

# Large Institutions Examination Procedures and Sample Format for Public Disclosure of Examination Results

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The Examination Procedures for Large Institutions and the Sample Format for Public Disclosure of Examination Results follow. Both documents are also available on the web site of the Federal Financial Institutions Examination Council.

Examination Procedures: [www.ffiec.gov/cra/pdf/cra\\_exlarge9.pdf](http://www.ffiec.gov/cra/pdf/cra_exlarge9.pdf)

Sample Format for Public Disclosure of Examination Results: [www.ffiec.gov/cra/pdf/ex\\_instruct\\_l.pdf](http://www.ffiec.gov/cra/pdf/ex_instruct_l.pdf)



# Large Institutions Ratings Matrixes

## Lending-Test Matrix

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Lending activity	Lending levels reflect excellent responsiveness to assessment-area credit needs.	Lending levels reflect good responsiveness to assessment-area credit needs.	Lending levels reflect adequate responsiveness to assessment-area credit needs.	Lending levels reflect poor responsiveness to assessment-area credit needs.	Lending levels reflect very poor responsiveness to assessment-area credit needs.
Assessment-area(s) concentration	A substantial majority of loans are made in the institution's assessment area(s).	A high percentage of loans are made in the institution's assessment area(s).	An adequate percentage of loans are made in the institution's assessment area(s).	A small percentage of loans are made in the institution's assessment area(s).	A very small percentage of loans are made in the institution's assessment area(s).
Geographic distributions of loans	The geographic distribution of loans reflects excellent penetration throughout the assessment area(s).	The geographic distribution of loans reflects good penetration throughout the assessment area(s).	The geographic distribution of loans reflects adequate penetration throughout the assessment area(s).	The geographic distribution of loans reflects poor penetration throughout the assessment area(s), particularly to low- or moderate-income geographies in the assessment area(s).	The geographic distribution of loans reflects very poor penetration throughout the assessment area(s), particularly to low- or moderate-income geographies in the assessment area(s).
Borrowers' profile	The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among retail customers of different income levels and among business customers of different sizes.	The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and among business customers of different sizes.	The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and among business customers of different sizes.	The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and among business customers of different sizes.	The distribution of borrowers reflects, given the product lines offered by the institution, very poor penetration among retail customers of different income levels and among business customers of different sizes.

## Lending-Test Matrix—continued

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Responsiveness to credit needs of highly economically disadvantaged geographies and to low-income persons and small business	The institution exhibits an excellent record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a good record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a poor record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.	The institution exhibits a very poor record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.
Community development lending activities	The institution is a leader in making community development loans.	The institution has made a relatively high level of community development loans.	The institution has made an adequate level of community development loans.	The institution has made a low level of community development loans.	The institution has made few, if any, community development loans.
Product innovation	The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment-area credit needs.	The institution uses innovative and/or flexible lending practices in order to serve assessment-area credit needs.	The institution makes limited use of innovative and/or flexible lending practices in order to serve assessment-area credit needs.	The institution makes little use of innovative and/or flexible lending practices in order to serve assessment-area credit needs.	The institution makes no use of innovative and/or flexible lending practices in order to serve assessment-area credit needs.

## Investment-Test Matrix

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Investment and grant activity	The institution has an excellent level of qualified community development investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.	The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a poor level of qualified community development investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.	The institution has a few, if any, qualified community development investments or grants, particularly those that are not routinely provided by private investors.
Responsiveness to credit and community development needs	The institution exhibits excellent responsiveness to credit and community economic development needs.	The institution exhibits good responsiveness to credit and community economic development needs.	The institution exhibits adequate responsiveness to credit and community economic development needs.	The institution exhibits poor responsiveness to credit and community economic development needs.	The institution exhibits very poor responsiveness to credit and community economic development needs.
Community development initiatives	The institution makes extensive use of innovative and/or complex investments to support community development initiatives.	The institution makes significant use of innovative and/or complex investments to support community development initiatives.	The institution occasionally uses innovative and/or complex investments to support community development initiatives.	The institution rarely uses innovative and/or complex investments to support community development initiatives.	The institution does not use innovative and/or complex investments to support community development initiatives.

## Service-Test Matrix

Characteristic	Outstanding	High Satisfactory	Low Satisfactory	Needs to Improve	Substantial Noncompliance
Accessibility of delivery systems	Delivery systems are readily accessible to all portions of the institution's assessment area(s).	Delivery systems are accessible to essentially all portions of the institution's assessment area(s).	Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area(s).	Delivery systems are accessible to limited portions of the institution's assessment area(s).	Delivery systems are inaccessible to significant portions of the assessment area(s), particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
Changes in branch locations	To the extent changes have been made, the institution's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.	To the extent changes have been made, the institution's opening and closing of branches has significantly adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
Reasonableness of business hours and services in meeting assessment-area(s) needs	Services (including where appropriate, business hours) are tailored to the convenience and needs of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) do not vary in a way that inconveniences certain portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) vary in a way that inconveniences certain portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.	Services (including, where appropriate, business hours) vary in a way that significantly inconveniences many portions of the assessment area(s), particularly low- and moderate-income geographies and/or individuals.
Community development services	The institution is a leader in providing community development services.	The institution provides a relatively high level of community development services.	The institution provides an adequate level of community development services.	The institution provides a limited level of community development services.	The institution provides few, if any, community development services.

