

SMALL INSTITUTIONS

In This Section

TOPIC	SEE PAGE:
EXAMINATION SCOPE	B-1
PERFORMANCE CONTEXT	B-2
ASSESSMENT AREA	B-3
PERFORMANCE CRITERIA	B-3
RATINGS	B-7
PUBLIC FILE CHECKLIST	B-10
RATINGS MATRIX	B-12
REFERENCES	B-13

EXAMINATION SCOPE

Institutions with More than One Assessment Area
<p>1. For institutions with more than one assessment area, select assessment areas for on-site review. In making those selections, review prior CRA performance evaluations, available community contact materials, and reported lending data and demographic data on each assessment area.</p> <p>Consider factors such as:</p> <ul style="list-style-type: none"> • Lending opportunities in the different assessment areas • Level of the institution's lending activity in the different assessment areas, particularly low- and moderate-income areas • Number of other institutions in the different assessment areas and the importance of the institution under examination in serving the different areas, particularly any areas with relatively few other providers of financial services • Existence of apparent anomalies in the reported HMDA data for any particular assessment area(s) • Length of time since the assessment area(s) was last examined on-site • Institution's prior CRA performance in different assessment areas • Experience of examiners in the same or similar assessment areas • Comments from the public regarding the institution's CRA performance

**EXAMINATION
SCOPE (cont'd)**

Interstate Institutions	
2.	For interstate institutions, a rating must be assigned for each state where the institution has a branch and for each multi-state MSA where the institution has branches in two or more states that comprise that MSA. Select one or more assessment areas in each state for an examination using these procedures.

**PERFORMANCE
CONTEXT**

Gather Performance Context Information	
1.	Review standardized worksheets and other agency information sources to obtain relevant demographic, economic, and loan data, to the extent available, on each assessment area under review.
2.	Obtain for review the Consolidated Reports of Condition (Call Reports)/Thrift Financial Reports (TFRs), Uniform Bank/Thrift Performance Reports (UBPR/UTPR), annual reports, supervisory reports, and prior CRA evaluations of the institution under examination. Review financial information and the prior CRA evaluations of institutions of similar size that serve the same or similar assessment area(s).
3.	Consider any information the institution may provide on its local community and economy, its business strategy, its lending capacity, or that otherwise assists in the evaluation of the institution.
4.	Review community contact forms prepared by the regulatory agencies to obtain information that assists in the evaluation of the institution. Contact local community, governmental, or economic development representatives to update or supplement this information. <i>Refer to the Community Contact Procedures for more detail.</i>
5.	Review the institution's public file for any comments received by the institution or the agency since the last CRA performance evaluation for information that assists in the evaluation of the institution.
6.	Document the performance context information gathered for use in evaluating the institution's performance.

**ASSESSMENT
AREA**

Evaluate Assessment Area(s)	
1.	<p>Review the institution’s stated assessment area(s) to ensure that it:</p> <ul style="list-style-type: none"> • Consists of one or more MSAs or contiguous political subdivisions (for example, counties, cities, or towns) • Includes the geographies where the institution has its main office, branches, and deposit-taking ATMs, as well as the surrounding geographies in which the institution originated or purchased a substantial portion of its loans • Consists only of whole census tracts and block numbering areas • Consists of separate delineations for areas that extend substantially across CMSA or state boundaries unless the assessment area(s) is located in a multistate MSA • Does not reflect illegal discrimination • Does not arbitrarily exclude any low- or moderate-income area(s), taking into account the institution’s size, branching structure, and financial condition
2.	<p>If an institution’s assessment area(s) does not coincide with the boundaries of an MSA or political subdivision(s), assess whether the adjustments to the boundaries were made because the assessment area(s) would otherwise be too large for the institution to reasonably serve, have an unusual configuration, or include significant geographic barriers.</p>
3.	<p>If the assessment area(s) fails to comply with the applicable criteria described above, develop, based on discussions with management, a revised assessment area(s) that complies with the criteria. Use this assessment area(s) to evaluate the institution’s performance, but do not otherwise consider the revision in determining the institution’s rating.</p>

