status

Survey respondents indicated the portion of reservation land (in terms of percentages) that was tribal trust land, allotted land, fee-simple land, privately owned land, and “tribe owns” land. Some survey respondents indicated that they saw no distinctions between the choices of tribal trust land and “tribe owns land” nor did they perceive a distinction between fee-simple land and privately owned land. According to survey respondents, the

largest portion of land was tribal trust land. In the 31 surveys indicating percentages of zero or higher, the average percentage of tribal trust land was 47 percent and the median percentage was 50 percent. Fee simple land was the next highest category with 26 respondents indicating an average percentage of 28 percent and a median percentage of 1 percent (the median is so much lower because a number of reservations had no fee-simple land).

NAIHC and NCRC ran some “cross-tabulations” to determine whether tribal representatives perceived a greater extent of predatory lending and whether foreclosures were higher in any particular category of land status. Our initial hypothesis was that perceptions of predatory lending and foreclosures would be higher on reservations with greater percentages of fee-simple land and lower percentages of tribal trust land since legal protections may be greater with collectively owned tribal trust land than fee-simple land. Survey responses indicate some support for this hypothesis.

As the percentage of land in tribal trust increased, the perception of the extent of predatory lending decreased. For the eight surveys indicating “no problem” with predatory lending, the average percentage of tribal trust land was 54 percent and the median percentage was 68 percent. For the 18 surveys indicating “somewhat of a problem with predatory lending,” the average percentage of tribal trust land was 48 percent and the median percentage was 50 percent. For the 5 surveys suggesting that predatory lending was a “big problem,” the average percentage of tribal trust land was 38 percent and the median percentage was 20 percent.

When perceptions of the extent of predatory lending are compared to the percentage of fee simple land, the relationship is not as strong, perhaps due to the lower amount of variance of fee-simple land. Median percentages of fee simple land were less than 1 percent, 5.5 percent, and 10 percent on reservations in which the perception of predatory lending was not a problem, somewhat of a problem, and a big problem, respectively. The average percentages of fee-simple land moved in the reverse direction, with the average percentage of fee-simple land the smallest on those reservations in which predatory lending was a “big” problem.

Comparing the answers regarding foreclosures as a result of abusive lending and tribal land status produced results more consistent with the hypothesis that fewer predatory events occur on reservations with a larger portion of tribal trust land. The average and median percentage of tribal trust land moved in the expected direction with foreclosures. When survey respondents indicated that they did not know about foreclosures associated with predatory lending, the median percentage of trust land was 50 percent; the median

percentage decreased to 37 percent when survey respondents had knowledge of foreclosures. Consistent with this result on tribal trust land, the median percentage of fee simple land was 35 percent when the survey respondent indicated knowledge of foreclosure but 0 percent when they did not know about foreclosures associated with predatory lending.

This survey suggests that tribal authorities may wish to increase legal protections against predatory lending if they convert land status from tribal trust to fee-simple or other forms of private ownership.

2003 Predatory Lending Survey: *Study of Predatory Lending in Tribal Areas*

Sponsored by the National American Indian Housing Council and the National Community Reinvestment Coalition

Explanation of Survey:

Audience: Native American or Alaska Native staff of Tribal Housing Authorities and/or tribal members who have purchased a home, or obtained a refinance or home improvement loan.

Date (to be) Issued: Between March and June 2003

Purpose of Survey: To determine whether or not predatory lending has occurred in tribal areas and to detect the areas where abusive lenders are most prominent/active. To determine whether lenders have provided mortgage loans without regard to a recipient's repayment ability.

2003 Study of Predatory Lending in Tribal Areas Survey

Sponsored by the National American Indian Housing Council and
the National Community Reinvestment Coalition

1. Predatory loans have high interest rates and fees. They also have abusive terms and conditions that trap borrowers. Borrowers cannot afford these loans and often end up in foreclosure, bankruptcy, or other financial hardships. For your tribe, predatory lending is: (Check one.)

- A big problem
- Somewhat of a problem
- Not a problem

2. Have you or someone you've known (of Native American or Alaska Native ethnicity) had a house that was foreclosed upon because of predatory lending?

(More than one response is permitted.)

- Yes, my house went through foreclosure.
- Yes, I know someone who has experienced a foreclosure.
- No, I have never been through foreclosure.
- No, I do not know anyone who experienced a foreclosure.
- Not sure.

3. Have you or a member of your tribe accepted a mortgage loan with a high interest rate? High interest is defined as 9 percent or more.

- Yes, the rate is/was _____ (Please fill in)
- Yes, not sure of the rate
- No
- Not sure

4. Why did you or a member of your tribe take out the high interest rate loan?

- To buy a home
- To pay sudden or large medical bills
- To make home repairs
- To pay off credit cards or other bills
- Not sure
- Other (Please specify)

5. Do you feel as if you or a member of your tribe have been discriminated against by a mortgage lender based on:

Race

- Yes
- No
- Not Sure

Gender

- Yes
- No
- Not Sure

Age

- Yes
- No
- Not Sure

6. If you feel discrimination is occurring, when does the discrimination occur?

(Check one.)

- Being rejected when applicants qualify for loans
- Getting high interest rate loans when applicants qualify for lower interest rate loans
- Other (If you need more space, please write on the back of this survey or on a separate page.)

7. Do you feel lenders are targeting a particular segment of your tribal population for abusive loans? (If yes, please mark all that apply. If not, please skip this question.)

- Males
- Females
- Young people (ages 18 to 30)
- Elders (ages 60+)
- Single-parent heads of households
- Families
- First-time homeowners
- Homeowners interested in refinancing
- Potential manufactured or mobile home purchasers
- Other (Please specify)

8. What specific predatory lending practices are occurring with your tribal members? (Mark all that apply.)

- Home improvement scams
 - Loans made to the mentally incapacitated
 - Loans made to people who cannot afford the loans
 - Mortgage customers are pushed to banks and mortgage companies offering high rates
 - Loans with high points and fees are offered
 - Loans with exceptionally high interest rates
 - Loans with excessive prepayment penalties
 - Loans with large down-payments
 - Lenders who contact customers at all hours, send late payment notices and make in-person visits to harass customers
 - Loans on manufactured or mobile homes with high rates or abusive terms
 - Other
-

9. If you have an example of predatory lending, please fill in the lines below.

If your purchased a home with the loan, what was the:

Name of Lender: _____
Purchase Price: \$ _____ Year of Loan: _____
Down Payment: \$ _____
Cost of Origination Fee & Points: \$ _____ Interest Rate: _____ %
Additional Comments: _____

If the loan was a refinance or a home improvement loan, what was the:

Name of Lender: _____
Loan amount: \$ _____ Year of Loan: _____
Cost of Fees & Points: \$ _____ Interest Rate: _____ %
Additional Comments: _____

10. Which of the following describes your tribe's land status? If more than one category, please list the percentage. (Mark all that apply.)

- Tribal trust land _____ %
- Privately owned land _____ %
- Allotted land _____ %
- Tribe owns the land _____ %
- Fee-simple _____ %
- Not sure

11. If you are an umbrella tribe, how many Tribally Designated Housing Entities (TDHEs) are under you? _____ Please specify the names of any tribes:

(If this question does not apply, please write in "N/A" for Not Applicable.)

12. Would you like help in getting out of a predatory loan?

- Yes
- No

Contact Information (Your response below is voluntary.)

Your Name _____ Your Job Title _____
Your Tribe _____ Phone Number _____

PLEASE FAX THIS TO NAIHC AT 202-789-1758
Deadline: June 4, 2003

NAIHC and NCRC Survey of Predatory Lending Practices in Tribal Areas

Homeownership counselor	8	21.6%
Executive directors & other mgt	9	24.3%
Other housing professional	6	16.2%
Did not identify	14	37.8%
Number of Observations	37	

States

Arkansas	1	2.7%
Alabama	1	2.7%
Arizona	2	5.4%
California	7	18.9%
Massachusetts	1	2.7%
Michigan	5	13.5%
Minnesota	2	5.4%
North Dakota	1	2.7%
Nebraska	2	5.4%
New Mexico	3	8.1%
Nevada	1	2.7%
Oklahoma	4	10.8%
Oregon	1	2.7%
South Dakota	1	2.7%
South Dakota & North Dakota	2	5.4%
Washington	2	5.4%
Wisconsin	1	2.7%
Number of Observations	37	
Number of Distinct States	15	

Extent of Predatory Lending

By State

	Big Problem	Somewhat	Not
New Mexico	2	1	0
SD & ND	2	2	0
Oregon	1	0	0
California	0	3	4
Michigan	0	4	1

Sample of Tribes

Chippewa	3
Choctaw	2
Acoma	1
Eskimo	1
Apache	1
Sioux	1
Yurok	1
Umatilla	1

Question 1 - Extent of Predatory Lending Problem

Big Problem	5	13.5%
Somewhat of Problem	21	56.8%
Not a Problem	11	29.7%
Did Not Answer	0	0.0%
Number of Observations	37	

Question 2 - Foreclosure Due to Predatory Loan

My House Foreclosed	1	2.7%
Someone I Know Foreclosed	13	35.1%
Not Sure	5	13.5%
Number of Observations	37	

Question 3 - Accepted High Interest Rate Loan

Yes, Sure of Rate	9	24.3%
Yes, Not Sure of Rate	11	29.7%
No	7	18.9%
Not Sure	10	27.0%
Number of Observations	37	

If Known, What was Rate of Loan

Average Rate	15.3%
Median Rate	12.0%
Highest Rate	30.0%
Number of Observations	9

Question 4 - Reasons for High Rate Loan

Buy Home	12	32.4%
Pay Medical	1	2.7%
Make Home Repairs	1	2.7%
Pay Off Credit Card Bills	4	10.8%
Other	4	10.8%
Not Sure	10	27.0%
Number of Observations	37	

Question 5 - Discrimination Occuring

	Yes	No	Not Sure	Did Not Answer	Percent Yes
Based on Race	18	8	8	3	52.9%
Based on Gender	9	9	14	5	28.1%
Based on Age	7	9	18	3	20.6%

Question 6 - Type of Discrimination

	Number Yes	Percent
Rejection When Qualify	4	10.8%
Steering to High Rate	13	35.1%
Other	5	13.5%
Number of Observations	37	

