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FHCCI Uses Data to Advocate for Improved Mortgage Lending Practices

INDIANAPOLIS, IN – The Fair Housing Center of Central Indiana (FHCCI) analyzes and investigates mortgage lending disparities and predatory practices to encourage fair access to homeownership and strong protections for consumers in financial policy. Fifty years ago this month, the Home Mortgage Disclosure Act (HMDA) was passed by Congress. It was signed into law by President Ford on December 31, 1975, creating unprecedented transparency in data for mortgage lending. Today, the Fair Housing Center of Central Indiana (FHCCI) announces significant improvements to its publicly available data portal and provides an end-of-year update on lender specific mortgage activities, all of which are only possible due to HMDA's passage.

FHCCI HMDA Data Portal: In 2024, the FHCCI [launched a data portal](#), originally focused on the Indianapolis metro area, which provides mortgage lending and key housing demographic data. The portal was later updated to include Indiana's 20 most populous counties and additional years of mortgage data.

Today, the FHCCI announces its most recent and most substantial update to the portal. Users may now access data for *all 92 Indiana counties*, including by city (municipality), for calendar years 2019-2024. This makes our portal the only such source for easy-to-review and downloadable mortgage lending data, designed for the housing consumer, in Indiana. With the portal, consumers can evaluate the performance of specific lenders using mortgage data broken down by race/color, national origin/ethnicity, gender, and income level, which lenders must disclose under HMDA requirements. The data provided in this portal is intended to promote transparency, ensure accountability, and advance racial and economic justice. We also aim to empower individuals with information about mortgage lending decisions impacting their neighborhoods.

In the past, the FHCCI has [released mortgage lending reports](#), such as for Marion County and Allen County, which included data on major mortgage lenders and their performance. Due to the portal's expansion statewide, the FHCCI is releasing a few spreadsheets from the portal with the goal to encourage meaningful conversations about fair housing practices, advocate for positive change, identify opportunities for investment, and advance partnerships with mortgage lenders. These spreadsheets offer an example of the data that may be accessed through the portal and include suggestion notes on key areas of review.

The premade 2024 HMDA spreadsheets of top lenders, sortable by race and ethnicity and identifying mortgage applications, denials, and originations, [are available at this link](#) for the following counties:

- Allen County
- Lake County
- Marion County
- Porter County
- St. Joseph County
- Vanderburgh County

During 2025, the FHCCI used data from the portal to raise awareness of fair lending concerns. We also submitted our analyses as part of federally scheduled 2025 Community Reinvestment Act (CRA) exams. These exams

focus on a bank's compliance with community lending requirements under CRA, including lending to low- and moderate-income neighborhoods. The 2025 exams covered a bank's performance for the years 2021-2023.

The National Bank of Indianapolis: In May 2025, the FHCCI [challenged an Indianapolis Zoning Board decision](#) which allowed a variance for a standalone ATM by The National Bank of Indianapolis (located at 5284 38th Street North Drive in Indianapolis, IN 46218). In its comments, the FHCCI argued that the ATM did not meet the financial needs of this neighborhood, which is in a banking desert, particularly in light of the Bank's full-service presence in other neighborhoods. Despite city staff being against the zoning variance and the FHCCI's concerns, the variance for the free-standing ATM was approved.

As an end-of-year update, the ATM appears to be nearing completion, or has been completed, in an otherwise-vacant and large Eastside parking lot:



This ATM is the Bank's only presence in a predominantly Black neighborhood and remains its only free-standing ATM. In comparison, all of the Banks's other neighborhood locations are standalone buildings with a full array of banking services to meet the local community's financial needs, such as these examples below:

Castleton location:



86th and Ditch Road location:



The FHCCI [also filed its concerns](#) with the Office of the Comptroller of the Currency (OCC) as part of The National Bank of Indianapolis' scheduled 2025 CRA exam. We pointed out disparities in the Bank's lending data, documenting low levels of mortgage lending to people of color and low-income households, in comparison to its peers.

In November 2025, the OCC [released the results](#) of its 2025 CRA Performance Evaluation, designating an overall “Satisfactory” rating to The National Bank of Indianapolis. However, the OCC had the following comments regarding the Bank’s mortgage lending performance (Pages 13-14).

- Distribution of Loans by Income Level of the Geography: Home Mortgage Loans
 - “The overall geographic distribution of home mortgage loans is poor.”
 - 2021:
 - “The bank’s geographic distribution of home mortgage loans was poor.
 - The percentage of loans in low-income geographies was below the percentage of owner-occupied housing units and was near to aggregate lending in those geographies.
 - The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units and was well below aggregate lending in those geographies.”
 - 2022-23:
 - “The bank’s geographic distribution of home mortgage loans was very poor.
 - The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied housing units and was significantly below aggregate lending in those geographies.
 - The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units and was significantly below aggregate lending in those geographies.”
- Distribution of Loans by Income Level of the Borrower: Home Mortgage Loans
 - “The distribution of home mortgage loans to individuals of different income levels is poor.”
 - 2021:
 - “The bank’s borrower distribution of home mortgage loans was poor.
 - The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and was significantly below aggregate lending in the AA.
 - The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families and was below aggregate lending in the AA.”
 - 2022-23:
 - “The bank’s borrower distribution of home mortgage loans was poor.
 - The percentage of loans to low-income borrowers was significantly below the percentage of low-income families and was significantly below aggregate lending in the AA.
 - The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families and was significantly below aggregate lending in the AA.”

FHCCI Note: CRA examiners are not required to evaluate a bank’s distribution of mortgage lending by race or ethnicity.

The FHCCI will continue to advocate for redress in any areas of noncompliance with CRA and the Fair Housing Act by local mortgage lenders, with a focus on fair lending improvement.

Horizon Bank: In August 2025, the FHCCI also [documented its fair lending concerns](#) as part of Horizon Bank’s scheduled Federal Reserve 2025 CRA exam. The FHCCI documented Horizon Bank’s low performance in meeting the mortgage lending needs of people of color and low-income households in Marion County and Allen County in recent years. The exam results have not yet been provided to the public.

As an end-of-year update, following the release of the FHCCI's concerns to the public, Horizon Bank announced its intention to open a full-service bank branch at 5959 E. 38th Street in Indianapolis, IN 46218. This would be the lender's first location in a majority-Black Indianapolis neighborhood. Construction is in progress on the location as of this press release:



The FHCCI looks forward to learning more from Horizon Bank about any targeted programs or efforts to address the lending disparities we have previously identified.

FHCCI Support: If you need assistance in accessing a portal spreadsheet for your city or county, contact the FHCCI. The FHCCI will also be hosting [an upcoming webinar](#) on how to use the data portal on January 20, 2026 from 2:00-3:30 PM (Eastern). The webinar is free although advanced registration is required.

A huge thank you to the Woodstock Institute for their assistance in the creation of the FHCCI data portal and its continued maintenance.

The Fair Housing Center of Central Indiana (FHCCI) is a private, nonprofit fair housing organization based in Indianapolis, Indiana. Its mission is to facilitate open housing for all people by ensuring the availability of affordable and accessible housing; promoting housing choice and homeownership; advocating for an inclusive housing market; working toward stable and equitable communities; and eradicating discrimination within Central Indiana, the State of Indiana, and nationally. For more information, visit: www.fhcci.org