



Preservation and Promotion of Minority Depository Institutions

Report to Congress for 2020



Preservation and Promotion of Minority Depository Institutions

The Federal Deposit Insurance Corporation Report to Congress for 2020



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Pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and Section 308 of the Financial Institutions Reform, Recovery and Enforcement Act of 1989

Introduction

Section 308 of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA) established the following goals: to preserve the number of minority depository institutions (MDIs); to preserve the minority character in cases involving merger or acquisition of an MDI; to provide technical assistance to help prevent insolvency of MDIs; to promote and encourage creation of new MDIs; and to provide for training, technical assistance, and educational programs for MDIs.

Pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, this report provides a summary profile of MDIs as of the end of 2020; a description of the FDIC's MDI program; and detailed information on the FDIC's 2020 initiatives supporting MDIs.

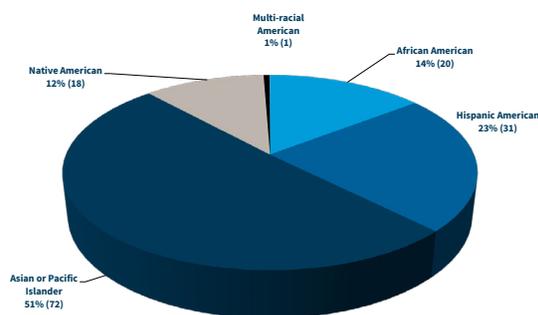
The FDIC defines an MDI as any federally insured depository institution for which: (1) 51 percent or more of the voting stock is owned by minority individuals; or (2) a majority of the Board of Directors is minority and the community that the institution serves is predominantly minority. Ownership must be by U.S. citizens or permanent legal U.S. residents to be counted in determining minority ownership. [The FDIC's Statement of Policy Regarding Minority Depository Institutions provides additional information](#) (see Attachment 1).

Summary Profile of Minority Depository Institutions

The FDIC maintains a list and tracks the insured MDIs it supervises, i.e., state-chartered institutions that are not members of the Federal Reserve System, as well as MDIs that are supervised by the Office of the Comptroller of the Currency (OCC) and the Board of Governors of the Federal Reserve (Federal Reserve)¹. The FDIC takes this broad approach given its role in considering applications for deposit insurance and in resolving institutions in the event an MDI were to fail.

Structure

FDIC-insured MDIs by Type as of 12/31/2020



Source: FDIC

¹ The FDIC's published list of FDIC-insured MDIs does not include women-owned or women-managed institutions because they are not included in the statutory definition.



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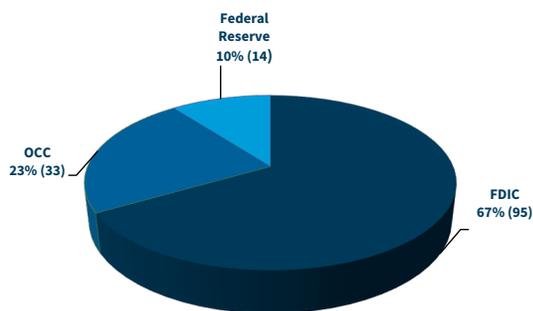


As of December 31, 2020, FDIC-insured MDIs totaled 142 institutions with combined total assets of over \$287 billion and 35,509 employees (see Attachment 2, [List of Minority Depository Institutions](#)). The FDIC supervised 95 of the 142 MDIs as their primary Federal regulator.

At the beginning of 2020, there were 144 FDIC-insured MDIs with combined total assets of nearly \$249 billion. During the year, two newly designated MDIs were added to the list, one Asian American and one Native American. In addition, due to a change in control, one Hispanic American MDI was added to the list. One Asian American MDI changed its minority status to Multi-racial American. Five MDIs were removed from the list during the year, including four that lost MDI status due to merger or acquisition (two Hispanic American, one African American, and one Asian American MDI). One Hispanic American MDI had a change in control that changed its status to non-MDI.

Of the four MDI mergers or acquisitions that took place, three of the four were with other MDIs. Of the \$6.7 billion in assets involved in MDI mergers and acquisitions, \$6.2 billion or 92 percent remained in MDIs after the transaction, preserving the minority character.

FDIC-insured MDIs by Primary Federal Regulator as of 12/31/2020



Source: FDIC.

Performance

As of December 31, 2020, the overall financial performance of FDIC-insured MDIs remains sound; however, there were nominal declines in key performance ratios. The proportion of profitable firms remained relatively stable over the year at about 85 percent of all MDIs. The percentage of unprofitable MDIs is over 14 percent and remains significantly higher than the percentage of both community banks and all banks that are unprofitable, at 4.41 and 4.58 percent, respectively. The unprofitable institutions generally are smaller institutions, many of which are located either in urban areas that experienced significant economic distress during the financial crisis and the pandemic, as well as smaller rural markets with economic challenges exacerbated by the pandemic.

MDI full-year 2020 net income was \$2.8 billion, a decline of \$350.3 million (11.3 percent) compared to full-year 2019. The reduction in net income was primarily due to a decrease in interest income of \$748.5 million (7.0 percent) and an increase in provisions for credit losses of \$694.7 million (129.0 percent).

The increase in provisions for credit losses was due to economic slowdowns and business shutdowns associated with the global pandemic. Additionally, 12 MDIs adopted the new accounting standard, current expected credit losses methodology (CECL) for estimating allowances for credit losses. Given the size of many of these banks, provisions played a meaningful role in increasing overall provisions for MDIs as a whole.



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MDIs reported relatively stable net interest income and higher noninterest income while net interest margins declined. Net interest income improved slightly by \$1 million due to the decline in interest expense of \$749 million (34.1 percent) being greater than the \$748 million (7.0 percent) decline in interest income. The net interest margin dropped 52 basis points to 3.43 percent from 3.95 percent at year-end 2019—because earning assets rose over \$44 billion. Further, the increase in noninterest income from one year prior was due to net gains on loan sales of \$110.7 million (177.0 percent) and net gains on sales of other assets of \$20.6 million (1081 percent).

Noninterest expense increased \$257 million (4.4 percent) compared to year-end 2019. This increase was due to increases in salaries and employee benefits, and premises and fixed asset expenses. During the same period, the MDI efficiency ratio (noninterest expense divided by net operating revenue) increased to 56.71 percent from 55.98 percent, compared to a ratio of 62.32 percent for all community banks. This means that MDIs spent 57 cents to bring in a dollar of revenue, while community banks overall spent 62 cents to bring in a dollar of revenue.

