



January 19, 2007

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

Attention: No. 2006-44

To Whom it May Concern:

The National Community Reinvestment Coalition, the nation's economic justice trade association of 600 community organizations, is pleased that the Office of Thrift Supervision (OTS) is proposing to align your CRA regulations and examinations with those of the other three federal banking agencies. We believe that your proposed changes to Community Reinvestment Act (CRA) exams will increase lending, investing and bank services in low- and moderate-income communities. NCRC urges your agency to implement your proposed changes as soon as possible.

All four federal agencies must establish the same CRA exams so that the public can effectively compare the CRA performance of banks and thrifts. Currently, banks and thrifts with similar assets have very different CRA exams. The weaker CRA standards for thrifts make it difficult to hold thrifts accountable for responding to community needs.

Mid-size thrifts with assets between \$250 million to \$1 billion currently only have a lending test. In contrast, mid-size banks have CRA exams that consist of a lending test and a community development test. The community development test rates a mid-size bank on the number of investments, bank services, and loans for affordable housing and economic development in low- and moderate-income communities. Mid-size banks are expected to offer a greater range of loans, investments, and services than mid-size thrifts. The total amount of bank and thrift financing and services would increase if mid-size thrifts were held to the same standards and had the same CRA exam as mid-size banks.

Likewise, large thrifts with assets greater than \$1 billion have lower CRA requirements than large banks. Large thrifts must undergo a lending test, but they can choose not to have an investment test and a service test. Alternatively, large thrifts can choose to have their investment and service test count for a minimal amount towards their CRA rating. In contrast, large banks always have a CRA exam in which the lending test counts for 50% of the rating, the investment test counts for 25%, and the service test counts for 25% of the rating. The large bank test has worked well for increasing bank lending, investing, and services in low- and moderate-income communities. NCRC urges the OTS to establish consistent standards for large thrifts by going back to the predictable weighting scheme of the large bank exam.



Finally, we ask the OTS to implement its proposal to add an anti-predatory lending screen to its CRA regulation. Like their bank counterparts, savings and loans must be penalized severely through lower ratings on CRA exams if they engage in illegal, discriminatory, and abusive lending practices. Again, savings and loans must be held to the same standard as banks, including facing CRA penalties if they issue abusive loans that drain equity from communities instead of meeting credit needs.

Consistent CRA exams establish the same standards for banks and thrifts, making it more likely that regulatory agencies and the general public can hold banks and thrifts accountable for serving the needs of communities. Currently, the different CRA standards increase the possibilities of some lending institutions shirking their community reinvestment obligations. We ask the OTS to enact its proposal to align its CRA exams with those of the other agencies as fast as possible.

Proposed Changes Would Have Significant Impact by Expanding Comprehensive CRA Exams to Thrifts with Hundreds of Billions of Dollars in Assets

As discussed in detail below, NCRC and the Economic Justice Project of the Justice Action Center based in New York Law School (hereafter EJP) have conducted research demonstrating that the new OTS exam regime has resulted in declines in community development lending, investments, and branches in low- and moderate-income communities. Given these findings, the OTS proposal is critically important since it would apply more rigorous CRA exams to thrifts with assets totaling more than \$1 trillion. Since thrifts with more than \$1 trillion in assets would have more comprehensive exams, the total amount of community development lending, investing, and branches in low- and moderate-income communities will increase significantly in future years.

The assets of the thrifts that would be impacted by the proposal are considerable. As Table 1 in the appendix shows, mid-size and large thrifts constituted 37 percent of all thrifts or 317 of the 854 savings and loans regulated by the Office of Thrift Supervision.¹ These 317 savings and loans represented almost 97 percent of the assets of the thrifts overseen by OTS (see Appendix Table 2). In terms of dollars, these thrifts held more than \$1.5 trillion in assets. This large amount of assets represents a significant resource in the financial industry, meaning that vigorous CRA exams are needed for mid-size and large thrifts.

Appendix Table 2 reveals that a number of states had either a large amount of assets held by mid-size thrifts or large thrifts, meaning that CRA exam reform will have a significant effect in these states. For example, 14 mid-size savings and loans held \$6.8 billion in assets or 70.1 percent of all thrift assets in Maryland. Similarly, large thrifts in Virginia had \$106.6 billion in assets or 97.6 percent of all the thrift assets in that state. In addition, the impacts of the OTS proposal would be profound for both urban and rural areas. Appendix Tables 3 and 4 illustrates that mid-size and large thrifts held \$1.4 billion

¹ FDIC Statistics on Depository Institutions database, June 2006.

in assets or 94.5 percent of all thrift assets in rural areas in New Hampshire. In urban areas in Nevada, mid-size and large thrifts contained \$352.6 billion in assets or 100 percent of all thrift assets.

The OTS' proposal will also promote branching in low- and moderate-income communities because mid-size and large thrifts control most of the branches and deposits among OTS-regulated thrifts. Appendix Table 5 shows that mid-size thrifts owned 1,576 or 15.8 percent of all branches of OTS-supervised thrifts while large thrifts controlled 7,013 branches or 70.5 percent of all thrift branches. Likewise, mid-size and large thrifts held \$756 billion in deposits or 94.7 percent of all deposits of OTS-supervised thrifts (see Appendix Table 6). In a number of states, the presence of thrifts affected by the OTS proposal is larger than the national aggregate. For example, in Texas, large thrifts owned 89.1 percent of all thrift branches compared with the national aggregate of 70.5 percent. Large Texan thrifts also controlled 93.6 percent of all thrift deposits, higher than the national figure of 85.8 percent. In other words, the OTS proposal is important across the country as a whole and in a large number of states in terms of encouraging institutions to build and maintain branches in low- and moderate-income communities.

OTS New Exam Structure Has Decreased Community Development Financing and Branching in Low- and Moderate-Income Communities

NCRC and EJP sampled virtually all the large thrift CRA exams issued between April 2005, when the new OTS CRA regulation was implemented, and mid-November of 2006. Our sample includes 25 large thrifts with assets of \$1 billion or more that were clearly examined under the new CRA exam procedures; their names are listed in Appendix Table 7². The sample shows that the option of electing alternative weights for the three tests of the large institution exam has resulted in decreases in community development financing and branching. While time constraints precluded an examination of applying the small institution exam to mid-size thrifts with assets between \$250 million to \$1 billion, a reasonable assumption is that the declines in community development financing and branching is of the same magnitude or greater for mid-size thrifts since a more streamlined exam has been applied to them.

