

SAMPLING GUIDELINES FOR COMPLIANCE AND CRA

OVERVIEW

This Appendix provides sampling guidelines to assist the examiner in selecting a sample of loans to review for compliance with applicable consumer protection laws and regulations and the technical requirements of the fair lending laws and regulations. The Appendix also provides guidelines for selecting a CRA sample. These procedures are shown separately. Sampling guidelines for conducting comparative loan file analyses for the fair lending laws and regulations are presented in Part III:H3 of this manual.

IN THIS APPENDIX

TOPIC	SEE PAGE:
COMPLIANCE	H-2
TYPES OF SAMPLING: JUDGMENTAL AND STATISTICAL SAMPLING	H-2
DETERMINING SAMPLE SIZE	H-3
REQUESTING AUTOMATED DOWNLOAD OR LOAN TRIAL FROM THE FINANCIAL INSTITUTION	H-5
SAMPLE SELECTION FROM AUTOMATED DOWNLOAD	H-5
SAMPLE SELECTION FROM A LOAN TRIAL	H-7
COMMUNITY REINVESTMENT ACT (CRA)	H-10
GENERAL SAMPLING GUIDELINES	H-10
STATISTICAL SAMPLING AT SMALL INSTITUTIONS	H-11
SAMPLE SELECTION	H-12
INFORMATION TO BE GATHERED FOR EACH LOAN RECORD	H-12
GEOCODING LOAN LOCATIONS	H-13
CALCULATING PROPORTION ESTIMATES	H-13
SAMPLE SIZE TABLE	H-15
RANDOM NUMBERS	H-16
REFERENCES	H-17

COMPLIANCE

The compliance sampling guidelines assist examiners in selecting samples of loans to review for compliance with applicable consumer protection laws and regulations and the technical requirements of the fair lending laws and regulations.

TYPES OF SAMPLING**Judgmental and Statistical Sampling**

- **Judgmental Sampling:** With judgmental (or judgment) sampling, the selection of population units (e.g. loans) for the sample is based on the judgment of the individual drawing the sample. Since the units are selected on a subjective basis rather than by using a random selection procedure, the population units do not have known probabilities of being selected.
- **Statistical Sampling:** With statistical sampling, population units are selected by some well-defined random procedure so that each unit in the population has a known, nonzero probability of being selected. Statistical sampling allows unbiased population projections to be made from the sample results. Statistical sampling is also referred to as probability sampling (in statistical texts) or random sampling.

Statistical sampling is the preferred method and should be used to the greatest extent possible. However, some types of transactions may not be easily identifiable, such as loans with flood insurance or co-signer loans. In these instances, it would be appropriate to request the particular loan type desired without specifying individual files. This would constitute a judgmental sample, the results of which should be kept separate from statistical samples.

NOTE: Regardless of the type of sampling procedure employed, the examiner should clearly document in the workpapers the sampling method utilized, loan universe and sample size(s), and the results. If loan underwriting is not centralized, examiners must ensure that the loan universe(s) (regardless if provided via automated download or loan trial) includes loans from all branch offices of the institution.

Examiners should review the findings and conclusions drawn from the **initial** loan samples. They should be alert for findings suggesting a potential disclosure problem with loans originated from a particular branch or by specific loan officer(s). Additional sampling by branch office and/or loan officer may be necessary. Additional sampling may also be necessary in the case of potentially reimbursable transactions.

NOTE: The examiner's findings regarding the institution's universe of loans for a particular loan type are based on the loans in the initial sample only. Additional samples provide further support for the examiner's original conclusion. Thus, the results from the initial and any additional loan samples should not be combined when writing the report violation, but should be described separately.

TYPES OF SAMPLING (cont'd)

Judgmental and Statistical Sampling (cont'd)

Examiners should select independent loan samples for the Compliance, CRA, and Fair Lending (comparative analysis) portions of the examination. For example, assume the examiner selects 31 mortgage loans from a universe of 100 loans for his or her CRA sample. Then, if the examiner desires to sample 10 loans for the compliance review, these loans would be selected independently from the 100 loans. There may or may not be overlap between the two samples.

