

Introduction

Determining the scope of a compliance examination is made easier by the routine collection and analysis of information available prior to the commencement of the examination. This section discusses the Compliance Preliminary Examination Response Kit (PERK) and identifies information available at the Regional office that should be reviewed prior to the on-site portion of the examination.

The overall objectives of this phase of the examination process are to collect and review as much information as possible prior to the examination to enable the examination team to work more efficiently when in the association and to minimize time spent during an examination waiting for data and files from the association's management and staff. Obtaining data prior to the commencement of field work gives the examiner a clearer picture about the range of the association's products and services and which laws and regulations apply to the association. From this knowledge, the examiner can better plan work assignments and have a better idea about anticipated on-site examination time. The examiner should generally perform this stage of the examination process off-site.

Compliance PERK

Preliminary Examination Response Kit (PERK)

The PERK is a request by the regional office for a collection of information that should be prepared by institution management and ready for the examiners prior to or at the commencement of an examination. This information prepared by management in advance of the examination assists OTS and the institution by:

- increasing the efficiency of the on-site examination;
- determining the scope of the examination; and
- reducing costs and workload

The OTS's PERK is designed to reduce regulatory burden, eliminate redundancies and focus requests only for the minimum information needed to conduct a risk-focused examination based on the examination scope. The collection and review of the information in the PERK should serve to minimize the time that the examination team needs to spend on-site. Therefore, it is in the best interests of an association's management to be as responsive and complete as possible in answering the PERK. The PERK is comprehensive, but is purposely designed to minimize on-site examination time and make the examination process less disruptive for the association.

Pursuant to the OTS customer service plan standards, the PERK will be sent to the institution four weeks prior to the examination start date and will include the approximate start date for the on-site examination, the examination as of date, the number of on-site staff and an estimation of the amount of time required to conduct the examination and a contact person's name and phone number.

The PERK is comprised of various documents and information requests that are listed in the Summary Schedule (PERK 001). Section 060 of the Thrift Activities Handbook provides instructions specific to each PERK document. The remainder of this subsection discusses particular aspects of the Compliance PERK, which is contained in Appendix A.

Revisions to the Compliance PERK were included in the August 1995 overall revisions. The CRA materials contained in the Compliance PERK were further revised in December 1995, November 1996 and October 1997 to incorporate the requirements of the revised CRA regulation.

The revised Compliance PERK contains a "Compliance Examination Summary Schedule," "Fair Lending Questionnaire" and "Community Reinvestment Act Information," which also includes optional supplementary schedules.

The revised CRA portion of the PERK meets several objectives. First, it organizes the information requests according to the method used to evaluate

CRA performance. For example, there is a separate information request for small institutions being evaluated under the “new” CRA regulation. Second, it incorporates the requirements of the revised regulation and examination procedures into the information requests. Third, it deletes existing information requests that were process-oriented. Fourth, it balances the examiner’s need for timely information with the need to reduce or minimize unnecessary burden on examined institutions.

The revised Compliance PERK, like the existing PERKs for all examination functions, is a guide. As such, the information requests can and should be tailored to the activities of each institution and the scope of the examination.

Information Available at the Regional or Area Office

Prior to the commencement of a compliance examination, the examiner should obtain for review:

- The most recent compliance examination report
- The most recent thrift examination report
- OTS financial and monitoring reports
- The most recent audit report
- Correspondence and internal memoranda

- Documentation pertaining to supervisory and enforcement actions or CRA-related commitments
- Consumer complaints filed since the previous examination
- The most recent HMDA filing and pertinent aggregate reports
- Outside contact interview forms from prior OTS examiners or from the other agencies
- Any CRA comments filed and maintained in the public comment file at the Regional office’s
- Business Plan
- Regulatory Plan

If possible, the examiner should have a discussion with the previous examiner. Also, the examiner may do some preliminary research to identify individuals in the association’s community who might be contacted for CRA purposes.