Alternative Weights on Investment Test Decrease Community Development Lending and Investment in Low- and Moderate-Income Communities

After controlling for differences in the length of the CRA exam, NCRC and EJP found that the median community development (CD) lending and investment level on the large thrift's previous exam (the exam immediately before the alternative weighting option) was \$6.2 million. The median CD lending and investment level for the most current CRA exam (when the alternative weighting option was available) was \$5.7 million (see Appendix Table 8). When further controlling for assets, the median CD lending and

² Summary information is presented concerning NCRC and New York Law School's database and research. For more information, please contact NCRC at (202) 628-8866.

investment to asset ratio was .48 percent on the previous exams and was .33 percent on the current exams.

The declines in CD lending and investment were driven by significant declines in investment levels, particularly for the thrifts that elected to decrease the weight on their investment test. Of the twenty five thrifts in the sample, three increased their weight on the investment test, twelve elected to keep the weight the same at 25%, and ten decreased the weight of the investment test (see Appendix Table 9). The three thrifts that increased the weight of the investment test were very large institutions with median asset levels of \$14.1 billion as of the most current CRA exam. The thrifts therefore had large median CD investment levels that also increased from the previous exam to the current exam (\$30.5 million on previous to \$40.6 million on current). The CD investment to asset levels also rose slightly for the three thrifts from .26 percent to .29 percent.

The impacts of the new OTS structure on CD investment comes across clearly when comparing the twelve thrifts that elected to retain the same 25 percent weight on the investment test with the ten thrifts that decreased the weight of the investment test. The thrifts electing the same weight on the investment test and those decreasing the weight had similar median asset levels of about \$1.5 billion. After controlling for differences in CRA exam time periods, the median investment levels for the thrifts keeping the same weight were \$1.25 million for the previous exam and \$1.39 for the current CRA exam. In contrast, the median investment levels for the thrifts decreasing the weight of the investment test were \$849,000 on the previous CRA exam and \$600,000 for the current CRA exam. Further controlling for asset levels shows a decrease in the ratio for CD investment to assets for both groups of thrifts, but reveals a substantially lower CD investment to asset level for the thrifts decreasing weights on the investment test. The median ratios were .10 percent and .8 percent on the previous and current exams, respectively, for thrifts keeping the same weights, as opposed to .07 percent and .04 percent for the thrifts decreasing the weight of the investment test.

The decrease in CD investment for the thrifts lowering the weights on their investment test would not be as worrisome if they compensated by increasing their CD lending levels. In other words, if overall CD financing (lending and investment) was the same or higher, perhaps the lowering of the weight on the investment test would be less of a concern. However, overall CD lending and investing declined for the ten thrifts decreasing the weight of their investment test from a median of \$5.5 million to a median of \$4.5 million. Their median CD financing to asset levels likewise declined from .46 percent to .30 percent (see Table 8).

Even the thrifts that kept the same weight on the investment test had decreases in CD lending and investment, but the median dollar levels and ratios on their most current exams of \$5.9 million and .34 percent were higher than the thrifts that decreased the investment weight. The fact that CD lending and investing declined for even those thrifts keeping the same investment weight begs the question whether overall expectations on the part of the OTS examiners for CRA performance declined over the years. It is thus

possible that two effects could be occurring: 1) overall expectations by the OTS regarding levels of CD lending and investing could be declining and 2) thrifts choosing lower weights for investment could also be decreasing their effort on the investment test. It certainly appears that the latter is occurring while the former explanation is also plausible and could be occurring simultaneously.

Alternative Weights on Service Test Decrease Branching Presence in Low- and Moderate-Income Communities

The NCRC and EJP sample also reveals that thrifts choosing to diminish weight on the service test decreased their branching presence in low- and moderate-income (LMI) neighborhoods. Of the thrifts in the sample, 13 chose to retain the same weight on the service test while 4 chose to increase the weight on the service test and 4 chose to decrease the weight of the service test (see Appendix Table 10).³ Predictably, the thrifts that chose a greater weight on the service test performed the best on measures of branch presence in LMI neighborhoods while thrifts that diminished the service test weight performed the worst on measures of branch presence.

The results on branching indicators are indeed worrisome when considering that the thrifts choosing to diminish the service test had median assets and branches that were twice as large as those increasing or maintaining service test weight. The median asset levels and number of branches on the current CRA exam of thrifts choosing a greater weight on the service test was \$2.1 billion in assets and 27 branches. In contrast, the four thrifts that chose a lower service test weight had median assets and branches on their current CRA exam of \$5.8 billion in assets and 53 branches. The pack of thrifts choosing the same weight on the service test of 25 percent had median assets and branches on their current CRA exam of \$1.7 billion and 33 branches.

All thrifts in the sample were not placing branches in proportion to the portion of LMI census tracts but thrifts decreasing service test weight had the least branch presence in LMI census tracts. On the current CRA exams, thrifts choosing the same service test weight had a median of 12.5 percent of their branches in LMI tracts while LMI tracts were 30.3 percent of the tracts in their assessment areas. The difference in the median portion of branches and census tracts was -17.9 percentage points. In contrast, for thrifts choosing an increased weight for the service test, the difference in the median portion of branches and LMI census tracts on the current CRA exam was -9.2 percentage points (19.6 percent of branches in LMI tracts minus 28.7 percent of census tracts that were LMI). Finally, for thrifts choosing to diminish the service test weight, the difference in the median portion of branches and LMI tracts was -24.1 percentage points (13.8 percent of their branches in LMI tracts minus 37.9 percent of tracts that were LMI). The percentage point differences on the previous CRA exams before the alternative weight option were similar for the three groups of thrifts; the exception was that the thrifts

³ Large thrifts with one or no branches were excluded from the analysis of branching. Four thrifts from our sample were excluded from this part of the analysis.

maintaining the same weights narrowed the difference of LMI branches and LMI census tracts by three percentage points on their current exams relative to their previous exams.

Some may discount these results as preliminary and not predictive because the sample size is small for thrifts decreasing service test weight. What must be taken into account, however, is that this sample captures almost all of the thrifts that have been scrutinized by the new OTS CRA exam structure, meaning that this is about the most robust sample currently available. Moreover, the thrifts that decreased the service test weight were larger with greater median asset levels and branches than the other thrifts. If larger thrifts have a tendency to decrease their service test weights, then overall thrift branch presence in LMI neighborhoods is likely to decline because the better performance of smaller thrifts on the service test cannot make up for the worse performance of larger thrifts. Indeed, it appears that the burden shifts to the proponents of the current OTS CRA exam structure to demonstrate how it is not a step backwards from the previous CRA exam structure.