NOTE: The only time that loan samples may be utilized for different aspects of the examination (e.g., Compliance and CRA) is when the exact same sample sizes are taken from the exact same universe of loans.

DETERMINING SAMPLE SIZE

Examiners should use judgment in determining how many loans to review as this will vary depending upon the specific circumstances. Regardless of the type of sampling method utilized, when determining the sample size at any financial institution, examiners should consider at a minimum:

- the loan products reviewed at the previous examination and deficiencies noted
- the variety of loan products offered
- the volume of loan originations (i.e. the larger the universe, then the larger the sample size needed)
- new products offered since the previous examination

In determining the loan types to be sampled, the following **characteristics**, which are not necessarily all-inclusive, should also be considered:

- **Maturity**
 - Closed-End (time and demand loans)
 - Open-End (credit cards and home equity lines of credit)
- **Collateral**
 - Automobile (direct and indirect)
 - Real estate (home improvement, residential mortgage, and construction)
 - Unsecured
- **Repayment Terms**
 - Demand
 - Installment (monthly, quarterly, annual, balloon payment, and long- and short-odd days to the first payment)
 - Single payment

**DETERMINING
SAMPLE SIZE
(cont'd)**

- **Insurance**
 - Credit life, accident, and health insurance
 - Property insurance
 - **Finance Charges**
 - Simple interest
 - 360/365-day method
 - **Prepaid Finance Charges**
 - Real estate points
 - Origination fees
 - **Variable-Rate Feature**
 - Regular
- Vendors single interest insurance
--Private Mortgage Insurance (PMI)
--Add-on or discount interest
--Documentation fees
--Discounted

It should be noted that a particular loan might exhibit several of the aforementioned characteristics, all of which may be reviewed at the same time. However, it should also be noted that not all loan types or characteristics must be sampled at each examination. A review of the workpapers from prior examinations will assist the examiner in establishing the loan sample(s) at the current examination. Emphasis should be placed on those types of loans that evidenced concerns in the past and those that could result in reimbursable violations (e.g., loans written with credit insurance or PMI, discounted Adjustable Rate Mortgages (ARMs), and construction loans).

Loans selected for review should be limited to those originated since the date of the previous examination. Examiners may, however, wish to initially focus on the prior six months or the past year, if an adequate sample can be drawn. This is because there may have been changes within the financial institution's compliance program in which deficiencies from several years ago have been corrected. Examiners should focus on current deficiencies, not weaknesses that have been detected and subsequently corrected.

**REQUESTING
AUTOMATED
DOWNLOAD
OR LOAN
TRIAL FROM
THE
FINANCIAL
INSTITUTION**

Examiners should select loans from the financial institution's automated download of the loan portfolio or a loan trial, as opposed to making a general request for loans and allowing bank management to select the loans for review. Examiners should first determine if an automated download is available. Procedures for selecting loan samples from an automated download are explained in the next section. If an automated download is not available, the sample should be selected through the financial institution's loan trial. The use of random selection methods (whether from an electronic or a hard copy list) should increase substantially the objectivity of the examination, as compared to those based on judgmental sampling. This is because the use of random selection methods removes the potential for bias in results associated with the loan selection process.

NOTE: There may be some difficulties with manipulating the electronic files or loan trial because of the need to understand the file structure and/or the codes used by the bank. Examiners should also request information about the loan codes from financial institution management.

**SAMPLE
SELECTION
FROM
AUTOMATED
DOWNLOAD**

The following provides guidance for selecting a stratified random sample of loans for compliance review when the financial institution's loans are provided in an electronic format. The different types of loans being sampled at a financial institution constitute the strata. A separate random sample will be selected from each stratum (loan type). Because the loans are in an electronic file, this is a fairly straightforward process: the loans can be electronically arranged and sorted in specified ways for sampling purposes.

