

# CRA TOOLKIT

#### Resources to use in developing and implementing a CRA strategy for your bank.

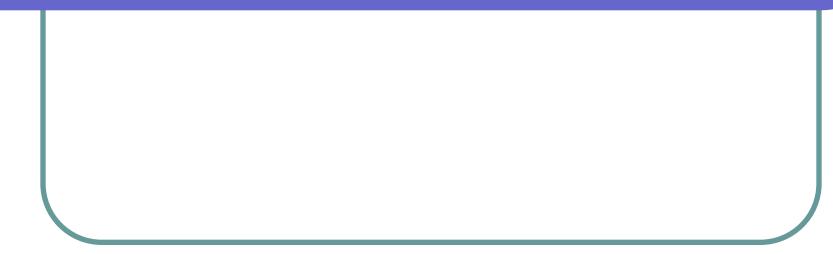


- Supervisory agency & other regulatory resources
- Assessment area and geographic data resources
- Performance context resources





# Supervisory Agency & Other Regulatory Resources



## Federal Financial Institutions Examination Council (FFIEC)

#### Home page - <u>www.ffiec.gov</u>

#### Home Mortgage Disclosure Act (HMDA)

- Link: <u>http://www.ffiec.gov/hmda/default.htm</u>
- Also access links to FAQs, the FFIEC geocoding system, information on how to file your HMDA data, census reports, public data and other reporting resources

#### Community Reinvestment Act (CRA)

- Link: <u>http://www.ffiec.gov/cra/default.htm</u>
- Also access links to the Interagency Q&As, CRA ratings, exam schedules, interpretive letters, information on how to file your CRA data, and other public data and CRA related resources

FFIEC FEDERAL FINANCIAL INSTITUTIONS EXAMINATION COUNCIL Promoting uniformity and consistency in the supervision of financial institutions

# Exam Schedules, Procedures & Guidance

- FFIEC link to agency examination schedules, annual asset threshold adjustments, list of distressed and underserved nonmetropolitan middle-income geographies, examination procedures, and public evaluations http://www.ffiec.gov/cra/examinations.htm
  - FDIC link to examination procedures and other resources and information on CRA http://www.fdic.gov/regulations/community/community/index.html
  - Federal Reserve link to the the Consumer Compliance handbook http://www.federalreserve.gov/boarddocs/supmanual/cch/cch.pdf
  - OCC link to examination procedures and other resources and information on CRA <u>http://www.occ.gov/topics/compliancebsa/cra/index-cra.html</u>
  - OTS link to examination procedures and other resources and information on CRA <u>http://www.ots.treas.gov/?p=CRA</u>

**NOTE**: Public Evaluation Templates and Instructions for Completing them – can be useful for conducting self-evaluations:

## Interagency Q & A's on CRA

- Link to current Interagency Questions & Answers Regarding Community Reinvestment (3/11/2010) <u>http://www.ffiec.gov/cra/qnadoc.htm</u>
- Summary of New Guidance and Revisions (Dallas Fed)

http://dallasfed.org/ca/pubs/qa.pdf

 Note: This publication was issued in January 2009 and does not reflect changes effective with Q&As issued in March 2010

#### Locating Public Evaluations

FFIEC <u>http://www.ffiec.gov/craratings/default.aspx</u>

- FDIC <a href="http://www2.fdic.gov/crapes/">http://www2.fdic.gov/crapes/</a>
- FRB <u>http://www.federalreserve.gov/dcca/cra/crarate.cfm</u>
- OCC <u>http://www.occ.treas.gov/cra/crasrch.htm</u>
- OTS <u>http://www.ots.treas.gov/?p=CRASearch</u>



## Other Supervisory Agency Resources

- A Banker's Quick Reference Guide to CRA (Dallas Fed) http://dallasfed.org/ca/pubs/quickref.pdf
  - Note: This publication was created in 2005 and has not been updated to reflect changes in annual asset size thresholds

#### • CRA Loan Data Collection Grid (Dallas Fed): http://www.dallasfed.org/ca/pubs/craloan.pdf

 Note: This publication was revised in 2006 and has not been updated to reflect current guidance allowing ISB's to categorize loans to businesses that have a purpose of CD as CD loans

