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Comptroller of the Currency  
Administrator of National Banks

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Multinational Banking Department  
250 E Street, S.W.  
Washington, D.C. 20219

PUBLIC DISCLOSURE

**COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

October 31, 1996

**Bank of America, N. A.**  
1825 East Buckeye Road  
Phoenix, AZ 85034

**Charter Number: 22106**

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.</p>
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## GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Bank of America, N. A.**, prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency.

The evaluation represents the OCC's current assessment and rating of the institution's CRA performance based on an examination conducted as of **October 31, 1996**. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution and (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessment of financial institutions.

### **Basis for the Rating**

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics. This includes the competitive environment in which the institution operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

## ASSIGNMENT OF RATING

### Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance record of meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

## DEFINITIONS

For this Evaluation, the following abbreviations are defined:

- LMI** - **Low- and Moderate-Income** are the income level for individuals or average income level for census tracts (CT) that are less than 80% of the median family income of the respective MSA.
- Mid** - **Middle-Income** is the income level for individuals or average income level for CTs that are equal to or greater than 80% and less than 120% of the median family income of the respective MSA.
- Upper** - **Upper-Income** is the income level for individuals or average income level for CTs that are equal to or greater than 120% of the median family income of the respective MSA.

## DISCUSSION OF INSTITUTION'S PERFORMANCE

Institution's Rating:

Based on the findings presented below, this institution is rated:

**"Outstanding Record of Meeting Community Credit Needs."**

**Evaluation Period:** This Disclosure evaluates the bank's performance from August 12, 1994 through October 31, 1996.

### **BANK PROFILE**

Bank of America, N.A. (BANA) is a wholly owned subsidiary of BankAmerica Corporation (BAC). BAC, based in San Francisco, California, is the third largest bank holding company in the United States. BANA is structured as a limited purpose bank focusing on revolving lines of credit, through the issuance of credit cards. BANA directs the marketing of its products to consumers and small businesses.

BANA is the third largest bank in Arizona. Its headquarters are in Phoenix. The bank does not have any branch offices. As of June 30, 1996, BANA reported total assets of almost \$8 billion. Then, loans were more than \$7 billion primarily consisting of credit card accounts. Unused credit card lines were more than \$29 billion. The bank's primary funding comes from debt obligations and brokered deposits.

BANA offers trademark bank cards from Visa and Mastercard. BANA provides credit card services for affiliate banks in eight states. This relationship has been established with the following banks:

<b>Bank Name</b>	<b>Headquarters City &amp; State</b>
Bank of America - Arizona	Phoenix, Arizona
Bank of America, NT & SA	San Francisco, California
Bank of America - Hawaii	Honolulu, Hawaii
Bank of America - Illinois	Chicago, Illinois
Bank of America - Nevada	Las Vegas, Nevada
Bank of America - New Mexico	Albuquerque, New Mexico
Bank of America - Northwest	Seattle, Washington
Bank of America - Texas	Irving, Texas

BANA, as a subsidiary of BAC, is part of a network of banks and finance companies that provide a variety of financing products. Also, the affiliates' market and extend these products in BANA's delineated community. Credit products the affiliates have brought to the community include:

Bank Name	Loan Product
Bank of America - Arizona (BAAZ)	Residential Mortgages(Purchase, Refinance & Home Improvement), Consumer Credit (Auto, personal & Home Equity), and Commercial (Small Business & Small Farm)
Bank of America, NT & SA (BANTSA)	Government Guaranteed Student Loans
Bank of America - Nevada (BANV)	Indirect Consumer Auto Loans
Bank of America - Community Development Bank (BACDB)	Low-Income Housing Loans and SBA Guaranteed Loans
Bank of America, FSB (BAFSB)	Community Development Loans
Security Pacific Housing Services, Inc. (SPHS)	Indirect Loans for Manufactured Housing
Security Pacific Finance Services (SPFS)	Home Equity Financing through Second Mortgages

BAC has developed the above network of loan products through affiliates that have the expertise in helping to meet a customer's borrowing needs. Further, BAC affiliates have created a variety of programs that help to meet the financing needs of developers of affordable housing and economic revitalization. We considered only those lending activities BAC affiliates specifically allocated to BANA's CRA performance.