Sample Selection from Automated Download

Step 1. Once an electronic file of the financial institution's loans is obtained, and the coding structure is known, the process of selecting a sample is relatively easy. The loans are grouped into the various loan universes that will be sampled (e.g., ARMs, construction loans, single payment loans). Each loan universe could be a separate electronic file or a subfile of the main file. Within each loan universe, a random sample of loans will be selected.

NOTE: There should be sufficient information in the file to identify the different loan types, though an examiner may need assistance from bank management to interpret the codes.

Step 2. For each universe, place the loans in random order. The random ordering is achieved by assigning a random number between zero and one (i.e., a decimal number) to each loan in the file, and then sorting the loans in ascending order by the random number. Excel software contains a random number generation tool that examiners should use to randomly select loans for review during an examination. This "random number generation" tool can be accessed by following these steps:

**SAMPLE
SELECTION
FROM
AUTOMATED
DOWNLOAD
(cont'd)**

- Select the following from the Excel Menu:
 - Tools
 - Add-Ins
 - Analysis Tool Pak (check box and click “OK”)
 - Tools (again)
 - Data Analysis
 - Random Number Generation (highlight and click “OK”)
- Respond to the items on the Random Number Generation screen as follows:
 - Number of Variables (Leave blank)
 - Number of Random Numbers (Leave blank)
 - Distribution (Select “Uniform” from list)
 - Parameters (Leave default set at 0 and 1)
 - Random Seed (Leave blank)
 - Output Options (Click “Output Range”)
 - (Click the box for “Output Range”)
 - (Select the range (output location) for the random numbers by highlighting the column on the spreadsheet where the random numbers should be placed. Use the “Shift” key and the down arrow to highlight the column.)
 - (Click box at end of selected range or press enter)
 - (Click “OK”)
- The random numbers are automatically assigned and placed in the designated statistical column. Sort the loans in ascending order by the random number as follows:
 - Click a cell in the column you would like to sort by
 - Click “Sort Ascending”

Step 3. Once the loans for a given type are placed in random order, determine the number of loans to select for review. The sample needed for the examination is simply taken from the top of the list. If an “out-of-scope” loan is identified in the sample, the examiner selects the next loan from the list to replace it. From within each loan type, print out all of the loans that will be reviewed. This information should be forwarded to bank management so that the loan documentation files will be ready at the commencement of the examination.

**SAMPLE
SELECTION
FROM
AUTOMATED
DOWNLOAD
(cont'd)**

<p><i>NOTE: An “out-of-scope” loan would be any loan that is not in the target universe. For instance, a loan that was originated prior to the last examination date, an automobile loan to a business for business use, or a consumer loan that is greater than \$25,000 (unless secured by personal property used as the principal dwelling or by real property).</i></p>
<p>Step 4. If an examiner decides that additional loans for a given stratum (type) are needed based on the results of the initial sample of loans, additional loans should be selected. As with replacements for “out-of-scope” loans, the examiner would take the additional sample of loans from the list, picking up where he or she left off when selecting the initial sample. (The main purpose of selecting additional loans would be for reviewing more examples of potential loan violations. Any estimates regarding the institution’s universe of loans for that stratum would be based on the loans in the initial sample only).</p>

**SAMPLE
SELECTION
FROM A
LOAN TRIAL**

For the case of sampling from a loan trial, the selection of a simple random sample from each stratum (type) would be rather difficult to do. Instead, another type of statistical sample, referred to as a systematic sample, should be selected from each stratum. As is true for a simple random sample, each loan in a given stratum will have the same chance of being selected for review. The basic idea of systematic sampling is straightforward:

- Select every kth loan (for example, every fifth loan) after selecting the initial loan at random from among the first “k” loans (for example, a random selection from among the first five loans).

The logistics of preparing a “universe” of loans from the loan trial for sampling, however, can be somewhat problematic, as will subsequently be discussed.