Question 7 - Targetting

	Number Yes	Percent
Males	1	2.7%
Females	7	18.9%
Young (ages 18 to 30)	8	21.6%
Elders (60 plus)	6	16.2%
Single Parents	5	13.5%
Families	2	5.4%
First Time Homeowners	13	35.1%
Homeowners Refinancing	3	8.1%
Purchasers of Mobile or Manuf Homes	12	32.4%
Other	2	5.4%
Number of Observations	37	

Question 8 - Specific Predatory Practices

	Number Yes	Percent
Home Improvement Scams	3	8.1%
Loans to Mentally Incapacitated	1	2.7%
Unaffordable Loans	12	32.4%
Steering to High Rate Lenders	5	13.5%
High Points and Fees on Loans	10	27.0%
High Interest Rates on Loans	13	35.1%
Prepayment Penalties	7	18.9%
Large Downpayments	5	13.5%
Lenders Harass	6	16.2%
Abusive Manufactured Home Lending	18	48.6%
Other	2	5.4%
Number of Observations	37	

Question 9 - see narrative summary

Question 10 - Tribal Land Status

	Average %	Median %	Responses
Tribal Trust Land	47%	50%	31
Allotted Land	12%	0%	27
Fee- Simple Land	28%	1%	26
Privately Owned Land	8%	0%	27
Tribe Owns Land	13%	0%	26

Crosstabulations of Selected Responses

Extent of Predatory Lending by Land Status - Percentage of Land in Tribal Trust

	Average %	Median %	Responses
Big Problem	38%	20%	5
Somewhat of a Problem	48%	50%	18
Not a Problem	54%	68%	8

Extent of Predatory Lending by Percentage of Fee Simple Land

Big Problem	19.9%	10.0%	4
Somewhat of a Problem	30.4%	5.5%	16
Not a Problem	30.1%	0.5%	6

Knew Someone Foreclosed Upon by Land Status - Percentage of Land in Tribal Trust

Knew Someone Foreclosed	43%	37%	12
Did Not Know Someone Foreclosed	51%	50%	19

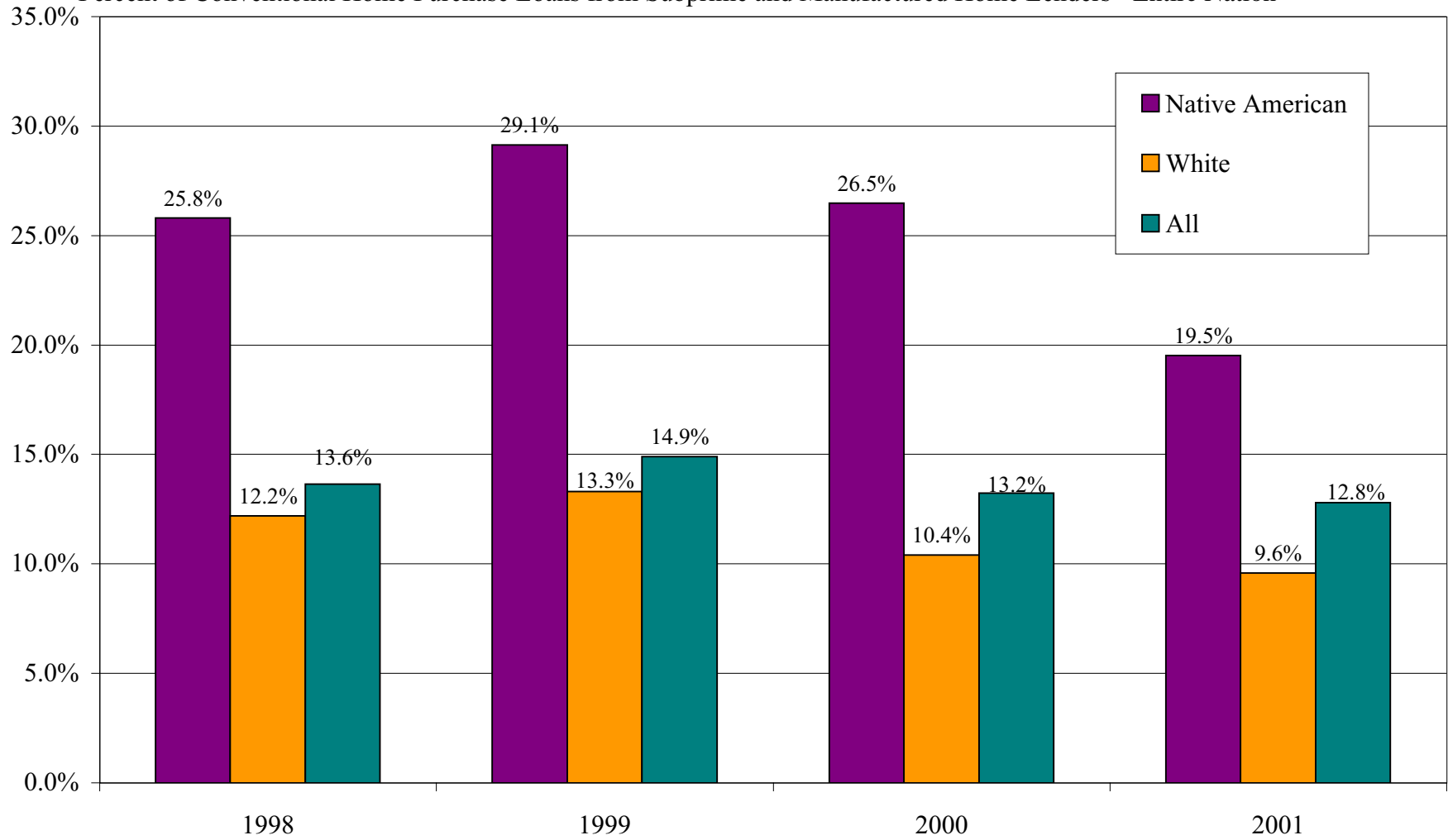
Knew Someone Foreclosed Upon by Percentage of Fee Simple Land

Knew Someone Foreclosed	40%	35%	10
Did Not Know Someone Foreclosed	21%	0%	16

NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

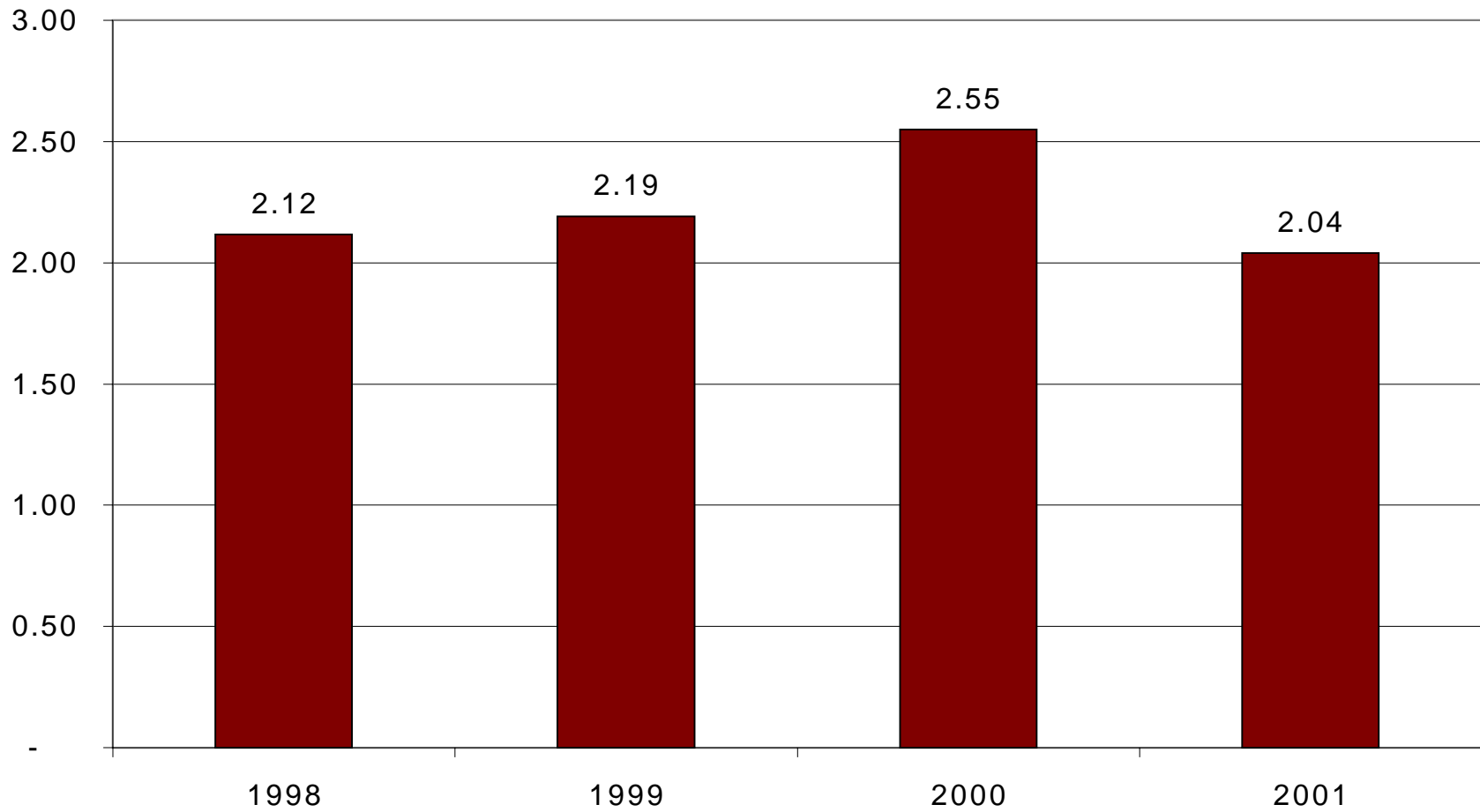
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders - Entire Nation



