

FORM 21A.9 CRA SELF-ASSESSMENT

Instructions:

This Self-Assessment (performed annually) consists of five sections and asks for information relating to each of the five Performance Categories and their Assessment Factors. Circle YES or NO where appropriate and place a check (☐) next to those selections that are appropriate to your institution. You may need to consult with others in your bank for some of the sections.

SECTION I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Assessment Factor A. Bank activities to ascertain credit needs and efforts to communicate with community.

1. How have you assessed your community's credit needs? _____

2. Have you met with community groups? Yes No
With what groups? (check all that apply)
 - ☐ Neighborhood Organizations
 - ☐ Community-based/Nonprofit Development Organizations (e.g., Community Development Corporations/Neighborhood Housing Services)
 - ☐ Social Service Agencies
 - ☐ Minority and Small Business Associations
 - ☐ Chamber of Commerce
 - ☐ Religious and Civic Organizations
 - ☐ Realtors
 - ☐ Financial Intermediaries (Foundations, Loan Consortia, Loan Funds)
 - ☐ Technical Assistance Providers
 - ☐ Legal Aid Attorneys
 - ☐ Other: _____
3. How often have you met with these representatives or organizations?
 - ☐ Monthly
 - ☐ Semi-Annually
 - ☐ Quarterly
 - ☐ Annually
 - ☐ Other: _____
4. Have you contacted the city or town government? (check all that apply)
 - ☐ Mayor or Manager
 - ☐ City Council or Selectmen
 - ☐ Housing/Community Development Department
 - ☐ Economic Development/Small Business Department
 - ☐ Planning Department
 - ☐ Small Business Development Centers/Incubators
5. Have you contacted state agencies? (check all that apply)
 - ☐ Housing Finance Agency
 - ☐ State Community Development Department
 - ☐ State Economic Development Department

6. How often have you met with these representatives or organizations?
- ☐ Monthly
 - ☐ Semi-Annually
 - ☐ Quarterly
 - ☐ Annually
 - ☐ Other: _____
7. Do you collect and analyze demographic data of your local community?
- ☐ Population (Race & Ethnicity, Gender, Age, Household Types)
 - ☐ Housing Stock Conditions
 - ☐ Economic Indicators
 - ☐ Major Industries/Employers
8. How does the bank conduct and document its needs assessment process?
- ☐ Surveys to _____
How Often? Quarterly Semi-Annually Annually Other: _____
 - ☐ Group Meetings with _____
How Often? Quarterly Semi-Annually Annually Other: _____
 - ☐ Focus Groups of? _____
How Often? Quarterly Semi-Annually Annually Other: _____
 - ☐ Individual Meetings with _____
How Often? Quarterly Semi-Annually Annually Other: _____

Assessment Factor C. Board of Directors participation in formulating policies and reviewing institution's CRA performance.

1. How often does the Board review the bank's CRA Statement, policies, and activities?
- ☐ Annually
 - ☐ Semi-Annually
 - ☐ Quarterly
 - ☐ Other: _____
2. Does the Board have a CRA Committee? Yes No
3. How involved is the Board in the development of CRA policies and programs?
- ☐ Involved in creation of policies and programs
 - ☐ Monitor and oversight role
 - ☐ Reacts to issues presented by management
4. How does the Board help to assess community credit needs?
- _____
- _____
5. Are the president and Board made aware of community issues? Yes No
- How?
- ☐ Direct involvement with community organizations
 - ☐ Bank senior loan officer
 - ☐ Bank community affairs/CRA officer
 - ☐ Written reports documenting the bank's activities

SECTION II. MARKETING AND TYPES OF CREDIT EXTENDED

Assessment Factor B. Extent of marketing and special credit-related programs.

1. How aggressively is the bank marketing loan availability?

| Newspapers — list them: | Products/Services | Frequency |
|-------------------------|-------------------|-----------|
|-------------------------|-------------------|-----------|

- 1.
- 2.
- 3.
- 4.
- 5.

| Ethnic/Minority Targeted Publications and Media: | Frequency |
|--|-----------|
|--|-----------|

- 1.
- 2.
- 3.
- 4.
- 5.

| Community Organization's Newsletters | Frequency |
|--------------------------------------|-----------|
|--------------------------------------|-----------|

- 1.
- 2.
- 3.
- 4.
- 5.

| Radio/Television Stations | Frequency |
|---------------------------|-----------|
|---------------------------|-----------|

- 1.
- 2.
- 3.
- 4.
- 5.