A customer's primary contact with BANA is by phone or mail. BANA does not accept consumer deposits. Customers can establish deposit accounts supporting the bank's secured card program through its deposit taking affiliates. Small business customers establish their relationship through affiliate business banking units.

### COMMUNITY PROFILE

BANA delineated its community as the Phoenix Metropolitan Statistical Area (MSA). The table below presents the MSA's demographic information. The source of this information was the 1990 census.

Population	Median Income	# of CTs	% of CTs			% of Individuals	
			LMI	Mid	Upper	LMI	Mid & Upper
2,238,480	\$35,425	490	31	38	30	42	58

The Phoenix MSA covers the counties of Maricopa and Pinal. The City of Phoenix is the capital of the State of Arizona and County Seat for Maricopa County. Phoenix, incorporated in 1881,

is currently the ninth largest city in the nation. A diversified economy employs the residents of the Phoenix MSA. More than 3,100 firms support a manufacturing base that employs more than 23% of the Phoenix civilian labor force. More than 45% of total employment is in retail trade and the service sectors, represented principally by tourism.

A variety of state and national banks, credit unions and thrift offices serve the financial needs of the Phoenix MSA. Maricopa County businesses are eligible for assistance in financing fixed assets through the Development Finance Division, Arizona Department of Commerce. Some cities in the Phoenix MSA have their own Industrial Development Authority.

The City of Phoenix developed a Consolidated Plan for 1995-1996. The plan states the Phoenix market for multifamily rental units has absorbed a previous surplus and is leading the construction of new housing. Recent vacancy rates for multifamily units have fallen to 3%, down from the high of 17% in 1988.

Local nonprofit housing organizations have taken advantage of the supply of HUD-owned homes over the past few years. They have used these homes to create opportunities for lower income home ownership and transitional housing for homeless families. The median single-family home price in Phoenix rose 28% over the last ten years, to \$80,400.



## I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

**Assessment Factor A** - Activities conducted by the institution to ascertain the credit needs of its community. This includes the institution's efforts to communicate to community members the credit services provided by the institution.

- **BANA has extensive contact with a variety of individuals and organizations to ascertain the credit needs of its community.**

BANA management regularly evaluates the effectiveness of the bank's efforts in helping to meet the credit needs in targeted areas of the delineated community. BAC's corporate ascertainment process continues to supply management with recommendations to develop new credit products or enhance existing products.

**Arizona Community Development Team (ACDT):** In 1995, all BAC affiliates in the Arizona market formed a group called ACDT. The group comprises community development specialists from BANA, BAAZ, BAFSB's Mortgage Group, and BAFSB's Community Development Division. The ACDT compiled a list of community credit needs based on their experiences, and also their communications with the following information sources: branch manager feedback, a formal retail calling program, meetings with community groups, quarterly meetings with BAAZ's community affairs committee, market research, media reports, and demographic information. Through this process they identified the following community credit needs: affordable housing loans (purchase, rehabilitation, construction, down payment assistance programs), small business access to credit, consumer lines of credit (credit cards and cash-secured credit cards), and adult credit education and credit counseling services.

**Wilson Coalition:** Since 1995, BANA has played a leadership role in the Wilson Coalition, a community-based organization serving the people of a very low-income area near BANA's offices. A BANA Senior Vice President (SVP) co-chairs this group comprising a broad base of key business and government leaders, service providers and neighborhood activists. The coalition works on neighborhood issues such as affordable housing, education, crime, family wellness, and poverty.

BANA's participation in the Wilson Coalition has promoted meaningful communication between the bank, community leaders, and residents of the Wilson School District. Through a mentoring program established with BANA and the Wilson School District, BANA learned of the community's need for basic banking services such as checking accounts and credit cards. Through management's planning meetings with the Christmas in April program, BANA learned of affordable housing and rehabilitation needs throughout this community. Further, through communications with local leaders involved in the coalition, BANA became aware of the need to renovate an abandoned historic church in a low-income area of Phoenix. The SVP is actively working on converting the structure into a day care facility that could produce jobs and services for the area.