NAIHC-NCRC Data Analysis

Disparity in the Market Share of Loans from High-Cost Lenders - Entire Nation

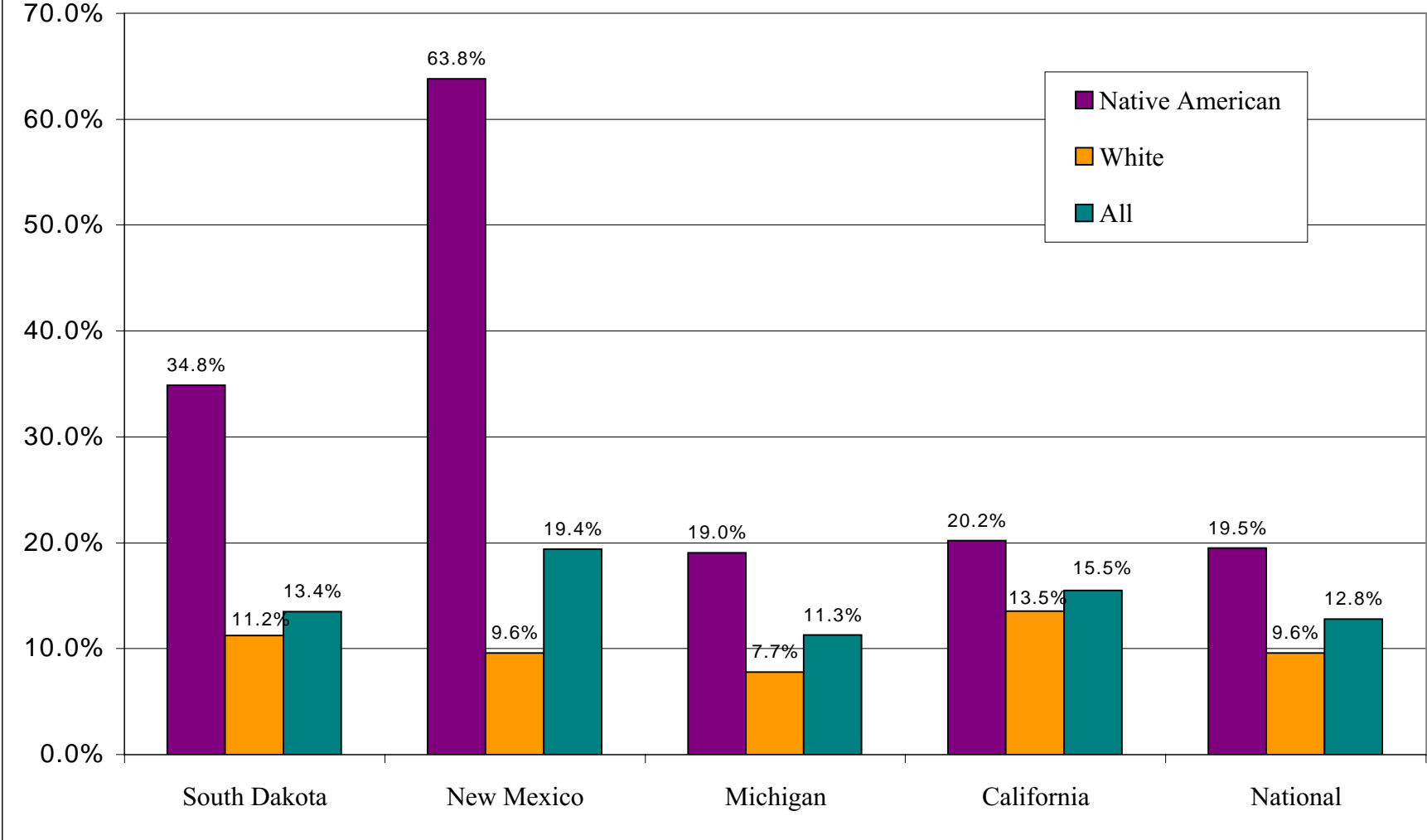
Native Americans vs Whites - Conventional Home Purchase to Owner-Occupants



NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

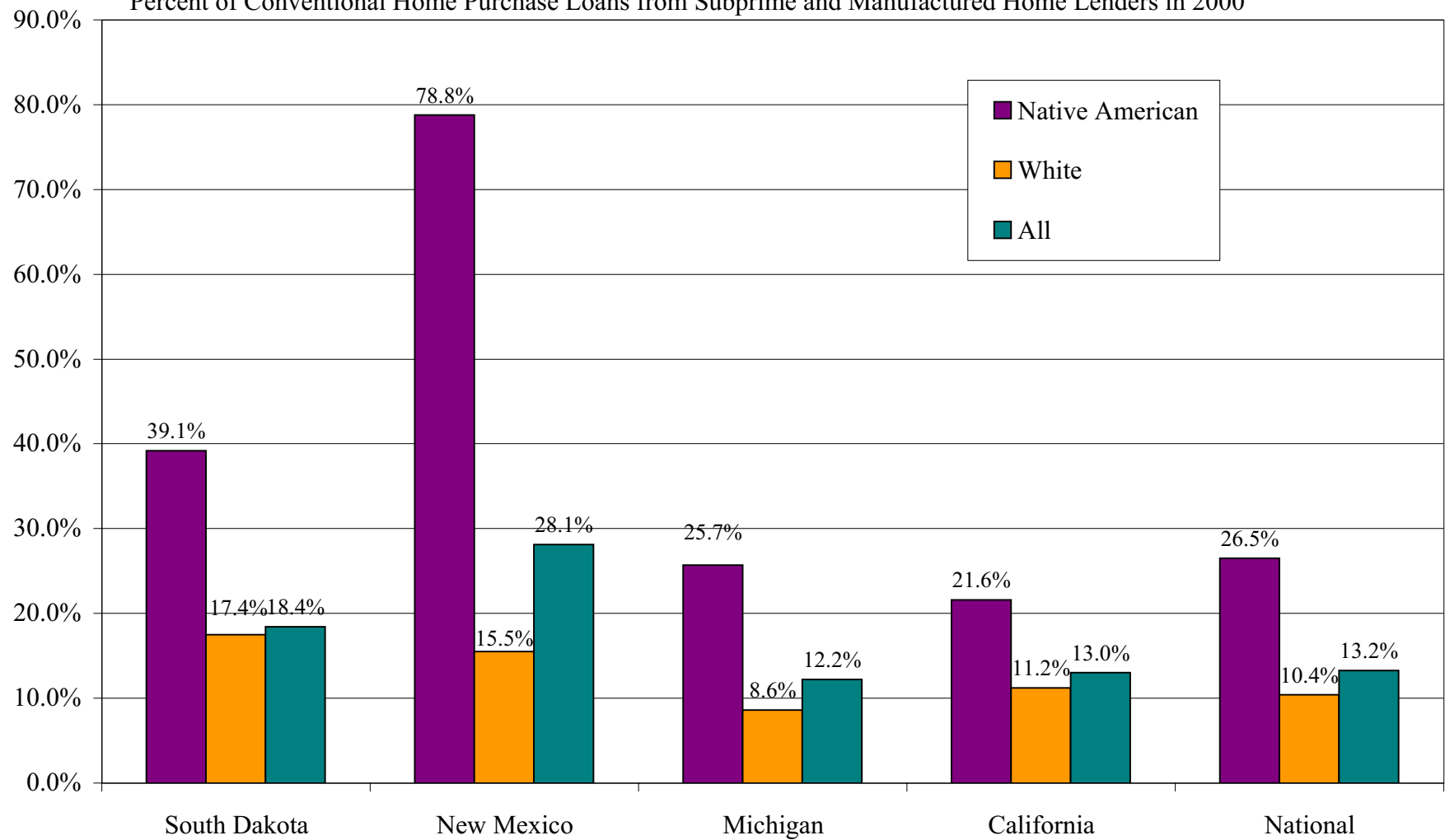
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders in 2001



NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

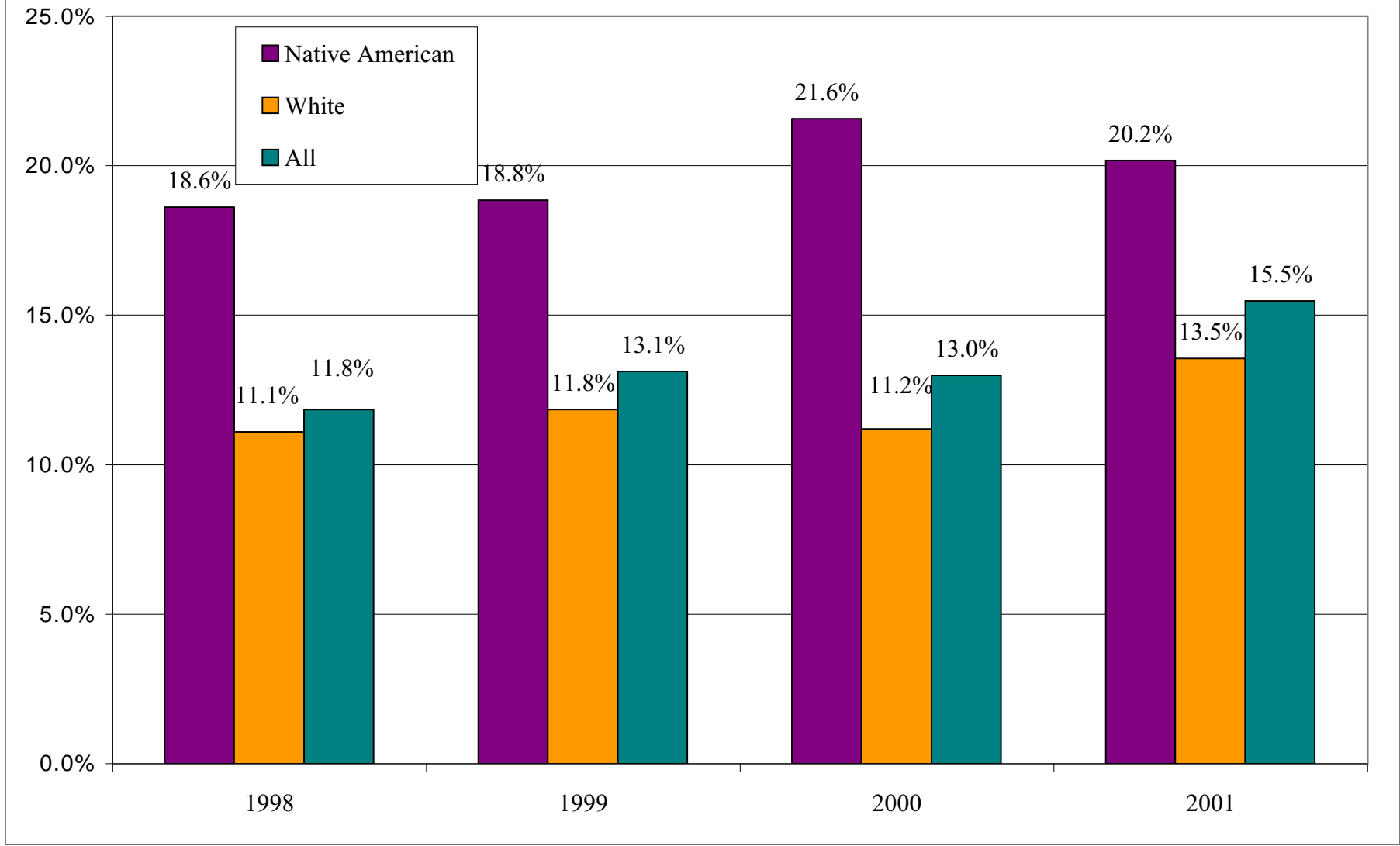
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders in 2000



NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

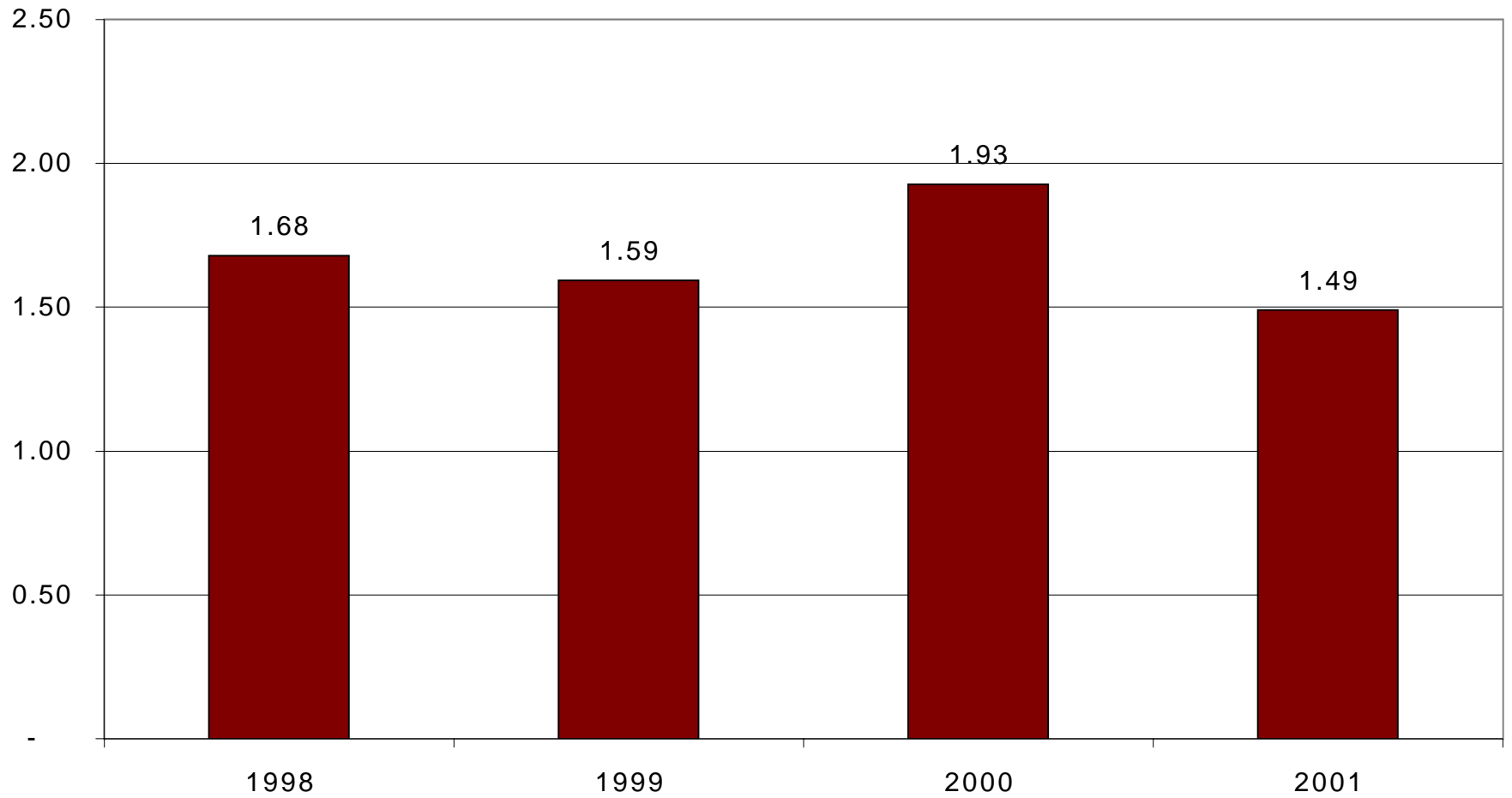
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders; California