Despite the increase in noninterest income, the increase in provisions for credit losses coupled with the negligible increase in net interest income were the primary drivers of the decline in the pretax return on assets of 45 basis points to 1.28 percent from year-end 2019, 3 basis points lower than community banks' ratio of 1.31 percent.

Total earning assets increased \$44.2 billion (19.6 percent) from the year prior as loan balances rose \$18.9 billion (11.0 percent), cash and due increased \$17.7 billion (101.1 percent), and securities increased \$8.6 billion (22.1 percent).

The 11.0 percent loan growth rate at MDIs exceeded the loan growth rate for all community banks by 70 basis points. Paycheck Protection Program (PPP) lending activity continues to contribute significantly to this growth. The number of PPP loans held by MDIs at the end of 2020 was 102,787, representing \$8.6 billion or 4.5 percent of total loans. Commercial and industrial (C&I) loan balances reported growth of \$7.5 billion and 1-4 family loan balances increased \$3.3 billion from 2019. Commercial real estate (CRE) categories accounted for \$6.1 billion of total loan growth, which was mostly from nonfarm, nonresidential lending (\$4.6 billion), and multifamily loans (\$1.4 billion). Funding the asset growth was an almost equal growth in total deposits, which increased by \$42.1 billion (21.0 percent).

Since year-end 2019, total 30-89 day past due balances decreased while noncurrent balances and net charge-off balances increased. The 30-89 day past due loan balance decreased by \$87 million (6.8 percent) from year-end 2019, and the 30-89 day past due rate decreased 13 basis points to 0.62 percent from year-end 2019. This decrease in past due loan balances can be partly attributed to the modification or deferral programs provided under section 4013 of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).

Noncurrent balances increased by \$850 million (31.4 percent). The noncurrent rate was 1.86 percent, up 29 basis points, and higher than community banks' noncurrent rate of 0.77 percent. The percentage of noncurrent 1-4 family residential balances increased from 3.69 to 5.11 percent of total assets.

The net charge-off rate decreased 3 basis points from year-end 2019 to 0.28 percent. Real estate secured by farmland, total consumer, and auto



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portfolios had the highest declines in net charge-off rates. The coverage ratio (allowance for loan and lease losses to noncurrent loans and leases) increased to 99.06 percent, up from 77.66 percent a year ago, due to the large provisions for credit losses that led to an increase in the allowance for loan and lease losses. The MDI coverage ratio trails the rate of all community banks (171.44 percent).

Total equity capital increased from the previous year by \$1.4 billion (4.6 percent) to \$32.2 billion. Over 83 percent of MDIs reported an increase in equity capital from a year ago. All but one institution was considered well capitalized or adequately capitalized.

Within the MDI sector, the financial performance of a small subset of institutions has been uneven. Generally, smaller MDIs and those serving low- and moderate-income communities, including both urban and rural markets, continue to face significant challenges, in part reflecting the continuing economic challenges faced by many of the communities they serve. Further, the economic strain caused by the pandemic disproportionately affected these communities.

FDIC National Minority Depository Institutions Program

The FDIC's [Statement of Policy Regarding Minority Depository Institutions](#) (see Attachment 1) provides the framework for the agency's MDI program. The FDIC has a National Director of Minority and Community Development Banking in the Washington, D.C. office, two national staff, and MDI coordinators in each of its six regional offices. The National Director reports to the Directors of

the Division of Risk Management Supervision and the Division of Depositor and Consumer Protection to leverage resources and expertise in the two divisions.

The National Director advises the FDIC Chairman on MDI activities and initiatives, provides overall direction and guidance, and consults with other FDIC divisions to provide appropriate resources across the agency to support program initiatives. The FDIC's MDI program is fully integrated into the supervision, consumer protection, insurance, and receivership business lines. The National Director works closely with MDIs and their trade associations to seek feedback on the FDIC's efforts under this program, discuss possible training initiatives, and explore options for preserving and promoting minority ownership and management of depository institutions. The National Director also regularly meets with Federal banking agency colleagues to discuss outreach and training efforts, to share ideas, and to identify opportunities where the agencies can work together to support MDIs. In addition, the FDIC coordinates with other Federal agencies that provide programs that can assist MDIs.



In the FDIC continuing series [#FDIC explains](#), Betty J. Rudolph, National Director, Minority and Community Development Banking, explains what MDIs are and why they are so important.



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Executives and staff in the FDIC's six regional offices communicate with each MDI regularly to outline the FDIC's efforts to promote and preserve minority ownership and management of financial institutions; offer to have a member of regional management meet with the institution's board of directors to discuss issues of interest; hold roundtable discussions and training sessions; and seek input regarding any training or other technical assistance the institution may desire.

The FDIC has a website (fdic.gov/mdi) dedicated to MDIs that houses the FDIC's [Annual Reports to Congress](#), a list of MDIs updated quarterly, research studies on MDIs, and other helpful resources. These resources include information on how collaborations with MDIs can result in sound and profitable lending and investments that meet the needs of underserved communities, updates on the FDIC's MDI Subcommittee, and contact information for national and regional MDI coordinators and staff.

2020 Initiatives Supporting Minority Depository Institutions

The preservation and promotion of MDIs remains a long-standing, top priority for the FDIC. The FDIC's research study, [Minority Depository Institutions: Structure, Performance, and Social Impact](#), published in 2019, found that MDIs have played a vital role in providing mortgage credit, small business lending, and other banking services to minority and low- and moderate-income communities.

In 2020, the FDIC pursued several strategies to support MDIs including increasing engagement and representation, facilitating partnerships, updating policies, and promoting the MDI sector through advocacy, as well as by providing outreach, technical assistance, and education and training for MDIs.

Engagement and Representation

The FDIC's [MDI Subcommittee](#) of the Advisory Committee on Community Banking (CBAC) was formed in 2019 and held two virtual meetings in 2020. There are nine executives serving as members of the MDI Subcommittee representing African American, Native American, Hispanic American, and Asian American MDIs across the country.



The MDI Subcommittee provides a venue for minority bankers to discuss key issues and share feedback on program initiatives, including the FDIC's revised [Statement of Policy Regarding Minority Depository Institutions](#). The MDI Subcommittee provides a platform for MDIs to promote collaboration, partnerships, and best practices, and it identifies ways to highlight the work of MDIs in their communities.

In addition, three MDIs serve on the 18-member CBAC to further bring MDI perspectives and issues to the table.