**Other Needs Ascertainment Activities:** To supplement the efforts of the ACDT and Wilson Coalition efforts, BANA management has also met with several community groups. These included the Neighborhood Housing Services of Phoenix, Mercy Housing Arizona, Self Employment Loan Fund agency, Avondale Neighborhood Housing Services, Arizona MultiBank CDC, The Center for New Directions, and the Downtown Neighborhood Learning Center.

**Investigation of State and Local Funding Needs:** In September of 1995, BANA investigated state and local funding needs by pursuing the purchase of up to \$3 million in Arizona municipal bond issuances. The Board of Directors approved and allocated funds for this endeavor, however, the bank's research efforts could not identify any investment quality bonds.

Our evaluation of BANA's performance included the review of community contact forms. We used this data to obtain information on community credit needs and opinions of the bank's CRA performance. We found that BANA has accurately identified the credit needs of its delineated community.

**Assessment Factor C** - The extent of participation by the institution's Board in formulating the institution's policies and reviewing its performance with respect to the purpose of the Community Reinvestment Act.

- **BANA's Directors have demonstrated active support for flexible and innovative programs designed to help meet the community's need for credit.**

Its Board and management actively guide BANA's CRA performance. Both work in unison to provide regular CRA oversight and follow up. A formal CRA program is in place, which includes the use of annual self assessments to monitor performance. The Control Services Department regularly analyzes CRA-related activities and reports to the Board. The Board has approved several special purpose loans, investments, and service projects that have enhanced BANA's ability to help meet the credit needs of its community.

The Board has designated a CRA Officer, a community development project manager, and several support personnel to conduct day-to-day CRA activities. They are knowledgeable in the technical aspects of CRA and highly involved in the Phoenix community. This team provides ongoing training to employees to promote their participation in the CRA program.

The Board annually reviews and approves the bank's expanded CRA Statement. The Statement describes examples of how BANA ascertains and helps to meet the credit needs of its delineated community. Also, it accurately lists the types of credit BANA offers. BANA's audit department adequately monitors BANA's compliance with the technical provisions of CRA. Our review confirmed BANA's compliance with CRA's regulatory requirements.

## **II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED**

**Assessment Factor B** - The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

- **Management effectively uses a targeted marketing strategy to direct BANA's advertising of specific credit products.**

BANA only occasionally uses mass media to market its credit products. Instead, management relies on targeted marketing such as direct mail campaigns, and personal contacts with local government officials, community and trade organizations.

BANA offers a secured credit card product to help meet the needs of inexperienced and low-income borrowers. Preapproved credit solicitations are often used in the marketing of this product and other credit card products. These marketing solicitations do not exclude low- and moderate-income segments of BANA's community.

BANA is expanding its credit marketing through new technologies. Management is now promoting business and consumer loan products through the Internet for the rapidly expanding market of personal computer users. Individuals using this media can now apply for a credit card through BANTSA's home page.

Management has actively marketed BANA's products and services in the local community through a combination of corporate advertising and retail bank support. Besides traditional marketing efforts, BANA has promoted its willingness to meet community credit needs through participation in programs such as the Wilson Coalition.

**Assessment Factor I** - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

- **BANA's level of small business and residential lending has been responsive to the community's credit needs.**

**Small Business Loans** - During the evaluation period BANA worked extensively with its affiliates to develop a small business revolving loan program that a credit card accesses. These extensions of credit have provided a new source of small business loans to the community. While BAC markets the card program as a travel and entertainment account, a small business can also use the account for other purposes up to its assigned limit. The business card program has helped meet one of the community's pressing credit needs. The program has credit limits that range from \$2,500 to \$100 thousand. BAC affiliate banks underwrite the small business relationship and BANA services the account. BAC has allocated those accounts generated in the Phoenix MSA to BANA.

