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# **FAIR LENDING IN THE LOWER HUDSON VALLEY REGION: ARE WE GETTING THERE?**

**Testing Report**

**2017-2018**

**The presentation and analysis in this report reflect the results of the specific project and do not purport to make any further general statements about a particular geographic area or lender.**



**EQUAL HOUSING  
OPPORTUNITY**

**This project was made possible by a generous grant from the United States  
Department of Housing and Urban Development.**

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# **FAIR LENDING IN THE LOWER HUDSON VALLEY: ARE WE GETTING THERE?**

## **PROJECT SUMMARY**

Westchester Residential Opportunities, Inc. (“WRO”) was founded in 1968 and remains the only private nonprofit Fair Housing agency in the Lower Hudson Valley region of New York State that conducts ongoing fair housing enforcement as well as fair housing education and outreach. As part of the U.S. Department of Housing and Urban Development FHIP funding process in 2016, WRO applied for an 18-month PEI Fair Housing Enforcement Program grant to conduct fair lending tests of mortgage lenders and brokers operating in the Lower Hudson Valley region of New York. WRO received one of the three grants in the nation that were awarded during that grant funding period.

WRO began an 18-month fair lending grant in December 2016. Between January 2017 and June 2018, WRO conducted a series of fair lending tests of mortgage lenders in Putnam, Rockland and Westchester Counties. The tests looked at lending on the basis of race (primarily black individuals), national origin (here individuals of Latino and Hispanic descent) and other protected classes, such as disability and familial status, that might be of interest to HUD.

Lending tests were conducted both as in-person visits with lenders and conducted by telephone with testers posing as potential borrowers or proxies for potential borrowers making an inquiry on the type of loan products that might be available to them. Generally, the prospective borrowers would be interested in purchasing in selected town or communities but not have a specific property that they were interested in purchasing. This report presents and analyzes the findings of the testing project.

Testing is conducted by housing advocates at non-profit organizations across the country, to enforce fair housing and fair lending laws under the Fair Housing Act (FHA)<sup>1</sup> and the Equal Credit Opportunity Act (ECOA)<sup>2</sup>. Individuals who take out loans to purchase homes are protected against discrimination under both the FHA and ECOA. “Audit-based or systemic testing” is used generally where segregated lending or housing patterns occur or where historic, anecdotal or prior complaints of discrimination may have occurred. “Complaint-based testing” attempts to

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<sup>1</sup> 42 U.S.C. § 3601 et seq.

<sup>2</sup> 15 U.S.C. § 1691 et seq.

investigate individual complaints of potential discrimination. While WRO's fair lending staff received some complaints from the public, all the testing for this project was audit-based.

WRO utilized both matched-pair testing and single-part testing to uncover evidence of discrimination against members of a protected class. A protected class is a category or group of individuals protected from discrimination under federal, state or local laws.<sup>3</sup> WRO uses best practices that were developed in consultation with agencies across the country and has adapted them to fit the mission of the organization and the needs of its service area.<sup>4</sup> WRO's approach to testing is discussed in the Methodology section below.

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<sup>3</sup> The federal protected classes under the Fair Housing Act are race, color, religion, sex, national origin, disability and familial status. ECOA also federally protects individuals on the basis of race or color, religion, national origin, sex, marital status, age and the applicant's receipt of income derived from any public assistance program. New York State also adds marital status, age, sexual orientation and military status, and Westchester County additionally adds victims of domestic abuse, sexual abuse and stalking, gender identity, citizenship or alienage status and source of income. Source of income protection refers to protection against discrimination on the basis of the source of lawful, verifiable income derived from social security or any form of federal, state or local public assistance or housing assistance, including "Section 8", any disability payment and assistance, grant or loan program from a private housing assistance organization.

<sup>4</sup> WRO's mission is to promote equal, affordable, and accessible housing opportunities for all residents of its region. Its service area includes Westchester County as well as the wider region of the Lower Hudson Valley.

## **ABOUT WESTCHESTER RESIDENTIAL OPPORTUNITIES**

Westchester Residential Opportunities is a HUD-certified housing counseling agency and fair housing organization operating in its home community of Westchester County and also serving the Lower Hudson Valley region including Putnam and Rockland counties. WRO's mission is to promote fair and affordable housing opportunities for all residents of our region. WRO's main program areas include Fair Housing, Mortgage Default Prevention, Senior Housing, First Time Home Buying, Eviction Prevention and Independent Living.