# Large Institutions Format Guidance for Public Disclosure of Examination Results

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This following guidance was transmitted in CA 02-7 (June 13, 2002). The guidance may be applied to the new large-bank performance evaluation templates transmitted in CA 05-7 (September 16, 2005).





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Large Institution Performance Evaluation  
September 2000

Federal Reserve Bank Guidance  
June 2002

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SAMPLE LARGE INSTITUTION EVALUATION

**PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Name of Depository Institution

Institution's Identification Number

Address of Institution

Name of Supervisory Agency

Address of Supervisory Agency

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. 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.

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This table of contents is a sample for a large, multistate institution, and should be adjusted, as appropriate, to reflect the scope of the institution’s operations. Refer to the Instructions for Writing Public Evaluations for further guidance.

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Large Institution Performance Evaluation  
September 2000

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## INSTITUTION'S RATING

*INSTITUTION'S CRA RATING: Name of financial institution is rated "[BOLDFACE CAPS]."*

*The following table indicates the performance level of name of financial institution with respect to the lending, investment, and service tests. [Indicate the performance level under each criteria by marking an "X" in the appropriate row.]*

PERFORMANCE LEVELS	NAME OF FINANCIAL INSTITUTION		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

### NOTE

Present a bullet point **summary of the major factors supporting the institution's rating** with respect to each test.

## **INSTITUTION**

### **DESCRIPTION OF INSTITUTION**

Write a brief description of the institution. Include relevant information regarding the institution's holding company and affiliates, if any, the states and assessment areas served, the institution's ability to meet various credit needs based on its financial condition and size, product offerings, prior performance, legal impediments and other factors. Other information that may be important includes total assets, asset/loan portfolio mix, primary business focus, branching network, and any merger or acquisition activity.

#### **NOTE**

In addition to the above, remember: (1) When describing the bank's assessment areas, indicate if there has been any change in assessment areas since the prior examination. If so, explain the changes briefly with any necessary details. (2) A conclusion must be stated regarding the bank's ability to meet the various credit needs in its assessment areas but do not disclose confidential information, in accordance with the prohibition in 12 CFR 261.2(c)(1)(i). (3) You may include a map of the bank's assessment areas in an appendix.

## SCOPE OF EXAMINATION

### NOTE

Scope information orients the reader and, when presented here, eliminates repetition later in the document. At a minimum, the following items should be discussed: the specific lending products reviewed; the names of any affiliates reviewed and their corresponding lending, investment or service activities; the institution's assessment areas and whether its activities in the assessment areas were reviewed using the full examination procedures; and the period covered in the review. Indicate if any products or assessment areas were given greater weight in reaching conclusions. Indicate that the information presented here pertains throughout the evaluation unless specifically noted otherwise.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Discuss the institution's overall CRA performance. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses and relevant information from the performance context factored into the overall institution rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement are found by the [Agency] or identified through self-assessment(s), state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (for example, widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of

examination should be presented in general terms. Discuss whether management has [proposed/taken] steps that [have/would if implemented] address(ed) the technical violation(s).

**NOTE**

Use the following format for the discussion:

**LENDING TEST**

State the rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the lending test and provide a brief explanation to support the rating. This explanation should include the ratings of the states or conclusions about the full-scope MSAs, whichever is applicable, evaluated at the examination. Explain when any areas were given greater weight than others were.

**Lending Activity:** State the conclusion (for example, “excellent,” “good,” “adequate”) regarding lending activity. Use the Total Lending Activity Table below to show the total number and dollar value of all applicable loans originated or purchased by the bank and its affiliates. (Adjust table if consumer or other loan types are being evaluated.) If no affiliate lending is included, do not use the Total Lending Activity Table. Instead, refer to the combined totals from the Assessment Area Lending Table discussed below.

EXHIBIT 1  
**Summary of Lending Activity**

<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
HMDA home purchase	3,994	--	758,385	--
HMDA refinancings	2,081	--	399,258	--
HMDA home improvement	626	--	2,831	--
HMDA multifamily	52	--	130,041	--
<b>Total HMDA-related</b>	<b>6,753</b>	<b>68</b>	<b>1,290,515</b>	<b>75</b>
<b>Total small business</b>	<b>3,239</b>	<b>32</b>	<b>424,913</b>	<b>25</b>
<b>TOTAL LOANS</b>	<b>9,992</b>	<b>100</b>	<b>\$1,715,428</b>	<b>100</b>

Note: Affiliate loans include only loans originated or purchased within the bank’s assessment areas.

**Assessment Area Concentration:** Discuss the level of lending activity inside and outside all the bank’s assessment areas, using the Assessment Area Lending Table below. (Adjust the table if small farm, consumer, or other loan types are being evaluated.) It is not necessary to state a conclusion regarding assessment area concentration since this is factored into the overall lending activity conclusion. Provide a discussion if there is a high level of lending outside the assessment area. Refer to Core Table 1: Lending Volume, for additional information about assessment area lending.

EXHIBIT 2  
**Lending Inside and Outside the Assessment Area**

	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
HMDA home improvement	617	99	2,786	98	9	1	45	2
HMDA multifamily	45	87	111,581	86	7	13	18,460	14
<b>Total HMDA-related</b>	<b>662</b>	<b>98</b>	<b>114,367</b>	<b>86</b>	<b>16</b>	<b>2</b>	<b>18,505</b>	<b>14</b>
<b>Total small business</b>	<b>3,180</b>	<b>98</b>	<b>414,159</b>	<b>97</b>	<b>59</b>	<b>2</b>	<b>10,754</b>	<b>3</b>
<b>TOTAL LOANS</b>	<b>3,842</b>	<b>98</b>	<b>\$528,526</b>	<b>98</b>	<b>75</b>	<b>2</b>	<b>\$29,259</b>	<b>5</b>

Note: Affiliate loans not included.

