



OVERVIEW OF LAWS AND REGULATIONS

Community Reinvestment Act

Community Reinvestment Act (Regulation BB)

Executive Summary:

The Community Reinvestment Act (CRA) was originally enacted in 1977 to encourage insured depository institutions to help meet the credit needs of the communities in which they operate. Regulation BB which implements CRA (OTS's version of which is found at 12 CFR Part 563e) underwent a significant review during 1993 and 1994 by the federal regulatory agencies in consultation with banking and thrift industries, Congressional leaders, and leaders of community-based organizations across the country. This process, initiated by President Clinton in July 1993, culminated in the issuance of a revised Regulation BB in May 1995, intended to "replace paperwork and uncertainty with greater performance, clarity and objectivity."

CRA requires OTS to assess the record of each savings association in helping to meet the credit needs of its entire community, including low-and moderate-income neighborhoods, consistent with safe and sound operations, and take that record into account when deciding whether to approve an application by the institution for a deposit facility. The type of CRA performance standards that will be applied to a given institution will depend upon whether the institution is considered a large retail institution (triggering the lending, investment and services tests), a small institution (activating the streamlined performance criteria), or a limited purpose or wholesale institution (giving rise to the community development test). In addition, an institution's CRA performance may be evaluated under a strategic plan drawn up by the institution if submitted to the OTS (in the manner described in Section 563e.27) and approved by the OTS.

Savings associations, other than small savings associations, are required to collect, report and disclose certain information pertaining to small business and small farms loans, community development loans, and home mortgage loans. In addition, institutions also are allowed to collect and maintain data on consumer loans. The OTS prepares a CRA disclosure statement on an annual basis for each institution that compiles the information reported in a format prescribed by the regulation. Aggregate disclosure statements covering small business and small farm lending by all institutions are prepared by the OTS in conjunction with the other federal bank regulatory agencies.

A savings association's record of performance under CRA is taken into account when considering applications to establish a domestic branch office, relocate the main office or a branch, grant a thrift charter, and approve merger, acquisition, or consolidation activities. Adverse CRA ratings may serve as the basis for denying or conditioning approval of an application by the savings association.

Business Areas Impacted:

- Residential and Commercial Lending Units
- Credit Operations
- Treasury Operations
- Retail Operations
- Data Processing
- Marketing



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Highlights:

The following table depicts some of the major components of Regulation BB (which implements CRA) in a manner intended to allow for quick reference to particular requirements. The components addressed in the table include:

1. Determining the appropriate method for assessing CRA performance
2. Determining the appropriate assessment area(s) for the institution
3. Applying the lending, investment and service tests for large retail institutions
4. Applying the streamlined test for small institutions
5. Applying the community development test for wholesale or limited purpose institutions
6. Developing and evaluating a strategic plan
7. Role of performance context in assessing performance
8. Fulfilling data reporting requirements
9. OTS ratings of performance and impact on applications

MAJOR COMPONENTS	EXPLANATION
<p>1. Determining the Appropriate Method for Assessing CRA Performance</p> <p><i>The four assessment methods</i></p>	<p>Determine the assessment method that applies to your institution. There are four possible assessment methods, depending on the institution's size and the nature of its business. They are:</p> <ul style="list-style-type: none">• the lending, investment and service test for large, retail institutions;• the streamlined assessment method for small institutions;• the community development test for limited purpose or wholesale institutions; and• the strategic plan option.