Preferably, pre-examination information should be available to the examiner when he or she arrives to conduct this part of the examination. Based on a review of this information, as well as the response to the PERK, the examiner should be in a good position to identify areas of the association’s operations where examination time can best be focused.

The requested information should be maintained in the workpapers. The request can be altered for future examinations by only asking for copies of any items that have changed since the last request.

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Institution Name

The following is a schedule of information to be made available to the examiner in charge either prior to or at the commencement of the compliance examination. The information will help ensure an efficient review of the institution and minimize additional requests; however, other information may be requested during the examination. Please provide a brief explanation for any information that is not provided, e.g., included with the safety and soundness examination requests, or indicate the name of an individual to contact to obtain the requested information.

I. GENERAL

- __1. Organization chart, including the compliance officer and internal audit department reporting lines.¹
- __2. Corporate structure chart, including related organizations and affiliates.¹
- __3. Formal compliance policy and program adopted by the board of directors.
- __4. Identify the compliance officer and describe duties, or identify the distribution of compliance responsibilities. Also, identify the members of any compliance, community reinvestment or audit committees.
- __5. Internal/External audit reports¹ and other reviews that address compliance matters, including any self-assessments performed.
- __6. Minutes of board of directors' and other meetings¹ (including internal audit committee meetings) addressing CRA, Bank Secrecy Act, and other compliance matters, that were held during the review period. Please include materials reviewed or referred to in the minutes.
- __7. Real estate appraisal policy adopted by the board of directors, and appraisal manuals utilized by internal appraisers.¹
- __8. Debt collection procedures and loan modification policies adopted by the board of directors.¹
- __9. Foreclosed real estate disposition procedures and manuals.¹
- __10. Loan servicing and collection procedures and manuals.¹
- __11. Branch/Teller manuals.

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- __12. Policies and procedures relating to deposit administration, including compliance with the Truth in Savings Act.
- __13. Training manuals and other training information relating to compliance laws and regulations. Include a record of dates and participants, if available.
- __14. List all accountholders/borrowers living outside of the United States.
- __15. List all loan programs, including both open- and closed-end mortgage and consumer loan programs, and current rate sheets.
- __16. List third party or affiliated vendors providing compliance services.
- __17. Current underwriting standards and policy, as approved by the board of directors, and publicly-available loan underwriting standards. Include information on any credit-scoring system utilized and results of any validations conducted.¹
- __18. Internal loan processing procedures relating to issuance of various loan disclosures.
- __19. Mission statement and business plan, including financial projections.¹
- __20. Sample Loan Officer/Originator employment agreement, including commission schedule if applicable.¹
- __21. Internal audit procedures.¹
- __22. A listing of loans originated or purchased during the review period by type. If possible, please sort this list by MSA (or assessment area if not an MSA) for each full year and part year of the review period. The list should include the loan number (or other identifier), the dollar amount, the date originated, and, if possible, the MSA, county, or other area identifier, and the applicant's income or business/farm revenue. The loan application register may be used for residential loans; a trial balance could be used for other types of loans.
- __23. Summary of new lending,¹ by month, of the number and total dollar amount of loans granted and purchased during the review period. Please separate the loans into the various types (e.g., purchase of one- to four-family, construction 5+ units, consumer installment, etc.) normally distinguished by your institution. Also, please distinguish refinance loans from purchase loans.

Note: The information requested in the preceding two paragraphs may overlap in some institutions. If an institution's reports are structured in such a way that the information may be provided in one report or response, please do so.

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- __24. Describe all litigation, pending litigation, or claims, judgments, and assessments in which the institution is involved or in which it is likely to become involved.
- __25. Branch closing policy adopted by the board of directors, and any information relating to closings conducted in accordance with the policy. For example, include any evaluations made by the institution regarding the community impact of any closings and any comments received from the public.