**PERFORMANCE
CRITERIA**

**Loan-to-Deposit
Analysis**

Perform Loan-to-Deposit Analysis	
1.	<p>From data contained in Call Reports, TFRs, or UBPR/UTPRs, calculate the average loan-to-deposit ratio since the last examination by adding the quarterly loan-to-deposit ratios and dividing by the number of quarters.</p>
2.	<p>Evaluate whether the institution’s average loan-to-deposit ratio is reasonable in light of information from the performance context including, as applicable, the institution’s capacity to lend, the capacity of other similarly-situated institutions to lend in the assessment area(s), demographic and economic factors present in the assessment area(s), and the lending opportunities available in the institution’s assessment area(s).</p>

**PERFORMANCE
CRITERIA
(cont'd)**

**Loan-to-Deposit
Analysis
(cont'd)**

3. If the loan-to-deposit ratio does not appear reasonable in light of the performance context, consider the number and the dollar volume of loans sold to the secondary market, or the innovativeness or complexity of community development loans and qualified investments to assess the extent to which these activities compensate for a low loan-to-deposit ratio or supplement the institution's lending performance as reflected in its loan-to-deposit ratio.

4. Discuss the preliminary findings in this section with management.

5. Summarize in workpapers, conclusions regarding the institution's loan-to-deposit ratio.

**Comparison of
Credit Extended
Inside and
Outside of the
Assessment
Area(s)**

Compare Credit Extended Inside and Outside of the Assessment Area(s)

1. If available, review HMDA data, automated loan reports, and any other reports that may have been generated by the institution to analyze the extent of lending inside and outside the assessment area(s). If a report generated by the institution is used, test the accuracy of the output.

2. If loan reports or data analyzing lending inside and outside of the assessment area(s) are not available or comprehensive, or if their accuracy cannot be verified, use sampling guidelines to select a sample of loans originated, purchased or committed to calculate the percentage (by number and dollar volume) located within the assessment area(s).

3. If the percentage of loans or other lending related activities in the assessment area(s) is less than a majority, then the institution does not meet the standards for "Satisfactory" under this performance criteria. In this case, consider information from the performance context, such as information about economic conditions, loan demand, the institution's size, financial condition, branching network, and business strategies when determining the effect of not meeting the standards for satisfactory for this criterion on the overall rating for the institution.

4. Discuss the preliminary findings in this section with management.

5. Summarize in workpapers conclusions regarding the institution's level of lending or other lending related activities inside and outside of its assessment area(s).

**PERFORMANCE
CRITERIA
(cont'd)**

**Distribution of
Credit Within the
Assessment
Area(s)**

Analyze the Geographic Distribution of Credit	
1.	Determine whether the number and income distribution of geographies in the assessment area(s) are sufficient for a meaningful analysis of the geographic distribution of the institution's loans in its assessment area(s).
2.	If a geographic distribution analysis of the institution's loans would be meaningful and the necessary geographic information (street address or census tract/block numbering area (CT/BNA) numbers) is collected by the institution in the ordinary course of its business, determine the distribution of the institution's loans in its assessment area(s) among low-, moderate-, middle-, and upper-income geographies. Where possible, use the same loan reports, loan data, or sample used to compare credit extended inside and outside the assessment area(s).
3.	If a geographic analysis of loans in the assessment area(s) is performed, identify groups of geographies, by income categories, in which there is little or no loan penetration. Note that institutions are not expected to lend in every geography.
4.	To the extent information about borrower income (individuals) or revenues (businesses) is collected by the institution in the ordinary course of its business, determine the distribution of loans in the assessment area(s) by borrower income and by business revenues. Where possible, use the same loan reports, loan data, or sample used to compare credit extended inside and outside the assessment area(s).
5.	Identify categories of borrowers by income or business revenue for which there is little or no loan penetration.
6.	If an analysis of the distribution of loans among geographies of different income levels would not be meaningful (for example, very few geographies in the assessment area(s)) or an analysis of lending to borrowers of different income or revenues could not be performed (for example, income data are not collected for certain loans), consider possible proxies to use for analysis of the institution's distribution of credit. Possibilities include analyzing geographic distribution by street address rather than geography (if data are available and the analysis would be meaningful) or analyzing the distribution by loan size as a proxy for income or revenues of the borrower.
7.	If there are categories of low penetration, form conclusions about the reasons for that low penetration.