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MAJOR COMPONENTS	EXPLANATION
<p><i>Qualification as Small Savings Association</i></p>	<p>Note that the regulation implementing CRA does not apply to special purpose savings associations that do not perform commercial or retail banking services by granting credit to the public, other than as incident to their specialized operations.</p> <p>To determine whether the institution is considered large or small pursuant to §563e.12(s), ask:</p> <ul style="list-style-type: none"> • Did the institution, as of December 31 of either of the prior two calendar years, have total assets of less than \$250 million? • Was the institution independent? • If not, was the institution an affiliate of a holding company that, as of December 31 of either of the prior two calendar years, had total bank and thrift assets of less than \$1 billion?
<p><i>Qualification as wholesale or limited purpose savings association</i></p>	<p>To determine whether the institution qualifies for the community development test, ask:</p> <ul style="list-style-type: none"> • Is the institution a limited purpose institution because it offers only a single narrow consumer product line (such as motor vehicle loans) to a regional or broader market? • Is the institution a wholesale institution because it does not extend home mortgage, small business, small farm or consumer loans to retail customers in the ordinary course of business?
<p><i>Strategic Plan Option</i></p>	<p>Determine whether the institution would be interested in pursuing a strategic plan. Ask:</p> <ul style="list-style-type: none"> • Is management's priority to achieve certainty in the CRA process and assure a particular rating for a particular measurable level of performance? • Is the institution's business strategy somewhat unusual, yet does not qualify as either wholesale or



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MAJOR COMPONENTS	EXPLANATION
	<p>limited purpose?</p> <ul style="list-style-type: none"> • Would the institution benefit from the opportunity to tailor a performance plan to its business strategy? <p>Once you have determined which assessment method applies to your institution, consult the applicable matrices, below.</p>
<p>2. Determining the Appropriate Assessment Area</p> <p><i>Institutions not wholesale or limited purpose</i></p> <p><i>Wholesale or limited purpose institutions</i></p>	<p>Delineate one or more geographic areas within which the OTS will evaluate the institution's record of helping to meet the credit needs of its community.</p> <p>Note that the OTS uses the assessment area(s) delineated by the institution in its evaluation of the institution's CRA performance unless the OTS determines that the assessment area(s) do not comply with the requirements of this section. The OTS does not evaluate the institution's assessment area delineation as a separate performance criteria.</p> <p>For institutions other than wholesale or limited purpose institutions, delineate:</p> <ul style="list-style-type: none"> • one or more metropolitan statistical areas (MSAs), using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation was made, <u>or</u> one or more contiguous political subdivisions, such as counties, cities, or towns, <u>and</u> • include the geographies in which the institution has its main office, branches, and deposit-taking automated teller machines (ATMs), as well as the surrounding geographies in which the institution has originated or purchased a substantial portion of its loans. <p>For wholesale or limited purpose institutions, the assessment area(s) must consist generally of:</p> <ul style="list-style-type: none"> • one or more MSAs (using the MSA boundaries that



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MAJOR COMPONENTS	EXPLANATION
	the consortium or third party.
<p>Performance Criteria <i>(see 563e.22 for details)</i></p>	<ul style="list-style-type: none"> • <u>Loans by an affiliate of the savings association, if:</u> <ol style="list-style-type: none"> 1. data is provided on the affiliate s loans pursuant to 563e.42; 2. no affiliate claims a loan origination or purchase that another institution claims; and 3. the savings association that elects to have a particular lending category within a particular assessment area considered, must have all loans within that lending category in that particular assessment area by all of its affiliates considered. • <u>Other loan data</u> The OTS will also consider any other loan data the savings association may choose to provide, including data on loans outstanding, commitments, and letters of credit. <p>The OTS evaluates an institution s lending performance based on the following criteria:</p> <ol style="list-style-type: none"> 1. lending activity; 2. geographic distribution; 3. borrower characteristics; 4. community development lending; and 5. innovative or flexible lending practices.



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MAJOR COMPONENTS	EXPLANATION
B. <u>Investment Test</u> Scope of Review	
<i>Mandatory consideration</i>	<p>The OTS reviews an institution's record of providing qualified investments (as defined in 563e.12(r)) that benefit the institution's assessment area(s) or a broader statewide or regional area that includes the assessment area(s).</p> <p>NOTE: Activities that are considered under the lending or service tests may not be considered under the investment test.</p>
<i>Optional consideration</i>	<p>At the institution's option, the OTS will consider qualified investments made by affiliates of the savings association, if the investment is not claimed by any other institution.</p>
Performance Criteria (see 563e.22 for details)	<p>The OTS evaluates an institution's investment performance based on the following criteria:</p> <ol style="list-style-type: none"> 1. dollar amount; 2. innovativeness or complexity; 3. responsiveness to credit and community development needs; and 4. degree to which the qualified investments are not routinely provided by private investors.