| Call Program Targeting: | Products/Services | Frequency |
|-------------------------|-------------------|-----------|
|-------------------------|-------------------|-----------|

Bank Customers
Homeowners
Renters
Students
Small/Minority Businesses
Agricultural Enterprises
Real Estate Brokers

2. What credit services have you advertised? (check all that apply)

- ☐ Home Mortgages
☐ Home Improvement/Equity Loans
☐ Small Business Loans
☐ Consumer Loans
☐ Commercial Loans
☐ Other: _____

3. Have you initiated other forms of outreach such as homebuying, small business or small farm seminars/clinics?

| Yes | No |
|-----|----|
|-----|----|

4. Have you instituted credit-related services such as prepurchase counseling?

| Yes | No |
|-----|----|
|-----|----|

5. Are bilingual lending officers available to meet a specific community need?

| Yes | No |
|-----|----|
|-----|----|

6. What types of credit is your bank offering to its community? (check all that apply)

- ☐ Home Mortgages
☐ Home Improvement/Equity Loans
☐ FHA Loans
☐ VA Loans
☐ Small Business/SBA Loans
☐ Consumer Loans

- ☐ Commercial Loans
- ☐ Other government insured, subsidized, or guaranteed loans
- ☐ Special credit-related loan programs designed by the bank to address specific income groups or identified as being needed by community representatives
- ☐ Other: _____

Assessment Factor I. Origination or purchase of loans within community. *Review of the new HMDA data will be helpful in this section.*

1. Define credit extended in the previous listing (in number and dollars during a calendar year):

Mortgages/Equity Loans

- ☐ Significant
- ☐ Average
- ☐ Limited
- ☐ None

Small Business Loans

- ☐ Significant
- ☐ Average
- ☐ Limited
- ☐ None

2. Are the majority of credit extensions within the community? Yes No

3. What is the percentage of credit extensions compared to deposits within your community?

4. What is the geographic distribution of credit applications and credit denials?

Assessment Factor J. Participation of governmentally insured, guaranteed, or subsidized loan programs.

1. Does the bank participate in any government finance programs? Yes No

If yes:

- | | |
|-------------------------------|---|
| <input type="checkbox"/> FHA | <input type="checkbox"/> State Housing Finance Agency |
| <input type="checkbox"/> HUD | <input type="checkbox"/> State Small Business Loans |
| <input type="checkbox"/> FmHA | <input type="checkbox"/> Fannie Mae |
| <input type="checkbox"/> SBA | <input type="checkbox"/> Freddie Mac |
| <input type="checkbox"/> VA | <input type="checkbox"/> Other: _____ |

2. In what types of loan programs is the bank involved?

- | | |
|---|---|
| <input type="checkbox"/> Residential Mortgages | <input type="checkbox"/> Small Business |
| <input type="checkbox"/> Housing Rehabilitation | <input type="checkbox"/> Small Farms |
| <input type="checkbox"/> Home Improvement | <input type="checkbox"/> Other: _____ |

SECTION III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of delineated community

1. How do you define the bank's community?
2. Are any communities or neighborhoods within the overall community delineation excluded? Yes No

If so, why?

Assessment Factor E. Geographic distribution of credit extensions, applications, and denials. *New HMDA data will offer information on mortgage credit applications and denials. Analyze the patterns of lending.*

1. How often does the bank review the geographic distribution of credit extensions, applications, and denials?

- | | |
|--|-------------------------------------|
| <input type="checkbox"/> Annually | <input type="checkbox"/> Quarterly |
| <input type="checkbox"/> Semi-Annually | <input type="checkbox"/> Bi-Monthly |
| <input type="checkbox"/> Other: _____ | |

- | | | | |
|----|--|-----|----|
| 2. | Does this review include mortgages? | Yes | No |
| 3. | Does this review include small business loans? | Yes | No |
| 4. | Does this review include consumer/personal loans? | Yes | No |
| 5. | When this review is done, do you get a “swiss cheese” pattern, effectively leaving lower-income or minority areas out of lending activity? | Yes | No |
| 6. | What impact does this loan review process have on loan policies? | | |
| | None Some Substantial | | |
| 7. | What impact does this loan review have on products and services? | | |
| | None Some Substantial | | |
| 8. | What impact does this loan review process have on marketing plans? | | |
| | None Some Substantial | | |

Assessment Factor G. Record of opening and closing offices and providing services.