II. BANK PROTECTION ACT

- __1. Identify the security officer and provide evidence of appointment by the board of directors.
- __2. Security policy and program and evidence of adoption by the board of directors. Include any training records.
- __3. Suspicious Activity Report (OTS Form 1601) filed in accordance with 12 CFR 563.180(d).¹
- __4. Reports of robberies or unexplained losses for which no criminal referrals were filed.

III. BANK SECRECY ACT (BSA)

- __1. Identify BSA Officer and other individual(s) involved in substantial BSA activities such as daily monitoring (not including tellers).
- __2. BSA policy adopted by the board of directors.
- __3. BSA compliance program.
- __4. Currency Transaction Report (CTR) Forms 4789 and Forms 4790 that have been filed.

IV. ELECTRONIC FUND TRANSFER ACT (EFTA)

- __1. EFTA policy adopted by the board of directors.
- __2. Initial disclosure statement of terms and conditions.
- __3. Sample error resolution notice provided periodically to customers.
- __4. Records describing any complaints received.
- __5. Sample periodic statements showing electronic fund transactions.

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__6. Sample automated teller machine receipt.

IV. EQUAL EMPLOYMENT OPPORTUNITY (EEO)

- __1. EEO policy adopted by the board of directors.
- __2. Any other EEO policies, including affirmative action, developed by the institution.
- __3. Employment administration manuals and the employee handbook.
- __4. Results of any review of employment practices or facilities access under the American Disabilities Act.

VI. EXPEDITED FUNDS AVAILABILITY ACT (EFA)

- __1. EFA policy adopted by the board of directors, and procedures used to ensure compliance.
- __2. EFA Disclosure Statement and sample (blank) deposit hold notices (exception, reasonable cause or case-by-case).

VII. FLOOD DISASTER PROTECTION ACT (FDPA)

- __1. FDPA policies adopted by the board of directors and procedures to ensure compliance.
- __2. Disclosure used to notify applicant of flood zone determinations.

VIII. HOME MORTGAGE DISCLOSURE ACT (HMDA)

- __1. A list of offices where the institution's HMDA reports are available to the public.
- __2. Loan application register (LAR) and LAR modified for public use.

IX. FAIR LENDING

- __1. Completed Fair Lending Questionnaire (enclosed).
- __2. Cosigner disclosure forms.
- __3. Any fair lending/nondiscrimination policy and training records.

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Docket #**X. FORMS AND DISCLOSURES**

- __1. All credit application forms, including applicant financial statement, for all types of credit offered by the institution.
- __2. Application denial, counteroffer, approval and credit account adverse action forms.
- __3. Internal application transmittal, credit evaluation and credit scoring forms.
- __4. Note and security agreement forms for all loans and lines of credit. If applicable, include any consumer lease financing documents and disclosures.
- __5. Segregated disclosures for closed-end credit.
- __6. Itemization of amount financed forms.
- __7. Initial and periodic disclosure statements for open-end credit.
- __8. Any additional disclosure materials provided for credit cards, home equity lines of credit or reverse mortgages.
- __9. Program disclosures for each type of ARM mortgage loan offered and the ARM informational booklet.
- __10. ARM adjustment notice forms.
- __11. Servicing transfer policy and three-year history disclosure statement form.
- __12. Servicing transfer to/from notification forms.
- __13. Initial and annual disclosure forms used for escrow accounts.
- __14. Uniform Settlement Statement (Form HUD-1), Good Faith Estimate form, required provider disclosures and settlement costs informational booklet.
- __15. Truth in Savings disclosures, including initial and periodic disclosures, maturity notices and sample rate sheets for all types of consumer deposit accounts available or held during the review period.
- __16. Savings (passbook, certificate, NOW, MMDA) and demand deposit account agreement forms, for accounts now being offered/accepted.

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¹ This item may also be required to fulfill safety and soundness examination requirements. If a compliance examination is conducted concurrently, institution management need only provide one response.