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<p><i>Criteria for evaluating the strategic plan</i></p>	<p>The OTS evaluates the measurable goals of an institution's strategic plan based on the following criteria:</p> <ol style="list-style-type: none"> 1. Extent and breadth of lending or lending-related activities; 2. Amount and innovativeness, complexity and responsiveness of qualified investments; and 3. Availability and effectiveness of systems for delivering retail banking services and extent and innovativeness of community development services.
<p>7. Role of Performance Context in the Evaluation Process</p> <p>Performance context information (See 563e.21(b))</p>	<p>The tests used to assess CRA performance (i.e. the lending/investment/service test, streamlined method, community development test and strategic plan) are all applied in the context of information about the institution and its community, competitors, and peers.</p> <p>Specifically, an institution's CRA performance will be judged in the context of the following information:</p> <ol style="list-style-type: none"> 1. Demographic and economic data of the assessment area(s); 2. Lending, investment and service opportunities in the assessment area(s); 3. Product offerings and business strategy; 4. Institutional capacity and constraints; 5. Past performance and performance of similarly situated lenders; 6. Written comments about the institution's performance; and 7. Any other relevant information.



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MAJOR COMPONENTS	EXPLANATION
	2. Other loan data.
<p><i>Data on affiliate lending and consortium or third-party lending</i></p> <p><i>Assessment area data</i></p> <p><i>CRA Disclosure Statement</i></p>	<p>Other optional data collection, maintenance and reporting information involves:</p> <ul style="list-style-type: none"> • Data on affiliate lending (where the institution elects to have the OTS consider loans by an affiliate). • Data on lending by a consortium or a third-party (where the institution elects to have the OTS consider community development loans by a consortium or third party). <p>Institutions, other than small institutions, must collect and report a list for each assessment area showing the geographies within the area by March 1 of each year.</p> <p>The OTS prepares a <u>CRA Disclosure Statement</u> for each institution that reports data pursuant to the requirements of 563e.42(h).</p>
<p>9. OTS Ratings of Performance and Impact on Applications</p> <p>Ratings in general (see 563e.28(a))</p> <p><i>Effect on discriminatory or other illegal credit practices</i></p>	<p>The OTS assigns each institution subject to CRA one of the following four overall ratings, based on its performance under the applicable test:</p> <ol style="list-style-type: none"> 1. Outstanding 2. Satisfactory 3. Needs to improve 4. Substantial noncompliance <p>Evidence of discriminatory or other illegal credit practices will adversely impact the evaluation of the institutions CRA performance.</p>



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MAJOR COMPONENTS	EXPLANATION
<i>Effect of CRA performance on applications</i>	<p>The OTS will take into account an institution's CRA performance, among other factors, in considering applications for:</p> <ol style="list-style-type: none">1. The establishment of a domestic branch or other facility that would be authorized to take deposits;2. The relocation of the main office or branch;3. The merger or consolidation with or the acquisition of the assets or assumption of liabilities of an institution requiring approval under the Bank Merger Act;4. A Federal thrift charter; or5. An acquisition subject to § 10(e) of HOLA.



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Public File Requirements

Savings associations must make available to the public for inspection upon request and at no cost, the information required pursuant to 12 C.F.R. § 563e.43 as follows:

- At the main office and, if an interstate savings association, at one branch office in each state, all information in the public file; and
- At each branch:
 - (1) A copy of the public section of the institution's most recent CRA Performance Evaluation and a list of services provided by the branch, and
 - (2) Within five calendar days of the request, all the information in the public file relating to the assessment area in which the branch is located.