The different types of loans being sampled at a bank constitute strata. A separate systematic sample will be selected from each stratum (loan type). There may be a separate loan trial (or group of two or more trials) for each stratum. Alternatively, the different types of loans may be mixed together on a single loan trial. These two possible situations are addressed separately as Case 1 and Case 2, as follows:

Sample Selection from a Loan Trial
<p>Case 1: The bank provides separate loan trials for each of the major types of loans being sampled.</p>
<p>Assume there is only one loan trial for each type of loan. If there are two or more trials for a type, the lists can just be merged to form one list.</p>
<p>Step 1. Review the loan trial and cross out any loans that can be identified as being “out-of-scope” for the review (e.g., the date of the loan is not within the time period specified for review).</p>

**SAMPLE
SELECTION
FROM A
LOAN TRIAL
(cont'd)**

Step 2. Once the “out-of-scope” loans have been crossed off, number the remaining loans consecutively from 1 to N, where N is the total number of “in-scope” loans on the list.

NOTE: Some of the loans in the remaining list may still be “out-of-scope,” but cannot be identified prior to the review process.

Step 3. Determine a sampling (or skip) interval “k” by dividing N by the target sample size n, and rounding the result **off** to the nearest integer. For example, if there were N=123 loans on the trial for a given loan type, and the examiner decides to select n=10 of them for review, the selection interval “k” would be 12 (i.e., 123/10, rounded to the nearest integer).

NOTE: To compensate for “out-of-scope” loans, it is at this point that the examiner may wish to “oversample.” This procedure is explained in Step 5.

Step 4. Identify the “random start” (initial selection) for the systematic selection, which is a randomly selected loan from among the first “k” loans listed in the trial. To do this, refer to the list of random numbers provided as Attachment B. Take the first random number available from this list (for example, the first one that has not yet been used). This will be a decimal number between 0 and 1. Multiply the random number by the selection interval “k” and round the result **up** to the next integer. This integer will identify the “random start.” Suppose that for the example introduced above with k=12, the next available random number from your list is 0.34309. The product of 12 and 0.34309 is 4.11708. Therefore, the random start (first selection) would be loan number 5 (since you always round up). Once you have the random start, the other selections are identified by repeatedly adding the skip interval “k” to the previous selection number. For example, in the case discussed above with a random start of 5 and a selection interval of k=12, the other selections would be loans numbered 17, 29, 41, 53, 65, 77, 89, 101, and 113.

NOTE: Examiners may use the random numbers listed in Attachment B at each examination, crossing off a number when used.

**SAMPLE
SELECTION
FROM A
LOAN TRIAL
(cont'd)**

Step 5. The systematic selection process should continue until the end of the list is reached, even if this adds one or two selections to the target sample size (this could happen because of the rounding of the skip interval “k” to an integer). If any of the loans selected are identified during the review process as “out-of- scope,” it should be dropped from the sample **without being replaced**. For example, **do not** replace an “out-of-scope” loan with the next one on the list. The deletion from the sample of “out-of-scope” loans may reduce the sample size below the target. If such a reduction is minimal, and if the examiner feels that the remaining sample is adequate, nothing more needs to be done. However, if the reduction in the sample size is of concern, there are two methods that can be used to compensate for “out-of-scope” loans.

- **Method 1.** The preferred method is to “oversample” to allow for anticipated deletions. For example, if the examiner expects, based on previous experience, that 10% of the loans in the loan trial are actually “out-of-scope,” the sample can be increased by 10% to account for this. In the example discussed above with a target sample size of 10, the examiner would select a systematic sample of 11 to compensate for an anticipated “out-of-scope” rate of 10%. This would dictate a selection interval “k” of 11 rather than 12. If all 11 loans turn out to be “in-scope,” they should **all** be retained for the sample.
- **Method 2.** Select a supplemental sample after a review of the initial sample. In this case, the size of the supplemental sample would be determined to provide the correct number of additional sample loans. The selection procedures used for the supplemental loan sample would be the same as those used for the initial sample, after removing the initial selections. For example, if in the case discussed above for selecting ten loans, suppose that three of them turn out to be “out-of- scope,” leaving a deficit of three. A supplemental sample of three or four loans could then be selected. It would be wise to select four, since the initial sample suggests that the “out-of-scope” rate is 30%.

