

SAMPLE WHOLESALE AND LIMITED PURPOSE 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 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.

\* This is a sample format created to reflect the Community Reinvestment Act's requirements for written evaluations pursuant to 12 U.S.C. Section 2906 of the IBBEA for an institution operating in multiple assessment areas, in metropolitan areas and non-metropolitan areas, in multiple states, including multistate metropolitan areas. It will be adjusted, as appropriate, to reflect each institution's operations.

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## GENERAL INFORMATION

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **(Name of depository institution)** prepared by **(Name of agency)**, the institution's supervisory agency, as of **(date of examination)**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part xxx.*

## INSTITUTION

**INSTITUTION'S CRA RATING:** This institution is rated \_\_\_\_\_.

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.

### 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.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE

Discuss the institution's overall CRA performance. The facts, data and analyses that were used to determine the overall rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the analyses of each of the performance criteria, and relevant information from the performance context, factored into the overall institution rating. Discuss what effect, if any, community development activities outside of the assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment area(s) may have on 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.

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) (e.g., 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.

## MULTISTATE METROPOLITAN AREA

**CRA RATING FOR (Name of MULTISTATE METROPOLITAN AREA):** \_\_\_\_\_

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*[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.

### **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 areas that it serves within the multistate metropolitan area. Indicate how many of these assessment areas were reviewed using the full examination procedures.

### **CONCLUSIONS WITH RESPECT TO COMMUNITY DEVELOPMENT TEST IN (Name of MULTISTATE METROPOLITAN AREA):**

Discuss the institution's CRA performance within the multistate metropolitan area. 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 the community development test analysis, as well as the institution's record in assessment areas examined using the limited examination procedures (located in the multistate metropolitan area), factored into the rating. Support your conclusions with an analysis of facts and data from the assessment areas reviewed using the full examination procedures. In addition, include discussions 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 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.

## STATE

**CRA RATING FOR (Name of STATE):** \_\_\_\_\_

*[If the institution has branches in more than one state, complete this section for each state. Otherwise, complete the Metropolitan Statistical Area and Non-Metropolitan Statewide Area presentations only, as applicable.]*

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.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of STATE):**

Describe the institution's operations within the state and the assessment area(s) that it serves. 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 assessment areas within the state.

**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 analyses of the performance criteria 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.

## **METROPOLITAN AREAS**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of METROPOLITAN AREA)*:**

Discuss the institution's CRA performance within the metropolitan area, including a description of the assessment area(s) that it serves within the metropolitan 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 analyses of the performance criteria factored into the metropolitan area conclusion. Support your conclusions with an analysis of facts and data across geographies and demographic groups in the assessment areas reviewed using the examination procedures. Discuss any additional facts and data considered.

Additionally, discuss the institution's record in assessment areas examined using the limited examination procedures (located in a metropolitan area). 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. Support your conclusions with appropriate facts and data.

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 AREAS**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of NON-METROPOLITAN STATEWIDE AREA)*:**

Discuss the institution's CRA performance within the non-metropolitan statewide area, including a description of the assessment area(s) that it serves 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 analyses of the

performance criteria factored into the conclusion for the non-metropolitan statewide area. Support your conclusions with an analysis of facts and data across geographies and demographic groups in the assessment areas reviewed using the examination procedures. Discuss any additional facts and data considered.

Additionally, discuss the institution=s record in assessment areas examined using the limited examination procedures (located in the non-metropolitan statewide area.) 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. Support your conclusions with facts and data as appropriate.

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.

## **OTHER ACTIVITIES**

*If a wholesale or limited purpose institution has adequately addressed the needs of its assessment area(s), qualified investments, community development loans, or community development services that benefit areas outside of the institution's assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment areas may be considered. If the activities considered were not sufficient to raise the rating of the institution from an overall satisfactory to an outstanding, this section need only contain a statement that other activities were considered but did not affect the overall rating of the institution.*

Charts or tables may be useful in depicting information throughout the presentation.

### **SUMMARY OF INSTITUTION'S OTHER COMMUNITY DEVELOPMENT ACTIVITIES**

Summarize the institution's community development activities outside its assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment area(s). Include number, volume, and types of community development loans, qualified investments, and community development services.

### **DISCUSSION OF PERFORMANCE IN OTHER COMMUNITY DEVELOPMENT ACTIVITIES**

Summarize the institution's performance in other community development activities. The narrative should demonstrate how these activities influenced the overall rating for the institution.

APPENDIX A

**SCOPE OF EXAMINATION**

Write a short description of the scope of the examination. At a minimum, discuss the specific products reviewed, the names of affiliates reviewed and their corresponding products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the full examination procedures, and the time period covered in the review.

Charts that illustrate the scope of the examination may be useful for large institutions with multiple assessment areas or institutions that use data from their affiliates. Charts, such as the ones below, may be used as a supplement to the discussion of the scope or in lieu thereof.

SCOPE OF EXAMINATION [SAMPLE]		
TIME PERIOD REVIEWED	1/1/95 TO 6/30/96	
<b>FINANCIAL INSTITUTION</b> XYZ National Bank, Wilmington, DE		<b>PRODUCTS REVIEWED</b> Community Development Investments Community Development Services
<b>AFFILIATE</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>
XYZ Corporation, Chicago, IL	Bank holding company	Qualified Investments
XYZ Investment Corporation, Chicago, IL	Holding company subsidiary	Qualified Investments

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION [SAMPLE]			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
DELAWARE MSA 11111 Wilmington	Full exam procedures		None
SOUTH DAKOTA MSA 1234 Sioux Falls	Ltd. exam procedures		Sioux Falls operations acquired in an acquisition dated 1/1/95 from ABCcorp. The scope includes only lending activity since that date.

APPENDIX B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

State or Multistate Metropolitan area Name	State Rating