

After 41 years is a Fair Housing Plan Necessary?

In carrying out job duties, a manager and maintenance worker at an apartment complex make statements expressing a preference against African American tenants

The owner and manager of a mobile home park refuse to rent or negotiate for rental based on race

An apartment complex attempts to move Hispanic and African American tenants from a more desirable location to a less desirable location to make room for Orthodox Jews who had been courted as tenants

An apartment complex discriminates against families with children

A property manager enters the dwellings of female tenants without permission or notice, touches female tenants in an unwelcome sexual manner, and takes steps to evict female tenants when they refuse or object to his sexual advances.

So read the Fair Housing Act complaints of six lawsuits filed during the last eight months by the United States Department of Justice. These lawsuits are grim reminders that the promise of the Fair Housing Act, equal housing opportunity for all, remains unmet in America today. From this sampling of suits filed by the United States Department of Justice, our target audiences are categorically predictable, yet constantly evolving in the sense that the participants are continually replaced by new renters, new owners of and persons employed in rental units covered by the Fair Housing Act, new employees of insurance companies that provide liability insurance to covered unit owners and their employees, and new employees of lending institutions that provide financing to persons and organizations purchasing covered rental properties.

While the name may be the same, the face has changed. It is this change that continues to fuel the need for DCRAC to engage in education, outreach, advocacy, and through referrals which result in enforcement of existing laws.

Why a Fair Housing Plan?

Plan your work and work your plan. It is not that we plan to fail. It is that we fail to plan.

Achieving the goal of equal housing opportunity in Delaware requires the coordination of resources devoted to education, outreach, advocacy and enforcement. We partner with agencies such as Human Relations Commission, National Community Reinvestment Coalition, Delaware Attorney General, Delaware Bank Commissioner, Delaware Insurance Commissioner, and federal regulators of financial institutions. Without a plan to address the requirements of state and federal law, Delaware is left with a patchwork of unconnected efforts. Such circumstances do not allow for a measured analysis of progress which in turn permits more focused resource investment.

DCRAC, for its part, is committed to furthering the goal of fair housing in Delaware. This commitment is engrained in our organizational structure, supported by the board of directors, the executive director, and all clinic directors, staff and volunteers who serve the organization. DCRAC's attack on fair housing issues is three pronged: Outreach Clinic, Controversy Clinic, and *Pro Bono* volunteers.

Crosscutting all three prongs, DCRAC is featured each week on cable channels that broadcast in each of Delaware's three Counties. From our participation in this media outlet, DCRAC addresses the kinds of education that consumers need and insurance companies and banks can undertake in the area of fair housing. Underscoring this effort is the recognition that insurance settlements for violations of the Fair Housing Act many times exceed hundreds of thousands of dollars. For banks and other mortgage lending institutions, the inception of a loan on a covered property is an excellent opportunity to provide the borrower with information on liability for owners and employees of rental units under the Fair Housing Act.

Through the Outreach Clinic, DCRAC attends and coordinates forums and fair housing symposia throughout Delaware offering information to the public on fair housing and fair lending requirements and processes. DCRAC also participates in foreclosure prevention seminars where we bring together all parties to attempt to work out amicable resolutions for families and individuals faced with deepening financial calamities. Our work at these seminars has produced real and meaningful relief for families and individuals in dire economic circumstances.

In our Controversy Clinic, DCRAC engages in both one-on-one and systemic advocacy. We deal on an individual basis with fair housing complaints by assisting with administrative filing requirements and follow up after the initial filing. We also assist individuals with foreclosure prevention through counseling them to obtain loan modification. Our systemic advocacy occurs in our representation on task forces devoted to fair housing, mortgage fraud and mediation programs. DCRAC conducts reviews of HMDA data to analyze race and ethnic based demographic trends in lending on both the national and state level. Finally, DCRAC has been an outspoken, and sometimes lone, commentator on bank mergers and the historical practices of merging banks in minority communities. Our organizational funding from groups that have borne the brunt of our comments is testimony to both our fairness and effectiveness in addressing fair housing issues.

A strong panel of *pro bono* volunteers adds heft and weight to our fair housing effort. With 20 hours of work a week from dedicated volunteers, we can better service clients and build effective contacts with fair housing organizations. Such volunteered hours allow DCRAC to address a variety of community groups. These include fair housing advocacy groups, devoted to the needs of particular populations such as persons with disabilities, families with children, immigrants seeking to understand their rights in the fair housing arena, homeless persons seeking to improve their housing circumstances, and racial and ethnic groups. Assisted by volunteers, DCRAC attempts to involve and engage housing providers, such as area housing authorities and large rental complexes, so they can be better aware of the problems of providing moderate and low-cost housing in the community and the particular responsibilities of

managers and employees of such complexes and their affirmative duties under fair housing laws. It is critical that banks and other sources of home loans are aware of DCRAC and our programs so that they are more sensitive to the needs of persons seeking financing for housing and the effect that fair residential lending practices can have on community areas and standards of housing. It is also important to DCRAC that neighborhood organizations and representatives provide to us information, ideas and support in identifying impediments to fair housing choice at the neighborhood level. Through these contacts and with the support of volunteers, we are able to develop and implement actions to address identified problems. In all these enumerated areas, volunteers allow DCRAC to expand its reach into an ever widening circle of circumstances and happenstances that increase our effectiveness and better our communities.

Subsumed within our fair housing agenda is the construct that there can be no fair housing without fair lending. A central historical cause of racial inequality in housing has been government and private redlining of neighborhoods that left individuals living in minority neighborhoods without access to mainstream mortgage lending. No other recent economic crisis illustrates better the saying "when America catches a cold, African Americans and Latinos get pneumonia" than the subprime mortgage meltdown¹ experienced over the last several years.

The presence of sustained residential and commercial investment by mainstream banks and other financial institutions in low-income and minority neighborhoods is a critical factor in maintaining neighborhood vitality². Without competition, mortgage lending in minority communities all too often is typified by subprime loans. In such circumstances, predatory lending (a subset of subprime loans) decimates not only neighborhoods but also generational inheritance. This point is more broadly made with reviewing the growth of alternative lenders in the City of Wilmington. Between 2000 and 2005, the number of alternative lenders in Wilmington increased by 58% (538 to 916). Almost half of this increase (187/378) was accounted for by mortgage loan brokers. DCRAC argues that such an increase could not have been possible without the withdrawal of mainstream lending institutions from minority communities in Wilmington. DCRAC's fair housing program must be vigilant to ensure that all homeowners and homeowner applicants have equal access to competitive mortgage financing.

Even if the headwinds of access to mortgage financing are overcome, many minority applicants must face the challenge of lending policies and requirements related to credit history, current credit rating, employment history, and general character. Such constructs permit lenders wide latitude to evaluate a loan applicant and we know that many times prospective borrowers have been denied loans when they are an acceptable risk. Many times such conduct translates into discrimination against minorities.