**Affordable Housing Loans** - In December 1995, BANA purchased a portfolio of residential real estate mortgages from BAAZ. The intent of the purchase was to fund affordable housing within

the bank’s delineated community and free additional funds for BAAZ to reinvest in the community. The portfolio is comprised exclusively of loans to low- or moderate-income borrowers, collateralized by residential real estate in the Phoenix MSA.

The table below summarizes the small business and affordable housing loan portfolios created by BANA.

AGGREGATE LENDING VOLUMES DURING THE EVALUATION PERIOD			
PRODUCT:	#	\$ (000's)*	Avg. loan \$ (000's)
Small Business Credit Cards	1,195	\$12,227	\$10
Affordable Housing Loans	198	\$10,160	\$51
<b>Total Lending Activity</b>	<b>1,393</b>	<b>\$22,387</b>	

\* Credit Cards are commitment amounts.

BANA has also originated a substantial volume of consumer credit card accounts in its affiliates’ delineated communities, including the Phoenix MSA. BANA has allocated CRA consideration of these accounts to its affiliates. We will review this activity as part of each affiliate’s CRA performance.

**Assessment Factor J** - The institution's participation in government-insured, guaranteed or subsidized loan programs for housing, small businesses or small farms.

- **BANA does not participate in government guaranteed or sponsored loan programs that address housing and business credit needs.**

BAC has structured BANA as a limited purpose bank. It does not offer government-insured or guaranteed loan programs. BAC affiliates do offer and extend government guaranteed loans. However, they have not allocated these loans to BANA.

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

#### Reasonableness of Delineated Community

- **BANA's delineated community is reasonable and does not arbitrarily exclude any low-or moderate-income areas.**

At least annually, management analyzes the reasonableness of BANA's community delineation. The analysis includes a review of lending patterns, community demographics, banking needs and the location of the bank's office. The Board of Directors reviews the analysis and approves any changes to the community delineation (see the "Community Profile" section of this Evaluation).

**Assessment Factor E** - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

- **Management uses an effective analysis process to identify the geographic distribution of BANA's credit products.**
- **The geographic distribution of BANA's loan originations is reasonable and is consistent with demographic patterns within the community.**

BANA's management uses an effective analytical process to understand the bank's distribution of lending among all income levels of census tracts and borrowers. Management uses this analysis as part of its annual CRA self-assessment. The analysis compares BANA's origination of its programs, to the income level of the individuals and the income level of the census tracts. They also provide this analysis to their affiliates to assist them in their own self-assessments.

The process allows BANA to identify areas of low penetration by product and to focus marketing efforts on those areas to improve its lending distribution. Our evaluation included a review of BANA's methodology, and we confirmed the reasonableness of the analysis process. We used the analysis to supplement our review of BANA's lending distribution.

**Small Business Lending** - Our analysis of BANA's allocated small business loan portfolio, shows a good penetration into LMI areas. Further, the BAC small business credit card program has been a strong producer of new loan volume. Our analysis of small business lending allocated to BANA also showed consistency in the bank's penetration of LMI areas throughout the evaluation period.

**Affordable Housing Lending** - Our analysis of BANA's affordable housing loan portfolio, shows an excellent penetration into LMI areas. When BANA proposed the acquisition of the residential portfolio, it specifically targeted LMI areas and LMI borrowers. The entire portfolio purchased met the LMI borrower standard, while 48% of the portfolio met the LMI area standard. The table below, shows BANA's distribution of small business and affordable housing loan portfolios by income level of CT.

DISTRIBUTION of the SMALL BUSINESS AND AFFORDABLE HOUSING LOAN PORTFOLIOS (% of # by income level of CT)				
Phoenix MSA	% of LMI CTs	Loans in LMI	Loans in Middle	Loans in Upper
Small Business	31	33	35	32
Affordable Housing	31	48	34	18

**Assessment Factor G** - The institution's record of opening and closing offices and providing services at offices.

- **BANA does not have any publicly accessible offices.**

BANA has no branches in the delineated community. The bank's office in Phoenix does not conduct business over the counter. Customer contact is usually through the bank's own toll-free phone number or BAC's affiliate banks' branch and ATM networks. BANA agents can help a cardholder in a variety of inquiries. This service is available 24 hours a day. BAC's affiliate banks have systems that include the use of a toll-free telephone system and the ATM network. These can provide information on the customer's relationships with any of the affiliates.

#### IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

**Assessment Factor D** - Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement(s).

- **BANA's practices do not discourage credit applications.**

BANA uses its affiliate actively to seek credit applications from all segments of its community. BANA uses compliance staff and targeted marketing programs to ensure applications are encouraged from low-income areas and low-income consumers.

BANA's compliance staff regularly assesses the adequacy of nondiscriminatory policies, procedures and training programs through internal reviews and management reporting mechanisms. BANA's compliance management system provides an extensive and ongoing review of the bank's performance in providing access to credit to all applicants.

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

- **Our evaluations revealed no evidence of prohibited or illegal credit practices.**

BANA meets the substantive provisions of anti-discrimination laws and regulations under the

Equal Credit Opportunity Act. We evaluated compliance with anti-discrimination laws through a review of 284 loan applications. Our sample included applications for credit cards processed by BANA between April 1, 1996 and June 30, 1996. The sample included declined applications that received passing credit scores. We compared these files with approved applications that received failing credit scores. Our comparisons considered the age or marital status of the applicant.

## V. COMMUNITY DEVELOPMENT

**Assessment Factor H** - The institution's participation, including investments, in local community development and redevelopment projects or programs.

- **BANA displays good leadership and participation in financing community development and redevelopment projects.**

During the evaluation period, BANA and BAC have actively searched for viable community development projects. The table below summarizes BANA's participation in community development-related projects.

COMMUNITY DEVELOPMENT ACTIVITIES		
Activity:	# of Projects	\$ (000's)
Lending	2	\$4,930
Equity & Municipal Investments	8	\$10,922
Grants	8	\$51
Total Community Development Activities	18	\$15,903

## LENDING

**Affordable Multifamily Housing Financing** - The Community Development Division of BAFSB actively finances affordable multifamily housing projects. During the evaluation period, BAFSB allocated two loans totaling almost \$5 million to BANA. These loans provided construction and permanent financing for 183 units of affordable housing for very low-income senior citizens and acquisition and rehabilitation financing for 124 units of affordable housing for very low-income families.

**An innovative loan commitment** - BANA's Board recently approved a \$4 million loan repayable over 20 years, to fund mortgage debt instruments issued by Neighborhood Housing Services of America (NHS). NHS is a national nonprofit organization. NHS will use the funds to revitalize low-income neighborhoods in Central Phoenix by providing low cost financing for owner-occupied, single family home purchase or rehabilitation. BANA is the first credit card

bank in the country to make this type of investment in NHTSA. In addition, BANA enhanced the affordability of the loan program by committing a \$60 thousand grant to buy down the cost of the mortgages.

## **INVESTMENTS**

**Low Income Housing Tax Credit (LIHTC)** - To spur production of low-income housing, BANA affiliates are making significant equity investments in nonprofit-sponsored projects. BACDB has placed LIHTC investments through the National Equity Fund and the California Equity Fund Limited Partnerships. BAC has allocated seven investments to BANA. The investments have provided developers with more than \$10 million in equity to build 396 units of affordable housing.

**Municipal Securities Holding** - BAC evaluated the municipal bond portfolios of its affiliates and identified investments that have contributed to community development. BAC has allocated a municipal bond issue totaling \$755 thousand to BANA. The issuer is the Navajo Indian New Public Housing Authority. The issuer used the proceeds of the bonds to finance affordable housing on the Navajo Reservation.

**Grants** - BANA also provides grants to organizations involved in community development. During the evaluation period, BANA contributed more than \$41 thousand to seven community groups. They have used these grants for homebuyer education programs, down payment assistance programs and affordable housing efforts throughout the Phoenix MSA.