Why Did Community Development Financing and Branching Levels Decline?

The NCRC and EJP sample suggests that overall grade inflation and higher component test ratings as a result of reducing weights were responsible for declining levels of community development financing and branching. From a lender's perspective, it makes sense to choose an easier exam procedure that does not require as much effort and results in the same or higher rating. A signal of reduced expectations from a regulator can, in fact, result in reduced community development financing and branching in LMI communities.

The first indication of reduced expectations is inflation of overall CRA exam ratings. On the previous exams, the large thrifts in our sample had an Outstanding rating 40 percent of the time and a Satisfactory rating 60 percent of the time (see Appendix Table 11). In contrast, the current CRA exams revealed Outstanding ratings for 52 percent of the thrifts and a Satisfactory rating for 48 percent of the thrifts. Likewise, on the lending test, the portion of Outstanding ratings increased from 40 percent on the previous exams to 48 percent on the current exams. The investment test results were somewhat different with a lower percent of thrifts rated Outstanding on the current exam than the previous exam, but the portion of thrifts receiving Outstanding and/or High Satisfactory increased four percentage points. In addition, the portion of thrifts scoring Low Satisfactory on the investment test fell from 40 percent on the previous exam to 24 percent on the current exam. On the service test, the portion of thrifts rated Low Satisfactory also declined from 20 percent on the previous exam to 12 percent on the current exam.

In order to further probe the possibility of grade inflation, NCRC and EJP hypothesized that a lender will increase the weight given to a component test on its current exam when it performs well on that test on the previous exam compared with its performance on the other component tests. In contrast, a lender will decrease the weight given to a

component test when it performs poorly on that test on the previous exam compared with the other component tests. We found that:

*Of the nine weight increases in the lending test:

- 3 occurred when the previous lending test rating was greater than both the service and investment ratings
- 2 occurred when the lending test rating was equal to the investment rating and greater than the service rating
- 4 occurred when the lending test rating was greater than the investment rating and equal to the service rating

*Of the three weight increases in the investment test:

- 2 occurred when the previous investment test rating was greater than the lending and service tests
- 1 occurred when the investment test rating was equal to the lending rating and greater than the service rating

*Of the 10 weight decreases in the investment test:

- 6 occurred when the previous investment test rating was lower than the lending and service ratings
- 3 occurred when the investment test rating was less than the lending rating and equal to service
- 1 occurred when the investment test rating was greater than the lending test rating and equal to service*

*Of the 4 weight increases in the service test:

- 3 occurred when the previous service test rating was equal to lending and greater than investment
- 1 occurred when the service test rating was greater than lending and equal to investment

*Of the 6 weight decreases in the service test:

- 2 occurred when the service test rating was less than the lending and investment ratings
- 2 occurred when the service test rating was equal to the lending test rating and lower than the investment test rating
- 2 occurred when the service test rating was less than the lending test rating and equal to the investment test rating

The hypothesis is supported in all changes except one or 31 of 32 cases (the sole exception above is italicized). We are considering the hypothesis supported if a thrift increased the weight of a previous component test with a rating that was greater than one other component test rating and greater than or at least equal to the other component test rating. Likewise, we are considering the hypothesis supported if a thrift decreased the weight of a component test with a rating that was less than one other component test rating and less than or at least equal to the other component test rating.

In sum, the large thrifts increased or decreased the weights on the component tests based on the strengths and weaknesses on their previous exams. The large thrifts guessed correctly that these weight selections would generally improve their ratings on the current CRA exams since the high ratings increased while the lower ratings decreased. NCRC and New York Law School suggest that while ratings overall improved, another result of the easier exams was lower levels of community development financing and branching in LMI communities.

Transition Period

The request for comments asks if a transition period should be established for migrating towards the CRA exam structure established by the banking agencies. NCRC believes that if the OTS establishes a new structure, the OTS should implement it swiftly. The agency can wait a period of six months to a year before conducting new exams for mid-size and large thrifts to give the thrifts time to adjust to the new exams and find and execute CD financing and CD service activities. The new exams can also use performance context procedures to allow mid-size and large thrifts time to re-establish and build up their CD activities. In other words, if CD activities are on the low side for some of the thrifts on the first round of exams, the OTS examiners can take into account the adjustment period while also stating on the evaluation that the examiner expects CD activities to increase for subsequent exams.

Assuming the OTS changes CRA exam structure, the OTS should immediately discontinue the small institution exam for mid-size banks and the alternative weight exam for large thrifts. As of the date of the OTS ruling, no more of the current exams should be conducted. Instead, if the OTS wants a transition period, the agency can wait for six months to a year before administering exams under the new exam structure. In no event, however, should the transition period extend beyond a year.

Conclusion

When the OTS issued its ruling establishing the alternative weight option for the large institution exam, the agency reasoned that allowing large thrifts to choose weights that reflected their area of specialization would result in more, not less, CD financing and branching. The OTS was adopting an economic principle of specialization and

comparative advantage.⁴ While this theory has been applied in other fields such as environmental pollution reduction (trading pollution credits), the theory was not applied correctly in this case. The NCRC and EJP research suggests that large thrifts are actually rather similar in structure, operations, and capacities. In fact, we found that thrifts that decreased their service test weights and performance actually had moderately larger amounts of assets and number of branches than thrifts who had relatively better performance on the service test. Thrifts that maintained the same investment test weight and those that decreased their investment test weight also had similar dollar amounts of assets.

Instead of allowing thrifts with different capacities to specialize in certain activities and thus do more of the activities, the alternative weight option appears to have allowed a significant number of thrifts to decrease their CD investments and CD services because they do not want to engage in these activities, not because they are incapable of engaging in these activities. The declining level of CD financing and services suggests that large thrifts were capable of delivering a higher level of CD activities on the previous exams and that they lowered their level of CD activities on their current exams because they were permitted to do so. By mis-applying the theory of comparative advantage, the OTS is likely to be lowering (not increasing) the amount of CD activity in LMI communities.

Moreover, applying only the lending test to mid-size thrifts (intermediate small thrifts in regulatory parlance) also is likely to result in declines in CD activity in LMI communities. While time constraints prohibited testing this proposition, it is very likely that the results would have been the same for mid-size banks since the small institution test requires less than the alternative weight option test.

The existing CRA regulation provides just the right amount of flexibility to allow for differences in capacity, comparative advantage, and specialization. The small, intermediate, large, wholesale and limited purpose, and strategic plan options have been carefully developed to allow for specialization with thrifts of various capacities and asset sizes. Moreover, the OTS notes that existing CRA procedures provide extra cushion for large thrifts which may not do well on the investment test by carefully considering that thrifts do not have as much investment authority as banks.⁵ In short, the CRA regulations and procedures allowed for enough flexibility so that institutions could take advantage of their comparative advantage and maximize the level of their CD activities.