Fair Lending Questionnaire
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Institution Name

In an effort to determine the extent of the institution's compliance with the applicable laws and regulations dealing with fair lending and employment, the managing officer is requested to provide answers to the following questions and present the completed questionnaire to the examiner in charge by the date requested in the cover letter. Please attach supplemental pages if additional space is needed. If a question is not applicable to the institution, respond with "Not applicable."

For the purpose of the questionnaire, the term, "minority group members" means American Indian, Alaskan Native, Asian, Pacific Islander, African American, Hispanic, and other minorities. As used herein, the "effective lending territory" of an institution means the geographical territory in which the institution makes a substantial majority of its loans and all other areas that are as close to the institution's offices as such areas.

1. Has the institution adopted comprehensive nondiscriminatory loan underwriting standards and business practices? If so, please describe. Are they reviewed regularly for compliance with applicable nondiscrimination and fair lending statutes and regulations? If so, what were the dates and results of the most recent review?
2. Has the board of directors reviewed, during the last twelve months, the institution's loan underwriting standards and the practices implementing them to ensure equal opportunity in lending? If yes, provide the date of the most recent review. If no, provide the name of the committee or individual to whom this responsibility has been delegated and the date of the board action delegating the responsibility for such review.
3. If deviations from the institution's underwriting standards are permitted, who has the authority to approve such variations?
4. Are there neighborhoods or areas within its effective lending territory in which the institution makes dwelling or other loans on more restrictive terms? If so, specify the areas and the reasons for such restrictions.
5. Are there neighborhoods or areas within its effective lending territory in which the institution does not make dwelling or other loans or areas where more restrictive terms are applied? If so, specify the areas and the reasons for such restrictions.
6. How does the institution ensure that lending staff has a good working knowledge of nondiscrimination/fair-lending statutes and regulations?

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7. Does the institution train (and periodically re-train) lending staff on the adopted underwriting standards? Does it provide any sensitivity training to all staff that deal with the public, particularly those who work in a multicultural environment? If so, please describe.
 8. What oversight mechanisms and monitoring procedures are in place to ensure adherence to the institution's underwriting and fair lending standards?
 9. What procedures are in place to prevent illegal prescreening or discouragement of written applications in connection with the processing of oral applications or inquiries?
 10. Does the institution review denied loan applications under any "second look" type of program and use the reversal of decisions to train affected staff? If so, please describe.
 11. Does the institution sample denied, withdrawn, and approved loan files for indications of discriminatory treatment? If so, please describe process and results.
 12. Does the institution periodically analyze (as outlined in Thrift Bulletins 25 and 47-2) its lending patterns/distribution:
 - By geographical location (census tract) of security property?
 - By race of applicant?
 - By income level of applicant?
 - By any other basis?

If so, please provide a copy of these analyses, as well as a description of any strategies or plans implemented or proposed to address any noted lending disparities or gaps.
 13. Does the institution conduct self-assessments of its lending activities to ensure compliance with record-keeping and reporting requirements and adherence to internal standards? If so, please describe.
 14. Has the institution assessed the effectiveness of its marketing/advertising strategies in informing all segments of its effective lending territory of credit products and financial services offered by the institution? If so, what were the conclusions including any planned initiatives for improvement?
 15. Does the institution perform unannounced testing or shopping of lending staff and underwriting practices? If so, please describe.
 16. Has the institution received or resolved any fair lending or fair housing complaints since the last review period? If so, please provide pertinent records.

What procedures or processes are in place to investigate and resolve consumer complaints that allege discriminatory treatment?

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- 17. Does the institution offer mortgage counseling services to potential applicants, as well as problem borrowers? If so, please describe.

- 18. Have there been any U.S. Department of Housing and Urban Development, U.S. Department of Justice, or other state or federal regulatory/enforcement inquiries or investigations into the institution's lending or business practices during the review period? If so, please describe.