**PERFORMANCE
CRITERIA
(cont'd)**

**Distribution of
Credit Within the
Assessment
Area(s) (cont'd)**

<p>Consider available information from the performance context, including:</p> <ul style="list-style-type: none"> • Information about the institution's size, branch network, financial condition, supervisory restrictions (if any) and prior CRA record • Information from discussions with management, loan officers, and members of the community • Information about economic conditions, particularly in the assessment area(s) • Information about demographic or other characteristics of particular geographies that could affect loan demand, such as the existence of a prison or college • Information about other lenders serving the same or similar assessment area(s)
8. Discuss the preliminary findings in this section with management.
9. Summarize in workpapers conclusions concerning the geographic distribution of loans and the distribution of loans by borrower characteristics in the institution's assessment area(s).

**Review of
Complaints**

Review Complaints Relating to CRA Performance
1. Review all complaints relating to the institution's CRA performance received by the institution (these should all be contained in the institution's public file) and those that were received by its supervisory agency.
2. If there were any complaints, evaluate the institution's record of taking action, if warranted, in response to written complaints about its CRA performance.
3. If there were any complaints, discuss the preliminary findings in this section with management.
4. If there were any complaints, summarize in workpapers conclusions regarding the institution's record of taking action, if warranted, in response to written complaints about its CRA performance. Include the total number of complaints and resolutions with examples that illustrate the nature, responsiveness to, and resolution of, the complaints.

**PERFORMANCE
CRITERIA
(cont'd)**

**Investments and
Services**

Review Investments and Services	
(At the institution’s option to enhance a “Satisfactory” rating)	
1.	If the institution chooses, review its performance in making qualified investments and providing branches and other services and delivery systems that enhance credit availability in its assessment area(s). Performance with respect to qualified investments and services may be used to enhance an institution’s overall rating of “Satisfactory,” but cannot be used to lower a rating that otherwise would have been assigned.
2.	To evaluate the institution’s performance in making qualified investments that enhance credit availability in its assessment area(s), consider: <ul style="list-style-type: none"> • Dollar volume of qualified investments, by type and location • Impact of those investments on the institution’s assessment area(s) • Innovativeness or complexity of the investments
3.	To evaluate the institution’s record of providing branches and other services and delivery systems that enhance credit availability in its assessment area(s), consider: <ul style="list-style-type: none"> • Number of branches and ATMs located in the institution’s assessment area(s) • Number of branches and ATMs located within, or that are readily accessible to, low- and moderate-income geographies compared to those located in, or readily accessible to middle- and upper-income geographies • Type and level of service(s) offered at branches and ATMs and alternative delivery systems • Institution’s record of opening and closing branches

RATINGS

Determine Rating	
1.	Group the analyses of the assessment areas examined by MSA and non-MSA areas within each state where the institution has branches. If an institution has branches in two or more states of a multi-state MSA, group the assessment areas that are in that MSA.

**RATINGS
(cont'd)**

- | |
|---|
| <p>2. Summarize conclusions about the institution's performance in each MSA and the non-MSA portion of each state in which an assessment area was examined using these procedures. If two or more assessment areas in an MSA or in the non-MSA portion of a state were examined using these procedures, weigh the different assessment areas considering such factors as:</p> <ul style="list-style-type: none"> • Significance of the institution's activities in each compared to the institution's overall activities • Lending opportunities in each • Importance of the institution in providing loans to each, particularly in light of the number of other institutions and the extent of their activities in each • Demographic and economic conditions in each |
| <p>3. For assessment areas in MSAs and non-MSA areas that were not examined using these procedures, consider facts and data related to the institution's lending to ensure that performance in those assessment areas is not inconsistent with the conclusions based on the assessment areas examined on-site.</p> |
| <p>4. For institutions operating in only one multi-state MSA or one state, assign one of the four preliminary ratings — "Outstanding," "Satisfactory," "Needs to Improve," and "Substantial Noncompliance" — in accordance with step 6 below. To determine the relative significance of each MSA and non-MSA area to the institution's preliminary rating, consider the:</p> <ul style="list-style-type: none"> • Significance of the institution's activities in each compared to the institution's overall activities • Lending opportunities in each • Importance of the institution in providing loans to each, particularly in light of the number of other institutions and the extent of their activities in each • Demographic and economic conditions in each |
| <p>5. For other institutions, assign one of the four preliminary ratings — "Outstanding," "Satisfactory," "Needs to Improve," and "Substantial Noncompliance" — for each state in which the institution has at least one branch and for each multi-state MSA in which the institution has branches in two or more states in accordance with step 6 below. To determine the relative significance of each MSA and the non-MSA area on the institution's preliminary state rating, consider:</p> <ul style="list-style-type: none"> • Significance of the institution's activities in each compared to the institution's overall activities |