CONTENTS OF THE PUBLIC FILE

ITEM	TIME FRAME
1. All written comments received from the public that relate to the institution's performance in helping to meet community credit needs <i>and</i> any response to the comments by the institution.	Ongoing, updated as needed for the current year and each of the prior two calendar years. (Ensure that this information is current as of April 1 of each year)
2. A copy of the public section of the savings association's most recent CRA Performance Evaluation prepared by OTS.	Within 30 business days after its receipt from OTS.
3. A list of the institution's branches, their street addresses, and geographies.	Ongoing, updated as needed. (Ensure that this information is current as of April 1 of each year)
4. A list of branches opened or closed by the savings association.	Ongoing, updated as needed for the current year and each of the prior two calendar years. (Ensure that this information is current as of April 1 of each year)
5. A list of services (including hours of operation, available loan and deposit products and transaction fees) generally offered at the institution's branches and descriptions of material differences in the availability or cost of services at particular branches. <i>Optional:</i> Information regarding the availability of alternative delivery systems (e.g., ATMs, banking by telephone or computer, loan production offices, etc.)	Ongoing, updated as needed. (Ensure that this information is current as of April 1 of each year)



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ITEM	TIME FRAME
6. Maps of each assessment area showing the boundaries of the area and identifying the geographies (i.e., census tracts) contained within the area, either on the map or in a separate list.	Ongoing, update as needed. (Ensure that this information is current as of April 1 of each year)
7. Any other information the institution chooses.	Ongoing, update as needed. (Ensure that this information is current as of April 1 of each year)

For institutions other than small institutions

1. If the institution has elected to have one or more categories of consumer loans considered under the lending test, for each of these categories, the number and amount of loans: <ul style="list-style-type: none"> • to low-, moderate-, middle-, and upper-income individuals; • located in low-, moderate-, middle-, and upper-income census tracts; and • located inside the institution's assessment area(s) and outside the savings association's assessment area(s). 	Ongoing, updated as needed for each of the two prior calendar years. (Ensure that this information is current as of April 1 of each year)
2. The institution's CRA Disclosure Statement.	Disclosure statements for each of the two prior calendar years must be placed in the public file within three business days of receipt from the OTS.

For institutions required to report Home Mortgage Disclosure Act (HMDA) data:

A copy of the HMDA Disclosure Statement provided by the Federal Financial Institutions Examination Council pertaining to the institution.	Within three business days after receipt; for each of the prior two calendar years
For institutions that elect to have mortgage lending of an affiliate considered by OTS, include the affiliate's HMDA Disclosure Statement	Within three business days after receipt; for either or both of the prior two calendar years, as applicable. (Ensure that this information is current as of April 1 of each year)



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Small institutions:

<p>1. The institution's loan-to-deposit ratio and, at its option, additional information regarding its loan-to-deposit ratio.</p>	<p>Ongoing, as needed for each quarter of the prior calendar year. (Ensure that this information is current as of April 1 of each year.)</p>
<p>2. If the institution has elected to be evaluated under the lending, investment and service tests, and it elects to have one or more categories of consumer loans considered under the lending test, then for each consumer loan category, the number and amount of loans:</p> <ul style="list-style-type: none"> • to low-, moderate-, middle-, and upper-income individuals; • located in low-, moderate-, middle-, and upper-income census tracts; and • located inside the institution's assessment area(s) and outside the savings association's assessment area(s). 	<p>Ongoing, updated as needed for each of the two prior calendar years. (Ensure that this information is current as of April 1 of each year.)</p>

Institutions with Strategic Plans:

A copy of the approved strategic plan.	Ongoing, during the term of the strategic plan.
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Institutions with less than satisfactory ratings:

A description of the institution's current efforts to improve its performance in helping to meet the credit needs of its entire community.	Must be updated quarterly.
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CRA Ratings Matrix — Small Institutions