#### • Office of the Comptroller of the Currency

 Makes one page fact sheets, e-zines and other publications on important CD programs and topics available <u>http://www.occ.treas.gov/cdd/commfoc.htm</u>

#### Federal Deposit Insurance Corporation

 Templates for Safe, Low-cost Transactional and Basic Savings Accounts <u>http://www.fdic.gov/consumers/template</u>

## Community Development

- Definitions of Terms in CRA Performance Evaluations (published by the FDIC): <u>http://www2.fdic.gov/crapes/peterms.asp</u>
- Glossaries of Community Development Terms- HUD: <u>http://www.hud.gov/offices/cpd/library/glossary/</u>
- Glossary of Community Development Terms St. Louis Fed: <u>http://stlouisfed.org/community\_development/selfstudy/pdf/glossary.</u> <u>pdf</u>
- Glossary of Economic terms -San Francisco Fed <u>http://www.frbsf.org/tools/glossary/</u>





# Assessment Area & Geographic Data Resources



# Information on Metropolitan & Micropolitan Statistical Areas

- Office of Management and Budget (OMB)
  http://www.whitehouse.gov/omb/inforeg\_statpolicy
- Lists of Metropolitan and Micropolitan Statistical Areas and definitions (current as of December 2009)
  - <u>http://www.census.gov/population/www/metroareas</u> /metrodef.html
- State-based maps (current as of November 2004)
  - <u>http://www.census.gov/geo/www/maps/stcbsa\_pg/s</u> <u>tBased\_200411\_nov.htm</u>

## Geocoding Tool

- Enter a street address to find the MSA/MD, state, county, and census tract codes.
   http://www.ffiec.gov/Geocode/default.aspx
- Click on the "Get Census Demographic" button for tract income level data





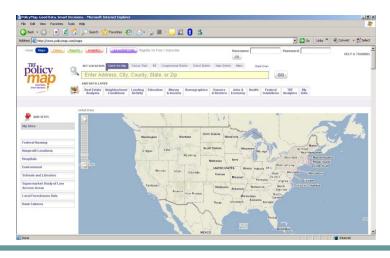


#### Distressed/Underserved Non-metro Middle-Income Areas Designated Disaster Areas

- Distressed and Underserved Nonmetropolitan Middle-Income Geographies
  - Scroll down to access the list for a specific year. <u>http://www.ffiec.gov/cra/examinations.htm</u>
- Designated Disaster Areas
  - Major Disaster Declarations administered by the Federal Emergency Management Agency (FEMA). Search for disaster areas by state and year. <u>http://www.fema.gov/news/disasters.fema</u>
    - Note: "Designated Disaster Areas" under CRA does not include counties designated to receive only FEMA Public Assistance Emergency Work Category A (Debris Removal) and/or Category B (Emergency Protective Measures).

## PolicyMap.org

- Online mapping tool
  - Access public data available in PolicyMap through maps and tables;
  - Download much of the public data in order to conduct your own analysis;
  - Save or print maps to incorporate in your own work;
  - Embed fully interactive maps on your own webpage;
  - Email maps to colleagues;
  - Save your work into your MyPolicyMap account or on your hard drive
  - Registration is <u>FREE</u>.
  - Subscription service provides access to additional tools and data



# Performance Context Resources

#### Fedstats.gov

Provides access to statistics from more than 100 federal agencies. Perhaps most readily useful is the basic census data (population demographics, basic business demographics, etc.) that is available at the city, county and state level:

http://www.fedstats.gov/







## Median Family Income

 HUD estimate for the fiscal year that corresponds to the year for which the loan application data are reported <u>http://www.ffiec.gov/hmda/censusproduct</u> s.htm#MSAincome



#### U.S. Census Bureau Resources

#### American Fact Finder

 A source for updated population, housing, economic, and geographic data <u>http://factfinder.census.gov/home/saff/main.html?\_lang=</u>

#### • The American Community Survey (ACS)

 An ongoing survey that provides data every year -- giving communities the current information they need to plan investments and services. <u>http://www.census.gov/acs/www/</u>