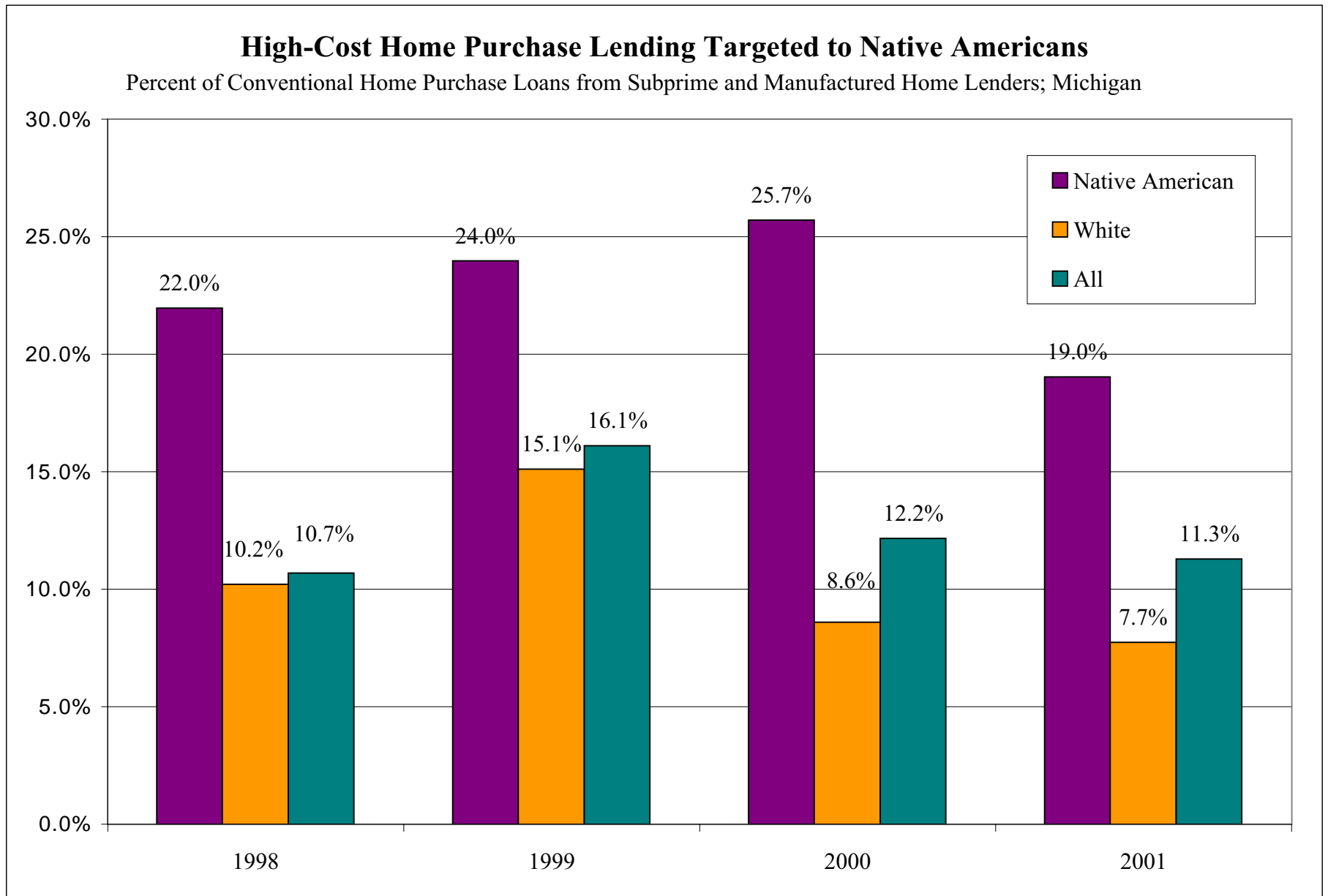
NAIHC-NCRC Data Analysis

Disparity in the Market Share of Loans from High-Cost Lenders - California

Native Americans vs Whites - Conventional Home Purchase to Owner-Occupants



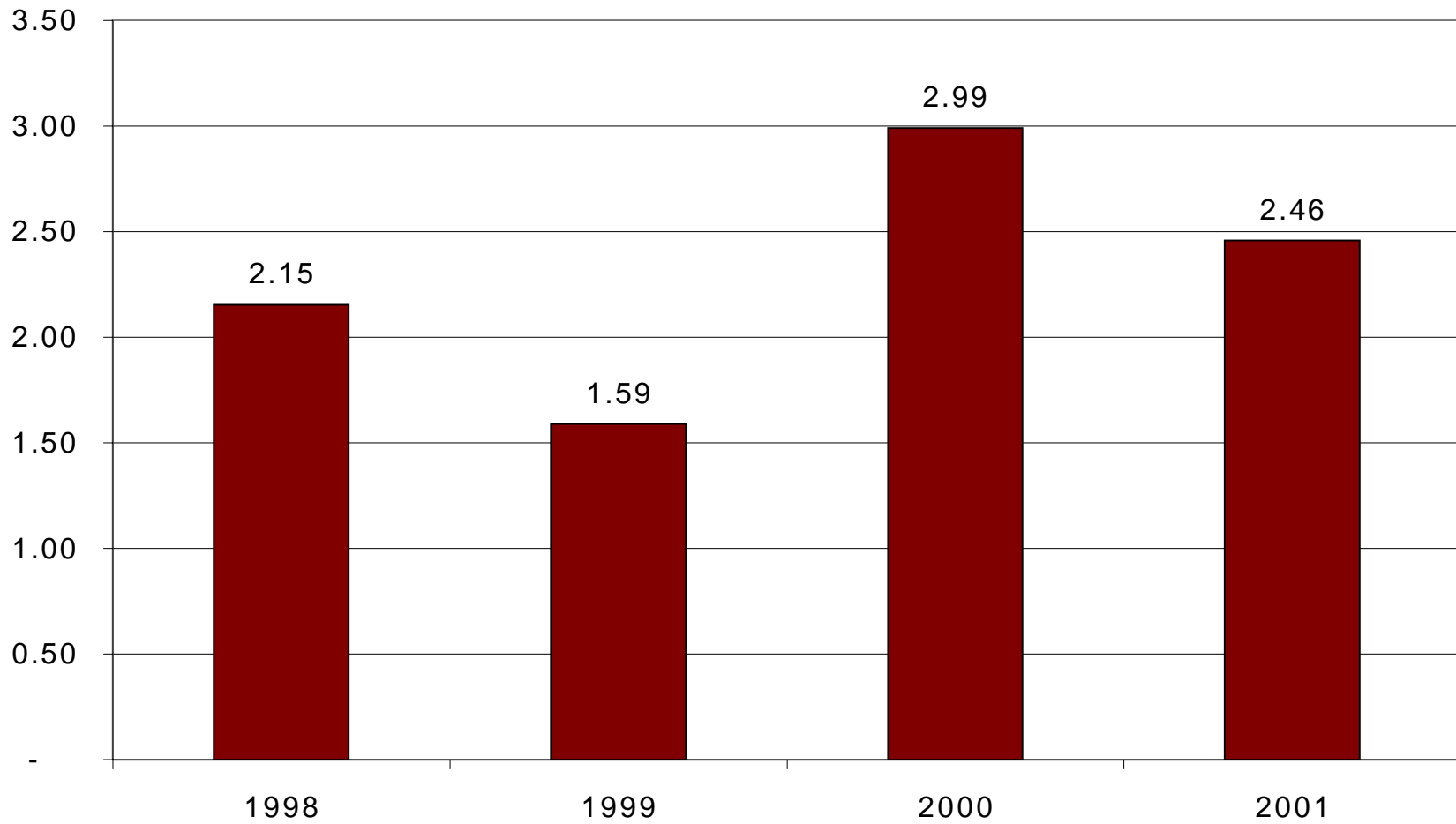
NAIHC-NCRC Data Analysis



NAIHC-NCRC Data Analysis

Disparity in the Market Share of Loans from High-Cost Lenders - Michigan

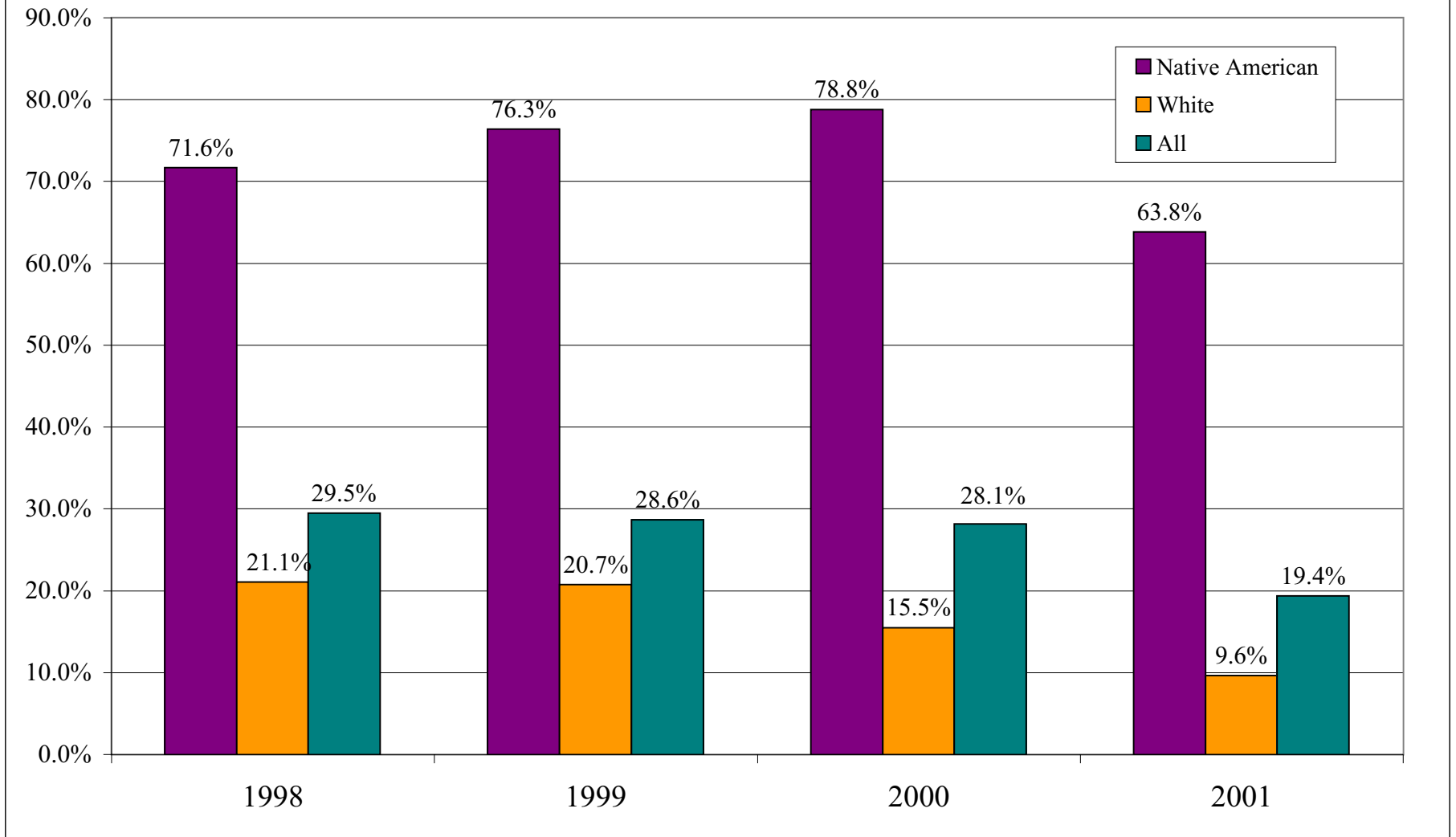
Native Americans vs Whites - Conventional Home Purchase to Owner-Occupants



NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

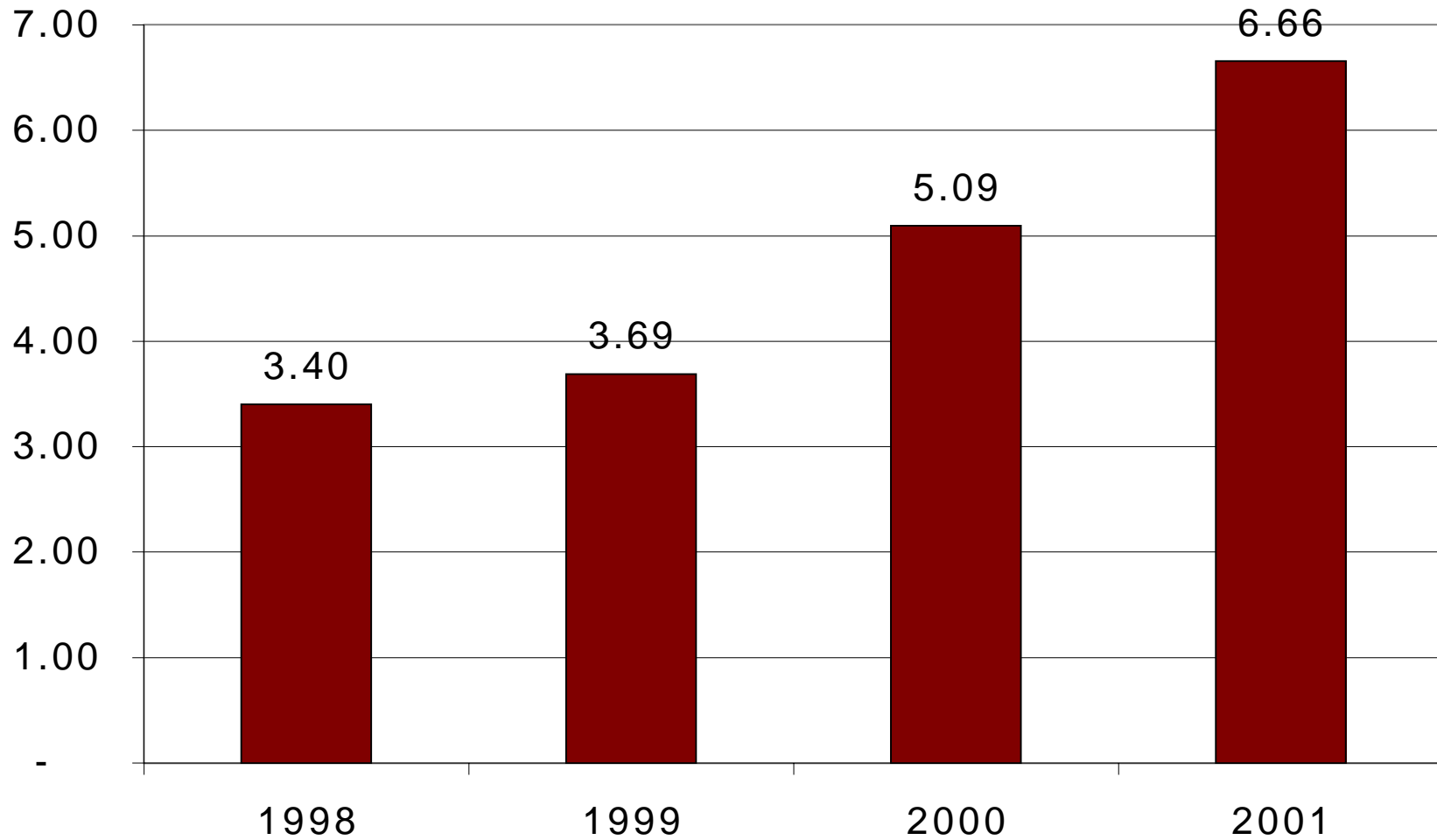
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders; New Mexico