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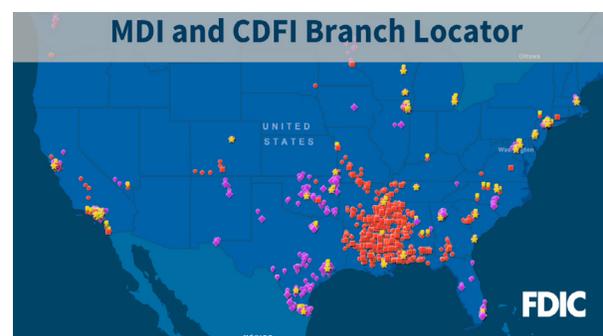
Partnerships

In 2019, the FDIC facilitated a number of networking roundtables to bring together MDIs and large banks, and these networking opportunities continued to bear fruit in 2020 with more than \$10 million in additional deposits into MDIs.

In October 2020, the FDIC published a resource guide, [Investing in the Future of Mission-Driven Banks: A Guide to Facilitating New Partnerships](#), as well as an [MDI and CDFI Bank Locator](#) to help private investors develop partnerships with MDIs and other mission-driven banks. The resource guide outlines the important role FDIC-insured MDIs and CDFIs play in the financial system, describes the business needs of these banks, and outlines strategies for private companies and philanthropic organizations to consider in supporting MDIs and CDFI banks through equity investments, grants, deposits, creation of an investment fund, technology support, and other partnership opportunities. These strategies can help MDIs build capacity and scale.

In December 2020, the FDIC reviewed proposals to engage a financial services advisory firm to work with law firms retained by the FDIC to begin standing up a [Mission-Driven Bank Fund](#), which will channel private investment funds into FDIC-insured mission-driven banks such as MDIs and CDFI banks. The fund will provide opportunities for FDIC-insured mission-driven banks to pitch proposals for equity capital, loan participations, and other ways to build capacity and scale. With significant investment commitments by private companies, philanthropic organizations, and other financial institutions, it is anticipated that the fund will provide a sizeable source of capital and other tools that can help

MDIs and CDFI banks grow their operations and expand their impact in minority communities. The FDIC intends to launch the fund in 2021. The FDIC will not be an investor or play a role in hiring the independent fund manager.



In 2020, the FDIC created an [interactive mapping system](#) to locate FDIC-insured MDI or CDFI bank headquarters and branches in the U.S. and territories.



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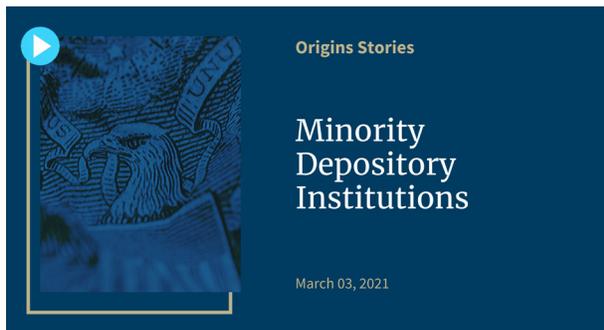
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Policies

The FDIC's Board of Directors updated and strengthened its [Statement of Policy Regarding Minority Depository Institutions](#) in August and published it for public notice and comment in September 2020. The policy statement reflects the agency's enduring commitment to fulfilling the five statutory goals to preserve and promote MDIs and outlines the framework for the MDI program across the FDIC. Key changes include emphasis on engagement with MDIs, enhanced technical assistance, and a description of how examiners apply examination standards to the unique business models of MDIs. The public comment period closed in November 2020, and after reviewing and considering the comments, the Board of Directors approved the final Statement of Policy on June 15, 2021.

Advocacy



It is important to promote the visibility of MDIs, to tell their stories, and showcase the important role they play in their communities. In early 2020, the FDIC began recording and publishing videos of MDI executives sharing their institutions' "origin stories," highlighting the reasons their institutions were formed and describing how they have served their communities over time. In addition, the FDIC recorded and promoted a

number of videos and podcasts centered on MDIs, and agency leaders emphasized the significance of MDIs in numerous public speaking engagements.

On March 3, 2020, the FDIC joined the U.S. Department of the Treasury for a Freedman's Bank Forum to commemorate the 155th anniversary of the Freedman's Savings and Trust Company's charter. Freedman's Savings and Trust Company was created to provide economic opportunity for newly emancipated African Americans.



FDIC Chairman Jelena McWilliams (center) participates in the Freedman's Bank Forum, an event held at the U.S. Treasury on March 3, 2020, to commemorate the 155th anniversary of the bank's founding. From left, NCUA Chairman Rodney Hood, Treasury Assistant Secretary Bimal Patel, Comptroller of the Currency Joseph M. Otting, and Federal Reserve Governor Michelle W. Bowman.

Outreach, Technical Assistance, Education

The FDIC also continuously pursued efforts to improve communication and interaction with MDIs and to respond to the concerns of minority bankers in 2020. The agency maintains active outreach with MDI trade groups and offers to arrange annual meetings between FDIC regional management and each MDI's board of directors to discuss issues of interest. The FDIC routinely contacts MDIs to offer return visits and technical assistance following the conclusion of FDIC safety and soundness, consumer compliance,



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Community Reinvestment Act, and other specialty examinations to help bank management better understand and implement examination recommendations. These return visits, normally conducted within 90 to 120 days after the examination, are intended to provide useful recommendations or feedback for improving operations, not to identify new issues.

Through its public [website](#), the FDIC invites inquiries and provides contact information for any MDI to request technical assistance at any time.

In 2020, the FDIC provided 135 individual technical assistance sessions on approximately 40 risk management, consumer compliance, and resolution topics, including:

- » Accounting,
- » Bank Secrecy Act and Anti-Money Laundering,
- » Business continuity planning,
- » Community Reinvestment Act,
- » Compliance management,
- » Funding and liquidity,
- » Information technology risk management and cybersecurity,
- » Internal audit,
- » Loan modifications and Troubled Debt Restructuring, and
- » Pandemic contingency planning.

The FDIC also held outreach, training, and educational programs for MDIs through conference calls and regional banker roundtables. In 2020, topics of discussion for these sessions included many of those listed above, as well as collaboration and partnerships, CECL accounting

methodology, information technology vendor management, cybersecurity, Community Reinvestment Act, innovation, Bank Secrecy Act, CDFI Fund Programs, and emerging technology.

Failing Institutions

In accordance with Section 308 and FDIC policy, the FDIC seeks to preserve the minority character of failing institutions before and during the resolution process. The FDIC provides ongoing supervisory oversight of institutions prior to failure, through regular on-site examinations, visitations, off-site monitoring, and through many offers of technical assistance.

In the event of a potential MDI failure, the FDIC contacts all MDIs nationwide that qualify to bid on failing institutions. The FDIC solicits qualified MDIs' interest in the failing institution and discusses the bidding process. The FDIC also provides technical assistance regarding completion of the bid forms and use of the FDIC's secured website for conducting due diligence. During the resolution process, the appropriate Federal and State regulators must clear institutions on the final bidders list.