- 19. Has the institution adopted a comprehensive equal employment opportunity program? If so, please describe and provide a copy of any analysis of its effectiveness. If there have been any state or federal regulatory/enforcement investigations or if there are any pending charges, lawsuits, or other proceedings against the institution on equal employment issues, please describe.

_____ (Managing Officer)

_____ (Title)

_____ (Date)

Community Reinvestment Act Information

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Institution Name

Introduction

Pursuant to the revised Community Reinvestment Act (CRA) regulation that became effective July 1, 1995, an institution's CRA performance may be evaluated in several ways beginning January 1, 1996:

- Small institutions (those under \$250 million in total assets that are either independent or an affiliate of a holding company with combined bank and thrift assets less than \$1 billion) are evaluated under the streamlined small institution procedures (see 12 CFR 563e.26). Small institutions may also wish to provide additional information for the examiner to consider in evaluating whether the institution may be eligible for an "Outstanding" CRA rating.
- Small institutions may elect to be evaluated under the lending, investment, and service tests if they have met the data collection requirements for large institutions (see 12 CFR 563e.21).
- Large institutions are evaluated under the lending, investment and service tests (see 12 CFR 563e.51(b)(4) and (c)(2), and 563e.22 through 563e.25).
- Institutions may begin submitting strategic plans for approval. Examinations based on approved strategic plans cannot take place until the institution has operated under the approved strategic plan for one year (see 12 CFR 563e.27). Up to that point, institutions with approved strategic plans will be examined under either the old regulation, the lending, investment, and service tests (if they elect), the small institution tests (if they qualify) or the community development test (if they are designated as "wholesale" or "limited purpose" institutions).

This section of the Compliance PERK contains information requests based on each of the evaluation methods described above.

The following information should be made available to the examiner-in-charge either prior to or at the commencement of the compliance examination. The information will help ensure an efficient review of the institution and minimize additional requests. Please provide a brief explanation for any information that is not provided or indicate the name of an individual to contact to obtain the requested information.

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Small Institutions

Beginning January 1, 1996, small institutions will be evaluated under the criteria contained in 12 CFR 563e.26. Completion of the following information will provide an opportunity for your institution to present its record with regard to CRA performance and will also materially aid the examiner's review of your institution's CRA activities.

Please be as specific as possible in responding to the information requests. Where appropriate, reference may be made to related documents, such as those requested in the Fair Lending Questionnaire. Please reference all attachments to the specific information requests enumerated below.

1. CRA Public File (see 12 CFR 563e.43).
2. For review periods longer than covered by the materials in the CRA Public File, any supplementary information to cover the balance of the review period and any pertinent confidential information related to the contents of the Public File.
3. A copy of the public CRA Notice.
4. Any response to the document entitled "Optional Information (Small Institutions)" (see separate guidance for the use of this document).

In addition, your institution may have compiled certain information (for example, an analysis of lending patterns or factors that may bear on your institution's loan-to-deposit ratio) that you would like the examiner-in-charge to review. If so, please provide the information in advance of the examination with your overall response to this PERK request or have it available when the examination begins.

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Large Institutions

Large institutions are examined under the lending, investment and service tests. Completion of the following information will provide an opportunity for your institution to present its record with regard to CRA performance and will also materially aid the examiner's review of your institution's CRA activities.

Information listed as optional in this request is intended to serve as a guide to the types of supplementary information regarding a large institution's performance that could be helpful in providing examiners with a greater understanding of the institution's performance and, thus, expedite the examination process. Your institution is not required to provide the information identified as optional. In addition, your institution is welcome to provide information demonstrating its performance that is not listed.

Please be as specific as possible in responding to the information requests. Where appropriate, reference may be made to related documents, such as those requested in the Fair Lending Questionnaire. Please reference all attachments to the specific information requests enumerated below.

1. CRA Public File (see 12 CFR 563e.43).
2. For review periods longer than covered by the materials in the CRA Public File, any supplementary information covering the balance of the review period and any pertinent confidential information related to the contents of the public file.
3. A copy of the public CRA notice.