- If the bank has opened a series of new branches, where are they located?
(number in each category)

| | |
|---|---|
| <input type="checkbox"/> Suburbs _____ | <input type="checkbox"/> Rural _____ |
| <input type="checkbox"/> Commercial Corridors _____ | <input type="checkbox"/> Lower Income _____ |
| <input type="checkbox"/> Urban Centers _____ | <input type="checkbox"/> Minority Communities _____ |
- Has the bank recently closed an office in the central city? Yes No
- Has the bank moved all but its deposit operations out of a central city branch? Yes No
- What are the service hours for branches in lower-income and minority communities?

- Do the hours meet the convenience and needs of the community? Yes No
- Does the bank have a Branch Opening and Closing Statement? Yes No
Examine the procedures cited for such activities.

- What is the community’s role in the bank’s efforts to open or close a branch?

SECTION IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Assessment Factor D. Practices to discourage applications for types of credit set forth in CRA Statement.

- Does the institution offer applications at every branch? Yes No
If not, how far must you go in order to apply for a loan?

- How do your terms for certain loan types compare to competing institutions (down payments, interest rates, application fees)?
Higher Comparable Lower
- Does the bank implement any procedures to assure applicants are not illegally discouraged or prescreened? Yes No
- How does the bank train employees on fair credit and lending practices?
☐ Upon Employment

- ☐ Through Handbook/Policy Manual
- ☐ Annual Training
- ☐ No Training
- ☐ Other _____

Assessment Factor F. Evidence of prohibited discriminatory or other illegal credit practices.

- | | | | |
|----|---|-----|----|
| 1. | Using HMDA or property transfer data, is there a lending pattern which shows that an institution unfairly discriminates against minorities, elderly, handicapped, or women? | Yes | No |
| 2. | Have any charges been made by community organizations or individuals charging unfair or discriminatory treatment to any population? | Yes | No |

SECTION V. COMMUNITY DEVELOPMENT

Assessment Factor H. Participation, including investments, in local development and redevelopment projects and programs.

- | | | | |
|----|---|-----|----|
| 1. | Does the bank participate in community development activities? | Yes | No |
| | <input type="checkbox"/> Investment in local economic industrial revenue bonds <input type="checkbox"/> Participation in community and economic development programs <input type="checkbox"/> Pooling funds with other local financial institutions for projects <input type="checkbox"/> Providing technical assistance <input type="checkbox"/> Local neighborhood preservation efforts | | |
| 2. | Does the bank work with any community development organizations? (check all that apply) | Yes | No |
| | <input type="checkbox"/> Community Development Corporations <input type="checkbox"/> Neighborhood Housing Services <input type="checkbox"/> Local Development Corporations <input type="checkbox"/> Local Minority Developers <input type="checkbox"/> Other _____ | | |
| 3. | Have you been approached by a community organization for assistance and refused to cooperate for seemingly unjustifiable reasons? | Yes | No |

Assessment Factor K. Ability to meet community credit needs consistent with institution's characteristics.

- | | | | |
|----|--|-----|----|
| 1. | Compare community investments relative to size. | | |
| | _____ | | |
| | _____ | | |
| 2. | Has the bank developed or implemented specific projects to promote economic revitalization and growth consistent with its size? | Yes | No |
| | If yes, how: | | |
| | <input type="checkbox"/> Direct Loans <input type="checkbox"/> Loans Through a Financial Intermediary <input type="checkbox"/> Financial Services <input type="checkbox"/> Technical Assistance | | |

Assessment Factor L. Participation in other activities not covered under other performance categories that bear on extent to which institution meets community credit needs.

- | | | | |
|----|---|-----|----|
| 1. | Are there other factors which might not come to light during a normal examination? | Yes | No |
| | Explain: _____ | | |
| | _____ | | |
| | _____ | | |
| 2. | Does the bank lend to development projects and/or higher-income homebuyers in areas that may lead to gentrification and resulting displacement of lower-income residents? | Yes | No |
| 3. | What efforts has the institution made to assist present residents in neighborhoods undergoing a process of reinvestment or change? | | |
| | <input type="checkbox"/> No programs underway | | |
| | <input type="checkbox"/> Community seminars on credit and finance | | |
| | <input type="checkbox"/> Special credit products for homeowners | | |
| | <input type="checkbox"/> Special mortgages for lower-income homebuyers | | |
| | <input type="checkbox"/> Other _____ | | |
| 4. | Are bank personnel trained or informed to treat customers equally during credit services inquiries? | Yes | No |
| 5. | Does the bank target some of its corporate contributions for community development efforts? | Yes | No |