WRO's fair housing department investigates complaints of unlawful discrimination in housing and lending and conducts systemic investigations of housing and home lending discrimination. As a qualified fair housing organization funded by the U.S. Department of Housing and Urban Development (HUD), WRO is authorized to investigate and enforce fair housing laws and does so by bringing complaints through HUD's administrative process, through local HUD-partners, such as the Westchester County Human Rights Commission and, where appropriate, through litigation in federal and state courts.

In addition to conducting fair housing and fair lending testing, WRO has assisted hundreds of complainants with fair housing issues in exercising their rights under federal, state and local fair housing laws. WRO has assisted individuals with disability-related fair housing complaints such as the filing of requests for reasonable accommodations and modifications and addressing issues related to discrimination based on source of income, such as Section 8 vouchers under the Westchester County Human Rights Law.

## REVIEW OF APPLICABLE LAWS

Testing under this grant involved a number of investigations based on different protected categories under two federal laws: The federal Fair Housing Act and the Equal Credit Opportunity Act.

### **The Fair Housing Act (FHA) Versus the Equal Credit Opportunity Act (ECOA):**

The FHA and ECOA both protect against discrimination and are similar in many ways, but there are some key differences. The federal Fair Housing Act covers 7 protected categories. Protected categories have been added at the state and local levels in the jurisdictions where testing was conducted for WRO’s investigations.

Fair Housing Act (FHA) – Federal, State, and County level protections	Equal Credit Opportunity Act (ECOA) – Federal protection
<p><b><u>Federal:</u></b></p> <ul style="list-style-type: none"> <li>• Race</li> <li>• Color</li> <li>• National Origin</li> <li>• Religion</li> <li>• Sex</li> <li>• Disability</li> <li>• Familial Status</li> </ul> <p><b><u>New York State Adds:</u></b></p> <ul style="list-style-type: none"> <li>• Marital Status</li> <li>• Age</li> <li>• Sexual Orientation</li> <li>• Military Status</li> <li>• Gender Identity and Expression (by Exec. Order)</li> </ul> <p><b><u>Putnam County New York Adds:</u></b></p> <ul style="list-style-type: none"> <li>• No additional locally protected categories</li> </ul> <p><b><u>Rockland County New York Adds:</u></b></p> <ul style="list-style-type: none"> <li>• Creed</li> <li>• Age</li> <li>• Sexual Orientation</li> </ul> <p><b><u>Westchester County New York Adds:</u></b></p> <ul style="list-style-type: none"> <li>• Citizenship or Alienage Status</li> <li>• Victims of Domestic Abuse, Sexual Abuse and Stalking</li> <li>• Source of Income</li> </ul>	<p><b><u>Federal:</u></b></p> <ul style="list-style-type: none"> <li>• Race</li> <li>• Color</li> <li>• National Origin</li> <li>• Religion</li> <li>• Sex</li> <li>• Marital Status</li> <li>• Age</li> <li>• Source of Income</li> <li>• Exercising rights under the Consumer Protection Act</li> </ul>

## **BACKGROUND, METHODOLOGY, AND REVIEW OF TERMINOLOGY USED**

For this project, WRO conducted testing of mortgage lenders (primarily banks) and brokers over an 18-month period spanning from January 2017 until June 2018. A total of 93 tests were conducted and encompassed investigations that included numerous protected categories. All testing conducted under this grant was audit-based testing. Audit-based testing is implemented when there is a desire to look at a particular type of institution or geographic area. In the case of this project, the focus was on smaller sized lending institutions based in the Lower Hudson Valley region.

### **Background on Fair Lending Testing**

Fair housing testing is a valuable tool to gather evidence of differential treatment by housing providers, lenders and related entities, such as appraisers, inspectors, and real estate agents, and can shine a light on potential discrimination where it may not have otherwise been discovered.

The Fair Housing Act states that it is unlawful for discrimination against protected classes to occur during “residential real estate-related transactions,” which includes the making or purchasing of home loans. Testing is conducted to isolate the treatment by a housing provider towards a member of a protected class under the law. A protected class under both the Fair Housing Act and the Equal Credit Opportunity Act is a category or group of individuals protected from discrimination under federal, state and/or local laws. The protected classes under the Fair Housing Act are race, color, religion, sex, handicap [disability], familial status, and national origin.<sup>5</sup> ECOA states that creditors cannot discriminate on the basis of race, color, religion, national origin, sex, marital status, and age, and source of income from a public assistance program.<sup>6</sup> New York state laws and regulations also add sexual orientation<sup>7</sup> and gender identity<sup>8</sup> among others to the list of protected classes (see chart on previous page).