Lending Test

4. The total number and dollar amount of the institution's home mortgage, small business and small farm loans originated or purchased during the review period. This includes data collected since your previous annual HMDA and CRA data submissions. We would appreciate reviewing this year-to-date information on diskette, if possible, to facilitate off-site analysis and reduce examination burden.
5. The number and dollar amount of the institution's home mortgage, small business and small farm loans originated or purchased within its assessment area(s) during the review period.

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6. For each assessment area, the total number and dollar amount of home mortgage, small business, and small farm loans originated or purchased in low-, moderate-, middle- and upper-income census tracts or BNAs (collectively referred to as “geographies”).
7. For each assessment area, the total number and dollar amount of home mortgage, small business, and small farm loans (originated or purchased) to individuals of low-, moderate-, middle- and upper-income.
8. The total number and dollar amount of small business and small farm loans by:
 - Loan amount less than \$100,000;
 - Loan amount between \$100,000 and \$250,000, inclusive;
 - Loan amount greater than \$250,000; and
 - To businesses or farms with revenues of less than \$1 million per year.
9. A schedule of the number and amount of community development loans made by the institution and access to information that describes the primary purpose of the loans.
10. Any information regarding the innovativeness or complexity of community development loans.
11. Any information regarding innovative or flexible loan programs targeting low- and moderate-income geographies or individuals, including the number and dollar amount of loans originated within the institution’s assessment area(s).
12. (OPTIONAL) Data collected and maintained pursuant to 12 CFR 563.42(c) for each category of consumer lending that the institution wishes to have considered under the lending test.
13. (OPTIONAL) Data collected, maintained and reported pursuant to 12 CFR 563e.42 for home mortgage, small business, small farm or consumer loans made by the institution’s affiliate(s) that it wishes to have considered under the lending test.
14. (OPTIONAL) Any other lending data that the institution chooses to provide, including additional distribution data or information regarding loans outstanding, commitments and letters of credit.

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15. A schedule of the amount and date of qualified investments, as defined in 563e.12(r), and access to any prospectus and supporting information that describes the qualified investments. Please distinguish between those qualified investments that are made in your assessment area(s) and those that are made outside the assessment area(s). For qualified investments made outside the institution's assessment area(s), please provide an explanation of how each benefits a larger statewide or regional area that includes the assessment area(s).
16. Any information regarding the innovativeness and complexity of the qualified investments listed, the degree to which these investments are not routinely provided by other private investors and their responsiveness to community development needs.
17. Information regarding the disposition of branch premises through donation, sale on favorable terms, or rent-free occupancy in a predominantly minority neighborhood to any minority- or women-owned depository institution or financial institution with a primary mission of promoting community development, if applicable.
18. (OPTIONAL) Information regarding any qualified investments provided by the institution's affiliate(s), including the dollar amount and date of such investments.

Service Test

19. The number of branches in low-, moderate-, middle- and upper-income geographies.
20. For each branch opened or closed during the review period, indicate its location by census tract, whether the census tract is low- or moderate-income and whether the branch served (if closed) or will serve (if opened) low- or moderate-income individuals.
21. A description of the institution's alternative delivery systems, if applicable, for delivering retail banking services in low- and moderate-income geographies or to low- and moderate-income individuals.
22. An explanation of any material differences in the hours of operations of, or services available at, branches located in low-, moderate-, middle- and upper-income geographies in the assessment area(s). Please include a discussion as to how the hours or services at these branches may have been tailored to help respond to community needs.

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23. A description of any community development service(s), as defined in 12 CFR 563e.12(j) provided by the institution, including information regarding the amount of time, resources, and staff devoted to providing such services and information regarding how the service(s) meets the credit needs of low- or moderate-income geographies or individuals.

24. (OPTIONAL) Any information regarding community development services provided by an affiliate(s).