The FDIC provides a two-week franchise marketing window exclusively for MDIs. During this window, the FDIC contacts all qualified MDIs on the bid list to ensure they received an invitation to bid, and provides full access to the data room if an MDI is interested. The FDIC also describes the failing bank transaction and offers technical assistance on the bidding process. Following the two-week period, the FDIC invites all other qualified bidders to the failing bank project.

In 2020, no MDIs failed.



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Conclusion

The FDIC recognizes that MDIs play a unique role in promoting economic viability in minority and underserved neighborhoods, and providing access to capital in their communities. The FDIC has long recognized the importance of MDIs in the financial system, and takes steps to preserve and encourage minority ownership and management of insured financial institutions.

MDI bankers provide valuable input to the FDIC, including unique insight and experiences, as active members of two FDIC Advisory Committees that shape FDIC priorities and policy: the Advisory Committee on Economic Inclusion and the Advisory Committee on Community Banking.

The MDI Subcommittee to CBAC also provides an opportunity for minority bankers to discuss key issues and share feedback with FDIC Board Members and senior management and to promote collaboration, partnerships, and best practices. Preserving, promoting, and building capacity in these institutions are top priorities for the FDIC.

The FDIC continually seeks to identify initiatives that will enable it to carry out its commitment to preserve MDIs and the minority character of these institutions.

Attachments

Attachment 1: FDIC's [Statement of Policy Regarding Minority Depository Institutions](#)

Attachment 2: [List of Minority Depository Institutions as of December 31, 2020](#)

“The FDIC has embraced our statutory responsibility to promote and preserve the health of MDIs by seeking new and innovative ways to engage with these institutions and better understand their needs.”

—Jelena McWilliams, Chairman, FDIC



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Attachment 1

Statement of Policy Regarding Minority Depository Institutions

The FDIC has long recognized the importance of minority depository institutions (MDIs) in the financial system and their unique role in promoting the economic viability of minority and underserved communities. The FDIC historically has implemented programs to preserve and promote these financial institutions. This Statement of Policy describes the framework the FDIC has put into place and the initiatives the FDIC will undertake to fulfill its statutory goals with respect to minority depository institutions (MDI Program).

Statutory Framework

In August 1989, Congress enacted the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA). Section 308 of FIRREA established the following goals:

- » Preserve the number of minority depository institutions;
- » Preserve the minority character in cases of merger or acquisition;
- » Provide technical assistance to prevent insolvency of institutions not now insolvent;
- » Promote and encourage creation of new minority depository institutions; and
- » Provide for training, technical assistance, and educational programs.

Definitions

Section 308 of FIRREA defines “minority depository institution” as any federally insured depository institution where 51 percent or more of the voting stock is owned by one or more “socially and economically disadvantaged individuals.” “Minority,” as defined by Section 308 of FIRREA, means any “Black American, Native American, Hispanic American, or Asian American.” Therefore, for the purposes of this Statement of Policy, “minority depository institution” is defined as any federally insured depository institution where 51 percent or more of the voting stock is owned by minority individuals. This includes institutions collectively owned by a group of minority individuals, such as a Native American tribe. Ownership must be by U.S. citizens or permanent legal U.S. residents to be counted in determining minority ownership. In addition to the institutions that meet the ownership test, for the purposes of this Statement of Policy, institutions will be considered minority depository institutions if a majority of the Board of Directors consists of minority individuals and the community that the institution serves is predominantly minority.

Identification of Minority Depository Institutions

To ensure that all minority depository institutions are able to participate in the MDI program, the FDIC will maintain a list of federally insured minority depository institutions. Institutions that are not already identified as minority depository institutions can request to be designated as such by certifying that they meet the above definition. For institutions supervised directly by the FDIC, examiners will review the appropriateness of



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their inclusion on the list during the examination process. In addition, case managers in regional offices will note changes to the list while processing deposit insurance applications, merger applications, change of control notices, or failures of minority depository institutions. The FDIC will work closely with the other federal banking regulators to capture accurately on the list institutions not directly supervised by the FDIC. In addition, the FDIC will periodically provide the list to relevant trade associations and seek input regarding the accuracy of the list. Inclusion in the FDIC's MDI Program is voluntary. Any minority depository institution not wishing to participate in the MDI program will be removed from the official list upon request.

Organizational Structure

The FDIC has designated a national director for the FDIC's MDI program in the Washington Office and a regional coordinator in each Regional Office. The national director will consult with officials from the following FDIC Divisions to ensure appropriate personnel are involved and resources are made available with regard to MDI Program initiatives: Division of Risk Management Supervision, Division of Depositor and Consumer Protection, Division of Resolutions and Receiverships, Division of Insurance and Research, Legal Division, and the Office of Minority and Women Inclusion. The national director will also consult with other organizations within the FDIC as appropriate.

As the primary federal regulator for State nonmember banks and State savings associations, the FDIC will focus its efforts on minority depository institutions with those charters. However, the national director will meet periodically with the other Federal

banking regulators to discuss each agency's outreach efforts, to share ideas, and to identify opportunities where the agencies can work together to assist minority depository institutions. Representatives of other divisions and offices may participate in these meetings.

Engagement with Minority Depository Institutions

The FDIC's MDI program will provide for continual engagement with minority depository institutions through ongoing interaction with the Washington, Regional, and Field Office staff. This interaction includes providing technical assistance to share information and expertise on supervisory topics, outreach initiatives to provide opportunities for open dialogue with senior FDIC staff, and training initiatives to offer opportunities to gain additional knowledge about specific regulatory requirements.

Further, trade associations affiliated with minority depository institutions serve as a significant resource in identifying specific interests or concerns for those institutions. The national director will regularly contact minority depository institution trade associations to seek feedback on the FDIC's efforts under the MDI program, discuss possible training initiatives, and explore options for promoting and preserving minority depository institutions. The national director and the regional coordinators also will solicit information from trade associations, including national and state bankers' associations, and other organizations about groups that may be interested in establishing new minority depository institutions. FDIC representatives will be available to address such groups to discuss the application process, the requirements of becoming FDIC insured, and the various programs supporting minority depository



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institutions. The regional coordinators will contact all new minority state nonmember banks and state savings associations identified through insurance applications, merger applications, or change in control notices to familiarize the institutions with the resources available through the MDI program.