#### State & County Quick Facts

 Provides basic census data (population, median income, housing statistics, etc.) by state and county: <u>http://quickfacts.census.gov/qfd/index.html</u>

#### **Economic Data**

#### Bureau of Labor Statistics

- Local area unemployment estimates <u>http://data.bls.gov/PDQ/outside.jsp?s</u> <u>urvey=la</u>
- Federal Bureau of Economic Analysis (BEA) Regional Facts (BEARFACTS)



 Describes an area's personal income, its sources and growth rates. <u>http://www.bea.gov/regional/bearfact</u> s/

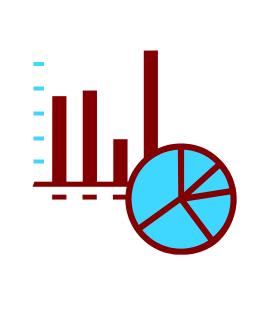
## Industry Analysis

- Deposit Market Share Report
  - Provides deposit and branch data on FDIC insured institutions by MSA or by state, county, and zip code

http://www2.fdic.gov/sod/sodMarketBank.asp?barlt em=2

- Institution Directory
  - Provides financial data and branch locations for FDIC insured institutions and their holding companies <u>http://www2.fdic.gov/idasp/</u>

#### **Small Business Data**



- Bureau of Labor Statistics
  - National and regional resources for employment and business data <u>http://www.bls.gov/</u>
  - Business Employment Dynamics is a quarterly data series that help to provide a picture of the state of the labor market. http://www.bls.gov/bdm/home.htm

#### Dunn & Bradstreet

 Source of information and ratios regarding industry and small businesses (by subscription) <u>http://www.dnb.com/us/</u>

## HUD Consolidated Plans

#### Five-year plans

 Analyses of the local housing market, and housing needs of low-income, homeless persons, and special needs populations.
 <u>http://www.hud.gov/offices/cpd/about/conplan/local/index.cfm</u>



#### HUD Economic Development Programs

- Information on eight Department of Housing & Urban Development Economic Development programs. <u>http://www.hud.gov/offices/cpd/economic</u> <u>development/programs/</u>
  - Search for RC/EZ/ECs by address or by state <u>http://egis.hud.gov/ezrclocator/</u>
  - Search for BRDI activities in a given locale. <u>http://cfpub.epa.gov/bf\_factsheets/basic/ind</u> <u>ex.cfm</u>

## Other Useful HUD Links

- American Housing Survey <u>http://www.huduser.org/portal/datasets/a</u> <u>hs.html</u>
- Low Income Housing Tax Credits <u>http://www.huduser.org/portal/datasets/li</u> htc.html



#### **Community Development Entities**

- Community Development Financial Institutions (CDFIs)
  - Search for a CDFI near you <u>http://www.cdfifund.gov/what\_we\_do/need\_a\_loan.asp</u>
- Community Development Housing Organizations (CHDOs)
  - <u>http://www.hud.gov/offices/cpd/affordablehousing/programs/home/topical/chd</u> <u>o.cfm</u>
- Directory of non-profits
  - Search for a list of non-profits by organization name, EIN, city, or state. <u>http://www2.guidestar.org/</u>
- Minority-owned banks
  - Investments in Minority Banks may qualify for CRA. Listing of minority institutions may be found at <u>http://www.federalreserve.gov/Releases/mob/</u>
- Low-income & community development credit unions
  - Search for Low-Income Credit Unions by charter, city, state, or other criteria. <u>http://cuonline.ncua.gov/CreditUnionOnline/CU/FindCreditUnions.aspx</u>
  - Statute allowing investment by banks: NCUA Rule and Regulation #701.32 allows credit unions to receive shares (which are deposits for credit unions), from non-members so long as they don't exceed 20% of total shares in the credit union or \$1.5MM, whichever is the larger.

## **Public School Review**

 Provides information on public schools in all 50 states and some private schools too. Data primarily describes academic performance, expenditure per student, student-teacher ratios, graduation rates, etc. It also includes percentage of students eligible for the Title 1 - free lunch program. http://www.publicschoolreview.com



## Stewards of the Toolbox

- Your local Community Affairs Representative
- Your bank's examiner
- You and your peers
- Community Organizations
- Government