In all of these manifestations, DCRAC is committed to rooting out fair housing discrimination through a considered and measured approach. We are certain that our program has had a meaningful impact on individuals. Perhaps most importantly, having an effective fair housing plan in place gives DCRAC confidence going forward that we are maximizing our use of dollars and resources to address the most basic human need of every person - a safe place to live and call home.

¹ <http://www.civilrights.org/publications/reports/fairhousing/foreclosure-crisis.html>

² Fair Housing Planning Guide, Volume I, Chapter 5 Section 3, p. 124.

DCRAC Background--briefly

Mission

DCRAC envisions Delaware to serve consumers of financial services by providing them the needed education, necessary consumer protections, convenient and competitive financial services, and an environment where they are heard. Our mission is to ensure equitable treatment and equal access to credit and capital for the underserved populations and communities throughout Delaware through advocacy, education, legislation, and outreach.

Our purpose is two-fold:

Through education and outreach (direct services) we develop consumers of financial services who can bank with and borrow from the mainstream financial service providers.

Through advocacy and legislation (impact services) we strive for equal access to credit and asset-building opportunities for all Delawareans among our financial systems, their regulators, our legislators, and the larger Delaware.

History

We were founded in 1987 because a study of Home Mortgage Disclosure Act data revealed that African Americans were more than seven times more likely to be denied home mortgages than white Americans. While we continue our role as CRA advocates (our mission focus), we have built a constituent base by remaining market centered. We have launched new and creative initiatives designed to make DCRAC relevant in the lives of Delawareans. In December 2007 we became the first Delaware non-profit (and 5th in the nation) to receive the Seal of Excellence. We are a very strong organization. Bigger circles tighter connections would appropriately define our relationship with the Delaware community.

Since our founding, we have emphasized community development needs of the low- to moderate-income individuals and communities in affordable housing, neighborhood revitalization, and small business development. Our primary role remains leveraging private capital for the support of community development in Delaware (including housing and small business counseling). We believe that educated consumers make our state and our community stronger. We credit our service growth to focusing on the market (our clients) and staying true to our mission (through the support of our well represented Board of Directors). As predatory lending practices and housing and lending discrimination continue, our services have become even more vital to the diverse demographics of the state.

DCRAC, for its part, is committed to furthering our goals of developing consumers of financial services who can bank with and borrow from the mainstream financial service providers and ensuring equal access to credit and asset-building opportunities for all Delawareans among our financial systems, their regulators, our legislators, and the larger Delaware. This commitment is engrained in our organizational

structure, supported by the board of directors, the executive director, and all clinic directors, staff and volunteers who serve the organization.

Role of the board

The Board's purpose is to advise, govern, oversee policy and direction, and assist with the leadership and general promotion so as to support the mission and needs. The board's major responsibilities are:

- Organizational leadership and advisement.
- Formulation and oversight of policies and procedures.
- Financial management, including adoption and oversight of the annual budget.
- Oversight of program planning and evaluation.
- Personnel evaluation and staff development.
- Review of organizational and programmatic reports.
- Promotion of the organization.
- Fundraising and outreach.
- Involvement in long-term and short-term planning.

Members of the Board share these responsibilities while acting in the interest of DCRAC. Each Member is expected to make recommendations based on his or her experience and vantage point in the community.

Expectations of Board Members:

- Become familiar with finances, budget, and financial/resource needs.
- Understand the policies and procedures.
- Engage in long-term and short-term planning.
- Participate in the development, oversight, and evaluation of policies for effective management of programs and resources.
- Provide approval of budget and assessment of financial performance; including review of organizational resources spent on programs, administration, and fundraising efforts.
- Provide approval for the organization's personnel policies.
- Promotion of the organization; including fundraising and outreach, commensurate with each Member's unique experience and vantage point in the community.
- Attend and participate in meetings on a regular basis, and special events as able.
- Provide guidance, supervision, and evaluation of the Executive Director as necessary.
- Participate in the selection, orientation, education, and training of new Members as needed.
- Board Members must engage in an annual evaluation of its own performance and develop recommendations for its improvement.

DCRAC's Fair Housing Plan is a Delaware imperative

Victims of predatory lending are victims of more than just financial bullying.³ DCRAC is the agency one turns to for answers to predatory lending issues in Delaware.⁴

Although the AI devotes 18 pages to HMDA and CRA,⁵ it ignores it when developing its recommendations to remove housing impediments.⁶ This oversight demonstrates the seriousness of the need that we meet in this community. Delaware has not developed an action plan to address this impediment, but DCRAC has.

Since 1987 we have implemented our plan to affirmatively further fair housing in Delaware. Before DCRAC, African Americans were seven times more likely to be denied a home loan as whites. We have been the lone voice on these issues in Delaware and know about predatory lending practices.⁷ We provided extensive comments to the federal regulators on the rise in exotic mortgages long before former Chairman Greenspan recognized it. As early as 1999 we expressed concerns over credit scores and were teaching our constituents how to build good credit. We forced two regulated Delaware Banks⁸ to exit the lucrative business of payday lending and submitted the charter for a low income credit union in October 2008—based on NCUA letter—we are revising our business plan. Failure to fund us will have a devastating impact on our ability to carry out our programs and could deprive the community of its lone grassroots advocate for economic justice. No other Delaware agency addresses the issue of predatory lending through each and every programmatic activity.

“Is housing discrimination, for example, still such a vast problem that only the concerted efforts of the Justice Department can remedy the harm?” says The Washington Post editorial of September 9, 2009 in response to the proposed restructuring of the Civil Rights Division at the Department of Justice. If that mood prevails, local organizations such as DCRAC will have to assure that housing discrimination complaints are fully addressed through our Outreach and Controversy Clinics.

³The News Journal, an article by Rashmi Rangan, July 6, 1997.

⁴<http://www.hud.gov/local/de/homeownership/predatorylending.cfm>

⁵<http://dspace.udel.edu:8080/dspace/bitstream/19716/231/8/Private+Impediments.pdf> Pages 61 to 79.

⁶<http://dspace.udel.edu:8080/dspace/bitstream/19716/231/11/Recommendations.pdf> Pages 95 and 96.

⁷<http://www.housingforall.org/rashmi.htm> and <http://www.fdic.gov/regulations/laws/federal/04cRANGAN2cra.html>

⁸<http://www.delawareonline.com/apps/pbcs.dll/article?AID=/20060223/BUSINESS/602230328> and <http://www.capegazette.com/storiescurrent/1105/countybank111105.html>

Impediments to Fair Housing Choice in Delaware: Existence, nature and extent of the problem

Residential segregation is extensive especially in the three main cities in Delaware--Wilmington⁹ (large concentrations of African American), Dover¹⁰ (African American and Latinos), and Georgetown.¹¹ In 2000, NCC had 20.2% African American (37.2% in Wilmington) and 5.3% Latinos; Kent County had 20.7% African Americans (37.2% in Dover) and 3.2% Latinos; Sussex County had 14.9% African Americans and 4.4% Latinos with the fastest rate of growth in Latino arrivals.¹² As such, all our programs are offered in English and Spanish. We operate from two locations: Wilmington in New Castle County and Georgetown in Sussex County—southern-most County).