Technical Assistance

Technical assistance, as defined by the FDIC's MDI program, is individual assistance that a regulator will provide to a minority depository institution in response to an institution's request for assistance in understanding supervisory topics or findings. At any time, the FDIC will share information and expertise with bank management on various topics including, but not limited to, understanding bank regulations, FDIC policies, examination procedures, accounting practices, supervisory recommendations, risk management procedures, and compliance management procedures. In providing technical assistance, FDIC staff will not actually perform tasks expected of an institution's management or employees. For example, FDIC staff may explain Call Report instructions as they relate to specific accounts, but will not assist in preparing an institution's Call Report. FDIC staff may provide information on community reinvestment opportunities, but will not recommend a specific transaction.

An institution can contact its field office representatives, case manager, or review examiner to request technical assistance. In addition, the regional coordinators and the institution's assigned case manager and review examiner are knowledgeable about minority bank issues and are available to answer questions or to direct inquiries to the appropriate FDIC office or staff member with expertise on the subject for response.

Case managers can explain the application process and the type of analysis and information required for different applications. Field office representatives also serve as a significant resource to minority depository institutions by readily answering examination related questions and explaining regulatory requirements. Other staff members within the FDIC with expertise in various regulatory topics will also be available to share knowledge to assist minority depository institutions in complying with regulations or implementing supervisory recommendations.

During examinations, the FDIC expects examiners to fully explain supervisory recommendations and offer to help management understand satisfactory methods to address such recommendations. At the conclusion of each examination of a minority depository institution directly supervised by the FDIC, the FDIC will be available to return to the institution to provide technical assistance by reviewing areas of concern or topics of interest to the institution. The purpose of return visits is to assist management in understanding and implementing examination recommendations, not to identify new problems.

Technical assistance is a tool to provide on-going support to institutions in an effort to ensure timely implementation of recommendations, full understanding of regulatory requirements, and in some instances, the viability of the institution. Technical assistance is not a supervisory activity and is not intended to present additional regulatory burden. Further, examination teams will not view requests for, or acceptance of, technical assistance negatively when evaluating institution performance or assigning ratings.



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Outreach

Outreach, as defined by the FDIC's MDI program, consists of FDIC representatives meeting with financial institutions with a primary focus of building relationships and open communication and providing information and resources.

Outreach is generally offered by the FDIC and can include meetings between financial institution management and senior FDIC management.

The FDIC maintains an MDI Subcommittee of its Advisory Committee on Community Banking (CBAC) comprised of executives of minority depository institutions. The MDI Subcommittee serves as a source of feedback on FDIC strategies to fulfill statutory goals to preserve and promote minority depository institutions. The MDI Subcommittee may also make recommendations or offer ideas to the CBAC for consideration and presentation to the FDIC. The MDI Subcommittee provides a platform for minority depository institutions to promote collaboration, partnerships, and best practices. The Subcommittee will also identify ways to highlight the work of minority depository institutions in their communities.

Executives and staff in the FDIC's regional offices will communicate regularly with each minority depository institution to outline the FDIC's efforts to promote and preserve minority depository institutions; will offer annually to have a member of regional management meet with the institution's board of directors to discuss issues of interest, including through roundtable discussions and training sessions; and will seek input regarding any training or other technical assistance the institution may desire.

The FDIC will explore opportunities to facilitate collaboration and partnering initiatives among

minority depository institutions or between minority depository institutions and non-minority depository institutions. The FDIC recognizes that by facilitating these collaborative relationships, institutions can have opportunities to better meet the needs of their communities.

Training and Educational Programs

Training and educational programs, as defined by the FDIC's MDI program, consist of instruction designed to impart proficiency or skills related to a particular job, process, or regulatory policy. The FDIC will work with other banking regulatory agencies and trade associations representing minority depository institutions to periodically assess the need for, and provide for, training and educational opportunities. The FDIC will partner with other Federal banking agencies and trade associations to offer training programs. This training and education can be provided in person, through webinars or conference calls, or in a conference setting.

Reporting

The regional coordinators will report regional office activities related to the MDI Program to the national director quarterly. The national director will develop a comprehensive report on all MDI Program activities and submit the report quarterly to the Chairman. The FDIC's efforts to preserve and promote minority depository institutions will also be highlighted in the FDIC's Annual Report and the Annual Report to Congress on the Preservation and Promotion of Minority Depository Institutions pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and Section 308 of FIRREA.



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Measuring Program Effectiveness

The national director and the regional office staff will routinely solicit feedback from minority depository institutions to assess the effectiveness of the FDIC's technical assistance, outreach, and training/education efforts and the MDI Program in general. The FDIC will track instances of technical assistance, outreach, and training and education and solicit feedback on the effectiveness of these activities by administering periodic surveys and holding discussions with bank management.

Examinations

All insured institutions must be operated in a safe and sound manner, in accordance with FDIC's regulations. Likewise, all examinations must be conducted within the parameters of FDIC exam policies and should consistently measure the risk an institution poses to the FDIC's deposit insurance fund. Notwithstanding, and consistent with the Uniform Financial Institutions Rating System (UFIRS) and the Uniform Interagency Consumer Compliance Rating System (UICCR), examiners are expected to recognize the distinctive characteristics and differences in core objectives of each institutions and to consider those unique factors when evaluating an institution's financial condition and risk management practices.

Under the UFIRS and UICCR, each financial institution is assigned a composite rating based on an evaluation of specific components, which are also rated. For UFIRS, these component ratings reflect an institution's capital adequacy, asset quality, management capabilities, earnings sufficiency, liquidity position, and sensitivity to market risk (commonly referred to as the CAMELS ratings). Likewise, the UICCR is organized under

broad components that assess the institution's board and management oversight, compliance program, violations of law, and consumer harm. The uniform rating systems and evaluation and rating criteria are specific to the examination types performed. Further, the assignment of the rating is based solely on the subject institution's individual performance under the specific components.

Management practices, particularly as they relate to risk management, vary considerably among financial institutions depending on size and sophistication, the nature and complexity of business activities, and risk profile. Each institution must properly manage risks and have appropriate policies, processes, or practices in place that management follows and uses. Activities undertaken in a less complex institution engaging in less sophisticated risk-taking activities may need only basic management and control systems compared to the detailed and formalized systems and controls used for the broader and more complex range of activities undertaken at a larger and more complex institution.

Peer comparison data are not included in the rating systems. The principal reason is to avoid over reliance on statistical comparisons to justify the component rating being assigned. Avoiding such overreliance is very important when evaluating minority depository institutions due to their unique characteristics. For example, many minority depository institutions were established to serve an otherwise under-served market. High profitability may not be as essential to the organizers and shareholders of the institution. Instead, community development, improving consumer services, and promoting banking services to the unbanked or under-banked



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segment of its community may drive many of the organization's decisions. The UFIRS allows for consideration of the characteristics by considering not only the level of an institution's earnings, but also the trend and stability of earnings, the ability to provide for adequate capital, the quality and sources of earnings, and the adequacy of budgeting systems.