Characteristic	Outstanding	Satisfactory	Needs To Improve	Substantial Noncompliance
Loan-to-deposit ratio	The loan-to-deposit ratio is more than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is less than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is unreasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.
Assessment area(s) concentration	A substantial majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are outside the institution's assessment area(s).	A substantial majority of loans and other lending related activities are outside the institution's assessment area(s).
Geographic distribution of loans	The geographic distribution of loans reflects excellent dispersion throughout the assessment area(s).	The geographic distribution of loans reflects reasonable dispersion throughout the assessment area(s).	The geographic distribution of loans reflects poor dispersion throughout the assessment area(s).	The geographic distribution of loans reflects very poor dispersion throughout the assessment area(s).
Borrower's profile	The distribution of borrowers reflects, given the demographics of the assessment area(s), reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), very poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
Response to substantiated complaints	The institution has taken noteworthy, creative action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken appropriate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken inadequate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution is unresponsive to substantiated complaints about its performance in meeting assessment area credit needs.
Investments	The institution's investment record enhances credit availability in its assessment area.	N/A	N/A	N/A
Services	The institution's record of providing branches, ATMs, loan production offices, and/or other services and delivery systems enhances credit availability in its assessment area(s).	N/A	N/A	N/A



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CRA Ratings Matrix — Large Institutions Lending Test

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Lending Activity	Lending levels reflect excellent responsiveness to assessment area credit needs.	Lending levels reflect good responsiveness to assessment area credit needs.	Lending levels reflect adequate responsiveness to assessment area credit needs.	Lending levels reflect poor responsiveness to assessment area credit needs.	Lending levels reflect very poor responsiveness to assessment area credit needs.
Assessment area(s) concentration	A substantial majority of loans are made in the institution's assessment area(s).	A high percentage of loans are made in the institutions' assessments area(s).	An adequate percentage of loans are made in the institution's assessment area(s).	A small percentage of loans are made in the institution's assessments area(s).	A very small percentage of loans are made in the institutions assessment area(s).
Geographic distributions of loans	The geographic distribution of loans reflects excellent penetration throughout the assessment area(s).	The geographic distribution of loans reflects good penetration throughout the assessment area(s).	The geographic distribution of loans reflects adequate penetration throughout the assessment area(s).	The geographic distribution of loans reflects poor penetration throughout the assessment area(s), particularly to low- or moderate-income geographies in the assessment area(s).	The geographic distribution of loans reflects very poor penetration throughout the assessment area(s), particularly to low- or moderate-income geographies in the assessment area(s).
Borrowers' profile	The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among retail customers of different income levels and business customers of different size.	The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different size.	The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different size.	The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different size.	The distribution of borrowers reflects, given the product lines offered by the institution, very poor penetration among retail customers of different income levels and business customers of different size.
Responsiveness to credit needs of highly economically disadvantaged geographies and low-income persons, small business	The institution exhibits an excellent record of serving the credit needs of the most economically disadvantaged areas of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a poor record of serving the credit needs of the most economically disadvantaged areas of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a very poor record of serving the credit needs of the most economically disadvantaged areas of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.
Community development lending activities	The institution is a leader in making community development loans.	The institution has made a relatively high level of community development loans.	The institution has made an adequate level of community development loans.	The institution has made few, if any, community development loans.	The institution has made a low level of community development loans.