**Geographic and Borrower Distribution:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding each of these elements of the lending test. Remember that overall conclusions are based on performance in the various assessment areas. It is not necessary to recalculate geographic and borrower distribution data for all the bank’s assessment areas combined. Support your conclusions by specifying the ratings/conclusions in the various assessment areas states or MAs (as applicable) that were factored into the conclusions about the bank’s overall performance. Discuss performance in general. Detailed discussions should be reserved for assessment area write-ups.

With respect to geographic distribution, note whether or not any significant lending gaps in contiguous geographies unexplained by performance context were found. If there were such lending gaps indicate in which assessment area(s) they occurred and include a cross-reference to the appropriate section of the evaluation.

In addition, discuss any significant qualitative aspects that may have augmented the bank’s overall geographic or borrower performance. This can include innovative or flexible lending practices or products that are available in all assessment areas. Describe the product or practice briefly and indicate in what way it assisted low- and moderate-income (LMI) geographies and/or LMI borrowers. State the volume of loans originated through the programs and that they are included in the overall volume of loans evaluated. If the products or practices are unique to specific states or assessment areas, they should be mentioned only briefly, and the reader should be directed to the appropriate section of the evaluation for a more detailed discussion.

**Community Development Lending:** State a conclusion about the level of community development lending (for example, “the bank is a leader,” “its level of . . . is relatively high,” “its level of . . . is adequate”) overall and in states or full-scope MAs, whichever is applicable. Note if any activity was outside the bank’s assessment area and explain why such activity was given consideration. Explain when any areas were given greater weight than others were. Refer as appropriate to issues relating to performance context and availability of opportunities. Provide the total of community development loans (number and dollar amount) in all the bank’s assessment areas combined. Similarly, provide these totals for “other community development lending activity” that was considered, such as letters of credit. Include general comments and specific examples of qualitative aspects of the activity that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity. Other than in the examples, details about the qualitative aspects of the loans should be presented in the discussions of the state or assessment area where the loans are located. Refer to Core Table 1 for information on the level of community development lending in the individual assessment areas.



**INVESTMENT TEST**

State the rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the investment test overall and provide a brief explanation to support this rating. This explanation should include the ratings of the states or conclusions about full-scope MAs, whichever is applicable. Note if any activity was outside the bank’s assessment area and explain why such activity was given consideration. Explain when any areas were given greater weight than others were. Provide the total amount of investments (number and dollar amount) in all the assessment areas combined, and state a conclusion (for example, “excellent,” “significant,” “adequate”) regarding the level of activity. Note if any investments were given greater weight than others were and explain why. Give the details of any investments that assist the overall, regional, or multiple assessment areas. Indicate if the amounts of such investments are in addition to or included in the specific assessment area activity shown in Core Table 14, which should be cross-referenced. Make general comments and provide specific examples of the qualitative aspects that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity. Other than in the examples, details about the qualitative aspects of investments should be presented in the discussions of the state or assessment area to which the investments relate.

**SERVICE TEST**

State the rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the service test. Support your rating by specifying the ratings/conclusions in the various assessment areas (states or MAs as applicable) that were factored into the conclusions about the bank’s overall performance. State general conclusions regarding each element of the retail service portion as well as the community development service portion of the test, using the terminology of Appendix A to Regulation BB, which describes the various performance levels. Detailed discussions should be reserved for assessment area write-ups. However, if there are particular assessment areas in which performance was exceptionally good or bad, you may mention the assessment area(s) and provide a cross-reference to the section of the evaluation in which detailed information is presented. Products should be described generally, and a statement should be made that they are available as described throughout all the assessment areas unless otherwise noted.

**COMPLIANCE WITH ANTIDISCRIMINATION LAWS**

As previously noted, write a paragraph about the institution’s record of complying with the antidiscrimination laws. Use the guidelines on page 3.

## MULTISTATE METROPOLITAN AREA

**CRA RATING FOR** *(Name of Multistate Metropolitan Area, Including State Names):*<sup>1</sup>

*The lending test is rated:*

*The investment test is rated:*

*The service test is rated:*

*[Complete for each multistate metropolitan area where an institution has branches in two or more states within the multistate metropolitan area.]*

Summarize the major factors supporting the institution's multistate metropolitan area rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

### NOTE

Present a bullet point summary supporting the ratings with respect to each test.

## SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the multistate MA. Discuss how CRA activities in the multistate MA were reviewed (using the examination procedures or through an analysis of available facts and data), and the time period covered in the review.

### NOTE

In addition to the above, indicate any variance from the information presented in the scope section of the institution portion of this document and explain the reason(s) for the variance. If there is more than one assessment area in the multistate metropolitan area, refer to the state and metropolitan area portions of this document for guidance.

1. This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN (NAME OF MULTISTATE METROPOLITAN AREA)**

Describe the institution's operations within the multistate metropolitan area, including a description of each of the assessment area(s) that it serves within the multistate metropolitan area. Information that may be important includes: total assets; asset/loan portfolio mix; primary business focus; branching network; and any merger or acquisition activity. For each of the assessment areas served, include key information such as the number of branches within the assessment area and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the examination procedures.