NAIHC-NCRC Data Analysis

Disparity in the Market Share of Loans from High-Cost Lenders - New Mexico

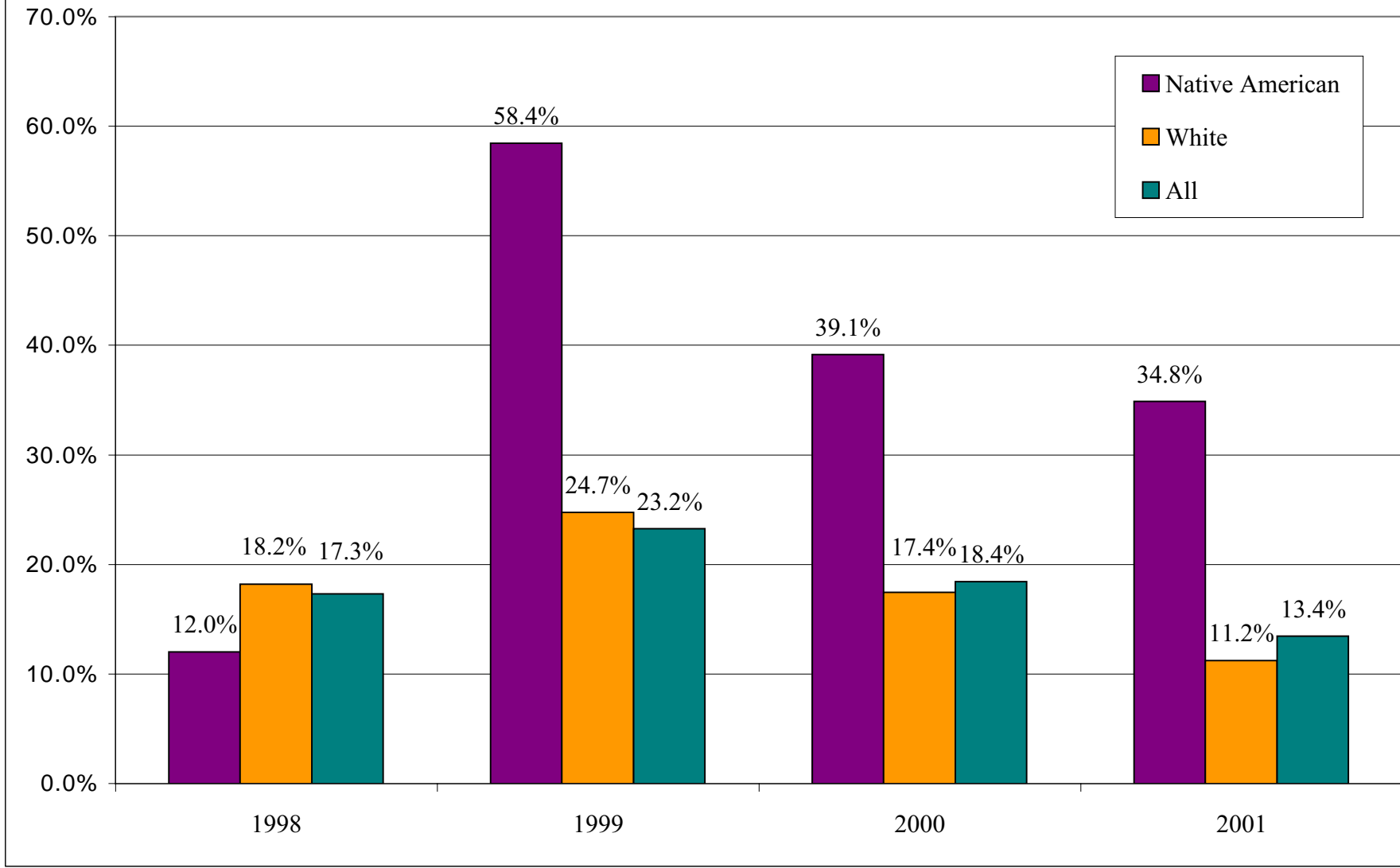
Native Americans vs Whites - Conventional Home Purchase to Owner-Occupants



NAIHC-NCRC Data Analysis

High-Cost Home Purchase Lending Targeted to Native Americans

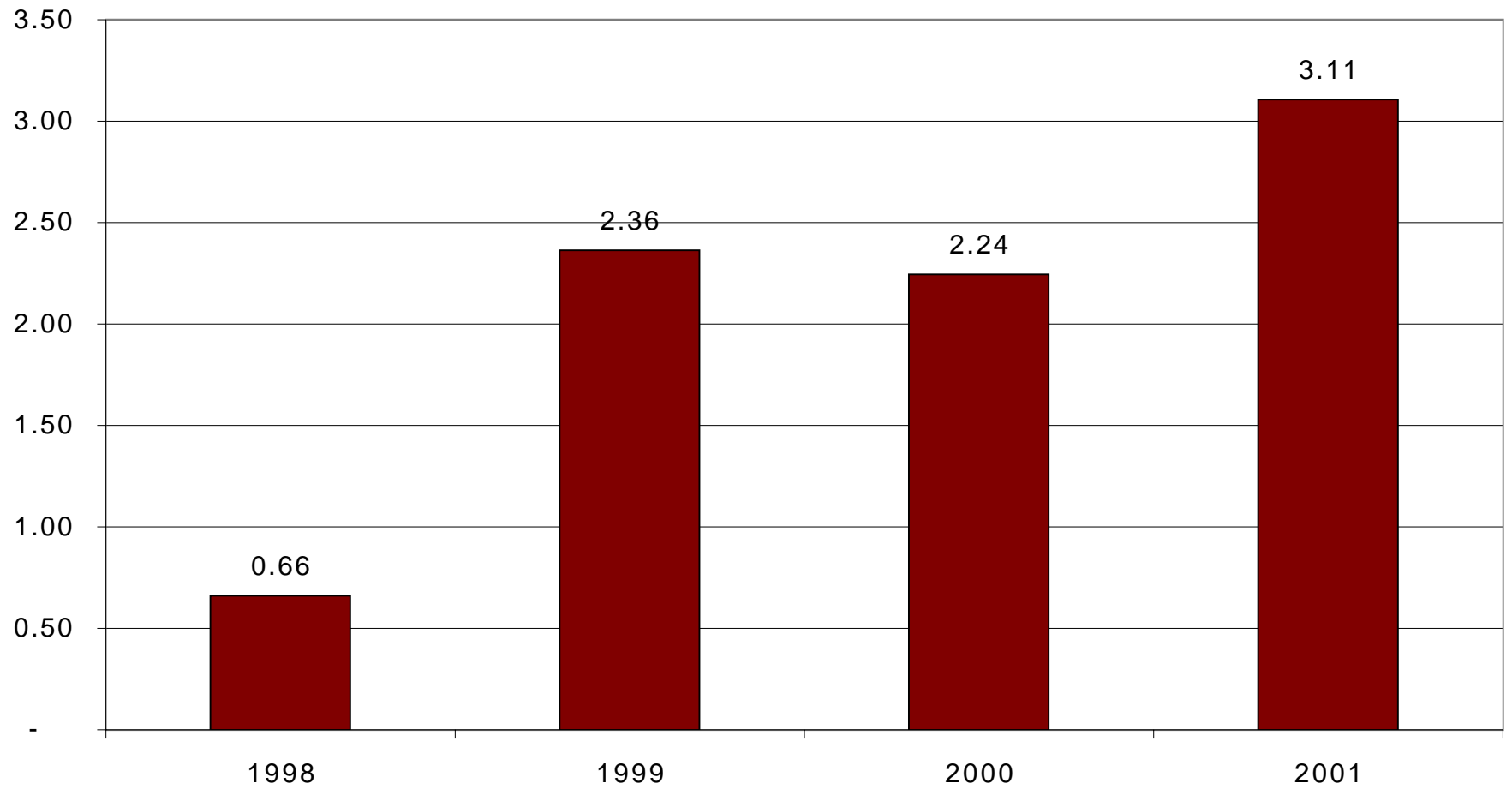
Percent of Conventional Home Purchase Loans from Subprime and Manufactured Home Lenders; South Dakota



NAIHC-NCRC Data Analysis

Disparity in the Market Share of Loans from High-Cost Lenders - South Dakota

Native Americans vs Whites - Conventional Home Purchase to Owner-Occupants



NAIHC-NCRC Data Analysis

Nationwide Single-Family Home Purchase Lending Trends to Native Americans (Conventional Home Purchase Loans, 1998 to 2001)

Excluding Associates Data Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	10,886	10,879	11,386	10,418	1,131	1,162	1,130	1,594	2,650	3,311	2,966	930	3,781	4,473	4,096	2,524
White	2,210,987	2,201,384	2,144,382	2,157,570	111,453	108,034	122,777	165,601	195,361	229,835	125,735	62,633	306,814	337,869	248,512	228,234
All	2,771,193	2,873,232	2,911,910	3,023,635	188,059	201,226	229,279	296,674	249,348	301,437	214,030	146,600	437,407	502,663	443,309	443,274