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Product Innovation	The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs.	The institution uses innovative and/or flexible lending practices in order to serve assessment area credit needs.	The institution makes limited use of innovative and/or flexible lending practices in order to serve assessment area credit needs.	The institution makes little use of innovative and/or flexible lending practices in order to serve assessment area credit needs.	The institution makes no use of innovative and/or flexible lending practices in order to serve assessment area credit needs.
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CRA Ratings Matrix — Large Institutions Investment Test

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Investment and Grant Activity	The institution has an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.	The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a poor level of qualified community development investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a few, if any, qualified community development investments or grants, particularly those that are not routinely provided by private investors.
Responsiveness to Credit and Community Development Needs	The institution exhibits excellent responsiveness to credit and community economic development needs.	The institution exhibits good responsiveness to credit and community economic development needs.	The institution exhibits adequate responsiveness to credit and community economic development needs.	The institution exhibits poor responsiveness to credit and community economic development needs.	The institution exhibits very poor responsiveness to credit and community economic development needs.
Community Development Initiatives	The institution makes extensive use of innovative and/or complex investments to support community development initiatives.	The institution makes significant use of innovative and/or complex investments to support community development initiatives.	The institution rarely uses innovative and/or complex investments to support community development initiatives.	The institution rarely uses innovative and/or complex investments to support community development initiatives.	The institution does not use innovative and/or complex investments to support community development initiatives.



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CRA Ratings Matrix — Large Institutions Service Test

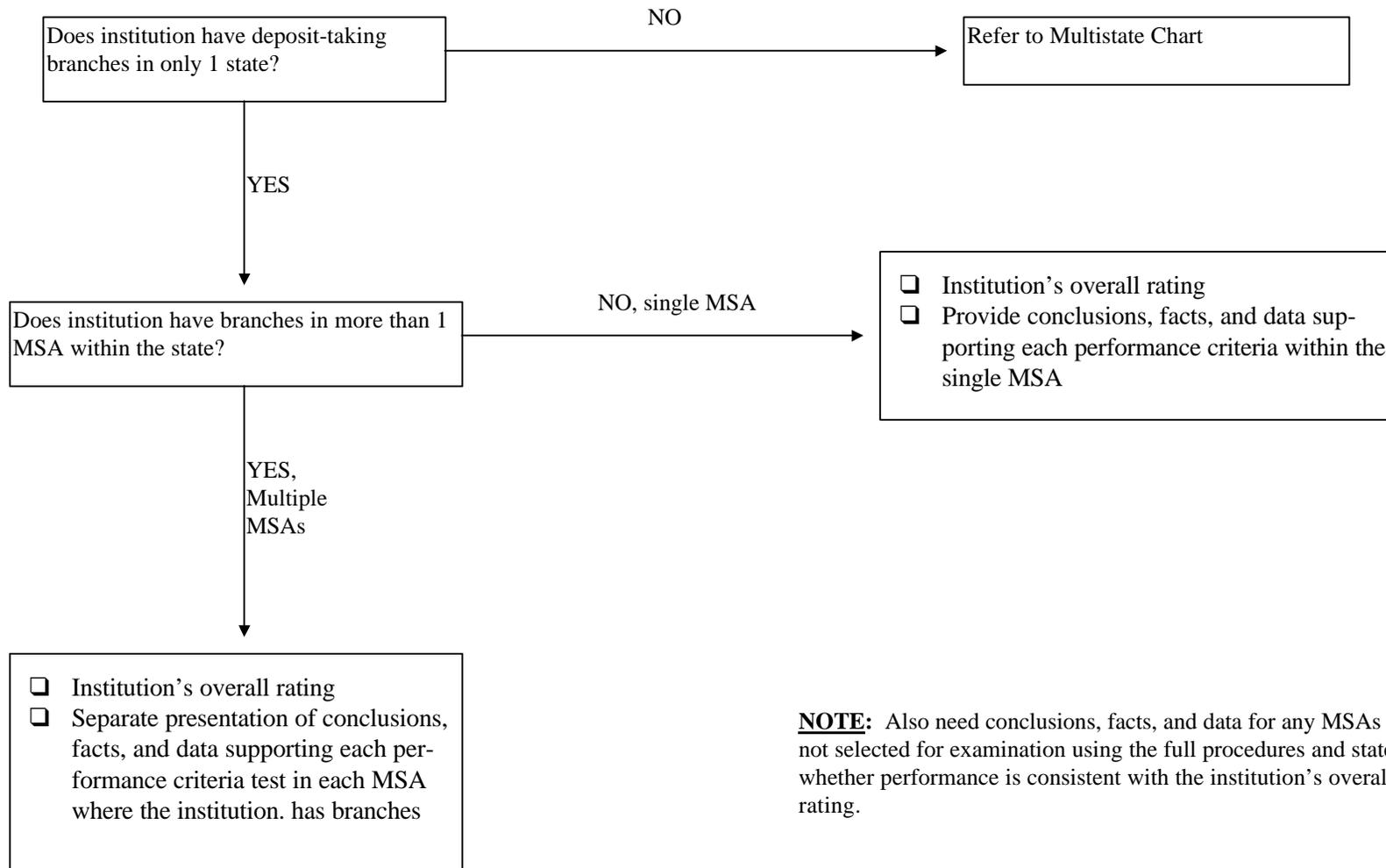
Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Accessibility of Delivery Systems	Delivery systems are readily accessible to all portions of the institution's assessment area(s).	Delivery systems are accessible to essentially all portions of the institution's assessment area(s).	Delivery systems are reasonably accessible to essentially all portions of the institutions assessment area(s).	Delivery systems are accessible to limited portions of the institution's assessment area(s).	Delivery systems are inaccessible to significant portions of the assessment area(s), particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
Changes in Branch Locations	To the extent changes have been made, the institution's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low- and moderate- income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate- income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has significantly adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
Reasonableness of business hours and services in meeting assessment area(s) needs	Services (including where appropriate, business hours) are tailored to the convenience and needs of the assessment area(s), particularly low- and moderate- income geographies and/or individuals.	Services (including, where appropriate, business hours) do not vary in a way that inconveniences certain portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) vary in a way that inconveniences certain portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) vary in a way that significantly inconveniences many portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.
Community Development services	The institution is a leader in providing community development services.	The institution provides a relatively high level of community development services.	The institution provides an adequate level of community development services.	The institution provides a limited level of community development services.	The institution provides few, if any, community development services.