Since its inception in 1968, WRO has conducted hundreds of fair housing tests in response to individual complaints and as part of audit-based investigations. WRO’s testers recorded the audio of their site visits and phone calls, which proves helpful

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<sup>5</sup> Fair Housing Act of 1968, 42 USC § 3605

<sup>6</sup> Equal Credit Opportunity Act of 1974, 15 USC § 1691

<sup>7</sup> NYS Exec Law, Art. 15 §296 (5) (a) (1)

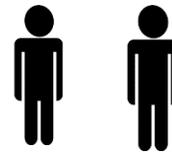
<sup>8</sup> 9 N.Y.C.R.R. § 466.13

in accurately analyzing the tests. All of WRO’s testing was conducted in the State of New York.

**The terminology used in assessing the results of the tests**

WRO used the following classification system to describe the outcomes of the tests. The term applied to the results of a particular tests depends primarily on whether the test conducted was a matched pair test or a test utilizing a single tester. As described earlier, matched pair testing is a methodology that utilizes a Control tester and a Protected class tester. In matched pair tests, Protected class testers are at least as well situated in terms of income and credit score, but in other material aspects are as identical as possible to the Control tester.

**Matched Pair Tests: Terminology is used to characterize the results:**



**Matched Pair Tests:** WRO used the following terminology to characterize the outcome of tests that were conducted using a matched paired methodology, meaning that both a Protected class tester and a Control tester were utilized.

**Equal:** The designation of “equal” indicates that during the course of the test the Protected class tester received substantially equal (or slightly better) treatment by the loan officer relative to the in the areas of approval amount and terms and conditions.

**Unequal:** Matched-pair tests were designated “unequal” where the Protected class tester received substantially different treatment by the loan officer relative to the Control tester. Examples of tests that were considered to be unequal were situations where a loan officer provided substantially different terms and conditions to the Protected class tester. Different terms and conditions may include the imposition of different fees or application of different debt to income standards. Another example might be the specification of different minimum credit scores for the same loan product. In some cases, actions carried out by loan officers may have fallen into more than one category.

**Unclear:** Some of the tests were considered to be unclear. This may have resulted in situations where a test was completed, but the results were too ambiguous to conclude whether the treatment was discriminatory or not.

**Single Part Tests: Terminology is used to characterize the results:**



**Single Part Tests:** As mentioned above, tests where a single tester was utilized were typically conducted when the tester was investigating a lender's compliance with a policy. WRO used the following terminology to characterize the outcome of tests that were conducted using a single tester methodology.

**Violative:** Tests were designated as “violative” where the loan officer did not comply with the policy being tested, or the policy adopted by the lending institution was itself in violation of fair housing or fair lending laws. The lender did not provide accurate information regarding the policy, or accurately apply the policy, or was not aware that there was a policy in place concerning the issue.

**Not Violative:** Tests were designated “not violative” were cases where the lending institution adopted a policy that complied with fair housing or lending laws and the loan officer provided accurate information concerning the policy or acted in compliance with the policy being tested.

**Invalid:** A test was considered invalid if a tester provided misinformation during the test that might skew the analysis. These tests were not counted in analyzing results.

## **FINDINGS OF THE TESTING**

WRO Fair Lending Staff conducted 93 fair lending tests during the December 2016 to June 2018 grant period.

### **OVERALL RESULTS:**

WRO Fair Lending Staff characterized the 93 tests as follows:

- 34 tests were classified as “equal” or “not violative”
- 48 tests were characterized as “unequal” or “violative”
- 11 tests were characterized as “unclear”
- 1 test was characterized as “invalid” and not included in the analysis.

When categorized by protected class, of the 93 tests:

- 16 tests were based on disability
- 30 tests were based on familial status
- 8 tests were based on gender identity
- 10 tests were based on limited English proficiency
- 10 tests were based on race
- 5 tests were based on religion/national origin
- 7 tests were based on section 8/source of income/home buying voucher
- 7 tests were based on sexual orientation

## **DISCUSSION OF RESULTS BY PROTECTED CLASS:**

### **Race/Color:**

The Fair Housing Act was initially enacted 50 years ago immediately after the assassination of Dr. Martin Luther King in 1968 with the goal of integrating neighborhoods and striving to create equal opportunity and to combat a long history of institutionalized racism. Initially, the federal Fair Housing Act prohibited discrimination based on race, national origin, religion, and color.