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	74.2%	70.9%	73.5%	80.5%	7.7%	7.6%	7.3%	12.3%	18.1%	21.6%	19.2%	7.2%	25.8%	29.1%	26.5%	19.5%
White	87.8%	86.7%	89.6%	90.4%	4.4%	4.3%	5.1%	6.9%	7.8%	9.1%	5.3%	2.6%	12.2%	13.3%	10.4%	9.6%
All	86.4%	85.1%	86.8%	87.2%	5.9%	6.0%	6.8%	8.6%	7.8%	8.9%	6.4%	4.2%	13.6%	14.9%	13.2%	12.8%
<i>Native/White Disp</i>	0.85	0.82	0.82	0.89	1.74	1.78	1.42	1.77	2.33	2.38	3.65	2.74	2.12	2.19	2.55	2.04

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-3.4%	2.7%	7.0%	6.3%	-0.1%	-0.3%	5.0%	4.6%	3.5%	-2.4%	-12.0%	-10.9%	3.4%	-2.7%	-7.0%	-6.3%
White	-1.1%	2.9%	0.8%	2.6%	-0.2%	0.9%	1.8%	2.5%	1.3%	-3.8%	-2.6%	-5.1%	1.1%	-2.9%	-0.8%	-2.6%
All	-1.3%	1.7%	0.4%	0.8%	0.1%	0.9%	1.7%	2.7%	1.2%	-2.6%	-2.2%	-3.5%	1.3%	-1.7%	-0.4%	-0.8%

Including Associates Data Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	10,886	10,879	11,386	10,418	1,131	8,091	6,623	1,598	2,913	3,311	2,990	963	4,044	11,402	9,613	2,561
White	2,210,987	2,201,384	2,144,382	2,157,570	111,453	119,984	144,202	165,829	207,404	229,835	126,878	63,678	318,857	349,819	271,080	229,507
All	2,771,193	2,873,232	2,911,910	3,023,635	188,059	235,653	282,114	297,189	270,052	301,437	215,995	148,098	458,111	537,090	498,109	445,287

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	72.9%	48.8%	54.2%	80.3%	7.6%	36.3%	31.5%	12.3%	19.5%	14.9%	14.2%	7.4%	27.1%	51.2%	45.8%	19.7%
White	87.4%	86.3%	88.8%	90.4%	4.4%	4.7%	6.0%	6.9%	8.2%	9.0%	5.3%	2.7%	12.6%	13.7%	11.2%	9.6%
All	85.8%	84.3%	85.4%	87.2%	5.8%	6.9%	8.3%	8.6%	8.4%	8.8%	6.3%	4.3%	14.2%	15.7%	14.6%	12.8%
<i>Native/White Disp</i>	0.83	0.57	0.61	0.89	1.72	7.72	5.28	1.77	2.38	1.65	2.71	2.78	2.15	3.73	4.08	2.05

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-24.1%	5.4%	26.0%	7.4%	28.7%	-4.8%	-19.2%	4.7%	-4.7%	-0.6%	-6.8%	-12.1%	24.1%	-5.4%	-26.0%	-7.4%
White	-1.1%	2.5%	1.6%	3.0%	0.3%	1.3%	1.0%	2.5%	0.8%	-3.8%	-2.6%	-5.5%	1.1%	-2.5%	-1.6%	-3.0%
All	-1.6%	1.1%	1.8%	1.3%	1.1%	1.4%	0.3%	2.7%	0.5%	-2.5%	-2.1%	-4.1%	1.6%	-1.1%	-1.8%	-1.3%

NAIHC-NCRC Data Analysis

Single-Family Home Purchase Lending Trends to Native Americans in California (Conventional Home Purchase Loans, 1998 to 2001)

Excluding Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	1,247	1,456	1,502	1,465	235	269	301	319	50	69	112	51	285	338	413	370
White	214,391	225,373	230,476	218,970	23,039	25,919	26,348	31,562	3,694	4,344	2,703	2,728	26,733	30,263	29,051	34,290
All	323,994	362,369	391,434	391,785	37,699	47,727	51,304	64,638	5,820	6,975	7,118	7,031	43,519	54,702	58,422	71,669

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	81.4%	81.2%	78.4%	79.8%	15.3%	15.0%	15.7%	17.4%	3.3%	3.8%	5.8%	2.8%	18.6%	18.8%	21.6%	20.2%
White	88.9%	88.2%	88.8%	86.5%	9.6%	10.1%	10.2%	12.5%	1.5%	1.7%	1.0%	1.1%	11.1%	11.8%	11.2%	13.5%
All	88.2%	86.9%	87.0%	84.5%	10.3%	11.4%	11.4%	13.9%	1.6%	1.7%	1.6%	1.5%	11.8%	13.1%	13.0%	15.5%
Native/White Disp	0.92	0.92	0.88	0.92	1.61	1.48	1.55	1.39	2.13	2.26	5.62	2.58	1.68	1.59	1.93	1.49

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-0.2%	-2.7%	1.4%	-1.6%	-0.3%	0.7%	1.7%	2.0%	0.6%	2.0%	-3.1%	-0.5%	0.2%	2.7%	-1.4%	1.6%
White	-0.8%	0.6%	-2.3%	-2.5%	0.6%	0.0%	2.3%	2.9%	0.2%	-0.7%	0.0%	-0.5%	0.8%	-0.6%	2.3%	2.5%
All	-1.3%	0.1%	-2.5%	-3.6%	1.2%	0.0%	2.5%	3.7%	0.1%	-0.1%	-0.1%	-0.1%	1.3%	-0.1%	2.5%	3.6%

Including Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	1,247	1,456	1,502	1,465	235	1,121	1,144	321	50	71	114	52	285	1,192	1,258	373
White	214,391	225,373	230,476	218,970	23,039	26,304	26,869	31,603	3,895	4,493	2,773	2,791	26,934	30,797	29,642	34,394
All	323,994	362,369	391,434	391,785	37,699	50,198	55,318	64,875	6,301	8,034	7,323	7,171	44,000	58,232	62,641	72,046

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	81.4%	55.0%	54.4%	79.7%	15.3%	42.3%	41.4%	17.5%	3.3%	2.7%	4.1%	2.8%	18.6%	45.0%	45.6%	20.3%
White	88.8%	88.0%	88.6%	86.4%	9.5%	10.3%	10.3%	12.5%	1.6%	1.8%	1.1%	1.1%	11.2%	12.0%	11.4%	13.6%
All	88.0%	86.2%	86.2%	84.5%	10.2%	11.9%	12.2%	14.0%	1.7%	1.9%	1.6%	1.5%	12.0%	13.8%	13.8%	15.5%
Native/White Disp	0.92	0.62	0.61	0.92	1.61	4.12	4.01	1.40	2.02	1.53	3.87	2.57	1.67	3.74	4.00	1.49

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-26.4%	-0.6%	25.3%	-1.7%	27.0%	-0.9%	-24.0%	2.1%	-0.6%	1.4%	-1.3%	-0.4%	26.4%	0.6%	-25.3%	1.7%
White	-0.9%	0.6%	-2.2%	-2.4%	0.7%	0.1%	2.1%	2.9%	0.1%	-0.7%	0.0%	-0.5%	0.9%	-0.6%	2.2%	2.4%
All	-1.9%	0.0%	-1.7%	-3.6%	1.7%	0.2%	1.8%	3.7%	0.2%	-0.3%	-0.1%	-0.2%	1.9%	0.0%	1.7%	3.6%

NAIHC-NCRC Data Analysis

Single-Family Home Purchase Lending Trends to Native Americans in Michigan (Conventional Home Purchase Loans, 1998 to 2001)

Excluding Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	295	384	402	332	19	35	29	52	64	86	110	26	83	121	139	78
White	98,626	92,577	92,045	86,844	2,798	5,068	4,041	5,618	8,400	11,387	4,611	1,666	11,198	16,455	8,652	7,284
All	112,439	108,278	110,296	106,038	4,332	8,154	7,099	8,897	9,111	12,619	8,167	4,583	13,443	20,773	15,266	13,480

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	78.0%	76.0%	74.3%	81.0%	5.0%	6.9%	5.4%	12.7%	16.9%	17.0%	20.3%	6.3%	22.0%	24.0%	25.7%	19.0%
White	89.8%	84.9%	91.4%	92.3%	2.5%	4.6%	4.0%	6.0%	7.6%	10.4%	4.6%	1.8%	10.2%	15.1%	8.6%	7.7%
All	89.3%	83.9%	87.8%	88.7%	3.4%	6.3%	5.7%	7.4%	7.2%	9.8%	6.5%	3.8%	10.7%	16.1%	12.2%	11.3%
<i>Native/White Disp</i>	<i>0.87</i>	<i>0.90</i>	<i>0.81</i>	<i>0.88</i>	<i>1.97</i>	<i>1.49</i>	<i>1.34</i>	<i>2.12</i>	<i>2.21</i>	<i>1.63</i>	<i>4.44</i>	<i>3.58</i>	<i>2.15</i>	<i>1.59</i>	<i>2.99</i>	<i>2.46</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-2.0%	-1.7%	6.7%	2.9%	1.9%	-1.6%	7.3%	7.7%	0.1%	3.3%	-14.0%	-10.6%	2.0%	1.7%	-6.7%	-2.9%
White	-4.9%	6.5%	0.9%	2.5%	2.1%	-0.6%	2.0%	3.4%	2.8%	-5.9%	-2.8%	-5.9%	4.9%	-6.5%	-0.9%	-2.5%
All	-5.4%	3.9%	0.9%	-0.6%	2.9%	-0.7%	1.8%	4.0%	2.5%	-3.3%	-2.7%	-3.4%	5.4%	-3.9%	-0.9%	0.6%

Including Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	295	384	402	332	19	198	102	52	67	87	111	26	86	285	213	78
White	98,626	92,577	92,045	86,844	2,798	5,245	4,478	5,665	8,554	11,497	4,651	1,677	11,352	16,742	9,129	7,342
All	112,439	108,278	110,296	106,038	4,332	8,662	7,938	9,025	9,369	13,089	8,238	4,596	13,701	21,751	16,176	13,621