Performance Context

25. (OPTIONAL) Any information that the institution wishes to offer that provides a clearer picture of its performance, including information about the assessment area(s) (such as economic conditions, demographic information relevant to loan demand or economic studies prepared by the institution or an outside party) and the institution itself (such as its business strategy, lending capacity or any constraints on its ability to meet the credit needs of the assessment area(s)).

26. (OPTIONAL) A copy of any analysis done by the institution of its lending activity, particularly with respect to the distribution of loans: (a) within versus outside of its assessment area(s); (b) in geographies of different income levels; and (c) to borrowers of different income levels and to businesses and farms of different sizes.

27. (OPTIONAL) A description of any actions taken to address lending disparities identified through internal reviews.

CRA Optional Information—Small Institutions

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Small institutions will be evaluated under the criteria outlined in 12 CFR 563e.26.

The information to be reviewed during the examination is intended to be derived, where possible, from records kept by the institution in the ordinary course of business (e.g., automated reports and CRA Public File), thus minimizing recordkeeping and examination burden. The examination will assess any information the institution wishes to present to ensure comprehensive evaluation of its performance.

A small institution may wish to provide supplementary information regarding its performance and factors that bear on that performance. In addition, it may wish to provide information regarding services and community development investments in order to improve upon a “Satisfactory” rating. A small institution also has the option to request an evaluation under the performance tests used for large institutions.

This outline guides an institution by identifying the types of supplementary information that may provide examiners with a better understanding of the institution's performance and, thus, expedite the examination process. An institution is not required or expected to provide any portion of the information described—completion is entirely voluntary. In addition, an institution may wish to offer other information that better and more succinctly describes its CRA performance.

Note: The terms in this outline are defined in 12 CFR 563e.12. For example, “geographies” means either census tracts or block numbering areas.

1. Provide a copy of any analysis done by the institution of its lending activity, particularly with respect to the three factors related to the distribution of loans: (a) within versus outside of the institution's assessment area(s); (b) in geographies of different income levels; and (c) to borrowers of different income levels and to businesses of different sizes. The institution may also wish to provide information regarding lending outside of its assessment area(s) to low- and moderate-income borrowers or geographies. If any analysis uncovered disparities in lending patterns, also provide a description of any actions taken to address the causes of such disparities.
2. Provide information regarding the institution's community development lending. The information would include affordable housing rehabilitation, construction and permanent financing of multifamily rental properties servicing low- and moderate-income persons.¹

CRA Optional Information—Small Institutions

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3. Provide information regarding innovative or flexible loan programs targeting low- and moderate-income individuals or geographies. If available, provide the number and dollar amount of loans originated within the institution's assessment area(s) under such programs.
 4. If the institution wishes the examiner to consider services and community development investments as defined in 12 CFR 563e.23 and 24, provide access to information regarding:
 - a. retail services (including alternative delivery systems) serving low- or moderate-income individuals or geographies;
 - b. community development services;² or
 - c. community development investments.³

¹ Other types of community development loans include, but are not limited to, loans to not-for-profit organizations servicing primarily low- and moderate-income housing borrowers, or other community development needs; loans to Community Development Financial Institutions, Community Development Corporations, minority- and women-owned financial institutions, and low-income or community development credit unions; loans to local, state, and tribal governments for community development activities; and loans to finance environmental clean-up or redevelopment of an industrial site as part of efforts to revitalize the low- or moderate income community in which it is located.

² Community development services are required to be related to the provision of financial services and focus on serving low- and moderate-income housing needs or economic revitalization and development. They may include providing technical assistance in the financial services field to community based groups, local or tribal government agencies, or intermediaries that help to meet the credit needs of low- and moderate-income individuals or small businesses and farms; lending executives to organizations facilitating affordable housing construction, rehabilitation, or development; providing credit, home buyer, or home maintenance counseling and/or financial planning to promote community development and affordable housing school savings programs; and other financial services the primary purpose of which is community development, such as low-cost or free government check cashing, electronic benefits transfer and point-of-sale terminal systems.

