

# Best Practices in CRA Program Management



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## WHO WE ARE

### Overview:

- Comerica Incorporated is a financial services company headquartered in Dallas, Texas, and strategically aligned by three major business segments: the Business Bank, the Retail Bank, and Wealth Management. We are among the 25 largest U.S. banking companies based on assets of \$53.7 billion at year end 2010. Comerica focuses on relationships and helping people and businesses be successful.



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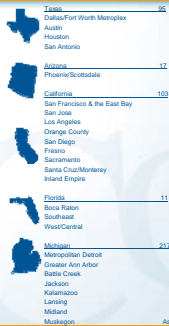
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## WHO WE ARE

- In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico.



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**Comerça Bank** **WHAT WE DO**

**Lending**

- Mortgages
- Consumer Loans
- Micro loan pools
- SBA Lending
- Community Development

**Investments**

- Housing and Economic Development Programs
- Health and Human Services
- Education
- Civic and Community
- Alternative Delivery Systems

**Services**

- Provide Money Smart Curriculum
- Youth Savings Program
- Non-Profit Board and committee involvement
  - Senior Management involvement
- Employee Volunteer Program
- Loan Officer participation on lending committees and loan funds

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**Comerça Bank** **HOW WE DO IT**

**Lending**

- Develop CRA goals
- Develop outside partnerships
- Participation in Loan Funds



**Comerça honored by Detroit Micro Enterprise Fund**

The Detroit Micro Enterprise Fund (DMEF) recently held its community reception, presented by Comerça Bank. Comerça was honored for being a pioneer in its support of the nonprofit, which provides low interest loans and support services for new and emerging businesses in Detroit, and for its ongoing support of the organization. (Pictured left to right) are Mary Fryenweather, director of fund development, DMEF, Louise Clayton and Aline Ippas, Comerça Bank, and Lorenzo Thurman, executive director, DMEF.

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**Comerça Bank** **HOW WE DO IT**

**Investments**

- Support non-profit organizations
- Community Development Advisory Committee
- CRA Associations
- Support from key stakeholders




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**Comerça Bank** **HOW WE DO IT**

**Services**

- Membership on non-profit boards
- Employee Volunteer Program
- Loan Officer participation
- Support from key stakeholders



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**Comerça Bank** **EVALUATION TOOLS**

- Quarterly CRA Self Assessment Reports
- Quarterly Lending, Investment, and Service Reports
- Service Reports to Alliance for Fair Banking
- Employee Volunteer Service Report

	CRA SELF ASSESSMENT (1 Q)			
	Lending Test	Investment Test	Service Test	Composite Rating
Bank A	High Satisfactory	Outstanding	Outstanding	Outstanding
Bank B	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Bank C	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Bank D	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Bank E	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Bank F	Satisfactory	Outstanding	Satisfactory	Satisfactory

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**Comerça Bank** **Challenges + Opportunities = Success**





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Comerica Bank Challenges + Opportunities = Success

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Comerica Bank

**COLLECTIVE**  
*Success*

When our customers succeed, so do we.

Louise G. Guyton  
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