Other information that may be important includes population trends, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are not reviewed using the examination procedures.

**NOTE**

In addition to the above, identify the states, counties and major cities that constitute the MA and provide the following data: total deposits in the MA, MA deposits as a percentage of the state's overall total deposits, and the institution's deposit share in the MA. Discuss qualitative aspects that may have influenced the bank's performance, such as the level of competition and length of time in the market. Insert the demographic information table below, which provides most demographic details. In addition, discuss HUD adjusted-income ranges, unemployment rates and major employers, and provide an overview of the economy together with any other relevant performance context information you used, including information obtained from community contacts.

EXHIBIT 3  
Assessment Area Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	39	14.6	37,694	7.8	15,579	41.3	113,168	23.3
Moderate-income	57	21.3	90,481	18.6	20,899	23.1	79,578	16.4
Middle-income	96	36.0	192,219	39.6	23,846	12.4	93,094	19.2
Upper-income	75	28.1	164,819	34.0	8,355	5.1	199,373	41.1
<b>Total Assessment Area</b>	<b>267</b>	<b>100.0</b>	<b>485,213</b>	<b>100.0</b>	<b>68,679</b>	<b>14.2</b>	<b>485,213</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-occupied</b>		<b>Rental</b>		<b>Vacant</b>		
	#	%	#	%	#	%	#	%
Low-income	71,485	12,252	3.3	17.1	50,122	70.1	9,111	12.7
Moderate-income	150,066	48,351	12.9	32.2	87,510	58.3	14,205	9.5
Middle-income	292,074	153,540	40.8	52.6	110,334	37.8	28,200	9.7
Upper-income	257,663	161,863	43.0	62.8	68,383	26.5	27,417	10.6
<b>Total Assessment Area</b>	<b>771,288</b>	<b>375,006</b>	<b>100.0</b>	<b>48.8</b>	<b>316,349</b>	<b>41.0</b>	<b>78,933</b>	<b>10.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
	#	%	#	%	#	%	#	%
Low-income	8,402	10.1	7,096	9.9	1,306	10.9	0	--
Moderate-income	15,865	19.0	13,177	18.4	2,688	22.5	0	--
Middle-income	25,892	31.0	23,028	32.2	2,864	23.9	0	--
Upper-income	33,388	40.0	28,274	39.5	5,114	42.7	0	--
Tract not reported	0	0.0	0	0.0	0	0	0	--
<b>Total Assessment Area</b>	<b>83,547</b>	<b>100.0</b>	<b>71,575</b>	<b>100.0</b>	<b>11,972</b>	<b>100.0</b>	<b>0</b>	<b>--</b>
	<b>Percentage of Total Business:</b>		<b>85.7</b>		<b>14.3</b>			

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN  
(NAME OF MULTISTATE METROPOLITAN AREA)**

Discuss the institution's CRA performance within the multistate metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record in assessment areas reviewed using the examination procedures in the multistate metropolitan area. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

**NOTE**

The discussion of conclusions should reflect the following format:

**LENDING TEST**

State a rating with respect to the lending test (for example, “outstanding,” “high satisfactory,” “low satisfactory”) and briefly explain the basis for the rating.

**Lending Activity:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding lending activity and refer to Core Table 1: Lending Volume for details. Explain the basis of your conclusion, and, as applicable, include performance context information.

**Geographic Distribution:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding the overall geographic distribution of loans and refer to Core Tables 2 through 7 and Table 13, as applicable, for details. Explain the basis of your conclusion, with reference to applicable performance context and community contact information. Discuss performance with respect to each of the following loan products, as applicable: HMDA-related (for example, home purchase loans, refinancings) small business, small farm, and consumer. For each product category:

1. State a conclusion (for example, “excellent,” “good,” “adequate”) concerning the evaluation of performance in relation to the appropriate demographic and aggregate data contained in the core tables, and insert key numbers as necessary.
2. Discuss separately performance in LMI geographies.
3. Discuss any significant lending gaps in contiguous geographies.
4. Discuss any qualitative aspects of lending performance that may have augmented performance, such as innovative or flexible lending practices or products. Products or practices already discussed in detail at the institution level should be mentioned only briefly. However, for those products or practices unique to the multistate metropolitan area, provide a more detailed description of the product(s) or practice(s) and indicate in what way LMI geographies were assisted. Include information on the volume of loans originated through the programs and indicate that the loans are included in the overall volume of loans evaluated.

**Distribution by Borrower Income and Revenue Size of the Business:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding the overall distribution of loans by borrower income and revenue size of the business. Refer to Core Tables 8 through 13, as applicable, for details. Explain the basis of your conclusion, and include applicable performance context and community contact information. Discuss separately performance with respect to HMDA-related, small business loans, consumer and small farm loans, as applicable. For each product category:

1. State a conclusion (for example, “excellent,” “good,” “adequate”) regarding the evaluation of performance in relation to the appropriate demographic and aggregate information provided in the tables, using key numbers as necessary.
2. For HMDA-related and consumer loans, discuss performance separately in relation to LMI borrowers.
3. Discuss any qualitative aspects of lending performance that may have augmented performance levels, such as innovative or flexible lending practices or products. Products or practices already discussed in detail at the institution level should be mentioned only briefly. However, for those products or practices unique to the multistate metropolitan area, provide general descriptions of the product(s) or practice(s) and indicate in what way LMI borrowers were assisted. Include information about the volume of loans originated through the programs and indicate that the loans are included in the overall volume of loans evaluated.