To select four additional loans, the remaining loans (i.e., 123-10) would be renumbered from 1 to 113. The new selection interval “k” would be 28 (i.e., $113/4$, rounded). To identify the random start for the supplemental sample, use the next random number from the list of numbers within Attachment B. Multiply this random number by 28, and round the product up to the next integer to identify the first selection.

**SAMPLE
SELECTION
FROM A
LOAN TRIAL
(cont'd)**

<p>CASE 2: The bank provides only one loan trial, and all loan types are mixed throughout the list.</p>
<ul style="list-style-type: none"> • This case is more complicated and more prone to errors than Case 1, even though the basic idea is the same. The first step is identical to that for Case 1—Review the loan trial and cross out those that are known to be “out-of-scope.”
<ul style="list-style-type: none"> • Next, go through the list and classify each loan by type. This might best be done using different colored highlighters to identify the loans by the different types. Then, the loans of a given type (same color) are numbered consecutively from 1 to N, and selection from these would be carried out the same way as it was in Case 1 (Steps 3–5), including any possible “oversampling” or sample supplementation.

**COMMUNITY
REINVESTMENT
ACT (CRA)

General
Sampling
Guidelines**

<p>I. General Sampling Guidelines</p>
<p>Based on loan sampling, examiners should estimate three sets of proportions in connection with CRA examinations of small institutions:</p> <ul style="list-style-type: none"> • Loans inside and outside of an assessment area • Loans in low-, moderate-, middle-, and upper-income geographies in an assessment area • Loans to low-, moderate-, middle-, and upper-income borrowers within an assessment area and/or loans to small businesses/farms of different sizes within an assessment area <p>Examiners should analyze the results based on the performance context and other information obtained during the examination.</p> <p>Under the revised regulation, small institutions are not required to collect data for CRA examination purposes. However, some small institutions may choose to provide data regarding their loans, including the census tract locations and borrower incomes, similar to the data requirement for large institutions. Some institutions may even provide a summary of their distribution of loans. In this case, if the examiner is able to verify the institution’s information, the examiner may use the data supplied by the institution and will not need to perform sampling to evaluate the institution’s CRA performance.</p> <p>These sampling procedures may also be utilized at large institutions if data have not been collected for some reason. For example, if a large institution has chosen not to collect consumer loan information, yet it comprises a substantial portion of lending, an examiner may choose to review consumer loans. In this case, these sampling guidelines would apply.</p>