The OTS, with the alternative weight option and the small institution test for mid-size thrifts, went too far in applying the comparative advantage theory and therefore was running the risk of permanently decreasing CD activities of the institutions it regulated. The result would have been less responsiveness to community needs over time, which is exactly the opposite of CRA's mandate for institutions to affirmatively and continually respond to credit needs. We applaud Director John Reich for recognizing this likely

⁴ Federal Register, Vol. 70, No. 40, Wednesday, March 2, 2005, p. 10030.

⁵ Federal Register, Vol. 71, No. 226, Friday, November 24, 2006, p. 67828.



possibility and proposing an alignment of OTS regulations with those of the other agencies. We ask the OTS to now expeditiously rule on its proposal in its current form.

Thank you for providing us with an opportunity to provide our opinions on this important matter. If you have any questions, please contact myself or Josh Silver, Vice President of Research and Policy, on 202-628-8866.

Sincerely,

A handwritten signature in black ink, appearing to read "John Taylor". The signature is written in a cursive style with a large initial "J" and "T".

John Taylor
President and CEO

NCRC Analysis of OTS CRA Proposal

Table 1: Numbers of Thrifts in Each State

	Institutions Assets \$ 250 mil to >\$ 1billion		Institutions Assets >\$ 1billion		Total Thrifts #
	#	%	#	%	
United States	211	24.71%	106	12.41%	854
Alabama	0	0.00%	2	18.18%	11
Alaska	0	0.00%	0	0.00%	1
American Samoa	0	0.00%	0	0.00%	0
Arizona	2	66.67%	0	0.00%	3
Arkansas	2	28.57%	0	0.00%	7
California	11	40.74%	13	48.15%	27
Colorado	0	0.00%	1	9.09%	11
Connecticut	6	66.67%	0	0.00%	9
Delaware	0	0.00%	5	83.33%	6
District of Columbia	0	0.00%	0	0.00%	1
Florida	7	18.42%	11	28.95%	38
Georgia	5	27.78%	1	5.56%	18
Guam	0	0.00%	0	0.00%	1
Hawaii	0	0.00%	2	100.00%	2
Idaho	3	100.00%	0	0.00%	3
Illinois	11	20.00%	3	5.45%	55
Indiana	12	26.09%	2	4.35%	46
Iowa	5	26.32%	1	5.26%	19
Kansas	2	12.50%	2	12.50%	16
Kentucky	1	4.55%	0	0.00%	22
Louisiana	6	24.00%	0	0.00%	25
Maine	1	12.50%	0	0.00%	8
Maryland	14	30.43%	0	0.00%	46
Massachusetts	7	33.33%	1	4.76%	21
Michigan	6	46.15%	1	7.69%	13
Minnesota	2	9.09%	1	4.55%	22
Mississippi	1	20.00%	0	0.00%	5
Missouri	6	19.35%	1	3.23%	31
Montana	0	0.00%	0	0.00%	3
Nebraska	1	10.00%	1	10.00%	10
Nevada	1	33.33%	1	33.33%	3
New Hampshire	4	66.67%	0	0.00%	6
New Jersey	12	30.77%	7	17.95%	39
New Mexico	3	42.86%	1	14.29%	7
New York	12	27.91%	9	20.93%	43
North Carolina	4	25.00%	0	0.00%	16
North Dakota	2	66.67%	0	0.00%	3
Ohio	12	16.00%	9	12.00%	75
Oklahoma	0	0.00%	1	16.67%	6
Oregon	2	100.00%	0	0.00%	2
Pennsylvania	14	31.82%	4	9.09%	44
Puerto Rico	0	0.00%	0	0.00%	0
Rhode Island	2	50.00%	0	0.00%	4
South Carolina	5	23.81%	2	9.52%	21
South Dakota	2	50.00%	0	0.00%	4
Tennessee	5	29.41%	1	5.88%	17
Texas	3	15.00%	7	35.00%	20
Utah	2	33.33%	3	50.00%	6
Vermont	0	0.00%	0	0.00%	2
Virgin Islands	0	0.00%	0	0.00%	0
Virginia	4	23.53%	6	35.29%	17
Washington	3	42.86%	2	28.57%	7
West Virginia	2	33.33%	0	0.00%	6
Wisconsin	6	26.09%	5	21.74%	23
Wyoming	0	0.00%	0	0.00%	3