While others have focused on the supply of affordable housing, DCRAC has focused on training families to explore their own finances to make housing affordable for themselves. **Financial education and information about the Landlord tenant code becomes crucial** as a growing number of cost burdened¹³ consumers of housing flood the market with impaired credits (as a result of losing their home among others) and reduced incomes (the local economy). For many Delawareans, information could be the catalyst that saves their future while misinformation could add to a growing number of families in shelters or on the streets. Nearly 43% of Delaware's renter households were cost-burdened in 2005¹⁴.

According to the Delaware State Housing Authority's Consolidated Plan, a few of the needs identified include:

1. More than 18 percent of Delaware's homeowners and 43 percent of Delaware's renter households were cost-burdened in 2005, paying more than 30 percent of their income for housing.
2. A full-time childcare worker, preschool teacher, or retail salesperson earning their occupation's median wage cannot afford the fair market rent for a 1- bedroom apartment anywhere in Delaware.
3. Two of the top three industries projected to create the most new jobs in Delaware from 2004-2014 had 2006 average annual wages of less than \$26,000.
4. From 2000 to 2015, the number of households in Delaware is projected to increase four percent faster than the population.

⁹ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/12/Residential+Segregation.pdg> page 23

¹⁰ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/12/Residential+Segregation.pdg> page 31

¹¹ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/12/Residential+Segregation.pdg> page 37

¹² <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/9/Profile+of+Delaware.pdf> page 16 and 17.

¹³ Cost burdened households pay >30% of their income for housing.

¹⁴ www.destatehousing.com/information/pubs.shtml Consolidated Plan at 3.

Of the estimated 6,758 homeless people in Delaware, barriers to housing include the following¹⁵:

1. Lack of income;
2. Poor credit history;
3. Criminal background history;
4. Behavioral health issues;
5. Lack of mailing address;
6. Literacy problems.

These same barriers impact the very poorest Delaware households that are paying 50% or more of their income for housing, making it impossible for them to have a home and still meet other basic needs; a desperate and precarious family situation in which child health, school achievement, nutrition, and family stability suffer greatly.

While the majority of renter units in all three counties are affordable to households with incomes over 80% of Median Family Income (MFI), far fewer renter units are affordable to households with incomes below 80% of MFI and the lowest income households, with incomes below 30% of MFI, have very few affordable housing options¹⁶.

With personal income tax revenues reduced by 3.3% and corporate tax revenues at about 50% less than FY 08, the Delaware Economic and Financial Advisory Council (DEFAC) projections portray a grim economic future. For many Delawareans, information could be the catalyst that saves their future while misinformation could add to a growing number of families in shelters or on the streets.

Unfortunately income has not kept pace with rising cost, leading to a growing gap between what Delawareans can afford to pay for housing and what it costs. This creates both economic and quality-of-life problems for Delawareans. As of 2005, 54,525 owner-occupied households in Delaware were cost-burdened, paying 30% or more of their incomes for housing costs. Of these households, 34,132 have incomes below 80% of MFI. Additionally, 37,263 renter households in Delaware were cost-burdened which equates to 42.5% of all renter households. Alarming, 97.7% of these cost-burdened renter households have incomes below 80% of MFI. Renter households that are cost-burdened and have incomes below \$20,000 account for 19,385, making their housing situation extremely precarious. In addition to the realities of poverty, this segment of the population could benefit immensely from information and education about smart money choices.

¹⁵ www.destatehousing.com/information/pubs.shtml Consolidated Plan at 21

¹⁶ Id. At 3.

At our seminars we recognize that over 80% of those who participate have never worked with a budget or a spending plan. Much of their cost burdens could be attributed to the high cost of borrowing and poor repayment habits that stem from ignorance about credit. Our seminar targets the extremely low income households and prepares them to become smart consumers of goods and services.

Housing Discrimination is alive and well. Even though we do not have access to the number and nature of complaints that were filed with the Human Relations Commission, we know that 80% of those who are discriminated against do not file a complaint. HUD sponsored HDS 2000 documents the existence of racial and ethnic discrimination in US housing markets. According to HDS 2000, in rental markets, white favored treatment over African Americans is still 21.6% and over Hispanics it is 25.7% and in the homeownership market white home buyers are consistently favored over African American home buyers in 17% of tests and over Hispanics they are favored 19.7%¹⁷.

The foreclosure crisis impedes HUD's goals of increasing homeownership. Foreclosures will continue to rise and are expected to reach 6,000 in 2009—three times the pre-2007 numbers¹⁸. The need is so severe that even the Delaware Courts took action by ordering mediation of foreclosure complaints.¹⁹ Foreclosures lead to family instability as well as community devastation. Homeownership is the main asset in many families and communities assets. Loss of homeownership to foreclosure impacts individuals, families, communities, governments, and others in a variety of ways.

Information about Delaware Foreclosures was researched by The Reinvestment Fund at the request of the Delaware State Bank Commissioner's Office. Published in August 2006, it provided a stark look at how the foreclosure issue has been, is and will be affecting Delaware. Foreclosures are concentrated in a number of LMI neighborhoods, in areas with significantly higher percentages of African American households²⁰. In New Castle County the median block group is 7.9% African American, foreclosure properties, however, sit within block groups that are typically 19.2% African American²¹. The sheer number of homeowners that are projected to be impacted by the foreclosure crisis in Delaware demands individual advocacy.

Delaware is one of the smallest states in the nation and is home to an estimated 311,000 households. It boasts one of the highest median home prices in the nation (\$270,000) and has been one of the most active home sale markets in the last couple of years. 73% of households owned their own homes. To better understand what types of properties and transactions are in foreclosure -- and what might be

¹⁷ http://www.urban.org/UploadedPDF/410821_Phase1_Report.pdf pages iii to v.

¹⁸ <http://courts.delaware.gov/Courts/Superior%20Court/> Administrative Order No. 2009-3. At 1.

¹⁹ The News Journal editorial dated September 2, 2009.

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causing the rise – The Reinvestment Fund obtained foreclosure filings for the period 2000 through 2005, mapped the location of these properties and analyzed their mortgage histories. This analysis revealed:

1. Many homeowners in Delaware went in and out of foreclosure more than once during this time period. When the list of filings is distilled to unique properties in foreclosure, the increase in the actual number of properties in foreclosure was closer to 23.6%.
2. Foreclosure filings are disproportionately concentrated in New Castle County. 54% of all owner occupied housing units in Delaware sit within New Castle County, yet 76% of all foreclosure filings occurred in New Castle. Foreclosures are concentrated in a number of LMI neighborhoods including Wilmington's Browntown, Hedgeville, Eastside and Southbridge; as well as Elsmere and Middletown in New Castle County; Milford, Harrington, Dover and Smyrna in Kent County; and Laurel and Seaford in Sussex County.
3. Foreclosure filings are concentrated in areas with significantly higher percentages of African American households and only slightly lower home values. Home appreciation rates and incomes are virtually the same. In New Castle County, the median block group is 7.9% African American. Foreclosure properties, however, sit within block groups that are typically 19.2% African American.
4. The median homeowner in foreclosure purchased their home in 1998 and paid between \$80,000 and \$110,000 for their home (depending upon the year of purchase).