**Community Development Loans:** State a conclusion about the level of community development lending (for example, “the bank is a leader,” “makes a relatively high level of” or, “makes an adequate level of . . .”) and refer as appropriate to issues relating to performance context and availability of opportunities. State the total of community development loans (number and dollar amount) in the multistate area, and reference Core Table 1 for loan volume in the individual assessment areas. In addition, state the total in the multistate area of “other community development activity” considered, such as letters of credit. Provide details on and specific examples of the qualitative aspects that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity.

#### **INVESTMENT TEST**

State a rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the investment test. Note the combined total, in number and dollar amount, of all investments in the MA assessment area, and direct the reader to Core Table 14 for MA details. Note if any investments were given greater weight than others were and explain why. Comment on the qualitative aspects that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity. Provide significant examples of qualified investments to substantiate your conclusions.

### **SERVICE TEST**

State a rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the overall service test and briefly explain the basis for the rating.

#### **Retail Services**

For retail services, state a conclusion regarding each of the following items. Use the terminology of Appendix A of Regulation BB for describing the various performance levels:

1. Accessibility of branches, with a reference to Core Table 15 for details and a comparison of branch locations with the population information provided in the table.
2. Availability of alternative delivery systems that may effectively enhance service to LMI geographies or persons.
3. Changes in branch locations (as shown in Table 15) and the impact on LMI geographies or persons.
4. Reasonableness of services if it differs from the overall.

#### **Community Development Services**

State a conclusion (for example, “leader in providing,” “provides a relatively high level”) regarding community development services and provide details and specific examples representative of the institution’s activity.



## STATE

### **CRA RATING FOR (Name of State):<sup>2</sup>**

**The lending test is rated:**

**The investment test is rated:**

**The service test is rated:**

*[Complete for each state in which an institution has branches if the institution has branches in two or more states. For an institution that has branches in only one state, complete the Metropolitan Area and Non-Metropolitan Statewide Area presentations only for that state, as applicable in light of the location of the branches.]*

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

#### NOTE

Present a bullet point summary to support the ratings with respect to each test.

## SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the state. Discuss how CRA activities in the state were reviewed (which metropolitan areas or non-metropolitan statewide areas included assessment areas that were reviewed using the full examination procedures and which metropolitan areas were reviewed through an analysis of available facts and data), and the time period covered in the review.

#### NOTE

In addition to the above, indicate any variance from the information presented in the scope section of the institution portion of the document and explain the reason(s) for the variance. Specify which assessment areas had full reviews and which had limited ones and note if any areas fully reviewed were given greater weight in reaching conclusions.

<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN (NAME OF STATE)

Describe the institution's operations within the state, including a description of the assessment area(s) served. Information that may be important includes: total statewide assets; asset/loan portfolio mix; primary business focus; branching network; any merger or acquisition activity; and a brief description of the metropolitan areas, non-metropolitan areas, and assessment areas served within the state.

### NOTE

In addition to the above, specify the MAs that are included in the state's assessment areas and their general location in the state, and provide data on the following: total deposits in the state, state deposits as a percentage of the bank's overall total deposits, and the bank's deposit share in the state. In addition, discuss qualitative aspects that may have influenced the bank's performance, such as the level of competition and length of time in the market. General information concerning the total population of the combined assessment areas, income ranges and unemployment levels, and a broad economic overview should also be presented. Include a general discussion of credit needs in the assessment area(s) and any information from community contacts that is applicable to the entire state. Specific demographic information is to be presented in the discussions relating to the individual assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (NAME OF STATE)

Discuss the institution's CRA performance within the state. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

### NOTE

Use the following format for the discussion of conclusions:

#### LENDING TEST

State the rating (for example, "outstanding," "high satisfactory," "low satisfactory") with respect to the lending test and provide a brief explanation to support the rating. The explanation should include the conclusions for the full-scope MAs evaluated at the examination. Explain when any areas were given greater weight than others were.

**Lending Activity:** State a conclusion (for example, "excellent," "good," "adequate") regarding

lending activity. Insert the Total Lending Activity Table into the text (see example in institution section) showing the number and dollar value of all applicable loans originated or purchased by the bank and its affiliates, if applicable, in all assessment areas in the state. Make reference to Core Table 1: Lending Volume for further information about lending in specific assessment areas. You may note strengths or weaknesses in lending activity in specific assessment areas if necessary; however, details should usually be given only in the discussions of the specific assessment areas.

**Geographic and Borrower Distribution:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding each of these elements of the lending test. Remember that overall conclusions are based on performance in the various assessment areas, and it is not necessary to calculate performance data for all the assessment areas in the state. Provide support by specifying the conclusions in the various assessment areas that were factored into the bank’s overall performance. Discuss performance in general. Detailed discussions should be reserved for assessment area write-ups.

With respect to geographic distribution, provide a general discussion of any significant lending gaps in contiguous geographies that were found. Details should be provided in the discussion of the assessment area concerned.

In addition, discuss any significant qualitative aspects that may have augmented the bank’s performance levels in the state, for example, innovative or flexible lending practices or products that are available throughout the assessment areas in the state. Provide a general description of the product(s) or practice(s) and indicate in what way LMI geographies and/or LMI borrowers were assisted. Include information on the volume of loans originated under the programs and indicate that the loans are included in the overall volume of loans evaluated. If such products or practices are unique to specific assessment areas, they should be mentioned only briefly and the reader should be directed to the appropriate section(s) of the evaluation for details.