WRO conducted ten matched-pair tests on race. Tests conducted under the Race investigation for this grant utilized a matched pair testing methodology with a black Protected class tester and a white Control tester. All race tests conducted in this investigation were completed as in-person tests. Race testing was conducted in both Westchester and Rockland Counties, with a majority of the tests (8) occurring in Westchester County and two occurring in Rockland County.

There are many studies that indicate that African American borrowers pay higher interest rates than their white counterparts. An analysis of Home Mortgage Disclosure Act (HMDA) data by the Pew Research Center shows that Blacks and Hispanics are less likely to own homes than Whites. Rates of homeownership in 2017 for Blacks and Hispanics were at 41.3% and 47%, respectively, and for Whites were 71.9%. Further, Blacks and Hispanics have a harder time getting approved for a loan than White or Asian applicants, and when they are approved, they tend to pay higher interest rates.<sup>9</sup>

Of the ten race-based tests we conducted

- 2 were categorized as Equal
- 5 were categorized as Unclear
- 3 were categorized as Unequal

### **Familial Status/ Maternity Leave:**

In 1988 the FHA was amended to include Disability and Familial Status as protected classes. Familial status means “one or more individuals (who have not attained the age of 18 years) being domiciled with the protections afforded against discrimination on the basis of familial status shall apply to any person who is

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<sup>9</sup> Desilver, D. (2017, Jan 10) *Blacks and Hispanics Face Extra Challenges in Getting Home Loans*. <http://www.pewresearch.org/fact-tank/2017/01/10/blacks-and-hispanics-face-extra-challenges-in-getting-home-loans/>

pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years”.<sup>10</sup>

Familial Status protections in mortgage lending transactions largely pertain to how income is counted during the pre-approval process if a woman is pregnant and is planning on being on maternity leave during the loan approval process or at the time of closing.

Historically, some banks have had a policy of requiring that women on maternity leave return to work before they could close on a mortgage loan.

Familial status and maternity leave protections also extend to a parent (whether male or female) who is in the process of adopting a child and plans to take time off to spend time with that child when the adoption process is complete.

Many of the issues around maternity leave from the perspective of the lender stem from the fact that applicants for a mortgage may not be receiving any income during the leave. In fact, applicants for a mortgage are not required to return to active work status in order to be approved for a loan and may be approved even if their leave period is unpaid. Fannie Mae guidelines clearly spell out the proper procedure for qualifying an applicant in connection with a maternity leave.<sup>11</sup>

Persons applying for a home loan can be approved based on their pre-leave income or on the income that they receive while being on leave as supplemented by liquid assets not required to close the loan.

WRO conducted 30 maternity leave tests. 11 tests were conducted utilizing in-person site visits, and 19 were conducted by phone. Three of the tests were matched-pair and the remainder were conducted as single part tests.

The familial status/maternity tests were conducted in Putnam, Rockland and Westchester Counties. Of those:

- 2 were categorized as Equal or Not Violative
- 1 was categorized as Invalid
- 1 was categorized as Unclear
- 26 were categorized as Unequal or Violative

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<sup>10</sup> Fair Housing Act of 1968, 42 USC § 3605

<sup>11</sup> Fannie Mae (2017). Selling Guide, B3-3.1-09. <https://www.fanniemae.com/content/guide/selling/b3/3.1/09.html>

## **Disability:**

WRO conducted disability tests in two different ways: 1. Using Source of Income as a protected class; and 2. By requesting a reasonable accommodation for a visually disabled customer. WRO conducted 16 disability tests, with ten of those based on source of income accommodations and six based on a visual/disability accommodation.

Although the FHA does not include source of income as a protected class, the Equal Credit Opportunity Act prohibits discrimination against any applicant “because all or part of the applicant’s income derives from any public assistance program”. So, a person using income such as Social Security Disability Income (SSDI) to make mortgage payments should not be treated differently than other applicants whose income comes from their employment. The Consumer Financial Protection Bureau (CFPB) states that lenders must get a Social Security Administration benefit verification letter to verify income such as SSDI or SSI. Requiring additional documentation such as a doctor’s letter may constitute discrimination because it creates unnecessary hurdles for those with disabilities.