The Foreclosure Prevention Task Force recommended more education as well as increased capacity of housing counselors. Since this report, the economic crisis has added to Delaware's woes. In 2004, Delaware still saw employment growth at 2.7% and in August 2009 our unemployment rate is 8.3%. The 96 year old Hercules is gone and the 60 year old Chrysler has closed its operations. Employers are instituting lay-offs or pay cuts or both. The state had to adjust its dismal revenue projections²² through pay cuts to its employees. Sub-prime foreclosures are expected to peak in mid to late 2009, but foreclosures caused by the Delaware economy are still a moving target.

In 2007, the Lt Governor of Delaware convened a Task Force to size the foreclosure issue in Delaware and to identify some strategies to address the growing foreclosure numbers. In 2007, there were 164,590 outstanding conventional mortgages--11% (18,876) sub-prime; 3,452 were seriously delinquent conventional mortgages--51% (1,776) sub-prime; of the delinquent sub-prime mortgages, 67% (1,042) were Adjustable Rate Mortgages²³.

The interim report published in November 2007, cites a Delaware State Housing Authority's Delinquency Analysis presented on November 20, 2007, as of the end of the second quarter of 2007:

²² www.wgmd.com/index2.php?option=com_content&do_pdf

²³ In the interim report published in November 2007, it cites a Delaware State Housing Authority's Delinquency Analysis presented on November 20, 2007, as of the end of the second quarter of 2007.

1. There were 164,590 outstanding conventional mortgages in Delaware. 11% (18,876) of these loans were considered sub-prime mortgages.
2. There were 3,452 seriously delinquent conventional mortgages in Delaware. 51% (1,776) of these loans were sub-prime mortgages.
3. Of the delinquent sub-prime mortgages, 67% (1,042) were Adjustable Rate Mortgages (ARM).

There can be no fair housing without fair lending. The low- and moderate-income minority community is targeted for high cost loans. As a result, their credit is impaired and their disposable income is expended in fees. Consequently, their housing choices are limited. Credit and affordable housing are a major impediment to desegregation. Our efforts, along with other national consumer advocates, led to reform in HMDA disclosure. We analyze and publish HMDA reports and respond to media coverage of such studies. Such data analysis and reporting is crucial because it holds our lenders accountable. Our unique advocacy and service is recognized as inextricable to the economic well-being of our communities. Without our services, lending practices in Delaware would be even more segregated, predatory, and financially devastating to low-income families. Prior to DCRAC African Americans were seven times more likely to be denied mortgage loans than white borrowers. Our comments on bank mergers have resulted in financial and resource commitments to Delaware's distressed communities. Delaware is a banking state. We have fewer consumer protections and no usury laws. As such, our vulnerable are made more vulnerable.

The impacts of redlining continue in 2009. Less favorable terms have been the only ones available in the neighborhoods in which the minority borrowers reside, or in which the dwellings they plan to purchase are located²⁴. Often also, the limited lending options available in such neighborhoods have been offered by lenders who operate only in such areas²⁵. Because some banks or savings and loan institutions in cities will not make loans in minority neighborhoods, minority borrowers cannot benefit from competitive loan offerings available in the larger market.²⁶

According to focus groups in New Castle,²⁷ Kent,²⁸ and Sussex,²⁹ a major impediment to desegregation is access to credit and credit practices—these are also identified as impediments to housing choice in the analysis of impediments. The growth of alternate lenders in Wilmington, suggests that lower income communities are financially limited in their housing choices when they have to pay a high cost for credit³⁰. Equity drains impose barriers to HUD achieving its policy goal of increasing homeownership.

²⁴ Fair Housing Planning Guide, Volume I, Chapter 5 Section 3 at 135

²⁵ Id.

²⁶ Id.

²⁷ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/6/Evidence+of+Housing+Discrimination.pdf> page 51.

²⁸ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/6/Evidence+of+Housing+Discrimination.pdf> page 52.

²⁹ <http://dspace.udel.edu:8080/dspace/bitstream/19716/231/6/Evidence+of+Housing+Discrimination.pdf> page 53.

³⁰

Discrimination in lending continues. A central historical cause of racial inequality in housing has been government and private redlining of neighborhoods that left individuals living in minority neighborhoods without access to mainstream mortgage lending. No other recent economic crisis illustrates better the saying "when America catches a cold, African Americans and Latinos get pneumonia" than the subprime mortgage meltdown³¹.

1. The presence or absence of sustained residential and commercial investment by banks and other financial institutions in low-income and minority neighborhoods is the most important factor in maintaining neighborhood vitality³².
2. Lending policies and requirements related to credit history, current credit rating, employment history, and general character of applicants permit lenders to use a great deal of discretion and in the process deny loans even though the prospective borrower would have been an acceptable risk³³.
3. The subjectivity built into the loan process is a principal cause of discrimination in lending—after controlling for all objective indicators of applicant risk, lenders still rejected members of minority groups 56% more often than otherwise identical whites—for whites, “compensating factors” are considered at a much higher rate than for Blacks or Hispanics³⁴.
4. Minority home buyers face discrimination from mortgage lending institutions.³⁵
5. Minority communities are flooded with sub prime loans.³⁶
6. Minorities are more likely to be offered a high interest rate loan.³⁷

	1999	2000	2001	2002	2003	2004	2005
Growth of alternate lenders							
Licensed Lenders	282	354	316	332	369	411	463
Motor Vehicle Sales Finance	99	97	96	83	76	83	78
Mortgage Loan Brokers	76	118	135	149	162	227	263
Transportation of Money and Valuables	4	4	4	4	4	4	4
Cashing of Checks, Drafts, and Money Orders	15	12	9	23	31	36	42
Sale of Checks and Transmission of Money	19	18	25	25	25	33	40
Pre-need Funeral Contracts	43	43	44	44	44	44	25
Business and Industrial Development	0	1	1	1	1	1	1
Totals	538	647	630	661	712	839	916

³¹ <http://www.civilrights.org/publications/reports/fairhousing/foreclosure-crisis.html>

³² Fair Housing Planning Guide, Volume I, Chapter 5 Section 3, p. 124.

³³ Id. At 135.

³⁴ Id.