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³ Qualified investments include, but are not limited to, investments, grants, deposits, or shares: in or to financial intermediaries that promptly lend to facilitate lending in low- and moderate-income areas or to low- and moderate-income individuals in order to promote community development; in support of organizations engaged in affordable housing rehabilitation and construction; in support of organizations promoting economic development by small businesses; to support or develop facilities that promote community development in low- and moderate-income areas for low- and moderate-income individuals; projects eligible for low-income housing tax credits; in state and municipal obligations that specifically support affordable housing or other community development needs; and in or to organizations supporting activities essential to the capacity of low- and moderate-income individuals or geographies to utilize credit or sustain economic development. Information regarding community development lending (including loans for affordable multiunit housing) would not be included, but would be considered in the evaluation of the institution's lending.

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Institution Name

Small Institutions

The following is not provided as a substitute for the requirements for the CRA Public File. Rather, it summarizes the information from the CRA Public File that the OTS uses to evaluate CRA performance. It is intended to assist small institutions in confirming that the information covered by this request is needed for the examination. For specific guidance, please refer to 12 CFR 563e.43.

1. A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.
2. Written comments received from the public during the review period that specifically relate to the institution's performance in helping to meet the credit needs of the assessment area(s) and any response by the institution.
3. The institution's loan to deposit ratio for each quarter of the review period and any additional data it wishes to provide regarding this ratio.
4. A list of the institution's branch offices, including their street addresses and geographies and a list of branch offices opened or closed during the review period.
5. If the institution reports residential loans under the Home Mortgage Disclosure Act (HMDA), copies of the HMDA Disclosure Statement provided by the FFIEC pertaining to the review period and the loan application register for the current year.
6. A trial balance or other listing of small business and small farm loans made by the institution during the review period, sorted if possible by MSA, showing the loan number (or other unique identifier), the loan amount at origination, the date of origination, and, if possible, the location of the loan.
7. For any category of consumer loans the institution chooses to have considered, a trial balance or other listing of such loans originated or purchased during the review period sorted, if possible, as in (6) above.
8. If the institution elects to include affiliate lending for any part of the review period, a copy of the comparable data for the affiliate should be provided for each loan type to be considered.

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9. The institution's CRA Notice.
10. 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 particular branches, if any. At its option, an institution may include information regarding the availability of alternative systems for delivering retail banking services.

Large Institutions

The following is not provided as a substitute for the requirements of the CRA Public File requirements. Rather, it summarizes the information from the CRA Public File that the OTS uses to evaluate CRA performance. It is intended to assist large institutions in confirming that the information covered by this re-quest is needed for the examination. For specific guidance, please refer to 12 CFR 563e.43.

1. A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.
2. Written comments from the public during the review period that specifically relate to the institution's performance in helping to meet credit needs in the assessment area(s) and any response by the institution.
3. A list of the institution's branches, including their street addresses and geographies and a list branch offices opened and closed during the review period.
4. 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 particular branches, if any. At its option, an institution may include information regarding the availability of alternative systems for delivering retail banking services.
5. If the institution reports residential loans under the Home Mortgage Disclosure Act (HMDA), copies of the HMDA Disclosure Statements provided by the FFIEC pertaining to the review period and the loan application register for the current year.
6. The institution's CRA disclosure statements for the review period.

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7. For any category of consumer loans the institution chooses to have considered, a trial balance or other listing of loans made by the institution for each of the two prior calendar years, sorted, if possible, by MSA, showing the loan number (or other unique identifier), the loan amount at origination, the date of origination, and, if possible, the location of the loan.
8. If the institution elects to include affiliate lending for any part of the review period, a copy of the comparable data for the affiliate should be provided for each loan type to be considered.
9. The institution's CRA Notice.
10. If the institution received less than a satisfactory rating during its most recent examination, a description of current efforts to improve its CRA performance.