**RATINGS
(cont'd)**

- Lending opportunities in each
- Importance of the institution in providing loans to each, particularly in light of the number of other institutions and the extent of their activities in each
- Demographic and economic conditions in each

6. Consult the Small Institution Ratings Matrix and information in workpapers to assign a preliminary rating of:

- “Outstanding” if the institution meets the rating descriptions and standards for “Satisfactory” for each of the five core criteria, and materially exceeds the standards for “Satisfactory” in some or all of the criteria to the extent that an outstanding rating is warranted, or if the institution’s performance with respect to the five core criteria generally exceeds “Satisfactory” and its performance in making qualified investments and providing branches and other services and delivery systems in the assessment area(s) supplement its performance under the five core criteria sufficiently to warrant an overall rating of “Outstanding”
- “Satisfactory” if the institution’s performance meets each of the standards for a satisfactory rating or if exceptionally strong performance with respect to some of the standards compensates for weak performance in others
- “Needs to Improve” or “Substantial Noncompliance” if the institution’s performance fails to meet the standards for “Satisfactory” performance
Whether a rating is “Needs to Improve” or “Substantial Noncompliance” will depend upon the degree to which the institution’s performance has failed to meet the standards for a “Satisfactory” rating.

7. For an institution with branches in more than one state or multi-state MSA, assign a preliminary rating to the institution as a whole taking into account the institution’s record in different states or multi-state MSAs by considering:

- Significance of the institution’s activities in each compared to the institution’s overall activities
- Lending opportunities in each
- Importance of the institution in providing loans to each, particularly in light of the number of other institutions and the extent of their activities in each
- Demographic and economic conditions in each

**RATINGS
(cont'd)**

<p>8. Review the results of the fair lending component of the most recent compliance examination and determine whether the findings should lower the institution’s overall CRA rating or, if applicable, its CRA rating in any state or multi-state MSA. If evidence of discrimination was uncovered, consider:</p> <ul style="list-style-type: none"> • The nature and extent of the evidence • The policies and procedures that the institution has in place to prevent discriminatory or other illegal credit practices • Any corrective action the institution took or committed to take, particularly voluntary corrective action resulting from a self-assessment conducted prior to the examination • Other relevant information, such as the institution’s past fair lending performance <p><i>NOTE: Refer to the “Guidelines for Referring Violations of the Anti-Discrimination Provisions of the Equal Credit Opportunity and Fair Housing Acts to the Department of Justice or Notifying the Department of Housing and Urban Development of Violations of the Fair Housing Act,” Transmittal #DCA-003, dated 1/23/97, for additional procedures to follow during a CRA examination in the event substantive violations of the anti-discrimination provisions of the Equal Credit Opportunity or Fair Housing Acts are found.</i></p>
<p>9. Assign a final rating for the institution as a whole and, if applicable, each state in which the institution has at least one branch and each multi-state MSA in which it has branches in two or more states, considering the:</p> <ul style="list-style-type: none"> • Institution’s preliminary rating • Results of the fair lending component of its compliance examination
<p>10. Discuss conclusions with management.</p>
<p>11. Write an evaluation of the institution’s performance for the Compliance Report of Examination and the public evaluation.</p>
<p>12. Prepare recommendations for a supervisory strategy and for matters that require attention or follow-up activities.</p>

**PUBLIC FILE
CHECKLIST**

Review Public File
<p>1. There is no need to review each branch or each complete public file during every examination. In determining the extent to which the institution’s public files should be reviewed, consider the institution’s record of compliance with the public file requirements in previous examinations, its branching structure and changes to it since its last examination, complaints about the institution’s compliance with the public file requirements, and any other relevant</p>

**PUBLIC FILE
CHECKLIST
(cont'd)**

information.