Examiners are instructed to consider all relevant factors when assigning a component rating. The rating systems are designed to reflect an assessment of the individual institution, including its size and sophistication, the nature and complexity of its business activities, and risk profile.

Failing Institutions

The FDIC will attempt to preserve the minority character of failing institutions during the resolution process. In the event of a potential failure of a minority depository institution, the Division of Resolutions and Receiverships will contact all minority depository institutions nationwide that qualify to bid on failing institutions. The Division of Resolutions and Receiverships will solicit qualified minority depository institutions' interest in the failing institution, discuss the bidding process, and offer to provide technical assistance regarding completion of the bid forms. In addition, the Division of Resolutions and Receiverships, with assistance from the Office of Minority and Women Inclusion, will maintain a list of minority individuals and nonbank entities that have expressed an interest in acquiring failing minority depository institutions and have been pre-approved by the Division of Risk Management

Supervision and the chartering authority for access to the FDIC's virtual data room for online due diligence.

Internet Site

The FDIC will maintain a website to promote the MDI program. Among other things, the website will describe the tools and resources available under the program. The website will include the name, phone number, and email address of the national director, each regional coordinator, and additional staff. The website will also contain links to the list of minority depository institutions, pertinent trade associations, and other federal agency programs. The FDIC will also explore the feasibility and usefulness of posting other items to the page, such as statistical information and comparative data for minority depository institutions. Visitors will have the opportunity to provide feedback regarding the FDIC's program and the usefulness of the website.

Federal Deposit Insurance Corporation

By order of the Board of Directors.

Dated at Washington, DC, on June 15, 2021.

Link to FR Doc. 2021-12972 [Published 6-23-21](#)



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Attachment 2

Minority Depository Institutions (MDI)

December 31, 2020										
NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Alamerica Bank	Birmingham	AL	20000128	35314	NM	FDIC	B	1	Atlanta	16,346
Commonwealth National Bank	Mobile	AL	19760219	22229	N	OCC	B	1	Atlanta	54,519
Bac Florida Bank	Coral Gables	FL	19731012	21265	NM	FDIC	H	2	Atlanta	2,205,940
Banescos USA	Coral Gables	FL	20060110	57815	NM	FDIC	H	2	Atlanta	1,935,793
U S Century Bank	Doral	FL	20021028	57369	NM	FDIC	H	2	Atlanta	1,500,542
Interamerican Bank FSB	Miami	FL	19760823	31823	SB	OCC	H	2	Atlanta	227,519
International Finance Bank	Miami	FL	19831130	24823	NM	FDIC	H	2	Atlanta	838,794
Ocean Bank	Miami	FL	19821209	24156	NM	FDIC	H	2	Atlanta	4,532,395
Plus International Bank	Miami	FL	20010914	57083	NM	FDIC	H	2	Atlanta	92,136
Sunstate Bank	Miami	FL	19990315	34643	NM	FDIC	H	7	Atlanta	503,940
Central Bank	Tampa	FL	20070226	58377	NM	FDIC	A	3	Atlanta	266,811

Attachment 2: List of Minority Depository Institutions as of December 31, 2020



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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Touchmark National Bank	Alpharetta	GA	20080128	58687	N	OCC	A	3	Atlanta	428,546
Citizens Trust Bank	Atlanta	GA	19210618	8033	SM	FED	B	1	Atlanta	572,362
First IC Bank	Doraville	GA	20000131	34998	NM	FDIC	A	3	Atlanta	764,419
Metro City Bank	Doraville	GA	20060404	58181	NM	FDIC	A	3	Atlanta	1,902,095
Promiseone Bank	Duluth	GA	20081106	58657	NM	FDIC	A	3	Atlanta	522,906
Loyal Trust Bank	Johns Creek	GA	20191118	59182	NM	FDIC	A	8	Atlanta	65,660
Embassy National Bank	Lawrenceville	GA	20070305	58413	N	OCC	A	3	Atlanta	113,523
Carver State Bank	Savannah	GA	19270101	16584	NM	FDIC	B	1	Atlanta	52,273
Quantum National Bank	Suwanee	GA	19951227	34110	N	OCC	A	3	Atlanta	608,173
Mechanics & Farmers Bank	Durham	NC	19080301	12266	NM	FDIC	B	1	Atlanta	309,179
Lumbee Guaranty Bank	Pembroke	NC	19711222	20568	NM	FDIC	N	4	Atlanta	417,194
Optus Bank	Columbia	SC	19990326	35241	NM	FDIC	B	1	Atlanta	187,386

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Citizens Bank of Chatsworth	Chatsworth	IL	19031207	10843	NM	FDIC	A	3	Chicago	40,142
American Metro Bank	Chicago	IL	19970129	34334	NM	FDIC	A	3	Chicago	84,116
GN Bank	Chicago	IL	19340101	29399	SB	OCC	B	1	Chicago	99,678
International Bank of Chicago	Chicago	IL	19921026	33708	NM	FDIC	A	3	Chicago	796,525
Millennium Bank	Des Plaines	IL	20070702	58348	NM	FDIC	A	3	Chicago	224,726
First Independence Bank	Detroit	MI	19700514	20179	NM	FDIC	B	1	Chicago	287,416
Bay Bank	Green Bay	WI	19950821	34052	NM	FDIC	N	4	Chicago	122,797
Columbia Savings&Loan Assn	Milwaukee	WI	19240101	28480	SL	FDIC	B	1	Chicago	24,844
Native American Bank NA	Denver	CO	19870727	27026	N	OCC	N	4	Dallas	198,499
Liberty Bank&Trust Co	New Orleans	LA	19721116	20856	NM	FDIC	B	1	Dallas	765,297
Community 1St Bank Las Vegas	Las Vegas	NM	19491123	16854	NM	FDIC	H	2	Dallas	165,035
Centinel Bank of Taos	Taos	NM	19690301	19904	NM	FDIC	H	2	Dallas	340,289
Firstbank	Antlers	OK	19010101	14331	SM	FED	N	4	Dallas	531,693