Several of WRO’s tests were conducted to determine whether a lender would reasonably accommodate a blind applicant requesting a reasonable accommodation to have documents provided in electronic format so that documents could be read via screen reading software. The tester requested documents in a text format like Microsoft Word. One tester made multiple calls to the lending institution for this request. In this situation, the tester was told by the agent they did not know the answer to the question of whether or not they could provide the documents in the form requested. Multiple calls later the agent reported that she was continuing to ask management if they could fulfill the request. Ultimately, the agent stated that they could, in fact, provide the documents, but only after multiple calls were made by the tester.

We conducted 16 tests based on Disability. Tests were conducted in Putnam and Rockland Counties. Of those:

- 11 were categorized as Equal
- 1 was categorized as Unclear
- 4 were categorized as Unequal

**Religion:**

WRO conducted five paired tests for religion. For each test, an Arab Muslim protected class tester wore a hijab during her site visits. The control tester was White and did not wear clothing associated with any religion.

We conducted 5 tests based on Religion/National Origin. Tests were conducted in Rockland and Westchester Counties. Of those:

- 1 was categorized as Equal
- 2 were categorized as Unclear
- 2 were categorized as Unequal

**Sexual Orientation:**

Sexual orientation is not a federally protected category under the Fair Housing Act or ECOA, however, under New York Human Rights Law sexual orientation is a protected class regarding credit transactions related to housing transactions (NY Exec. Law § 296-A).

WRO conducted seven matched pair tests for sexual orientation as a protected class. All tests were done in-person. In the tests, the protected class tester mentioned their same-gender spouse when appropriate and the control tester mentioned their opposite-gender spouse when appropriate. All of the tests showed no substantial differential treatment.

We conducted 7 tests based on Sexual Orientation. Tests were conducted in Putnam, Rockland and Westchester Counties. Of those:

- 7 were categorized as Equal
- 0 were categorized as Unequal

**Gender Identity:**

Persons who are gender non-conforming may experience discrimination and unequal treatment in the housing, employment, and public accommodations spaces.

Recent regulations have increased protections for LGBT individuals seeking mortgages. Although the Fair Housing Act does not specifically include gender identity, recent appellate level case law indicates that discrimination against Transgender individuals may be covered under the Act on the basis of sex.

The New York State law explicitly prohibits discrimination based on gender identity, under the New York Code of Rules and Regulations (9 NYCRR §466.13).

We conducted 8 tests based on Gender Identity. Tests were conducted in Putnam, Rockland and Westchester Counties. Of those:

- 7 were categorized as Equal
- 1 was categorized as Unclear
- 0 were categorized as Unequal

### **Source of Income/Section 8 First Time Home Buying Voucher:**

ECOA prohibits discrimination against any applicant “because all or part of the applicant’s income derives from any public assistance program”. The Consumer Financial Protection Bureau, (CFPB) interprets public assistance programs to include those regarding rent and mortgage (12 CFR Appx. Supp. I to § 1002).

The Housing Choice Voucher program (also known as “Section 8”) is a federal government program that provides low-income housing financial assistance. It is most commonly used to assist in payment of rent, but also may be used to provide assistance with first-time homeownership. Section 8 can financially assist homebuyers with monthly mortgage payments or a single grant contributing towards the down payment (42 USC § 1437 (f) (y)).

Stipulations for eligibility in the program, include:

- The applicant must be a Section 8 participant for at least one year and be a first-time home or single parent displaced homemaker.
- The applicant must attend a homebuyer education class and be credit qualified and pre-approved by a mortgage company.

We conducted 7 tests based on Source of Income/Section 8 Home Buying. Tests were conducted in Putnam, Rockland and Westchester Counties. Of those:

- 3 were categorized as Not Violative
- 4 were categorized as Violative
- 1 was categorized as Unclear

## Limited English Proficiency (LEP)

WRO conducted 10 tests to examine whether banks and mortgage companies offer readily available Spanish translations of mortgage documents, which may be necessary for a comprehensive understanding of the lending process for individuals with LEP. People who can read English well can look over an application in detail before they sign it. Not having translated versions for LEP borrowers to refer to may limit their understanding of the application. In February 2018, WRO released a report called “*Fair Lending the Hudson Valley: Access to Home Loans for Hispanic Individuals with Limited English Proficiency*” which documented its findings on testing conducted in this area. This report on WRO’s test findings found that banks and other lenders investigated failed to make Spanish language translations of key mortgage documents available to prospective borrowers who were Hispanic with limited English proficiency, despite the fact that those translations were readily available to the banks.