**COMMUNITY
REINVESTMENT
ACT
(cont'd)

Statistical
Sampling At
Small Institutions**

II. Statistical Sampling at Small Institutions
<ul style="list-style-type: none"> • Determine one or more major product lines from which to select a sample, taking into account factors such as the institution’s business strategy and its areas of expertise. <p><i>NOTE: Examiners should sample no more than two product lines if the institution is eligible for Small Institution CRA scoping.</i></p> <p>As an initial matter, examiners may select for review from among the same categories of loans that are to be used when reviewing large institutions (for example, mortgages, small business and farm loans, and consumer loans).</p> <p><i>NOTE: The major consumer product categories are defined in the CRA regulation as home equity, motor vehicle, other secured, unsecured, and credit card.</i></p>
<ul style="list-style-type: none"> • Determine the universe of loans for each category. <p><i>NOTE: The universe of loans is defined as the total number of loans, both originated and purchased by the institution, for a major product category.</i></p> <p>In order to determine the number of loans for the sample (known as the sample size), examiners should know the number of loans in the universe, even if this requires them to count the number of loans manually.</p> <p>This universe can be defined as any of the following:</p> <ul style="list-style-type: none"> • Total number of loans since the previous examination • Total number of loans in the previous year • Total number of loans in the previous six months <p>At a minimum, the universe of loans should cover at least the activity in the six months prior to the examination. It should cover at least the prior year if the number of loans made in the last six months is less than 50. If the universe of loans for the previous year for any particular product category is less than 50, then all loans made or purchased since the previous examination for that product should be included in the universe.</p> <p><i>NOTE: Examiners should limit the review period to no more than 1 year for institutions which are eligible for Small Institution CRA scoping.</i></p>
<ul style="list-style-type: none"> • Determine the number of loans to be sampled for each product category by using Attachment A. The table indicates the sample size based on the universe of loans for each product and the desired confidence and precision levels. <p>Initially, examiners should select samples based on a 90% confidence interval, with a level of precision of plus or minus 15 percentage points. This means that there is a 90% chance that the results from the sample will be within 15 percentage points of the true proportion, for whichever criterion is being evaluated.</p>

**COMMUNITY
REINVESTMENT
ACT
(cont'd)
Statistical
Sampling At
Small Institutions
(cont'd)**

For loan products or institutions that require further investigation or are undergoing greater scrutiny for any reason, a larger sample may be necessary because examiners may need results with a higher degree of reliability. Examiners may use the 90% confidence level with a level of precision of plus or minus 10 percentage points when a larger sample is necessary. Examiners should use their judgment to determine which sample size to use based on the initial scoping of the examination and subsequent findings on site.

Sample Selection

III. Sample Selection

Once the number of loans to be sampled is determined, the examiner should select these loans from a list of loans unique to that product using one of the following methods:

- To select loans from an automated download, place the loans in random order and follow the procedures previously discussed under “Sample Selection from Automated Download.”
- To select loans from a trial, calculate the selection interval to use for sampling by dividing the number of loans in the universe by the number of loans that will be in the sample and rounding to the nearest whole number. Follow the procedures previously discussed under “Sample Selection from a Loan Trial.”

**Information to be
Gathered for
Each Loan
Record**

IV. Information to be Gathered for Each Loan Record

- Once the loans for each sample have been identified, record relevant loan information into a spreadsheet. Data for each loan should include, at a minimum:
 - Institution’s internal loan ID number
 - Loan type
 - Loan dollar amount
 - Location – In cases where the census tract of the loan is not readily available, examiners are expected to geocode the loans (refer to “Geocoding Loan Locations” below).

COMMUNITY REINVESTMENT ACT (cont'd)
Information to be Gathered for Each Loan Record (cont'd)

- For the home related and consumer loans sampled, the borrower income that was used to approve the loan
 - For the small business and small farm loans sampled, the business's or farm's revenue
-
- When data is missing, attempt to obtain this information through discussions with institution personnel. Obtaining information through these discussions can significantly reduce the number of records in the sample with "missing data" and thereby increase the validity of each sample.

Geocoding Loan Locations

V. Geocoding Loan Locations

If the institution has not already geocoded each loan by determining the Metropolitan Statistical Area (MSA) (if applicable), state, county, and census tract or Block Numbering Area (BNA), the examiners will need to determine this for the loans in the sample. MSA/BNA information is available through the Internet.

Calculating Proportion Estimates

VI. Calculating Proportion Estimates

- Calculate the following proportion estimates as itemized in the examination procedures:
 - Percentage of the number of loans (by product type) inside and outside the assessment area(s)
 - Percentage of the dollar amount of loans (by product type) inside and outside the assessment area(s)

- In accordance with the CRA examination procedures, examiners should tabulate the following statistics based on **only those loan records from the sample that are within the assessment area(s)** for each product category:
 - Number and percentage of loan originations (by product category, if applicable) in low-, moderate-, middle-, and upper-income geographies
 - Dollar amount and percentage of loan originations (by product category, if applicable) in low-, moderate-, middle-, and upper-income geographies
 - Number and percentage of loan originations (by product category, if applicable) to low-, moderate-, middle-, and upper-income borrowers