BANA also contributed \$10 thousand to the Self Employment Loan Fund. The fund promotes self-sufficiency of low-income individuals, especially women and minorities, by encouraging the growth of micro-enterprise. They accomplish this through training, technical assistance and access to credit. The fund has served more than 125 individuals. They also have 27 businesses in the borrowing phase of their program.

## **LEADERSHIP**

BANA management has shown leadership in community development activities. Examples of BANA's leadership include the following continuing projects:

- **Wilson Coalition Project.** A BANA SVP co-chairs the Wilson Coalition, a community-based organization serving the needs of a very low-income area in Phoenix. The coalition works on neighborhood issues such as affordable housing, education, crime, family wellness, and poverty. The group has several community projects planned, including the revitalization of 50 homes and a homeless shelter. This is a part of the Christmas in April program. Rehabilitation is scheduled to begin in April 1997. The SVP has provided her financial expertise and leadership to many aspects of the group's endeavors. In the Christmas in April project, she helped identify qualified applicants for the program.
- **Sacred Heart Church Project.** In 1996, BANA began efforts to renovate an abandoned



historic church in a very low-income area of Phoenix. City leaders had identified the rehabilitation of this city-owned property, as an important community need. BANA's SVP has actively undertaken the task providing financial expertise and leadership to this renovation project. Her responsibilities have included initiating a feasibility study, investigating financial constraints, analyzing budgets, and ordering engineering and structural studies of the building. Based on extensive research and community response, BANA is considering converting the building into a day care facility. Their plans are to employ care givers from the local community and provide child care for BANA employees and local residents.

**Assessment Factor K** - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

- **We did not identify any constraints on BANA's ability to help meet the credit needs of its delineated community.**

BANA has made an ample commitment of financial and personnel resources to help meet its community's credit needs. BANA combined with BAC, has shown this commitment through participation in many community development projects, small business lending and affordable lending programs. Information about BANA's financial condition, size, and local economic conditions can be found in the Bank and Community Profiles Section of this Evaluation.

**Assessment Factor L** - Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

- **BANA positively helps meet credit needs in its community through grants, officer and staff volunteer work.**

Annually, BANA makes grants to other community organizations that foster job development, economic revitalization, shelter for the needy, home renovation, general community restoration, and credit management and education. These grants are beyond BANA's community development grants.

**Credit Counseling and Education Services** - BANA continues to be actively involved with Consumer Credit Counseling Services (CCCS). CCCS is a nonprofit counseling agency that offers free, confidential financial counseling to troubled borrowers. CCCS helps in negotiating debt management plans that may help the consumer avoid bankruptcy. BANA supplements CCCS operating expenses by donating 12% of the payments received from its borrowers participating in a CCCS debt management plan. During the review period BANA donations exceeded \$139 thousand on behalf of its borrowers.

BANA is also a founding partner in the CCCS Southwest Education program. They designed this program to teach money management skills in local schools and businesses. During the

evaluation period BANA contributed \$10 thousand to the program.

**Innovative Partnership with Big Brothers/Big Sisters** - BANA is involved in an innovative pilot mentoring program with Big Brothers/Big Sisters. The program entails funding a “dedicated” employee of Big Brothers/Big Sisters exclusively to match bank employees with Wilson School District students. This is the first time Big Brothers/Big Sisters has partnered with a major corporation in this type of endeavor. The effort involved a financial commitment from the bank of \$30 thousand for three years. BANA hopes to provide support to these “at risk” students by providing role models, encouraging education and careers, and meeting other basic social needs.

### **ADDITIONAL INFORMATION**

Bank of America, N.A., is a subsidiary of BankAmerica Corporation, San Francisco, California, a bank holding company. The bank is affiliated to other chartered financial institutions in Arizona, California, Nevada, New Mexico, Texas and Washington. For information about the CRA performance of these institutions, contact either the institution directly, or the Bank of America’s Community Development Department, 315 Montgomery Street, San Francisco, California 94138.

The OCC also supervises BANA’s national bank affiliates. The Federal Reserve Bank of San Francisco is responsible for the supervision of BankAmerica Corporation. The Federal Reserve should be contacted for information about any corporate transactions the company may be processing which are subject to CRA.