**Community Development Loans:** State a conclusion about the level of community development lending (for example, “the bank is a leader,” “makes a relatively high level,” “makes an adequate level”) overall and in full-scope MAs. Explain when any areas were given greater weight than others were. Refer as appropriate to issues pertaining to performance context and availability of opportunities. State the total of community development loans (number and dollar amount) in all the assessment areas in the state combined, and direct the reader to Core Table 1 for data on the volume of loans in each assessment area. In addition, state the total of “other community development activity” considered, such as letters of credit. Provide general comments and specific examples of qualitative aspects that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity. Other than in the examples, details about the qualitative aspects of loans should be presented in the discussions of the assessment areas in which the loans are located.

**INVESTMENT TEST**

State the rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the investment test in the state and in the full-scope MAs. Explain when any areas were given greater weight than others were. Provide the total amount of investments (number and dollar) for all the assessment areas in the state combined and state a conclusion regarding evaluation of the level of activity (for example, “excellent,” “significant,” “adequate”). Note if any investments were given greater weight than others were and explain why. Describe the details of any investments that assist the state’s overall assessment areas. Indicate if such amounts are in addition to or included in the specific assessment area activity shown in Core Table 14: Qualified Investments, and direct the reader to that table. Comment generally on the qualitative aspects that may have augmented performance, such as responsiveness to need, degree of innovation, or complexity. Details of qualitative aspects of investments should be presented in the discussions of the assessment areas to which the investments relate.

**SERVICE TEST**

State the rating (for example, “outstanding,” “high satisfactory,” “low satisfactory”) with respect to the service test and support your rating by specifying the conclusions in the various assessment areas that were factored into the rating of the bank’s performance. State conclusions about performance regarding each element of the retail service portion of the test as well as to the community development service portion. Use the terminology of Regulation BB Appendix A, which describes the various performance levels. Detailed discussions should be reserved for assessment area write-ups. However, if there are particular assessment areas in which performance was exceptionally good or bad, you may mention the assessment area(s) and refer to the section(s) of the document in which detailed information is presented. Discuss any differences in products offered that are unique to the state.

## **METROPOLITAN AREAS**

*(For metropolitan areas with some or all assessment areas reviewed using the examination procedures.)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of Metropolitan Area & State)**

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Information that may be important includes: the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the full examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted.

Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the full examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are reviewed using the limited examination procedures.

#### **NOTE**

In addition to the above, specify the counties and major cities that make up the MA and include data on the following: total deposits in the MA, MA deposits as a percentage of the state's overall total deposits, and the bank's deposit share in the MA. Discuss qualitative aspects that may have influenced the bank's performance, such as the level of competition and length of time in the market. Insert the demographic information table below, which provides primary demographic details. Finally, discuss HUD adjusted-income levels, unemployment rates and major employers, and provide an overview of the economy and any other relevant performance context information you used, including information obtained from community contacts.

EXHIBIT 3  
Assessment Area Demographics  
(Insert name of assessment area)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	39	14.6	37,694	7.8	15,579	41.3	113,168	23.3	
Moderate-income	57	21.3	90,481	18.6	20,899	23.1	79,578	16.4	
Middle-income	96	36.0	192,219	39.6	23,846	12.4	93,094	19.2	
Upper-income	75	28.1	164,819	34.0	8,355	5.1	199,373	41.1	
<b>Total Assessment Area</b>	<b>267</b>	<b>100.0</b>	<b>485,213</b>	<b>100.0</b>	<b>68,679</b>	<b>14.2</b>	<b>485,213</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	71,485	12,252	3.3	17.1	50,122	70.1	9,111	12.7	
Moderate-income	150,066	48,351	12.9	32.2	87,510	58.3	14,205	9.5	
Middle-income	292,074	153,540	40.8	52.6	110,334	37.8	28,200	9.7	
Upper-income	257,663	161,863	43.0	62.8	68,383	26.5	27,417	10.6	
<b>Total Assessment Area</b>	<b>771,288</b>	<b>375,006</b>	<b>100.0</b>	<b>48.8</b>	<b>316,349</b>	<b>41.0</b>	<b>78,933</b>	<b>10.2</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
				<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	8,402	10.1	7,096	9.9	1,306	10.9	0	--	
Moderate-income	15,865	19.0	13,177	18.4	2,688	22.5	0	--	
Middle-income	25,892	31.0	23,028	32.2	2,864	23.9	0	--	
Upper-income	33,388	40.0	28,274	39.5	5,114	42.7	0	--	
Tract not reported	0	0.0	0	0.0	0	0	0	--	
<b>Total Assessment Area</b>	<b>83,547</b>	<b>100.0</b>	<b>71,575</b>	<b>100.0</b>	<b>11,972</b>	<b>100.0</b>	<b>0</b>	<b>--</b>	
	<b>Percentage of Total Business:</b>		<b>85.7</b>		<b>14.3</b>				

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN  
(NAME OF METROPOLITAN AREA AND STATE)**

Discuss the institution's CRA performance within the metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the conclusions. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the full examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record in assessment areas reviewed using the full examination procedures in the metropolitan area. Charts

and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

#### NOTE

Use the following format for the discussion:

#### LENDING TEST

State a conclusion with respect to the lending test (for example, "excellent," "good," "adequate") and provide a brief explanation, including performance context information, as applicable, to support the conclusion.

