

Press Coverage | January 12, 2026

CFPB Withdraws Biden-Era Guidance on Immigration Status in Lending

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[Chris Willis](#)

Chris Willis, co-leader of Troutman Pepper Locke's Consumer Financial Services Regulatory Practice Group, was quoted in the January 12, 2026 *Law360* article, "[CFPB Withdraws Biden-Era Guidance on Immigration Status in Lending](#)."

Troutman Pepper Locke partner Chris Willis said that, at the time of the 2023 statement, an industry effort was under way to examine eligibility criteria in response to litigation in California challenging lenders' use of immigration status in loan applications.

The 2023 joint statement, in practice, "wasn't that big of a deal," Willis said. He called the withdrawn guidance a "natural outgrowth" of the Trump administration's hostility toward disparate impact claims.

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The Biden administration was making the argument in the joint statement that considering immigration status in credit eligibility could create a disparate impact on the basis of national origin, Willis said.

The Trump administration's latest move "is just the next step in the withdrawal of any sort of industry guidance that's based on disparate impacts that followed that April 2025 executive order," Willis said.

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