



The Consumer Financial Protection Bureau and the Department of Justice recently issued a joint statement regarding the potential civil rights implications of a creditor's consideration of an individual's immigration status under the Equal Credit Opportunity Act (ECOA). ECOA does not expressly prohibit consideration of immigration status, and a creditor may consider an applicant's immigration status when necessary to ascertain the creditor's rights regarding repayment. However, creditors should be aware that unnecessary or overbroad reliance on immigration status in the credit decision process, including when that reliance is based on bias, may violate ECOA's antidiscrimination provisions.

You can read the joint statement [here](#).

CCI suggests sharing this information with your lending department. As always, please contact CCI with any questions.