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
AllNations Bank	Calumet	OK	19010101	4051	SM	FED	N	4	Dallas	41,767
F&M Bank	Edmond	OK	19020101	12761	NM	FDIC	N	4	Dallas	561,850
Bank of Grand Lake	Grove	OK	20050609	57915	NM	FDIC	H	2	Dallas	192,804
Bank of Cherokee County	Hulbert	OK	19081201	2327	SM	FED	N	4	Dallas	139,799
Gateway First Bank	Jenks	OK	19350302	15118	NM	FDIC	N	4	Dallas	1,906,056
Chickasaw Community Bank	Oklahoma City	OK	19030101	11521	SM	FED	N	4	Dallas	293,241
First Security Bank&Trust Co	Oklahoma City	OK	19510406	17001	NM	FDIC	B	1	Dallas	56,312
Lakeside State Bank	Oologah	OK	19760209	22217	SM	FDIC	N	4	Dallas	66,287
First National Bank&Trust Co	Shawnee	OK	19841029	25738	N	OCC	N	4	Dallas	314,092
Carson Community Bank	Stilwell	OK	19030203	2320	NM	FDIC	N	4	Dallas	162,805
Oklahoma State Bank	Vinita	OK	19380713	15611	NM	FDIC	N	4	Dallas	221,735
Tri-State Bank Of Memphis	Memphis	TN	19461216	16511	NM	FDIC	B	1	Dallas	102,888
Citizens Savings B&T Co	Nashville	TN	19040104	10319	NM	FDIC	B	1	Dallas	111,579

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
International Bk of Commerce	Brownsville	TX	19841009	25679	NM	FDIC	H	7	Dallas	1,329,522
American Bank National Assn	Dallas	TX	19740502	21567	N	OCC	A	3	Dallas	133,185
One World Bank	Dallas	TX	20050404	57901	NM	FDIC	A	3	Dallas	126,688
State Bank of Texas	Dallas	TX	19871019	27074	NM	FDIC	A	3	Dallas	976,977
United Bk El Paso Del Norte	El Paso	TX	20010501	57119	SM	FED	H	2	Dallas	281,427
Freedom Bank	Freer	TX	19580712	17881	NM	FDIC	H	2	Dallas	61,935
American First National Bank	Houston	TX	19980518	34656	N	OCC	A	3	Dallas	2,065,901
Golden Bank National Assn	Houston	TX	19850503	26223	N	OCC	A	3	Dallas	1,152,253
Southwestern National Bank	Houston	TX	19971103	34319	N	OCC	A	3	Dallas	775,500
Unity NB of Houston	Houston	TX	19850801	26351	N	OCC	B	1	Dallas	183,270
Commerce Bank	Laredo	TX	19820331	23772	NM	FDIC	H	7	Dallas	582,677
Falcon International Bank	Laredo	TX	19861210	26856	NM	FDIC	H	2	Dallas	1,563,078
International Bk of Commerce	Laredo	TX	19660902	19629	NM	FDIC	H	7	Dallas	10,517,055

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Bank of South Texas	Mcallen	TX	19860708	26727	NM	FDIC	H	2	Dallas	137,087
Rio Bank	Mcallen	TX	19850211	25886	NM	FDIC	H	7	Dallas	667,998
Texas National Bank	Mercedes	TX	19201126	3337	N	OCC	H	2	Dallas	458,329
Lone Star National Bank	Pharr	TX	19830124	24347	N	OCC	H	2	Dallas	2,564,189
Citizens State Bank	Roma	TX	19780515	22657	NM	FDIC	H	2	Dallas	90,474
First State Bank	Shallowater	TX	19601008	18301	NM	FDIC	A	3	Dallas	110,192
Wallis Bank	Wallis	TX	19721028	20845	NM	FDIC	A	3	Dallas	1,162,005
International Bk of Com	Zapata	TX	19840206	24961	NM	FDIC	H	7	Dallas	442,135
Zapata National Bank	Zapata	TX	19611116	18454	N	OCC	H	2	Dallas	90,170
Pinnacle Bank	Marshalltown	IA	19270505	252	SM	FED	N	4	Kansas City	221,908
CBW Bank	Weir	KS	19340228	13959	NM	FDIC	A	3	Kansas City	85,972
Woodlands National Bank	Hinckley	MN	19081001	1417	N	OCC	N	4	Kansas City	296,132
Peoples Bank of Seneca	Seneca	MO	19960315	34146	NM	FDIC	N	4	Kansas City	274,450

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Turtle Mountain State Bank	Belcourt	ND	20071203	58586	NM	FDIC	N	4	Kansas City	69,026
Industrial Bank	Washington	DC	19340818	14679	NM	FDIC	B	1	New York	559,802
Leader Bank National Assn	Arlington	MA	20020508	57134	N	OCC	A	3	New York	2,177,734
Harbor Bank of Maryland	Baltimore	MD	19820913	24015	NM	FDIC	B	6	New York	322,453
Keb Hana Bank USA NA	Fort Lee	NJ	19860916	26790	N	OCC	A	3	New York	258,189
New Millennium Bank	Fort Lee	NJ	19990719	35151	NM	FDIC	A	8	New York	457,416
Ponce Bank	Bronx	NY	19600331	31189	SB	OCC	H	7	New York	1,315,262
Amerasia Bank	Flushing	NY	19880620	27267	NM	FDIC	A	3	New York	755,826
Newbank	Flushing	NY	20060929	58203	NM	FDIC	A	3	New York	481,597
Abacus Federal Savings Bank	New York	NY	19841129	32257	SB	OCC	A	3	New York	352,177
Carver Federal Savings Bank	New York	NY	19480101	30394	SB	OCC	B	6	New York	687,169
Eastbank National Assn	New York	NY	19841126	25749	N	OCC	A	3	New York	162,349
Global Bank	New York	NY	20070312	58263	NM	FDIC	A	3	New York	202,434

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Piermont Bank	New York	NY	20190701	59154	NM	FDIC	M	10	New York	164,079
Popular Bank	New York	NY	19990102	34967	SM	FED	H	7	New York	10,255,710
Shinhan Bank America	New York	NY	19901018	33188	NM	FDIC	A	8	New York	1,766,807
United Orient Bank	New York	NY	19810409	23373	NM	FDIC	A	3	New York	85,132
Noah Bank	Elkins Park	PA	20060717	58196	NM	FDIC	A	3	New York	331,176
Asian Bank	Philadelphia	PA	19990609	34759	SM	FED	A	3	New York	272,184
United Bank Of Philadelphia	Philadelphia	PA	19920323	33568	NM	FDIC	B	1	New York	55,570
Banco Popular De Puerto Rico	San Juan	PR	19990102	34968	SM	FED	H	7	New York	55,209,000
Oriental Bank	San Juan	PR	19650325	31469	NM	FDIC	H	7	New York	9,776,815
Firstbank Puerto Rico	Santurce	PR	19490117	30387	NM	FDIC	H	7	New York	18,778,630
First Commercial Bank USA	Alhambra	CA	19970520	34496	NM	FDIC	A	8	San Francisco	766,539
New Omni Bank National Assn	Alhambra	CA	19800212	23086	N	OCC	A	3	San Francisco	570,775
American Plus Bank N A	Arcadia	CA	20070808	58469	N	OCC	A	3	San Francisco	587,532