2. In any review of the public file undertaken, determine, as needed, whether branches display an accurate public notice in their lobbies, a complete public file is available in the institution's main office and at least one branch in each state, and that the public file is available in the main office and in a branch in each state contains:
 - All written comments from the public relating to the institution's CRA performance and responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution)
 - The institution's most recent CRA Public Performance Evaluation
 - A map of each assessment area showing its boundaries and, on the map or in a separate list, the geographies contained within the assessment area(s)
 - A list of the institution's branches, branches opened and closed during the current and each of the prior two calendar years, and their street addresses and geographies
 - The HMDA Disclosure Statement for the prior two calendar years, if applicable
 - The institution's loan-to-deposit ratio for each quarter of the prior calendar year
 - A quarterly report of the institution's efforts to improve its record if it received a less than satisfactory rating during its most recent CRA examination
 - A list of services (loan and deposit products and transaction fees generally offered, and hours of operation at the institution's branches), including a description of any material differences in the availability or cost of services among locations
3. In any branch review undertaken, determine whether the branch provides the most recent public evaluation and a list of services available at the branch or a description of material differences from the services generally available at the institution's other branches.

CRA RATINGS MATRIX – SMALL INSTITUTIONS

CHARACTERISTIC	OUTSTANDING	SATISFACTORY	NEEDS TO IMPROVE	SUBSTANTIAL NONCOMPLIANCE
Loan-to-deposit ratio	The loan-to-deposit ratio is more than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is less than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is unreasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.
Assessment area(s) concentration	A substantial majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are outside the institution's assessment area(s).	A substantial majority of loans and other lending related activities are outside the institution's assessment area(s).
Geographic distribution of loans	The geographic distribution of loans reflects excellent dispersion throughout the assessment area(s).	The geographic distribution of loans reflects reasonable dispersion throughout the assessment area(s).	The geographic distribution of loans reflects poor dispersion throughout the assessment area(s).	The geographic distribution of loans reflects very poor dispersion throughout the assessment area(s).
Borrower's profile	The distribution of borrowers reflects, given the demographics of the assessment area(s), excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), very poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
Response to substantiated complaints	The institution has taken noteworthy, creative action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken appropriate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken inadequate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution is unresponsive to substantiated complaints about its performance in meeting assessment area credit needs.
Investments	The institution's investment record enhances credit availability in its assessment area.	N/A	N/A	N/A
Services	The institution's record of providing branches, ATMs, loan production offices, and/or other services and delivery systems enhances credit availability in its assessment area(s).	N/A	N/A	N/A



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

Applicable Rules See the Reference area for the Introduction section, Community Reinvestment, at the beginning of Part IV of this manual.

**Advisory
Opinions** None

**Statements of
Policy** None

**DCA
MEMORANDA**

Small Institution CRA Scoping DCA-97-6456.9, dated 4/24/98

Community Reinvestment Act Data Worksheets DCA-97-6456.7, dated 8/21/97
(Incorporated in Supplemental Section)

Guidelines for Referring Violations of the Anti-Discrimination Provisions of the Equal Credit Opportunity and Fair Housing Acts to the Department of Justice or Notifying the Department of Housing and Urban Development of Violations of the Fair Housing Act, Transmittal #DCA-003, dated 1/23/97

FFIEC Guidance for Small Bank Public Evaluations DCA-96-6456.5, dated 12/17/96

CRA Rating Descriptions for Compliance Report DCA-96-6456.4, dated 10/28/96

Guidance for Small Bank Public Evaluations DCA-96-6456.3, dated 10/26/96



**FINANCIAL
INSTITUTION
LETTERS (FIL)**

See the Reference area for the Introduction section, Community Reinvestment, at the beginning of Part IV of this manual.

OTHER

FFIEC Legal Advisory Group Opinion on Interstate Banking and Branching Efficiency Act of 1994 (IBBEA) and CRA (Incorporated in Supplemental Section)