³⁵ http://www.urban.org/UploadedPDF/mortgage_lending.pdf The Urban Institute study (sponsored by HUD) titled *Mortgage Lending Discrimination: A review of existing evidence* page 2

³⁶ http://www.dcrac.org/v7i1_web.pdf Delaware CRA News, Volume 7 Issue 2

7. An NCRC study finds that as the composition of a neighborhood becomes more concentrated with African American residents, sub prime lending in mortgages and refinances rises and as the neighborhood becomes more elderly, subprime refinance lending rises—this is true even after holding income, credit worthiness and housing market factors constant³⁸.
8. Our own HMDA analysis supports it.³⁹

³⁷ http://www.dcrac.org/vol_10_issue_2_English.pdf Delaware CRA News, Volume 10 Issue 2.

³⁸ http://www.omm.com/omm_distribution/newsletters/client_alert_financial_services/pdf/ncrcdiscrimstudy.pdf pp. 7-9.

³⁹ <http://www.housingforall.org/rashmi.htm> and <http://www.fdic.gov/regulations/laws/federal/04cRANGAN2cra.html>

DCRAC's Response

Outreach Clinic

Indirect Outreach is offered to at least 2,000 Delawareans annually through toll free number, presence on the web⁴⁰, weekly two-hour radio program, monthly one-hour Spanish radio, weekly television programs, quarterly newsletters, and media coverage of consumer finance issues⁴¹. Our **television** program is aired live in New Castle County. Often we have guests⁴² in which case we spend some time preparing with our guests prior to the live broadcast. Once the show airs, we get dubs and federal express them to Sussex and Kent for airing in each County. In both Counties, we now air each week from 8 pm to 9 pm. On April 1, 2006, we launched a weekly and monthly presence on the **radio** that airs out of Millsboro (Sussex). This radio program is heard on the web. Our **newsletters** are published each quarter. Our circulation currently stands at 10,000. Once the material is compiled, we send it to HUD for approval. Then it is sent to printers. When our newsletters arrive, staff and volunteers tediously label each newsletter, gather these labeled newsletters and take them to Quigley Boulevard Post Office for bulk mailing. Newsletters are also posted on the web. Inherent in effective outreach is the task of maintaining our contacts data base. As strong community partners, we are invited to **outreach events** conducted by our partners. This requires us to make copies of pertinent materials, travel to the location, and be stationed at tables to answer questions. Our diverse partnerships enable us to reach a broader audience in Delaware.

Direct outreach helps us reach another 500 Delawareans through our 3 Fair Housing Symposia and 4-6 Mortgage Matters! annually.

Fair Housing/Fair Lending Symposia In the month of April we host fair housing/fair lending events in partnership with other FHIP and FHAPs since 2000. In 2008, we hosted the first annual conference on disability. We will host three fair housing events in April—one in each County and expect to serve about 100 who attend these three events. Our goal is to inform and educate consumers and suppliers of housing about fair housing laws. Our processes include working with partners, aggressive media campaign, educating the participants on the day of the event, data entry, and when the issue is resolved, implement file closure process. We provide in-kind contribution from our talented presenters and organizers. The Fair Housing Act prohibits discrimination in the sale, rental, and financing of dwellings on the basis of race, color, national origin, religion, sex, familial status, and disability. The Landlord-Tenant Code articulates the rights and responsibilities of both the landlord and the tenant. Delawareans have a right to be informed about their rights and responsibilities.

⁴⁰ www.dcrac.org

⁴¹ The World is watching your credit score, The News Journal, May 8, 2006

⁴² **Promote participation.** Our HUD guests have included Milton Pratt, Carolyn Peoples, Wanda Nieves, Elvis Solivan, and others.

Mortgage Matters! Our goal is to prevent foreclosures, and we help clients at all stages of the process. An additional goal is to retain Delaware's prestigious status as a homeowner state—at 73% Delaware ranked among the states with the highest percentage of homeowners in the nation. In addition to providing information and demanding an anti-predatory lending agenda, we work with families facing foreclosures by negotiating loan modifications with their lenders or servicers.

We will host two Mortgage Matters! each year. These sessions are five hours in duration; and over two days, sessions will be held in two of the three Delaware counties of New Castle, Kent and Sussex. We invite lenders and servicers to join us and to notify their clients that they will be available at the session to speak with them one-on-one. We schedule with about three or more servicers who attend these events where homeowners receive education about finances and the mortgage and foreclosure process.

DCRAC has been working with the State Bank Commissioner's office for the past several years on marketing and outreach to individuals facing foreclosure. The challenge has always been to get homeowners before they reach the foreclosure state, as well as to reach those in foreclosure to help determine if their home can be saved. In 2008, the Bank Commissioner's office turned over the management of these events to DCRAC. Although in 2009 the Attorney General's office is implementing similar events, DCRAC will continue to provide Mortgage Matters! to our constituency. Our program components include marketing and outreach, Financial Education, access to lenders/servicers to discuss issues, one-on-one counseling and intervention on behalf of the homeowner with the lender, and networks with local partner banks to escalate issues when necessary.

We have a track record of offering Mortgage Matters! since 2007 when we offered regular forums on Options to save your Home, partnered with the AAUW and LWV to present at their housing forums on issues related to affordable housing, options to save home, and discrimination in housing. Between January 2008 and May 2008, over 1,000 attended these events. Our processes include client intake, assessing possible resolutions, follow-through, data entry, and upon issue resolution, implement a survey and close the file.

Without the right mechanism to inform the community about available resources, the rights of the protected classes are in jeopardy because they do not know where to turn. Our outreach efforts are highly acclaimed and federal funders such as IRS and HUD have invited us to train organizations funded by them. Our television program (since 1999) was launched because we understood that many Delawareans have tuned themselves out of regular print media, or cannot read or write. We have used every medium available to us. We publish newsletters (since 1995); maintain a web presence (since 1999) and a radio presence (since 2006). In strong partnerships with those that provide direct services, we deliver education directly to thousands of Delawareans (seminars, symposia, conferences, etc.).

- a. Our three Clinics promote ALL our events. Our television and radio programs are perhaps the most effective outreach mechanism we have. They reach a large audience

of over 100,000 subscribers statewide. Our events are also promoted in our newsletters, and internally through our board of directors and volunteers.

- b. We use free advertising in print (press releases in media in each County and Delaware Money School with quarterly circulation of 20,000), radio (Public Service Announcements in each County), and television (6ABC).
- c. To reach the immigrant community, we work with the League of Women Voters' New Citizens Project.
- d. To reach the low income community, our Credit Clinic works with Shelters in the state of Delaware.
- e. To reach a new audience, we invest in strategic partnerships. We have partnered with community colleges as well as community centers and churches in each County.
- f. To reach and connect with an audience that would not traditionally come to a housing event, forum, or seminar we staff tables at events hosted by our partners in each County.
- g. We invite our partners to speak at fair housing/fair lending events, our television and radio programs, request them to write editorials and op-ed columns, and engage in a strategic outreach to our community.
- h. We develop fair housing messages that speak to our diverse audiences. We continue to use other non-traditional outreach activities such as: flyer drops, door-to-door informational delivery, strategic placement of our materials, Public Service Announcements, call-in to radio talk shows.
- i. We continue to build strategic partnerships with churches, governments, non-profits, realtors, lenders, insurers, schools, colleges, civic associations, community centers, etc.
- j. We will invest our limited resources in identifying a few key volunteer spokespersons who engage in delivering our message to broad audiences.