**COMMUNITY
REINVESTMENT
ACT (cont'd)****Calculating
Proportion
Estimates (cont'd)**

- Dollar amount and percentage of loan originations (by product category, if applicable) to low-, moderate-, middle-, and upper-income borrowers
- Number and percentage of loan originations to small businesses/farms of different sizes (by revenue)
- Dollar amount and percentage of loan originations to small businesses/farms of different sizes (by revenue)

Examiners should follow the guidelines in the CRA examination procedures for analyzing the results from sampling and, ultimately, assign a rating to the institution's lending performance.

Sample Size Table		
90% Confidence Interval		
No. of Originations and Purchases	Sample Size	
	10% Precision	15% Precision
10	9	8
50	34	24
100	50	31
200	67	37
300	76	39
400	81	40
500	84	41
600	86	42
700	88	42
800	89	42
900	91	43
1,000	92	43
1,250	93	43
1,500	94	43
1,750	95	44
2,000	96	44
2,250	96	44
2,500	97	44
2,750	97	44
3,000	97	44
3,500	98	44
4,000	98	44
4,500	98	44
5,000	99	44

RANDOM NUMBERS

0.38200	0.11692	0.54509	0.93725
0.10068	0.76571	0.03854	0.57637
0.59648	0.80123	0.99829	0.71999
0.89911	0.75829	0.05795	0.95322
0.88461	0.16840	0.78448	0.21992
0.95846	0.17753	0.22163	0.14505
0.01450	0.68123	0.55965	0.82025
0.40742	0.32841	0.59865	0.06351
0.86325	0.15769	0.81817	0.16541
0.13858	0.12033	0.16309	0.95004
0.24503	0.09137	0.57833	0.06900
0.04547	0.47011	0.10123	0.56258
0.03238	0.35252	0.37065	0.22309
0.16413	0.46727	0.11570	0.23917
0.21961	0.88348	0.51720	0.43397
0.01709	0.71441	0.01358	0.91305
0.28504	0.40043	0.08927	0.40794
0.34309	0.05341	0.66530	0.25922
0.55364	0.71868	0.53526	0.80044
0.35737	0.07834	0.60927	0.08249
0.37184	0.74892	0.40172	0.44646
0.35560	0.54076	0.28321	0.44240
0.91031	0.09787	0.45540	0.53639
0.46602	0.09870	0.20899	0.47337
0.42616	0.16886	0.47710	0.11240
0.30390	0.97241	0.56795	0.02460
0.97571	0.32383	0.66408	0.76263
0.80667	0.07096	0.60707	0.73745
0.99124	0.66311	0.57186	0.90796
0.25626	0.17273	0.33290	0.62673
0.95169	0.92596	0.47371	0.73421
0.05344	0.89953	0.10895	0.25645
0.70504	0.54039	0.54143	0.74697
0.81652	0.64925	0.19565	0.82986
0.97250	0.57942	0.97919	0.23957
0.46632	0.46541	0.08670	0.56990
0.30021	0.93738	0.79952	0.79647
0.75021	0.15278	0.82580	0.27607
0.35148	0.04978	0.93988	0.42332
0.77566	0.91806	0.45799	0.53157
0.07434	0.56850	0.50566	0.13248
0.19843	0.55220	0.50697	0.32572
0.06406	0.19382	0.71819	0.93927



**FDIC LAW,
REGULATIONS,
& RELATED
ACTS**

Applicable Rules

None

Advisory Opinions

None

**Statements of
Policy**

None

**DCA
MEMORANDA**

Small Bank CRA Scoping, Transmittal #98-009, dated 4/24/98

**FINANCIAL
INSTITUTION
LETTERS (FIL)**

None

OTHER

FFIEC Interim Guidance for Sampling at Small Institutions, "Red Book",
Tab M