Source: FDIC Statistics on Depository Institutions database, 6/06

NCRC Analysis of OTS CRA Proposal

Table 2: Thrifts by Asset Size (in Thousands of Dollars) in Each State

	Institutions Assets \$ 250 mil to >\$ 1 billion		Institutions Assets >\$ 1 billion		Total Thrifts \$ (000's)
	\$ (000's)	%	\$ (000's)	%	
United States	\$104,366,209	6.58%	\$1,428,377,848	90.06%	\$1,585,957,636
Alabama	0	0.00%	3,280,671	79.47%	4,128,241
Alaska	0	0.00%	\$0	0.00%	173,704
American Samoa	0	0.00%	\$0	0.00%	\$0
Arizona	562,925	78.90%	\$0	0.00%	713,495
Arkansas	1,614,151	78.74%	\$0	0.00%	2,050,006
California	6,390,937	1.86%	336,417,326	98.00%	343,267,873
Colorado	0	0.00%	2,131,046	66.61%	3,199,103
Connecticut	2,602,040	89.75%	\$0	0.00%	2,899,326
Delaware	0	0.00%	123,557,633	100.00%	123,563,391
District of Columbia	0	0.00%	\$0	0.00%	160,903
Florida	3,662,928	7.61%	42,407,079	88.16%	48,103,406
Georgia	2,602,759	31.48%	4,151,957	50.21%	8,268,447
Guam	0	0.00%	\$0	0.00%	84,523
Hawaii	0	0.00%	8,100,057	100.00%	8,100,057
Idaho	1,481,296	100.00%	\$0	0.00%	1,481,296
Illinois	5,204,297	14.64%	25,965,822	73.06%	35,542,492
Indiana	5,757,138	43.92%	3,874,994	29.56%	13,107,250
Iowa	3,198,696	56.92%	1,334,863	23.75%	5,620,021
Kansas	1,061,473	8.74%	10,035,913	82.65%	12,142,058
Kentucky	746,511	27.98%	\$0	0.00%	2,667,595
Louisiana	3,164,180	62.67%	\$0	0.00%	5,049,284
Maine	751,574	60.93%	\$0	0.00%	1,233,412
Maryland	6,852,226	70.65%	\$0	0.00%	9,698,699
Massachusetts	3,540,375	46.70%	2,220,075	29.28%	7,581,060
Michigan	2,500,630	13.70%	15,192,342	83.24%	18,251,108
Minnesota	1,209,769	30.81%	1,009,931	25.72%	3,926,565
Mississippi	353,070	46.53%	\$0	0.00%	758,761
Missouri	3,252,990	48.49%	1,532,798	22.85%	6,707,991
Montana	0	0.00%	\$0	0.00%	299,403
Nebraska	338,590	7.49%	3,320,272	73.43%	4,521,526
Nevada	448,485	0.13%	352,173,407	99.87%	352,621,892
New Hampshire	1,937,014	89.66%	\$0	0.00%	2,160,450
New Jersey	6,838,947	12.71%	44,740,609	83.14%	53,814,407
New Mexico	1,507,817	50.57%	1,222,379	41.00%	2,981,549
New York	5,504,880	9.96%	47,555,052	86.01%	55,290,907
North Carolina	2,744,722	65.66%	\$0	0.00%	4,180,075
North Dakota	1,122,093	99.26%	\$0	0.00%	1,130,422
Ohio	4,672,572	10.13%	36,449,226	79.05%	46,106,440
Oklahoma	0	0.00%	10,469,159	95.76%	10,932,409
Oregon	593,928	100.00%	\$0	0.00%	593,928
Pennsylvania	6,804,523	6.97%	88,738,291	90.86%	97,663,373
Puerto Rico	0	0.00%	\$0	0.00%	\$0
Rhode Island	581,885	67.32%	\$0	0.00%	864,298
South Carolina	2,424,405	30.93%	4,230,092	53.97%	7,837,681
South Dakota	1,388,114	95.64%	\$0	0.00%	1,451,419
Tennessee	1,688,759	36.14%	1,650,435	35.32%	4,672,414
Texas	1,682,916	2.69%	59,697,277	95.43%	62,554,156
Utah	617,512	0.91%	67,101,946	98.88%	67,862,692
Vermont	0	0.00%	\$0	0.00%	355,280
Virgin Islands	0	0.00%	\$0	0.00%	\$0
Virginia	1,998,587	1.83%	106,589,696	97.56%	109,253,766
Washington	1,881,605	15.34%	10,127,146	82.54%	12,269,577
West Virginia	658,130	72.00%	\$0	0.00%	914,014
Wisconsin	2,420,760	14.48%	13,100,354	78.36%	16,719,000
Wyoming	0	0.00%	\$0	0.00%	426,491

Source: FDIC Statistics on Depository Institutions database, 6/06

NCRC Analysis of CRA OTS Proposal

Table 3: Numbers of Thrifts in Urban and Rural Areas of Each State

	Institutions Assets >\$ 250 million					
	Urban Areas			Rural Areas		
	#	%	Total Thrifts	#	%	Total Thrifts
United States	261	44.46%	587	55	20.60%	267
Alabama	2	33.33%	6	0	0.00%	5
Alaska	0	0.00%	0	0	0.00%	1
American Samoa	0	0.00%	0	0	0.00%	0
Arizona	0	0.00%	3	0	0.00%	0
Arkansas	1	25.00%	4	1	33.33%	3
California	24	88.89%	27	0	0.00%	0
Colorado	1	50.00%	2	0	0.00%	9
Connecticut	4	57.14%	7	2	100.00%	2
Delaware	5	83.33%	6	0	0.00%	0
District of Columbia	0	0.00%	1	0	0.00%	0
Florida	16	48.48%	33	2	40.00%	5
Georgia	2	33.33%	6	4	33.33%	12
Guam	0	0.00%	0	0	0.00%	1
Hawaii	2	100.00%	2	0	0.00%	0
Idaho	1	100.00%	1	2	100.00%	2
Illinois	9	20.93%	43	5	41.67%	12
Indiana	10	40.00%	25	4	19.05%	21
Iowa	3	42.86%	7	3	25.00%	12
Kansas	4	40.00%	10	0	0.00%	6
Kentucky	1	9.09%	11	0	0.00%	11
Louisiana	5	27.78%	18	1	14.29%	7
Maine	0	0.00%	1	1	14.29%	7
Maryland	13	28.89%	45	1	100.00%	1
Massachusetts	8	38.10%	21	0	0.00%	0
Michigan	6	60.00%	10	1	33.33%	3
Minnesota	2	40.00%	5	1	5.88%	17
Mississippi	0	0.00%	2	1	33.33%	3
Missouri	7	36.84%	19	0	0.00%	12
Montana	0	0.00%	1	0	0.00%	2
Nebraska	2	66.67%	3	0	0.00%	7
Nevada	3	0.00%	3	0	0.00%	0
New Hampshire	2	66.67%	3	2	66.67%	3
New Jersey	19	48.72%	39	0	0.00%	0
New Mexico	2	66.67%	3	2	50.00%	4
New York	21	56.76%	37	0	0.00%	6
North Carolina	3	27.27%	11	1	20.00%	5
North Dakota	2	66.67%	3	0	0.00%	0
Ohio	16	32.00%	50	5	20.00%	25
Oklahoma	1	25.00%	4	0	0.00%	2
Oregon	1	100.00%	1	1	100.00%	1
Pennsylvania	16	42.11%	38	2	33.33%	6
Puerto Rico	0	0.00%	0	0	0.00%	0
Rhode Island	1	33.33%	3	1	100.00%	1
South Carolina	4	44.44%	9	3	25.00%	12
South Dakota	1	50.00%	2	1	50.00%	2
Tennessee	5	62.50%	8	1	11.11%	9
Texas	9	69.23%	13	1	14.29%	7
Utah	3	75.00%	4	2	100.00%	2
Vermont	0	0.00%	0	0	0.00%	2
Virgin Islands	0	0.00%	0	0	0.00%	0
Virginia	9	64.29%	14	1	33.33%	3
Washington	4	80.00%	5	1	50.00%	2
West Virginia	2	100.00%	2	0	0.00%	4
Wisconsin	9	56.25%	16	2	28.57%	7
Wyoming	0	0.00%	0	0	0.00%	3

Source: FDIC Statistics on Depository Institutions database, 6/06

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NCRC Analysis of CRA OTS Proposal

Table 4: Thrifts by Asset Size (in Thousands of Dollars) in Urban and Rural Areas of Each State