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CRA Ratings Matrix — Wholesale/Limited Purpose Institutions Community Development Test

Characteristic	Outstanding	Satisfactory	Needs To Improve	Substantial Noncompliance
Investment, Loan, and Service Activity	The institution has a high level of community development loans, community development services, or qualified investments, particularly investments that are not routinely provided by private investors.	The institution has an adequate level of community development loans, community development services, or qualified investments, particularly investments that are not routinely provided by private investors.	The institution has a poor level of community development loans, community development services, or qualified investments, particularly investments that are not routinely provided by private investors.	The institution has few, if any, community development loans, community development services, or qualified investments, particularly investments that are not routinely provided by private investors.
Investment, Loan, and Service Initiatives	The institution extensively uses innovative or complex qualified investments, community development loans, or community development services.	The institution occasionally uses innovative or complex qualified investments, community development loans, or community development services.	The institution rarely uses innovative or complex qualified investments, community development loans, or community development services.	The institution does not use innovative or complex qualified investments, community development loans, or community development services.
Responsiveness to Community Development Needs	The institution exhibits excellent responsiveness to credit and community economic development needs in its assessment area(s).	The institution exhibits adequate responsiveness to credit and community economic development needs in its assessment area(s).	The institution exhibits poor responsiveness to credit and community economic needs in its assessment area(s).	The institution exhibits very poor responsiveness to credit and community economic development needs in its assessment area(s).