In releasing this report, WRO partnered with Community Resource Center, located in Mamaroneck, New York, whose mission is “Improving access to and the effectiveness of community services through collaboration, coordination, and integration”. Said their Executive Director, Jirandy Martinez at the time of the release of the report: “Banks in the Lower Hudson Valley need to be serving all of the diverse populations in the area, including the Hispanic community. We are hopeful that this report and the work we and WRO are doing to raise awareness of this issue will result in positive moves by banks and other lending institutions to better and more fairly serve the Hispanic community.”

LEP is not an explicitly protected class under federal law. However, as HUD has noted in its guidance<sup>12</sup>, the linkage between LEP and national origin is intuitive and apparent, and national origin *is* a protected class. Providing translated loan origination documents also does not cause any significant burden to lenders, since they are easily accessible. Fannie Mae and Freddie Mac have jointly prepared Spanish-translated loan documents which are readily available on their websites<sup>13</sup>

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<sup>12</sup> U.S. Dep’t of Housing and Urban Development, Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency, September 14, 2016 (available at <https://portal.hud.gov/hudportal/documents/huddoc?id=lepmemo091516.pdf>) (the LEP Guidance)

<sup>13</sup> <http://www.freddiemac.com/uniform/spanish.html>; <https://www.fanniemae.com/singlefamily/spanish-resources-for-lenders>

We conducted 10 tests based on Limited English Proficiency. Tests were conducted in Putnam, Rockland and Westchester Counties. Of those:

- 1 was categorized as Not Violative
- 9 were categorized as Violative

## **NEXT STEPS AND POLICY RECOMMENDATIONS**

At the writing of this report, the Fair Housing Act has been in existence for 50 years, signed into law in 1968 just after the assassination of Dr. Martin Luther King. Many in the fair housing movement have taken time to reflect on this milestone and to consider the accomplishments of the Fair Housing Act, as well as the work that remains to be done in this area.

When initially enacted in 1968, the Fair Housing Act covered race, national origin, religion and color as protected classes. Since its inception, the law has been expanded to include the additional protected class of sex in 1974 and in 1988 the law was amended to include disability and familial status.

In the Lower Hudson Valley region, we are fortunate to have additional state and local protections including alienage status, source of income, gender identity and sexual orientation to name a few. These additional protections, by their local nature either at the county or state level, represent a patchwork in that they apply in some jurisdictions but not in others.

One of the problems faced in fair housing enforcement is that individuals are not always aware that they have been discriminated against, thus the importance of testing. Generally speaking, fair housing complaints nationwide have been on the rise since the mid-1990's indicating that many individuals have been served by fair housing organizations such as Westchester Residential Opportunities and benefitted from Education and Outreach initiatives.

The testing in this project uncovered some remarkable instances of differential treatment among several protected categories, most notably in the areas of familial status/maternity leave, Source of Income/Section 8 and treatment involving individuals with Limited English Proficiency.

***WRO makes the following recommendations to lenders and consumers in the Lower Hudson Valley region based on this recent testing:***

1. Invest in fair lending training regarding familial status and maternity leave provisions under the Fannie Mae and Freddie Mac guidelines. Our testing indicates that there is a significant amount of confusion on how these guidelines are implemented.

2. Lenders need to seek out information concerning Section 8 home buying vouchers and understand how this program works. Our testing indicates that banks may be rejecting these vouchers in a discriminatory manner.

3. In several cases in WRO's testing investigation, lenders were flummoxed when confronted with a reasonable accommodation request concerning accessing loan documents. Lenders should seek further information on how members of the disabled community can be served more quickly and efficiently.

4. Consumers need to know their rights and protections and they need information on how to respond to discrimination and how to report it.

5. WRO is available to conduct trainings to lenders and their employees in all of the above-mentioned areas and works closely with the Westchester County Human Rights Commission and Rockland County Human Rights Commission to advance fair housing in the region, along with other advocacy groups representing the disabled community, the LGBT community and immigrant rights groups who may work with constituents with Limited English Proficiency. The Human Rights Commissions in Westchester and neighboring Rockland County would benefit from additional funding to adequately do their work.