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	77.4%	57.4%	65.4%	81.0%	5.0%	29.6%	16.6%	12.7%	17.6%	13.0%	18.0%	6.3%	22.6%	42.6%	34.6%	19.0%
White	89.7%	84.7%	91.0%	92.2%	2.5%	4.8%	4.4%	6.0%	7.8%	10.5%	4.6%	1.8%	10.3%	15.3%	9.0%	7.8%
All	89.1%	83.3%	87.2%	88.6%	3.4%	6.7%	6.3%	7.5%	7.4%	10.1%	6.5%	3.8%	10.9%	16.7%	12.8%	11.4%
<i>Native/White Disp</i>	<i>0.86</i>	<i>0.68</i>	<i>0.72</i>	<i>0.88</i>	<i>1.96</i>	<i>6.17</i>	<i>3.75</i>	<i>2.11</i>	<i>2.26</i>	<i>1.24</i>	<i>3.93</i>	<i>3.56</i>	<i>2.19</i>	<i>2.78</i>	<i>3.84</i>	<i>2.44</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-20.0%	8.0%	15.6%	3.5%	24.6%	-13.0%	-3.9%	7.7%	-4.6%	5.0%	-11.7%	-11.2%	20.0%	-8.0%	-15.6%	-3.5%
White	-5.0%	6.3%	1.2%	2.5%	2.3%	-0.4%	1.6%	3.5%	2.7%	-5.9%	-2.8%	-6.0%	5.0%	-6.3%	-1.2%	-2.5%
All	-5.9%	3.9%	1.4%	-0.5%	3.2%	-0.4%	1.3%	4.1%	2.6%	-3.6%	-2.7%	-3.6%	5.9%	-3.9%	-1.4%	0.5%

NAIHC-NCRC Data Analysis

Single-Family Home Purchase Lending Trends to Native Americans in New Mexico (Conventional Home Purchase Loans, 1998 to 2001)

Excluding Associates Data Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	268	176	139	113	102	20	20	66	575	548	496	133	677	568	516	199
White	9,243	8,250	7,954	9,151	543	468	502	657	1,923	1,686	953	313	2,466	2,154	1,455	970
All	13,733	12,488	12,160	13,925	1,210	870	990	1,350	4,525	4,137	3,768	1,994	5,735	5,007	4,758	3,344

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	28.4%	23.7%	21.2%	36.2%	10.8%	2.7%	3.1%	21.2%	60.8%	73.7%	75.7%	42.6%	71.6%	76.3%	78.8%	63.8%
White	78.9%	79.3%	84.5%	90.4%	4.6%	4.5%	5.3%	6.5%	16.4%	16.2%	10.1%	3.1%	21.1%	20.7%	15.5%	9.6%
All	70.5%	71.4%	71.9%	80.6%	6.2%	5.0%	5.9%	7.8%	23.2%	23.6%	22.3%	11.5%	29.5%	28.6%	28.1%	19.4%
<i>Native/White Disp</i>	<i>0.36</i>	<i>0.30</i>	<i>0.25</i>	<i>0.40</i>	<i>2.33</i>	<i>0.60</i>	<i>0.57</i>	<i>3.26</i>	<i>3.70</i>	<i>4.55</i>	<i>7.48</i>	<i>13.78</i>	<i>3.40</i>	<i>3.69</i>	<i>5.09</i>	<i>6.66</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-4.7%	-2.4%	15.0%	7.9%	-8.1%	0.4%	18.1%	10.4%	12.8%	2.1%	-33.1%	-18.2%	4.7%	2.4%	-15.0%	-7.9%
White	0.4%	5.2%	5.9%	11.5%	-0.1%	0.8%	1.2%	1.9%	-0.2%	-6.1%	-7.0%	-13.3%	-0.4%	-5.2%	-5.9%	-11.5%
All	0.8%	0.5%	8.8%	10.1%	-1.2%	0.9%	2.0%	1.6%	0.4%	-1.4%	-10.7%	-11.7%	-0.8%	-0.5%	-8.8%	-10.1%

Including Associates Data Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	268	176	139	113	102	54	33	66	610	548	503	135	712	602	536	201
White	9,243	8,250	7,954	9,151	543	537	612	658	2,053	1,686	979	333	2,596	2,223	1,591	991
All	13,733	12,488	12,160	13,925	1,210	1,117	1,208	1,351	4,918	4,137	3,838	2,043	6,128	5,254	5,046	3,394

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	27.3%	22.6%	20.6%	36.0%	10.4%	6.9%	4.9%	21.0%	62.2%	70.4%	74.5%	43.0%	72.7%	77.4%	79.4%	64.0%
White	78.1%	78.8%	83.3%	90.2%	4.6%	5.1%	6.4%	6.5%	17.3%	16.1%	10.3%	3.3%	21.9%	21.2%	16.7%	9.8%
All	69.1%	70.4%	70.7%	80.4%	6.1%	6.3%	7.0%	7.8%	24.8%	23.3%	22.3%	11.8%	30.9%	29.6%	29.3%	19.6%
<i>Native/White Disp</i>	<i>0.35</i>	<i>0.29</i>	<i>0.25</i>	<i>0.40</i>	<i>2.27</i>	<i>1.35</i>	<i>0.76</i>	<i>3.24</i>	<i>3.59</i>	<i>4.38</i>	<i>7.27</i>	<i>13.09</i>	<i>3.31</i>	<i>3.65</i>	<i>4.76</i>	<i>6.55</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-4.7%	-2.0%	15.4%	8.6%	-3.5%	-2.1%	16.1%	10.6%	8.2%	4.1%	-31.5%	-19.3%	4.7%	2.0%	-15.4%	-8.6%
White	0.7%	4.6%	6.9%	12.2%	0.5%	1.3%	0.1%	1.9%	-1.2%	-5.8%	-7.0%	-14.1%	-0.7%	-4.6%	-6.9%	-12.2%
All	1.2%	0.3%	9.7%	11.3%	0.2%	0.7%	0.8%	1.7%	-1.4%	-1.0%	-10.5%	-13.0%	-1.2%	-0.3%	-9.7%	-11.3%

NAIHC-NCRC Data Analysis

Single-Family Home Purchase Lending Trends to Native Americans in South Dakota (Conventional Home Purchase Loans, 1998 to 2001)

Excluding Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	44	42	56	43	1	2	1	12	5	57	35	11	6	59	36	23
White	4,370	4,020	3,991	4,922	115	103	176	362	855	1,217	667	260	970	1,320	843	622
All	4,849	4,800	5,214	6,045	138	126	218	453	876	1,327	959	486	1,014	1,453	1,177	939

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	88.0%	41.6%	60.9%	65.2%	2.0%	2.0%	1.1%	18.2%	10.0%	56.4%	38.0%	16.7%	12.0%	58.4%	39.1%	34.8%
White	81.8%	75.3%	82.6%	88.8%	2.2%	1.9%	3.6%	6.5%	16.0%	22.8%	13.8%	4.7%	18.2%	24.7%	17.4%	11.2%
All	82.7%	76.8%	81.6%	86.6%	2.4%	2.0%	3.4%	6.5%	14.9%	21.2%	15.0%	7.0%	17.3%	23.2%	18.4%	13.4%
<i>Native/White Disp</i>	<i>1.08</i>	<i>0.55</i>	<i>0.74</i>	<i>0.73</i>	<i>0.93</i>	<i>1.03</i>	<i>0.30</i>	<i>2.78</i>	<i>0.62</i>	<i>2.48</i>	<i>2.76</i>	<i>3.55</i>	<i>0.66</i>	<i>2.36</i>	<i>2.24</i>	<i>3.11</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-46.4%	19.3%	4.3%	-22.8%	0.0%	-0.9%	17.1%	16.2%	46.4%	-18.4%	-21.4%	6.7%	46.4%	-19.3%	-4.3%	22.8%
White	-6.6%	7.3%	6.2%	6.9%	-0.2%	1.7%	2.9%	4.4%	6.8%	-9.0%	-9.1%	-11.3%	6.6%	-7.3%	-6.2%	-6.9%
All	-5.9%	4.8%	5.0%	3.8%	-0.3%	1.4%	3.1%	4.1%	6.3%	-6.2%	-8.0%	-8.0%	5.9%	-4.8%	-5.0%	-3.8%

Including Associates Data

Number of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	44	42	56	43	1	2	2	12	20	57	35	11	21	59	37	23
White	4,370	4,020	3,991	4,922	115	130	217	363	933	1,217	667	260	1,048	1,347	884	623
All	4,849	4,800	5,214	6,045	138	157	262	455	975	1,327	960	486	1,113	1,484	1,222	941

Market Share of Loans

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001	1998	1999	2000	2001
Native American	67.7%	41.6%	60.2%	65.2%	1.5%	2.0%	2.2%	18.2%	30.8%	56.4%	37.6%	16.7%	32.3%	58.4%	39.8%	34.8%
White	80.7%	74.9%	81.9%	88.8%	2.1%	2.4%	4.5%	6.5%	17.2%	22.7%	13.7%	4.7%	19.3%	25.1%	18.1%	11.2%
All	81.3%	76.4%	81.0%	86.5%	2.3%	2.5%	4.1%	6.5%	16.4%	21.1%	14.9%	7.0%	18.7%	23.6%	19.0%	13.5%
<i>Native/White Disp</i>	<i>0.84</i>	<i>0.56</i>	<i>0.74</i>	<i>0.73</i>	<i>0.72</i>	<i>0.82</i>	<i>0.48</i>	<i>2.78</i>	<i>1.79</i>	<i>2.49</i>	<i>2.75</i>	<i>3.55</i>	<i>1.67</i>	<i>2.33</i>	<i>2.19</i>	<i>3.10</i>

Change in Market Share

Borrower Characteristic	Prime Lenders				Subprime Lenders				Manufactured Home Lenders				Subprime plus Man. Home Lenders			
	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001	1998-1999	1999-2000	2000-2001	1998-2001
Native American	-26.1%	18.6%	4.9%	-2.5%	0.4%	0.2%	16.0%	16.6%	25.7%	-18.8%	-21.0%	-14.1%	26.1%	-18.6%	-4.9%	2.5%
White	-5.8%	7.0%	6.9%	8.1%	0.3%	2.0%	2.1%	4.4%	5.5%	-9.0%	-9.0%	-12.5%	5.8%	-7.0%	-6.9%	-8.1%
All	-4.9%	4.6%	5.5%	5.2%	0.2%	1.6%	2.4%	4.2%	4.8%	-6.2%	-8.0%	-9.4%	4.9%	-4.6%	-5.5%	-5.2%