Controversy Clinic

Client Assistance with fair housing and fair lending violations Throughout our history we have served our clients who believe they are victims of housing or lending discrimination by helping them file complaints, work with them through the process, and remain committed to their case until their disputes are resolved.

Client Assistance through loan modifications As the foreclosure crisis threatens the stability of our communities DCRAC has ramped up its Housing Clinic to serve 100 Delawareans faced with foreclosure through mortgage modifications.

Our goal is to provide direct assistance to 100 Delaware homeowners and refer another 100 Delawareans to a housing counselor, Human relations Commission (for fair housing violations), to NCRC for fair lending violations, to the Attorney General for mortgage fraud, and the Bank Commissioner for lending improprieties. During our contact with our community, we also become aware of new issues that impede goals of affirmatively furthering fair housing in Delaware. We bring these issues to the attention of HUD. Three recent issues we brought to HUD's attention were:

1. City of Wilmington's aggressive collection (on water and taxes) processes that added to a growing number of foreclosures.
2. Growing numbers of African American Section 8 tenants who have contacted DCRAC about alleged unlawful evictions.
3. Anecdotal stories about Latino homeowners being referred to collections versus others who are referred to loss mitigation.

Pledge

I, the counselor, pledge to

1. Treat you with the utmost respect and listen to you.
2. Keep you informed about your case, all available alternatives, and other resource that may help you.
3. Maintain confidentiality of your information, sharing it only for purposes of resolving your issue.
4. Leave messages that do not violate our confidentiality pledge to you.
5. Contact you in advance if I am unable to make my appointment due to circumstances beyond my control.
6. Respond to your request for information or your telephone call promptly.
7. Return all your documents to you when we close our files.
8. Work diligently toward resolution of your issue or helping you achieve your short-term financial goals.
9. Ask for relevant information because it is needed to achieve your goals.
10. Establish realistic goals and objectives today so that we may achieve them together.

I, the client, pledge to

1. Treat you with utmost respect, listen to you, do my homework, and be patient.
2. Recognize that you work with many other clients and therefore, I will limit my contact with you to the extent that is reasonable.
3. Contact you in advance if I am unable to keep my appointment due to circumstances beyond my control.
4. Respond to your request for information or your telephone call promptly.
5. Keep you updated on any changed circumstances (address change, job gain/loss, etc.).
6. Work diligently toward resolving my issue or achieving my short-term financial goals.
7. Provide you with the relevant information because it is needed to achieve my goals.
8. Establish realistic goals and objectives today so that we may achieve them together.

If you believe we discriminated against you, please note that you may file a complaint with: **Low Income Tax Clinic Program:** Director, Office of Equal Opportunity Program, Department of the Treasury, 1500 Pennsylvania Avenue, NW, Metropolitan Square--Room 6068, Washington, DC 20220 **Fair Housing Initiative Program:** Office of Fair Housing and Equal Opportunity, Department of Housing and Urban Development, Room 5204, 451 Seventh St. S, Washington, DC 20410-2000

Universal Intake Form

PLEASE PRINT

How were you referred to us? _____ If previous client, Counselor's Name: _____

Borrower Name: _____

First _____ M.I. _____ Last _____

Social Security # _____ Date of Birth _____ Race Ethnicity (Hispanic/Non-Hispanic) _____

Address: _____

Street Address _____ City _____ State _____ Zip _____

Home Phone: _____ Cell Phone: _____

Employer: _____ Annual Income: Gross \$ _____

Marital Status: Married Separated Unmarried (single, divorced, widowed) # of People in Household? _____

Other Income? * Please identify source and amount. _____

Co borrower Name: _____

First _____ M.I. _____ Last _____

Social Security # _____ Date of Birth _____ Race Ethnicity (Hispanic/Non-Hispanic) _____

Address: _____

Street Address _____ City _____ State _____ Zip _____

Home Phone: _____ Cell Phone: _____

Employer: _____ Annual Income: Gross \$ _____

Other Income?* Please identify source and amount. _____

Work Phone: _____ Email Address: _____

Marital Status: Married Separated Unmarried (single, divorced, widowed) _____

Other Income? * Please identify source and amount. _____

***Alimony, child support, or separate maintenance income need not be revealed if the Borrower or Co-Borrower does not choose to have it considered for repaying this loan.**

Do You Want to Keep Your Home? _____ Are you currently living in the home? _____

Name of Original Mortgage Company: _____

Name of Current Mortgage Company: _____

Have You Contacted Your Lender/Service? Yes _____ No _____ If Yes, Last Contact Date: _____

Loan Number: _____ Current Value of Your Home: _____

Type of Mortgage: _____ FHA _____ VA _____ Conv. _____ ARM _____ 80/20 _____ 30 -Yr Fixed _____

Other Identify: _____

Monthly Mortgage Payment: _____ Term: _____ Interest Rate: _____

Date Last Mortgage Payment Made: _____ How Many Months Past Due Are You? _____

Have You Been Served Legal Papers? _____ Do You Have a Second Mortgage? _____

If Yes, With Whom?: _____

Ever Had a Loan Modification / Forbearance Agreement? _____ When? _____

Have You Filed Bankruptcy? _____ When? _____

Have You Ever Worked with Another Agency to Remedy Your Mortgage Default? _____

If Yes, Agency's Name: _____ Counselor: _____ Payments to Agency (if any):

\$ _____

Universal Intake Form

Monthly Income: Borrower:		Monthly Income: Co-Borrower	
Wages (<i>before taxes</i>)	\$ _____	Wages (<i>before taxes</i>)	\$ _____
Unemployment Income	\$ _____	Unemployment Income	\$ _____
Child Support/Alimony*	\$ _____	Child Support/Alimony*	\$ _____
SSI/SSDI	\$ _____	SSI/SSDI	\$ _____
Retirement/Pension	\$ _____	Retirement/Pension	\$ _____
Rents received	\$ _____	Rents received	\$ _____
Other	\$ _____	Other	\$ _____
Gross Monthly Income:	\$ _____	Gross Monthly Income:	\$ _____
Net Monthly Income**:	\$ _____	Net Monthly Income**:	\$ _____

***Alimony, child support, or separate maintenance income need not be revealed if the Borrower or Co-Borrower does not choose to have it considered for repaying this loan.**

**Gross income, less Federal/State/Local taxes, FICA, 401K deductions, etc.

Besides income sources, please circle additional resources available to pay towards defaulted mortgage:
 401(k), 403(b), CDs, IRAs, Money Market, Family/Friends, Other Amount available: \$ _____