To all potential victims of housing discrimination, please remember that WRO remains ready to respond to inquiries about discrimination and requests for fair housing training.

## **Agencies and Organizations to Contact for Assistance**

For Fair Housing Assistance and Information on Filing Complaints

Westchester Residential Opportunities, Inc.

470 Mamaroneck Ave., Ste. 410

White Plains, NY 10605

914-428-4507

<http://www.wroinc.org>

For Fair Housing Information and to File Complaints

### ***Federal Government***

U.S. Department of Housing and Urban Development

New York Regional Office

Jacob K. Javits Federal Building

26 Federal Plaza, Ste. 3541

New York, NY 10278

Local office: 800-496-4294; 212-542-7109

National office: 800-669-9777 (English and Spanish); TTY: 800-927-9275

<http://hud.gov/fairhousing>

[http://portal.hud.gov/hudportal/HUD?src=/topics/housing\\_discrimination](http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination)

U.S. Department of Justice (*for discrimination under ADA*)

950 Pennsylvania Ave., NW

Civil Rights Division

Disability Rights Section, 1425 NYAV

Washington, DC 20530

Voice and TTY: 202-307-0663

ADA information: 800-514-0301

TTY: 800-514-0383

<http://www.justice.gov/crt/about/drs>

### ***State Government***

New York State Division of Human Rights

(*for all housing cases*)

1 Fordham Plaza, 4<sup>th</sup> floor

Bronx, NY 10458

888-392-3644; 718-741-8400

TTY: 718-741-8300

<http://www.dhr.ny.gov>

New York State Division of Human Rights

*(for assistance in Putnam, Rockland, and Westchester counties)*

8 John Walsh Blvd. Ste. 204

Peekskill, NY 10566

914-788-8050

<http://www.dhr.ny.gov/how-file-complaint>

New York State Division of Human Rights

*(for assistance in Dutchess, Orange, Putnam, Rockland and Westchester counties)*

7-11 South Broadway, Ste. 314

White Plains, NY 10601

914-788-8050

<http://www.dhr.ny.gov/how-file-complaint>

New York State Office of the Attorney General

Civil Rights Bureau

120 Broadway, 23<sup>rd</sup> floor

New York, NY 10271

212-416-8250

<http://www.ag.ny.gov/civil-rights/complaint-forms>

### ***County Government***

Rockland County Commission on Human Rights

50 Sanatorium Rd., Building G

Pomona, NY 10970

845-364-3886; TTY: 800-662-1220

<http://rocklandgov.com/departments/human-rights>

Westchester County Human Rights Commission

112 E. Post Rd., 3<sup>rd</sup> floor

White Plains, NY 10601

914-995-7710; TTY: 914-995-7754

### ***Yonkers***

City of Yonkers Human Rights Commission

87 Nepperhan Avenue, Room 310  
Yonkers, NY 10701  
914-377-6280

<http://www.cityofyonkers.com/play/departments-g-w/human-rights-/welcome>

## Other Government Agencies and Websites

### ***Federal***

National Council on Disability (*policy*)  
202-272-2004; TTY: 202-272-2074  
<http://www.ncd.gov/policy/housing>

U.S. Access Board (*UFAS standards*)  
<http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-stands-rds/ufas>  
Technical assistance: 800-872-2253  
TTY: 800-993-2822

### ***State***

New York State Justice Center (*special needs*)  
Information and referrals: 800-624-4143; TTY: 800-624-4143  
<http://www.justicecenter.ny.gov>

New York State Office for People with Developmental Disabilities  
866-946-9733; TTY: 866-933-4889  
<http://www.opwdd.ny.gov>

### ***County***

Putnam County Office for People with Disabilities  
845-808-1641  
<http://www.putnamcountyny.com>

Putnam County Office for the Aging  
845-808-1700  
<http://www.putnamcountyny.com>

Rockland County Department of Mental Health  
845-364-2378  
<http://rocklandgov.com/departments/aging>

Westchester County Department of Community Mental Health  
914-995-5220  
<http://mentalhealth.westchestergov.com>

Westchester County Department of Planning  
(*affordable rental and ownership housing listings*)  
914-995-4400  
<http://homes.westchestergov.com/homeseeker>

Westchester County Department of Senior Programs and Services  
914-813-6300  
<http://seniorcitizens.westchestergov.com>

Westchester County Office for the Disabled  
914-995-2957; TTY: 914-995-7397  
<http://disabled.westchestergov.com>