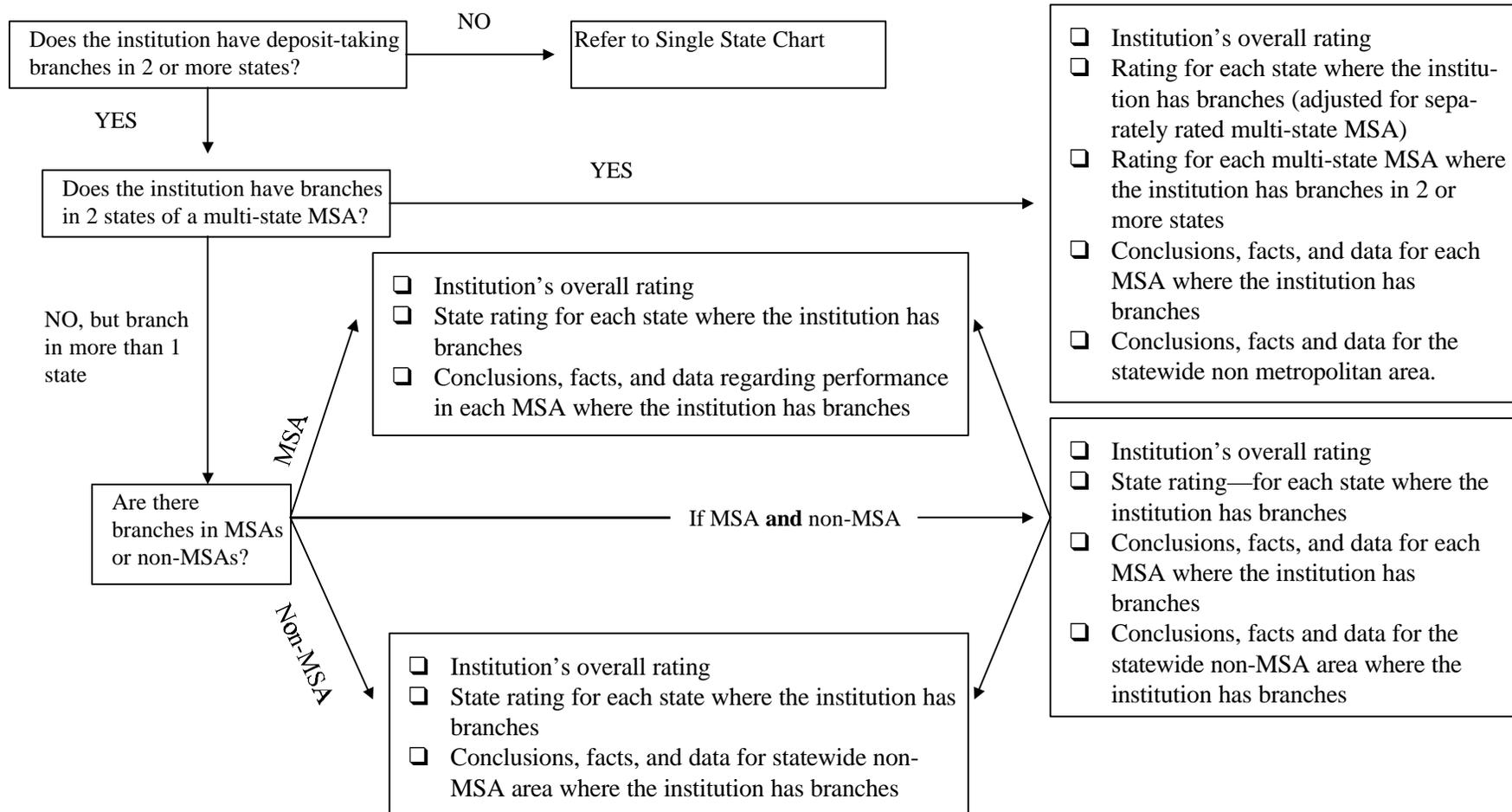
NOTE: Also need conclusions, facts, and data for any MSAs not selected for examination using the full procedures and state whether performance is consistent with the institution's overall rating.

Single State Chart

Prepared by Federal Reserve Board



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NOTE: Any State rating must also include a description of how the exam was performed and a list of branches examined. For MSA and non-MSA conclusions in the Performance Evaluation, state whether the area was examined using the full procedures and state whether performance is consistent with performance in the state.

Multi-State Chart

Prepared by Federal Reserve Board