**Lending Activity:** State a conclusion (for example, "excellent," "good," "adequate,") regarding lending activity and direct the reader to Core Table 1: Lending Volume for details. Explain the basis of your conclusion, with reference to any applicable performance context information.

**Geographic Distribution:** State a conclusion (for example, "excellent," "good," "adequate") regarding the overall geographic distribution of loans and direct the reader to Core Tables 2 through 7 and Table 13, as applicable, for details. Explain the basis of your conclusion, with reference to any applicable performance context and community contact information. Discuss separately performance with respect to HMDA-related products, such as home purchase loans and refinancings, as well as with respect to small business and small farm loans and consumer loans, as applicable. For each product category:

1. State a conclusion (for example, "excellent," "good," "adequate") regarding performance, with reference to the appropriate demographic and aggregate information contained in the core tables, and insert key numbers as necessary.
2. Discuss separately performance in LMI geographies.
3. Discuss any significant lending gaps in contiguous geographies.
4. Discuss any qualitative aspects of lending performance that may have augmented performance. These may include innovative or flexible lending practices or products that are available throughout the bank's assessment areas or that are unique to the particular assessment area. Products or practices already discussed in detail at the institution or state level should be mentioned only briefly. However, for those products or practices unique to the assessment area, provide details about the product(s) or practice(s) and indicate in what way LMI geographies were assisted. Include information concerning the volume of loans originated under the programs and indicate that the loans are included in the overall volume of loans evaluated.

**Distribution by Borrower Income and Revenue Size of the Business:** State a conclusion (for example, “excellent,” “good,” “adequate”) regarding the overall distribution of loans by borrower income and revenue size of the business. Refer to Core Tables 8 through 13, as applicable, for details. Explain the basis of your conclusion, with reference to any applicable performance context and community contact information. Discuss separately performance with respect to HMDA-related loans, small business loans, small farm loans, and consumer loans, as applicable. For each product category:

1. State a conclusion (for example, “excellent,” “good,” “adequate”) regarding performance in relation to the appropriate demographic and aggregate information provided in the tables, using key numbers as necessary.
2. For HMDA-related and consumer loans, discuss separately performance with respect to LMI borrowers.
3. Discuss any qualitative aspects of lending performance that may have augmented performance levels. These may include innovative or flexible lending practices or products that are available throughout the bank’s assessment areas or that are unique to the particular assessment area. Products or practices already discussed in detail at the institution or state level should be mentioned only briefly. However, for those products or practices unique to the assessment area, provide a more detailed description of the product(s) or practice(s) and indicate in what way LMI borrowers were assisted. Include information on the volume of loans originated under the programs and indicate that they are included in the overall volume of loans evaluated.

**Community Development Lending:** State a conclusion (for example, “the bank is a leader,” “makes a relatively high level of . . .,” “makes an adequate level of . . .”) for community development lending, and refer to performance context and availability of opportunities issues, as appropriate. State the volume of loans originated and purchased, and note any “other community development activity” that was considered, such as letters of credit. Indicate the level (number and dollar amount) of community development lending directed toward each of the four community development categories (for example, affordable housing) and include significant examples as warranted.

#### **INVESTMENT TEST**

State a conclusion (for example, “excellent,” “good,” “adequate”) regarding the level of investments. Note the number and dollar amount of investments in the assessment area, and direct the reader to Core Table 14 for details. Note if any investments were given greater weight than others were and explain why. Comment on the qualitative aspects that may have augmented performance levels, such as responsiveness to need, degree of innovation, or complexity. Provide significant examples of qualified investments to substantiate your conclusions.

#### **SERVICE TEST**

State a conclusion (for example, “excellent,” “good,” “adequate”) for the overall service test and the basis for the conclusion.



**Retail Services**

For retail services, using the terminology in Appendix A to Regulation BB, state a conclusion based on the following:

1. Accessibility of branches, with a reference to Core Table 15 for details and a comparison of branch locations with the population information provided in the table.
2. Availability of alternative delivery systems that may effectively enhance service to LMI geographies or persons.
3. Changes in branch locations (as shown in Table 15) and the impact on LMI geographies or persons.
4. Reasonableness of services if conclusion differs from that for the services overall.

**Community Development Services:**

State a conclusion (for example, “leader in providing,” “provides a relatively high level”) regarding community development services and provide details concerning and examples of the bank’s activity.

## **METROPOLITAN AREAS**

*(For each metropolitan area where no assessment areas were reviewed using the examination procedures.)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN (NAME OF METROPOLITAN AREA AND STATE)**

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Include key information such as the number of branches within the assessment areas and the number of individuals and geographies in each income category.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (NAME OF METROPOLITAN AREA AND STATE)**

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

- a. The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].
- b. The institution's [lending, investment, service] performance in the area [exceeds/is below], the institution's [lending, investment, service] performance for the [institution/state]; however, it does not change the rating for the [institution/state]

#### **NOTE**

Activity and performance context information for assessment areas having limited reviews is presented in the core tables and should not be repeated here. Conclusions (consistent, exceeds, or below) regarding performance should be entered into a table that includes all limited review assessment areas in a particular state. If there is only one such area, conclusions can be presented in text and no table is necessary.