	Monthly	Annual	Total
Total Mortgage Payment			
(Principal & Int., Property Taxes, H/O Insurances, H/O Ass'n Dues)	\$ _____	\$ _____	
If not escrowed, Property Taxes	\$ _____	\$ _____	
If not escrowed, H/O Insurance	\$ _____	\$ _____	
If not escrowed, Homeowner Associations Dues -	\$ _____	\$ _____	
Auto Expenses (gas, maintenance, etc.)	\$ _____	\$ _____	
Auto Insurance:	\$ _____	\$ _____	
Credit Cards	\$ _____	\$ _____	
Child Care, Alimony, Child Support:	\$ _____	\$ _____	
Food (Groceries, Eating Out, Snacks):	\$ _____	\$ _____	
Utilities (gas, electric, water, sewer, and garbage)	\$ _____	\$ _____	
Communications (cell phone, telephone, internet)	\$ _____	\$ _____	
Miscellaneous Spending Money:	\$ _____	\$ _____	
Auto Loans: Year _____ Make & Model _____	\$ _____	\$ _____	\$ _____
Auto Loans: Year _____ Make & Model _____	\$ _____	\$ _____	\$ _____
Installment Loans:	\$ _____	\$ _____	\$ _____
Medical Expenses:	\$ _____	\$ _____	\$ _____
Student Loans:	\$ _____	\$ _____	\$ _____
Home Equity Loans, outstanding balances	\$ _____	\$ _____	\$ _____
TOTAL MONTHLY EXPENSES:	\$ _____		
MONTHLY SURPLUS/SHORTFALL			
(Total Monthly Income minus Total Monthly Expenses)	\$ _____		

Universal Intake Form

1. I/we represent that I am/we are currently occupying the property securing the loan as my/our primary residence. If I am /we are currently occupying the property, I/we also represent that I/we intend to continue occupying the property as my/our primary residence.
2. Under penalty of perjury, I/we certify that all documents and information that I/we provide to the Housing Counselor and the Lender/Servicer, including the documents and information regarding my eligibility for any modification or eligibility for any Foreclosure Mediation Program, are true and correct and accurately reflect my financial status. My Lender/Servicer may discuss, obtain and share information about my mortgage and financial situation with third parties regarding a possible alternative to foreclosure.
3. I/we understand and acknowledge the Lender/Servicer may investigate the accuracy of my/our statements, may require me/us to provide supporting documentation, and that knowingly submitting false information may violate state and Federal law.
4. I/we understand that if I/we have intentionally engaged in fraud or misrepresented any fact(s), or if I/we do not provide all of the required documentation, the Lender/Servicer may refuse to consider any modification or alternative to foreclosure.
5. I/we certify that I am /we are willing to provide all requested documents and to respond to Housing Counselor/Mediator/Lender/Servicer communications in a timely manner. I/we understand that time is of the essence and intentional delays on my/our part could result in making me/us ineligible for the Foreclosure Mediation Program.
6. I/we understand that negotiations for a possible foreclosure alternative will not constitute a waiver or defense to my Lender's/Servicer's right to commence or continue any foreclosure or other collection action.
7. I/we understand that an alternative to foreclosure will only be provided if an agreement has been approved in writing by my Lender/Servicer.

Borrower	Date	Co-Borrower	Date
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Pro Bono Panel

It is our goal to recruit, train, utilize, and reward 10 volunteers who will help us implement our Fair Housing Plan in Delaware.

Volunteer Management Plan

Recruit

Be strategic: Reach clients, Financial Institutions with a culture of volunteerism, Strategic partners, law students, retired attorneys, etc.

Develop written material on volunteer opportunity

Develop Job Description

Clearly outline expectations

Highlight our Conflict of Interest Policy

Many professionals need to know that our Professional Liability Insurance can cover their volunteerism through us. To receive coverage, volunteers need to be available for at least 250 hours a year and work our case management.

Train

As you develop job description, develop training material

For Housing, check out Knowledge Base

For Housing, reach out to Human relations Commission, Housing & Urban Development, and National Community reinvestment Coalition.

In addition to 101 training, develop training component into your recruitment efforts

Utilize

Match volunteer desires with our needs.

Engage our volunteers with surveys, telephone contact and seek out ways to make their volunteerism with us pleasurable.

Recognize

Keep a list of volunteers.

Make a contact with them at least 3 weeks before the Recognition event

This is a team effort—all staff and board work on this.

Conflict of Interest Policy

As our organization works hard to protect the disadvantaged in our communities, those communities in which we live and work, there may be times when our work overlaps with our personal efforts and connections. During these times, we must assure that these interests do not conflict or compete with each other to the detriment of DCRAC. At all times we must maintain the objectivity and credibility of DCRAC. DCRAC expects all Board, volunteers, and staff to behave in a professional and ethical manner, to disclose real or perceived conflicts of interest, and to recuse themselves from discussions or decisions related to real or perceived conflicts of interest.

The intent of this policy is:

- To maintain credibility and confidence in the decisions of the Board, volunteers, and staff;
- To assure fairness and impartiality in decision-making;
- To disclose real or perceived conflicts of interest; and
- To act impartially and avoid the appearance of impropriety.

Any breach of these objectives could severely impact our strong reputation in the community and could endanger our tax exempt status. Examples of these conflicts of interest include: the ability to direct DCRAC funds to a specific individual or effort for personal gain; and the potential to use one's standing at DCRAC to receive favorable treatment from other individuals or organizations. All individuals representing DCRAC must sign the ***Conflict of Interest and Confidentiality Statement*** indicating that they have read and understood these policies at the time their affiliation with DCRAC commences and annually thereafter. The policy on conflict of interest and confidentiality will be reviewed and updated as needed on an annual basis. Should any conflict of interest arise, all individuals in service to DCRAC are obligated to adhere to the procedure outlined below:

Recusal Procedure

The individual in question is required to submit a ***Disclosure Statement***.

The individual must absent themselves from any portion of a DCRAC meeting if they have or have had a close, active association with a program or institution that is being considered for official action by DCRAC.

Official action includes commenting on a regulation, legislation, bank merger, or entering into a financial relationship that exceeds \$1,500/year.

Close, active association includes, but is not limited to: current or past employment; current or past discussion or negotiation of employment; or an unpaid official relationship by the individual or the individual's close family Member (spouse and child).

If we have doubts as to whether certain actions constitute a conflict of interest, we may ask these questions:

Does the person's action impede the ability of DCRAC to achieve its goals?

Does the person's action impede DCRAC's ability to raise funds?

Does the person's action harm DCRAC's reputation in the community?

Is the person using DCRAC resources to benefit another person or organization related to that person?

Record of these recusals is to be filed with the Executive Director of the organization in the event that the issue pertains to either a staff or volunteer. Executive Director or Board Member recusals will be filed with the Chair Person of the Board, and in the event the recusal is submitted by the Chair Person it shall be filed with the Secretary of the Board. The names of individuals who have recused themselves during a meeting for conflicts of interest will be recorded.