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
First Choice Bank	Cerritos	CA	20050818	57966	SM	FED	A	3	San Francisco	2,285,852
American Continental Bank	City Of Industry	CA	20031006	57444	NM	FDIC	A	3	San Francisco	306,107
United Pacific Bank	City Of Industry	CA	19820511	23805	NM	FDIC	A	3	San Francisco	178,910
Community Commerce Bank	Claremont	CA	19761001	26363	NM	FDIC	H	2	San Francisco	336,648
US Metro Bank	Garden Grove	CA	20060915	58310	NM	FDIC	A	3	San Francisco	766,987
California Business Bank	Irvine	CA	20051101	58037	NM	FDIC	A	3	San Francisco	92,189
Commercial Bank of CA	Irvine	CA	20030515	57417	NM	FDIC	H	2	San Francisco	1,613,806
Bank of Hope	Los Angeles	CA	19860318	26610	NM	FDIC	A	8	San Francisco	17,104,484
Broadway Federal Bank FSB	Los Angeles	CA	19470226	30306	SB	OCC	B	1	San Francisco	481,551
Cathay Bank	Los Angeles	CA	19620419	18503	NM	FDIC	A	3	San Francisco	19,024,182
Commonwealth Business Bank	Los Angeles	CA	20050303	57873	SM	FED	A	3	San Francisco	1,375,194
CTBC Bank Corp USA	Los Angeles	CA	19650427	19416	NM	FDIC	A	8	San Francisco	3,904,185
Eastern International Bank	Los Angeles	CA	19850226	32277	NM	FDIC	A	3	San Francisco	142,042

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Hanmi Bank	Los Angeles	CA	19821215	24170	NM	FDIC	A	8	San Francisco	6,201,210
Open Bank	Los Angeles	CA	20050610	57944	NM	FDIC	A	3	San Francisco	1,366,833
Pacific City Bank	Los Angeles	CA	20030918	57463	NM	FDIC	A	3	San Francisco	1,922,819
Preferred Bank	Los Angeles	CA	19911223	33539	NM	FDIC	A	3	San Francisco	5,143,336
Royal Business Bank	Los Angeles	CA	20081118	58816	NM	FDIC	A	8	San Francisco	3,349,367
Gateway Bank FSB	Oakland	CA	19900608	33103	SB	OCC	A	3	San Francisco	179,697
Metropolitan Bank	Oakland	CA	19830901	25869	NM	FDIC	A	3	San Francisco	191,004
East West Bank	Pasadena	CA	19720101	31628	SM	FED	A	8	San Francisco	52,225,880
Evertrust Bank	Pasadena	CA	19950503	34010	NM	FDIC	A	8	San Francisco	1,000,500
Pacific Alliance Bank	Rosemead	CA	20061227	58234	NM	FDIC	A	3	San Francisco	361,591
First General Bank	Rowland Heights	CA	20051013	58060	NM	FDIC	A	3	San Francisco	1,098,678
Bank of the Orient	San Francisco	CA	19710317	20387	SM	FED	A	3	San Francisco	927,306
California Pacific Bank	San Francisco	CA	19801016	23242	NM	FDIC	A	3	San Francisco	82,484

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
Mission National Bank	San Francisco	CA	19820216	23749	N	OCC	A	3	San Francisco	222,157
Asian Pacific National Bank	San Gabriel	CA	19900725	33013	N	OCC	A	3	San Francisco	56,578
Mega Bank	San Gabriel	CA	20080205	58401	NM	FDIC	A	3	San Francisco	414,127
Universal Bank	West Covina	CA	19541117	30722	SB	OCC	A	3	San Francisco	423,835
California Intl Bank N A	Westminster	CA	20051130	57974	N	OCC	A	3	San Francisco	78,702
Bank of Whittier	Whittier	CA	19821220	24211	N	OCC	A	3	San Francisco	117,420
ANZ Guam Inc	Hagatna	GU	19910111	33316	NM	FDIC	A	8	San Francisco	391,201
Bank of Guam	Hagatna	GU	19721211	20884	NM	FDIC	A	3	San Francisco	2,343,878
Bankpacific LTD	Hagatna	GU	19530101	30692	SL	FDIC	A	3	San Francisco	190,674
Finance Factors, LTD	Honolulu	HI	19520514	25158	NM	FDIC	A	3	San Francisco	589,003
Hawaii National Bank	Honolulu	HI	19600916	18296	N	OCC	A	3	San Francisco	782,075
Ohana Pacific Bank	Honolulu	HI	20060601	58231	NM	FDIC	A	3	San Francisco	197,802
OneUnited Bank	Boston	MA	19820802	23966	NM	FDIC	B	1	San Francisco	666,667

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)	
Eagle Bank	Polson	MT	20060725	58282	NM	FDIC	N	4	San Francisco	91,704	
Unibank	Lynnwood	WA	20061101	58407	NM	FDIC	A	3	San Francisco	403,875	
				Count	142					Total	\$287,375,155
				<u>Count</u>	<u>Minority Status</u>						
				20	B - Black or African American						
				31	H - Hispanic American						
				72	A - Asian or Pacific Islander American						
				18	N - Native American or Alaskan Native American						
				1	M - Multi-racial American						
				<u>Class</u>	<u>Definitions of Class Types</u>						
				92	NM - State bank, not a member of the Federal Reserve						
				15	SM - State bank, member of the Federal Reserve						
				25	N - National bank						
				2	SL - State or Federal savings and loan association						
				8	SB - State or Federal savings bank						
				<u>Regulator</u>	<u>Definitions by Primary Federal Supervisory Agency</u>						
				95	FDIC - Federal Deposit Insurance Corporation						
				33	OCC - Office of the Comptroller of the Currency						
				14	FED - Federal Reserve						
				<u>Count</u>	<u>Minority Status</u>						
				18	1 - Black or African American owned						
				20	2 - Hispanic American owned						
				61	3 - Asian or Pacific Islander American owned						
				18	4 - Native American or Alaskan Native American owned						
				0	5 - Multi-racial American owned						
				2	6 - Majority of the Board African American, serving a predominantly minority community						
				11	7 - Majority of the Board Hispanic American, serving a predominantly minority community						
				11	8 - Majority of the Board Asian or Pacific Islander American, serving a predominantly minority community						
				0	9 - Majority of the Board Native American or Alaskan Native American, serving a predominantly minority community						
				1	10 - Majority of the Board Multi-Racial American serving a predominantly minority community						

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