Please use the following text in your public evaluation:

"Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report. Conclusions regarding performance, which did not impact the overall (insert either "institution" or "state") rating, are as follows:"

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<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>

### **NON-METROPOLITAN STATEWIDE AREA<sup>3</sup>**

*(If some or all of the assessment areas within the non-metropolitan statewide area were reviewed using the examination procedures.)*

#### **NOTE**

For guidance in preparing this portion of the public evaluation, see **METROPOLITAN AREAS** beginning on page 19.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN (NAME OF NON-METROPOLITAN AREA AND STATE)**

Describe the institution's operations within the non-metropolitan statewide area, including a description of each of the assessment area(s) that it serves within the non-metropolitan statewide area. Information that may be important includes the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the full examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted.

Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the full examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are reviewed using the limited examination procedures.

3. The discussion of an institution's CRA performance within a non-metropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and non-metropolitan areas is optional because the performance in the non-metropolitan areas have been reviewed and discussed in the overall evaluation of the institution. Examiners may wish to discuss in greater detail, however, the assessment areas within non-metropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and non-metropolitan areas, or for intrastate banks with branches only in non-metropolitan areas.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN  
(NAME OF NON-METROPOLITAN AREA AND STATE)**

Discuss the institution's CRA performance within the non-metropolitan statewide area. The facts, data and analyses that were used to form a conclusion should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the conclusions for the non-metropolitan statewide area. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the full examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record in assessment areas reviewed using the full examination procedures in the non-metropolitan statewide area.

Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

## **NON-METROPOLITAN STATEWIDE AREA<sup>4</sup>**

*(If none of the assessment areas within the non-metropolitan statewide area were reviewed using the examination procedures.)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN (NAME OF NON-METROPOLITAN AREA AND STATE)**

Describe the institution's operations within the non-metropolitan statewide area, including a description of each of the assessment area(s) that it serves. Include key information such as the number of branches within each assessment area and the number of individuals and geographies in each income category.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (NAME OF NON-METROPOLITAN STATEWIDE AREA)**

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

- a. The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].
- b. The institution's [lending, investment, service] performance in the area [exceeds/is below], the institution's [lending, investment, service] performance for the [institution/state]; however, it does not change the rating for the [institution/state].

#### **NOTE**

For guidance in preparing this portion of the public evaluation, see **METROPOLITAN AREAS** beginning on page 24.

4. The discussion of an institution's CRA performance within a non-metropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and non-metropolitan areas is optional. Examiners may wish to discuss in greater detail, however, the assessment areas within the non-metropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and non-metropolitan areas, or for intrastate banks with branches only in non-metropolitan areas.

## **CRA APPENDIX A**

### **SCOPE OF EXAMINATION**

#### **NOTE**

The Scope of Examination discussion has been moved to the front of the public disclosure. On this page, refer the reader to that discussion, which is on page 3 in this document. There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state. Therefore, this appendix must be used for multistate institutions. In addition, large institutions with multiple assessment areas or affiliates subject to examination may warrant the use of charts that convey information regarding the scope of the examination. The following chart may be used as a supplement to the discussion of the scope. If it is used, please refer to Appendix A in your discussion.

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**SCOPE OF EXAMINATION** [SAMPLE]

TIME PERIOD REVIEWED	1/1/95 TO 6/30/96		
FINANCIAL INSTITUTION XYZ State Bank Grand Rapids, MI			PRODUCTS REVIEWED <ul style="list-style-type: none"> <li>• Small Business</li> <li>• Small Farm</li> <li>• Consumer</li> </ul> <ul style="list-style-type: none"> <li>• Unsecured</li> </ul>
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
XYZ Mortgage Company	Bank subsidiary		Mortgage loans
XYZ Community Investment Corporation	Holding company subsidiary		Investments
XYZ Credit Card Corporation	Holding company subsidiary		Credit Cards



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LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED <sup>5</sup>	OTHER INFORMATION
ILLINOIS MSA 0008 Decatur Adams County Non-MSA rural Illinois	Full procedures Ltd. procedures Full procedures		Mortgage loans not offered in non-MSA rural areas.
MICHIGAN MSA 0001 Grand Rapids City of Marcellus Non-MSA rural Michigan	Full procedures Full procedures Ltd. procedures		The scope of examination for non-MSA rural Michigan branches encompasses activities for the past six months, coinciding with their acquisition date.

**NOTE**

In the “branches visited” column, insert the names and addresses of the branches where examiners checked for technical compliance (sign and public file, if applicable). Under the table insert the following text:

“Note: “Branches visited” indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution’s CRA performance takes into consideration activity from all branch locations, as described in the “Scope of Examination.”

5. There is a statutory requirement that the written evaluation of a multistate institution’s performance must list the individual branches examined in each state.

**CRA APPENDIX B**

**SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

<b>State or Multistate Metropolitan Area Name</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall State Rating</b>

**NOTE**

The following appendix has been added to the public disclosure. It is based on the definitions used in relation to the FFIEC core tables. Please do not delete or change any items listed here. You may add items that are appropriate for a particular examination.

**CRA APPENDIX C****GLOSSARY**

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Block numbering area (“BNA”):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

**Geography:** A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Metropolitan area (MA):** Any primary metropolitan statistical area (“PMSA”), metropolitan statistical area (“MSA”), or consolidated metropolitan area (“CMSA”), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

**CRA APPENDIX D**

**CORE CRA TABLES**

**NOTE**

Insert all applicable CRA core tables here.

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**CRA APPENDIX E**

**ASSESSMENT AREA MAPS**

**NOTE**

You may include a map of the bank's assessment areas in this optional appendix.