

COMMUNITY REINVESTMENT ACT INFORMATION – LARGE INSTITUTIONS
Preliminary Examination Response Kit
Office of Thrift Supervision

Docket #: DocketNo
Institution Name: entity name
Examination As Of Date: August 18, 1989

Large Institutions

OTS examines large institutions under the lending, investment, and service tests. (See 12 CFR § 563e.22 through .24.) 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 only a guide to the types of supplementary information regarding a large institution's performance that could be helpful to examiners by providing an understanding of the institution's performance and thus expediting the examination process. OTS does not require your institution to provide the information identified as optional. In addition, you are welcome to provide other information not listed here to demonstrate its performance.

Please be as specific as possible in responding to the information requests. Please reference all attachments to the specific information requests below.

1. Name and telephone number of the institution's primary CRA contact.
2. CRA Public File information (unless otherwise requested below). This includes information required by 12 CFR § 563e.43(a)(1), (a)(3), (a)(4), (a)(5), and (a)(7), and 563e.43(b)(5) only.
3. 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.
4. A copy of the public CRA notice.
5. Access to board of directors' and committee minutes and other periodic reporting, if any, that address CRA-related topics.
6. Copies of CRA-related self-assessments or evaluations. A copy of any analysis done by the institution of its lending activity, particularly with respect to the distribution of loans:
 - Within versus outside of its assessment area(s).
 - In geographies of different income levels.
 - To borrowers of different income levels and to businesses and farms of different sizes.
7. (OPTIONAL) Designate the percentage weight to be given on the examination to lending, service, and investment. (Weights must total 100 percent with a minimum of 50 percent weight for lending.) If you do not allocate weights to the various performance tests, we will examine your institution under the standard allocation of 50 percent lending, 25 percent service, and 25 percent investment.

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Lending Test

1. A description of the CRA assessment area(s): Identify the states, Metropolitan Statistical Areas (MSA), Metropolitan Divisions (MD), or whole counties within the CRA assessment area(s). If your assessment area(s) consists of smaller political subdivisions, such as cities, towns, villages, boroughs, or a similar group of geographies that comprise less than a county, provide a listing of census tracts represented by those whole political subdivisions. Please identify the county, MD, and/or MSA within which these geographies reside.
2. Please provide the following information on diskette (or compact disk) to facilitate off-site analysis. All HMDA reporters, and those with submission format capability, should provide the data in Standard HMDA data submission format only. Please contact your vendor/service bureau support to determine how to generate a non-encrypted format file. Consult with your service provider or software application provider to determine your submission capabilities:
 - *HMDA* data for annual periods ended December 31, [Click and enter Four Digit Year], and data for the six month period ending June 30, [Click and enter Four Digit Year].

(Please note the FFIEC HMDA reporting system has adopted an encrypted format for HMDA submissions for 2003 and beyond. To ensure that the file you send us can be read, please follow the following procedures before copying your file for us.) Within the HMDA data program:

 - Click on the file drop-down menu in the upper left hand corner
 - Click on Export
 - Click on For Other Purposes (third choice down)
 - For Export Type, use Standard HMDA
 - If your institution is not a HMDA reporter, please submit your loan application registers for all years since your last CRA Public Evaluation.
 - *Small Business/ Small Farm Loans* – For each calendar year of the review period, and year-to-date data for the current year in “standard” FFIEC format, micro level data.
3. 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.
4. 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 (also referred to as “geographies”).
5. A schedule of the number and dollar amount of community development loans the institution made including information that describes the primary purpose of the loans. Any information regarding the innovativeness or complexity of community development loans.

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6. Identify any new lending products introduced since the last CRA Public Evaluation. Describe innovative or flexible loan programs targeting low- and moderate-income geographies or individuals, including the number and dollar amount of these loans originated within the institution's assessment area(s), and whether these loans are included in your HMDA data submission.
7. (OPTIONAL) Data collected and maintained pursuant to 12 CFR § 563.42(c) for home equity loans, and any other category of consumer lending that the institution wishes to have considered under the lending test.
8. (OPTIONAL) Data collected, maintained and reported pursuant to 12 CFR § 563e.42 for home mortgage, small business, small farm or consumer loans the institution's affiliate(s) made that it wishes to have considered under the lending test.
9. (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.

Investment Test

1. A schedule of the dollar amount and date of qualified investments, as defined in § 563e.12(s), and supporting information that briefly 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). (See Interagency Questions and Answers Regarding Community Reinvestment, §563e.12(h)-6.)
2. 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.
3. 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.
4. (OPTIONAL) Information regarding any qualified investments the institution's affiliate(s) provided, including the dollar amount and date of such investments.

Service Test

1. A description of any community development service(s), as defined in 12 CFR § 563e.12(i) the institution provided, 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.
2. The number of branches in low-, moderate-, middle-, and upper-income geographies.

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3. For each branch opened or closed during the review period, indicate its location by geography (census tract) and whether the geography is low- or moderate-income, and whether the branch served (if closed) or will serve (if opened) low- or moderate-income individuals.
4. 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.
5. 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.
6. (OPTIONAL) Any information regarding community development services an affiliate(s) provided.
7. (OPTIONAL) A description of any actions taken to address lending disparities identified through internal reviews.

Performance Context

1. Information that provides a clearer picture of the institution's performance, including all of the following:
 - Information about the assessment area(s) such as economic conditions, listing of major employers and changes since the prior evaluation and any impact these changes had on population and unemployment figures.
 - Competitive factors (other financial institutions including mortgage companies) within your assessment area.
 - Demographic information relevant to loan demand, or economic studies the institution or an outside party prepared.
 - 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).