Once a conflict of interest statement has been submitted, or a conflict of interest has otherwise come to the attention of the Executive Director or any Board Member, the procedure for Reviewing and Addressing Conflicts of Interest will be implemented:

Procedure for Reviewing and Addressing Conflicts of Interest

Board should consider the matter immediately.

The person involved in the conflict should not be present during discussions regarding the conflict.

This person should clearly not be involved in the decision making process regarding the conflict.

The person should be allowed to provide factual information pertaining to the proposed conflict.

All discussions should be documented in writing.

The issue should be deliberated with care and this deliberation should be documented.

Most important in the deliberation process should be that the Board ensure that DCRAC is not harmed in any manner.

An informed decision as to whether or not conflict exists will be determined.

It shall be noted that the Board may, with full disclosure, determine that although a conflict of interest exists, the action is permissible.

If it is determined that an actual conflict of interest existed, the conflict was not disclosed, or the relationship with DCRAC was exploited, we must follow the violations procedure for this policy:

Procedure for Violations of Conflict of Interest

The individual should be informed in writing regarding the basis for the Board's conclusion.

The individual then is provided an opportunity to submit a disclosure statement and explain the alleged action.

If it is determined that there was a failure to accurately disclose or any other violation of DCRAC's conflict of interest policy, the Board must take appropriate corrective actions, which may include sanctions or discharge, based on the nature of harm or potential harm.

Conflict of Interest and Confidentiality Statement

DCRAC considers certain information to be confidential and/or proprietary. Such information should not be communicated without proper authorization. Confidential information can include: certain business information such as financial and marketing data, budget information, bid proposals, contract negotiations, and research and development ideas; personnel actions, such as promotions, demotions, terminations, personnel controversies, compensation, payroll data, performance appraisals, personal information of an embarrassing nature or that an employee specifically requested be kept confidential; information about program recipients or clients of a personal nature; certain legal advice, opinions, and documents. If you are not sure if the information you are handling is confidential, consult.

When discussing or transmitting confidential information, please follow these guidelines:

Do not reveal any confidential information.

Make sure that confidential information is properly marked and secured before transmittal.

Ensure that the recipient of the confidential information has a legitimate need to know the information.

Avoid displaying confidential data where it can be easily observed, including on your computer screen when you are not at your desk.

Immediately inform the Executive Director of the loss of any confidential data.

Limit reproduction and distribution of such information.

Secure confidential documents in locked cabinets or containers when not in use.

Make sure that you properly dispose of all confidential information.

Do not remove any confidential information from the organization's office without specific authorization to do so. Before you leave employment at DCRAC, return all confidential and sensitive information to the Executive Director.

Conflict of Interest and Confidentiality Statement

I have received and read the DCRAC Conflict of Interest and Confidentiality Policy. I understand that the intent of this policy is to disclose real or perceived conflicts of interest, to recuse myself from decisions and discussions related to real or perceived conflicts of interest, to act impartially and avoid the appearance of impropriety, and to protect the confidential nature of the decision-making process.

I will not participate in any decision-making capacity if I have or have had a close, active association with an institution being considered for official action by DCRAC. I will not participate in any decision for which I or the organization that I represent may benefit materially. Thus, I will absent myself from any portion of a DCRAC meeting during discussions or decisions in which I have a perceived conflict of interest.

In addition, I understand that materials furnished for review purposes and discussion during DCRAC meetings are considered privileged information and, consequently, are confidential. All elements of DCRAC's discussions are to be treated in a professional and confidential manner. Both ethical and legal considerations demand that the information acquired for a specific purpose not be used to achieve any other objective unless prior permission is obtained from DCRAC.

_____ Print Name _____ Date
 _____ Signature _____ DCRAC Position

Disclosure Statement

Please read the following questions:	No	Yes	Explanation
Has DCRAC contracted to purchase or lease goods, services, or property from you, or from any of your relatives or business associates			
Has DCRAC offered employment to you, or to any of your relatives or business associates, other than a person who was already employed by the organization?			
Have you, or have any of your relatives or business associates been provided with a gift, gratuity or favor, of a substantial nature, from a person or entity which does business, or seeks to do business, with DCRAC?			
Have you or any of your relatives or business associates been gratuitously provided use of the facilities, property, or services of DCRAC?			
Have you commented on a regulation, piece of legislation, or bank merger that you have a close, active association with outside of DCRAC?			
Have you, as a DCRAC representative, entered into a financial relationship that exceeds \$1,500/year with an entity that you have a close, active association with outside of DCRAC?			
Did you obtain preferential treatment by DCRAC for yourself, or for any of your relatives or business associates?			
Did you make use of confidential information, such as grant opportunities, obtained from DCRAC for your own benefit, or for the benefit of a relative, business associate, or other organization?			
Did you take advantage of an opportunity, or enable a relative; business associate or other organization to take advantage of an opportunity which you had reason to believe would be of interest to DCRAC?			

EXPENSE BUDGET

Direct outreach	Staff	Volunteer	Advertising	Travel staff	Travel volunteer	Venue	Food	Material	Printing	Mailing	Total	In-kind	Cash
Fair Housing Symposia	3400	1000	500	250	1000	500	1000	500	0	0	8150	2000	6150
Mortgage Matters!	8500	8500	500	250	15000	4000	1000	2000	0	0	39750	23500	16250
Indirect outreach													
Toll free	3400	0	0	0	0	0	0	0	0	0	3400	0	3400
Website	1700	0	0	0	0	0	0	0	0	0	1700	0	1700
Newsletter	5100	1000	0	0	0	0	0	0	2500	1000	9600	1000	8600
Television	1700	200	0	0	250	4000	0	0	0	100	6250	450	5800
Radio	1700	200	0	0	0	2000	0	0	0	0	3900	200	3700
Events	1700	100	0	500	250	1000	0	400	0	0	3950	350	3600
Controversy													
Controversy--101	18700	4000	0	3000	300	0	0	0	100	1000	27100	4300	22800
Controversy- Referral	5100	4000	0	1000	300	0	0	0	100	500	11000	4300	6700
Controversy-- Systemic	10200	4000	0	5000	400	0	0	0	100	0	19700	4400	15300
Pro Bono--1700													
Recruit	6800	500	0	0	0	100	0	0	100	100	7600	500	7100
Train	8500	3000	0	0	4000	100	500	2000	0	100	18200	7000	11200
Utilize	11900	3000	0	0	1000	100	500	2000	0	100	18600	4000	14600
Recognize	1600	500	0	0	500	200	1000	100	100	100	4100	1000	3100
Admin													
Travel & Training	0	0	0	10000	0	0	0	0	0	0	10000	0	10000
Overheads	0	0	0	0	0	0	0	0	0	0	30000	0	30000
TOTAL	90000	30000	1000	20000	23000	12000	4000	7000	3000	3000	223000	53000	170000

Revenue Sources

Citi; New Castle County; City of Wilmington; HUD; NCRC; New Castle County Board of Realtors; individual donors.