	Institutions Assets >\$ 250 million					
	Urban Areas			Rural Areas		
	\$ (000's)	%	Total	\$ (000's)	%	Total
United States	1,502,679,895	97.78%	1,536,740,523	30,064,162	61.08%	49,217,113
Alabama	3,280,671	90.61%	3,620,469	0	0.00%	507,772
Alaska	0	0.00%	0	\$0	0.00%	173,704
American Samoa	0	0.00%	0	\$0	0.00%	0.00%
Arizona	562,925	78.90%	713,495	\$0	0.00%	0
Arkansas	731,097	66.25%	1,103,469	883,054	93.29%	946,537
California	342,808,263	99.87%	343,267,873	0	0.00%	0.00%
Colorado	2,131,046	97.65%	2,182,264	0	0.00%	1,016,839
Connecticut	1,421,754	82.71%	1,719,040	1,180,286	100.00%	1,180,286
Delaware	123,557,633	100.00%	123,563,391	0	0.00%	0.00%
District of Columbia	0	0.00%	160,903	\$0	0.00%	0.00%
Florida	45,197,114	96.39%	46,890,577	872,893	71.97%	1,212,829
Georgia	4,408,848	89.74%	4,912,640	2,345,868	69.90%	3,355,807
Guam	0	0.00%	0	\$0	0.00%	84,523
Hawaii	8,100,057	100.00%	8,100,057	0	0.00%	0.00%
Idaho	737,215	100.00%	737,215	744,081	100.00%	744,081
Illinois	28,803,261	88.40%	32,582,876	2,366,858	79.97%	2,959,616
Indiana	8,092,971	81.25%	9,960,920	1,539,161	48.92%	3,146,330
Iowa	2,720,087	87.18%	3,119,977	1,813,472	72.54%	2,500,044
Kansas	11,097,386	95.12%	11,666,356	0	0.00%	475,702
Kentucky	746,511	43.43%	1,718,700	\$0	0.00%	948,895
Louisiana	2,465,220	64.58%	3,817,119	698,960	56.73%	1,232,165
Maine	0	0.00%	64,213	751,574	64.28%	1,169,199
Maryland	6,565,370	69.76%	9,411,843	286,856	100.00%	286,856
Massachusetts	5,760,450	75.98%	7,581,060	0	0.00%	0.00%
Michigan	17,408,350	98.10%	17,745,697	284,622	56.31%	505,411
Minnesota	1,955,721	84.59%	2,312,005	263,979	16.35%	1,614,560
Mississippi	0	0.00%	330,542	353,070	82.45%	428,219
Missouri	4,785,788	82.63%	5,791,991	0	0.00%	916,000
Montana	0	0.00%	5,075	\$0	0.00%	294,328
Nebraska	3,658,862	96.71%	3,783,184	0	0.00%	738,342
Nevada	352,621,892	100.00%	352,621,892	0	0.00%	0.00%
New Hampshire	509,582	78.43%	649,755	1,427,432	94.49%	1,510,695
New Jersey	51,579,556	95.85%	53,814,407	0	0.00%	0.00%
New Mexico	1,639,053	96.00%	1,707,346	1,091,143	85.63%	1,274,203
New York	53,059,932	96.90%	54,755,984	0	0.00%	534,923
North Carolina	1,818,270	65.76%	2,764,949	926,452	65.47%	1,415,126
North Dakota	1,122,093	99.26%	1,130,422	\$0	0.00%	0.00%
Ohio	35,907,334	91.85%	39,092,754	5,214,464	74.35%	7,013,686
Oklahoma	10,469,159	96.17%	10,885,811	0	0.00%	46,598
Oregon	292,445	100.00%	292,445	301,483	100.00%	301,483
Pennsylvania	94,261,282	97.95%	96,229,645	1,281,532	89.38%	1,433,728
Puerto Rico	0	0.00%	0	\$0	0.00%	0.00%
Rhode Island	279,924	49.78%	562,337	301,961	100.00%	301,961
South Carolina	5,153,415	90.62%	5,687,004	1,501,082	69.80%	2,150,677
South Dakota	959,575	97.51%	984,111	428,539	91.70%	467,308
Tennessee	3,015,087	91.73%	3,286,772	324,107	23.39%	1,385,642
Texas	61,089,037	98.87%	61,785,537	291,156	37.88%	768,619
Utah	67,101,946	99.79%	67,245,180	617,512	100.00%	617,512
Vermont	0	0.00%	0	0	0.00%	355,280
Virgin Islands	0	0.00%	0	\$0	0.00%	0.00%
Virginia	108,151,306	99.44%	108,761,154	436,977	88.71%	492,612
Washington	11,325,101	98.21%	11,531,512	683,650	92.63%	738,065
West Virginia	658,130	100.00%	658,130	\$0	0.00%	255,884
Wisconsin	14,669,176	95.07%	15,430,425	851,938	66.11%	1,288,575
Wyoming	0	0.00%	0	\$0	0.00%	426,491

Source: FDIC Statistics on Depository Institutions database, 6/06

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NCRC Analysis of OTS CRA Proposal

Table 5: Numbers of Thrifts' Branches in Each State

	Institutions Assets \$ 250 mil to >\$ 1billion		Institutions Assets >\$ 1billion		Total Thrifts' Branches
	#	%	#	%	#
United States	1,576	15.84%	7,013	70.48%	9,950
Alabama	10	29.41%	1	2.94%	34
Alaska	10	142.86%	0	0.00%	7
American Samoa	0	0.00%	0	0.00%	0
Arizona	0	0.00%	103	85.12%	121
Arkansas	36	75.00%	0	0.00%	48
California	73	4.60%	1502	94.64%	1587
Colorado	0	0.00%	147	83.52%	176
Connecticut	33	35.48%	47	50.54%	93
Delaware	1	3.33%	29	96.67%	30
District of Columbia	3	6.98%	37	86.05%	43
Florida	53	6.96%	656	86.20%	761
Georgia	9	5.77%	115	73.72%	156
Guam	0	0.00%	0	0.00%	4
Hawaii	0	0.00%	87	100.00%	87
Idaho	29	36.71%	50	63.29%	79
Illinois	72	15.79%	310	67.98%	456
Indiana	105	38.46%	86	31.50%	273
Iowa	69	45.70%	51	33.77%	151
Kansas	17	11.72%	97	66.90%	145
Kentucky	14	21.21%	0	0.00%	66
Louisiana	56	54.90%	0	0.00%	102
Maine	21	61.76%	0	0.00%	34
Maryland	75	25.51%	145	49.32%	294
Massachusetts	42	12.43%	256	75.74%	338
Michigan	34	16.75%	150	73.89%	203
Minnesota	47	41.23%	9	7.89%	114
Mississippi	4	26.67%	0	0.00%	15
Missouri	30	26.09%	20	17.39%	115
Montana	0	0.00%	7	53.85%	13
Nebraska	17	12.50%	99	72.79%	136
Nevada	3	4.48%	63	94.03%	67
New Hampshire	26	45.61%	21	36.84%	57
New Jersey	89	15.29%	448	76.98%	582
New Mexico	39	76.47%	7	13.73%	51
New York	62	9.27%	563	84.16%	669
North Carolina	36	45.00%	7	8.75%	80
North Dakota	24	82.76%	0	0.00%	29
Ohio	64	16.08%	192	48.24%	398
Oklahoma	1	1.33%	63	84.00%	75
Oregon	16	7.73%	191	92.27%	207
Pennsylvania	116	29.67%	232	59.34%	391
Puerto Rico	0	0.00%	0	0.00%	0
Rhode Island	2	4.55%	28	63.64%	44
South Carolina	37	28.24%	64	48.85%	131
South Dakota	48	88.89%	0	0.00%	54
Tennessee	21	28.38%	22	29.73%	74
Texas	17	4.11%	369	89.13%	414
Utah	1	1.89%	49	92.45%	53
Vermont	9	60.00%	1	6.67%	15
Virgin Islands	0	0.00%	0	0.00%	0
Virginia	34	18.99%	133	74.30%	179
Washington	28	8.28%	302	89.35%	338
West Virginia	8	42.11%	0	0.00%	19
Wisconsin	33	10.06%	254	77.44%	328
Wyoming	2	14.29%	0	0.00%	14

Source: FDIC Summary of Deposits Database

NCRC Analysis of OTS CRA Proposal

Table 6: Thrifts' by Deposit Size (in Thousands of Dollars) in Each State

	Institutions Assets \$ 250 mil to >\$ 1billion		Institutions Assets >\$ 1billion		Total Deposits
	\$ (000's)	%	\$ (000's)	%	\$ (000's)
United States	\$71,010,403	8.89%	\$685,448,307	85.78%	\$799,121,268
Alabama	\$224,777	11.36%	\$1,114,457	56.33%	\$1,978,421
Alaska	\$0	0.00%	\$0	0.00%	\$140,491
American Samoa	\$0	0.00%	\$0	0.00%	\$0
Arizona	\$520,917	7.75%	\$6,012,588	89.43%	\$6,723,427
Arkansas	\$1,139,567	79.71%	\$0	0.00%	\$1,429,681
California	\$4,857,075	2.04%	\$232,936,412	97.70%	\$238,409,730
Colorado	\$0	0.00%	\$9,177,782	91.92%	\$9,984,091
Connecticut	\$1,655,263	33.91%	\$2,866,134	58.72%	\$4,880,770
Delaware	\$14,025	0.03%	\$54,072,941	99.97%	\$54,086,966
District of Columbia	\$95,611	3.41%	\$2,610,902	93.16%	\$2,802,713
Florida	\$2,468,947	4.11%	\$55,455,019	92.37%	\$60,036,396
Georgia	\$614,804	10.22%	\$3,970,776	66.03%	\$6,013,925
Guam	\$0	0.00%	\$0	0.00%	\$48,894
Hawaii	\$0	0.00%	\$5,535,948	100.00%	\$5,535,948
Idaho	\$948,224	41.25%	\$1,350,442	58.75%	\$2,298,666
Illinois	\$2,767,623	9.69%	\$22,801,383	79.79%	\$28,575,292
Indiana	\$3,684,955	36.65%	\$3,638,524	36.19%	\$10,053,369
Iowa	\$2,118,719	40.74%	\$2,359,232	45.37%	\$5,199,990
Kansas	\$630,813	7.40%	\$7,056,733	82.83%	\$8,520,033
Kentucky	\$761,011	35.83%	\$0	0.00%	\$2,123,710
Louisiana	\$2,038,983	59.36%	\$0	0.00%	\$3,434,972
Maine	\$514,003	59.89%	\$0	0.00%	\$858,215
Maryland	\$4,726,303	29.57%	\$8,751,543	54.75%	\$15,983,378
Massachusetts	\$2,700,116	15.14%	\$13,722,222	76.94%	\$17,834,339
Michigan	\$1,297,787	12.44%	\$8,716,402	83.58%	\$10,428,440
Minnesota	\$1,815,077	57.17%	\$62,599	1.97%	\$3,174,601
Mississippi	\$90,455	19.62%	\$0	0.00%	\$460,982
Missouri	\$1,713,363	38.77%	\$1,037,524	23.48%	\$4,419,425
Montana	\$0	0.00%	\$209,475	47.41%	\$441,799
Nebraska	\$301,843	7.27%	\$3,284,978	79.16%	\$4,149,693
Nevada	\$67,672	1.52%	\$4,358,751	97.87%	\$4,453,388
New Hampshire	\$815,534	37.66%	\$866,247	40.01%	\$2,165,232
New Jersey	\$5,135,196	12.84%	\$33,270,602	83.20%	\$39,990,407
New Mexico	\$1,373,532	65.46%	\$530,570	25.29%	\$2,098,269
New York	\$3,732,448	7.43%	\$44,565,200	88.73%	\$50,224,024
North Carolina	\$1,640,906	54.02%	\$159,325	5.25%	\$3,037,414
North Dakota	\$644,108	91.23%	\$0	0.00%	\$705,999
Ohio	\$2,935,294	12.81%	\$15,983,329	69.76%	\$22,913,384
Oklahoma	\$2,358	0.06%	\$3,539,804	92.71%	\$3,818,019
Oregon	\$580,989	7.15%	\$7,543,806	92.85%	\$8,124,795
Pennsylvania	\$5,806,509	26.68%	\$14,587,551	67.02%	\$21,765,978
Puerto Rico	\$0	0.00%	\$0	0.00%	\$0
Rhode Island	\$56,664	2.45%	\$1,699,866	73.62%	\$2,309,112
South Carolina	\$1,515,617	29.25%	\$2,626,550	50.70%	\$5,180,992
South Dakota	\$963,353	94.53%	\$0	0.00%	\$1,019,051
Tennessee	\$1,167,271	33.21%	\$1,340,278	38.14%	\$3,514,399
Texas	\$1,690,278	4.36%	\$36,298,303	93.59%	\$38,785,969
Utah	\$70,367	0.78%	\$8,839,513	98.15%	\$9,005,727
Vermont	\$181,444	42.94%	\$7,246	1.71%	\$422,566
Virgin Islands	\$0	0.00%	\$0	0.00%	\$0
Virginia	\$1,345,404	3.68%	\$34,813,448	95.19%	\$36,570,738
Washington	\$1,377,768	6.93%	\$18,296,328	92.07%	\$19,872,997
West Virginia	\$569,249	79.74%	\$0	0.00%	\$713,869
Wisconsin	\$1,602,125	13.28%	\$9,377,574	77.75%	\$12,061,006
Wyoming	\$36,056	10.62%	\$0	0.00%	\$339,576

Source: FDIC Summary of Deposits Database

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Appendix Table 7
NCRC/EJP Analysis of Large Thrifts: S&Ls in Sample

Name	City	State
Citizens Financial Bank	Munster	IN
Hudson City Savings Bank	Paramus	NJ
World Savings Bank	Houston	TX
Mid America Bank, FSB	Clarendon Hills	IL
Harbor Federal Savings Bank	Fort Pierce	FL
Provident Bank	Montebello	NY
Ironstone Bank	Fort Myers	FL
New South Federal Savings	Irondale	AL
Bank Financial, FSB	Olympia Fields	IL
North American, SB	Grandview	MO
Farmers & Mechanics Bank	Burlington Township	NJ
Encore Bank	Houston	TX
Coastal Federal Bank	Myrtle Beach	SC
Ohio Savings Bank	Cleveland	OH
Brookline Bank	Brookline	MA
Fidelity Bank	Wichita	KS
American Savings Bank	Honolulu	HI
Acacia Federal Savings Bank	Falls Church	VA
Capital One	McClellan	VA
First Market Bank	Richmond	VA
Peoples First Community Bank	Panama City	FL
Provident Savings Bank	Riverside	CA
Territorial Savings Bank	Honolulu	HI
World Savings Bank	Oakland	CA
R-G Crown Bank	Casseberry	FL

Appendix Table 8

NCRC/EJP Analysis: Large Thrifts and CD Investment & Lending Levels*

	All Thrifts in Sample	Greater Weight on Invest Test	Same Weight on Invest Test	Less Weight on Invest Test
Previous Asset Levels	\$1,300,000,000	\$11,700,000,000	\$1,250,000,000	\$1,200,000,000
Current Asset Levels	\$1,700,000,000	\$14,100,000,000	\$1,750,000,000	\$1,500,000,000
Previous Invest & Lend Level	\$6,208,550	\$34,701,000	\$6,041,000	\$5,547,048
Current Invest & Lend Level	\$5,685,200	\$41,349,000	\$5,881,967	\$4,470,589
Previous I&L/Asset Ratio	0.48%	0.30%	0.48%	0.46%
Current I&L/Asset Ratio	0.33%	0.29%	0.34%	0.30%
Number of Thrifts	25	3	12	10

* The data is expressed as medians; the analysis controlled for differences in exam time periods

Appendix Table 9
NCRC/EJP Analysis: Large Thrifts and CD Investment Levels*

	All Thrifts in Sample	Greater Weight on Invest Test	Same Weight on Invest Test	Less Weight on Invest Test
Previous Asset Levels	\$1,300,000,000	\$11,700,000,000	\$1,250,000,000	\$1,200,000,000
Current Asset Levels	\$1,700,000,000	\$14,100,000,000	\$1,750,000,000	\$1,500,000,000
Previous Investment Level	\$1,537,333	\$30,525,000	\$1,254,250	\$849,420
Current Investment Level	\$1,413,947	\$40,589,000	\$1,390,767	\$600,000
Previous Invest/Asset Ratio	0.12%	0.26%	0.10%	0.07%
Current Invest/Asset Ratio	0.08%	0.29%	0.08%	0.04%
Number of Thrifts	25	3	12	10

* The data is expressed as medians; the analysis controlled for differences in exam time periods

Appendix Table 10
NCRC/EJP Analysis: Large Thrifts Branching Levels*

	All Thrifts in Sample	Greater Weight on Serv Test	Same Weight on Serv Test	Less Weight on Serv Test
Previous Asset Levels	\$1,200,000,000	\$1,100,000,000	\$1,200,000,000	\$3,650,000,000
Current Asset Levels	\$1,700,000,000	\$2,050,000,000	\$1,700,000,000	\$5,750,000,000
Previous # Branches	23	18	23	31
Previous # LMI Branches	2	3	2	3
Previous % LMI Branches	11.06%	15.84%	8.13%	7.41%
Previous # LMI Tracts	74	56	69	636
Previous % LMI Tracts	27.37%	23.95%	29.34%	32.37%
Current # Branches	33	27	33	53
Current # LMI Branches	4	4	3	8
Current % LMI Branches	12.50%	19.55%	12.50%	13.78%
Current # LMI Tracts	163	81	155	682
Current % LMI Tracts	29.00%	28.75%	30.39%	37.89%
Per Pt Diff Prv Br-Tracts LMI	-16.31%	-8.11%	-21.22%	-24.96%
Per Pt Diff Cur Br-Tracts LMI	-16.50%	-9.20%	-17.89%	-24.11%
Thrifts in Sample	21	4	13	4

* Data is expressed as medians for each group.

Appendix Table 11: NCRC/EJP Analysis of CRA Ratings Trends

Overall CRA Ratings

	Out		S		NTI		SC			
	#	%	#	%	#	%	#	%		
P	10	40	15	60	0		0			
C	13	52	12	48	0		0			
% +/-		30		-20						

Lending Test Ratings

	Out		HS		LS		NTI		SC	
	#	%	#	%	#	%	#	%	#	%
P	10	40	12	48	3	12	0		0	
C	12	48	10	40	3	12				
% +/-		20		-17		0%				

Investment Test Ratings

	Out		HS		LS		NTI		NR	
	#	%	#	%	#	%	#	%	#	%
P	6	24	9	36	10	40	0		0	0
C	4	16	12	48	6	24			3NR	12
% +/-		-33		33		-40				100

Service Test Ratings

	Out		HS		LS		NTI		NR	
	#	%	#	%	#	%	#	%	#	%
P	7	28	13	52	5	20	0		0	
C	8	32	11	44	3	12	0		3NR	12
% +/-		14		-15		-40				100

Legend: P=previous exam, C=current exam, Out=Outstanding, HS=High Satisfactory, S=Satisfactory, LS= Low Satisfactory, NTI = Needs to Improve, SC= Substantial Noncompliance, NR = No Rating due to 0% weight selection