



Investing in the Future of Mission-Driven Banks

A Guide to Facilitating New Partnerships



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Executive Summary

Federal Deposit Insurance Corporation (FDIC)-insured Minority Depository Institutions (MDIs) and Community Development Financial Institution (CDFI) banks are banks, savings banks, and savings associations (collectively, banks) that serve minority, low- or moderate-income (LMI), and rural communities at higher rates than mainstream banks. Such banks are commonly known as “mission-driven banks” because they play a role in transforming the lives of underserved citizens and communities by making loans and providing other vital banking products and services. Mission-driven banks also provide safe and affordable financial services to residents and businesses in these communities.

Many mission-driven banks are small, and building capacity and scale are critical to growing their operations and expanding services to their communities. The FDIC regularly creates opportunities for MDIs and CDFI banks to build partnerships with other banks or private companies for financial support, lending, and other services, including technical assistance.

Grants, equity investments, the creation of an investment fund, deposits, and technology support are a few direct ways that private companies or philanthropic organizations can partner with these

institutions. Each method of support will have different implementation timeframes, impacts, and potential regulatory or legal requirements. Each mission-driven bank has different needs and may prefer a mix of these strategies based on its unique business model, strategic plan, history, culture, and financial condition.

Aggregate capital for the 247 MDIs and CDFI banks insured by the FDIC is less than \$40 billion, so a few million dollars of support at any one institution can have an enormous impact on its operations and the communities it serves. Every dollar of equity capital invested can increase lending by a multiple of the original investment. Every dollar of deposits can only increase lending up to the amount of the deposit.

Depending on the amount of capital the bank’s federal supervisory agency requires it to hold, the lending multiple for equity capital investments could be significant, between eight and ten in many circumstances. Grants and other investments may also qualify for matching funds in existing support programs, and partnerships between private companies, philanthropic organizations, or other banks can greatly expand the investment from the original partner.

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Overview

Minority Depository Institutions

MDIs play a unique role in promoting economic viability in minority and LMI communities.

Preserving, promoting, and building capacity in these institutions are high priorities for the FDIC.

The section of this report starting on page 15, “The Importance of Mission-Driven Banks,” contains more information on the unique role that MDIs play in their communities and describes recent FDIC initiatives to support these banks.

In 1989, Congress enacted the Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA), which recognized that minority banks can play an important role in serving the financial needs of historically underserved communities and minority populations. FIRREA established five goals related to MDIs:

- Preserve the number of MDIs;
- 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 MDIs; and
- Provide training, technical assistance, and educational programs for MDIs.

The FDIC defines an MDI as any federally insured depository institution for which 51 percent or more of the voting stock is owned by minority individuals or a majority of the board of directors is minority, and the community that the institution serves is predominantly minority.

As of December 31, 2019, the FDIC insured 144 MDIs with combined total assets of nearly \$249 billion and almost 37,000 employees. The FDIC serves as insurer of these banks, and as regulator and supervisor to 96 MDIs, or two-thirds of all MDIs that are banks.

The Office of the Comptroller of the Currency (OCC) and Federal Reserve supervise the remaining one-third of these MDIs, 23 percent and 10 percent, respectively. Unlike the 514 MDI credit unions that can receive direct support from the National Credit Union Administration through its MDI Preservation Program, the FDIC and other federal banking agencies do not have authority to directly fund insured depository institutions.

The table below shows key information about the MDI industry. It includes information on all FDIC-insured MDIs, including those supervised by the OCC and Federal Reserve.

To find a specific MDI, visit the FDIC’s [MDI and CDFI bank locator](#).

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MDI Industry Profile as of December 31, 2019 (\$ in millions)

Indicator	All MDIs	African American	Asian American	Hispanic American	Native American
Number of Banks	144	21	73	33	17
Total Assets	\$248,619	\$4,857	\$129,267	\$109,950	\$4,545
Median Asset Size*	\$339	\$106	\$408	\$467	\$199
Total Equity Capital	\$31,826	\$447	\$16,301	\$14,509	\$569
Return on Assets	1.33	0.14	1.45	1.28	0.55
Return on Equity	10.39	1.54	11.53	9.59	4.48
% Unprofitable Banks	14.58%	42.86%	12.33%	3.03%	11.76%

* The Hispanic MDI assets and equity capital shown above are for those banks not located in Puerto Rico, and the number of Hispanic MDIs above includes the four Puerto Rican MDIs, which are significantly larger, with \$10.9 billion in median assets.

Community Development Financial Institutions

The FDIC also supports the activities of insured CDFI banks. Although CDFIs can be nonbanks, this document refers only to CDFI banks, which the FDIC insures. CDFI banks provide financial services in low-income communities and to individuals and businesses that have traditionally lacked access to credit. The CDFI Fund, an agency of the U.S. Department of the Treasury, certifies institutions as CDFIs in recognition of their specialized role. All certified CDFIs must show that at least 60 percent of their total lending, services, and other activities benefit low-income communities.

As of December 31, 2019, the FDIC insured 138 CDFI banks with combined total assets over \$58 billion and approximately 13,000 employees. Of these 138 banks, 35 were also MDIs. Fifteen of the 21 African American MDIs are also CDFI banks. The FDIC

supervises almost 70 percent (95 institutions) of all CDFI banks, while the OCC supervises 17 percent and the Federal Reserve 14 percent. Compared with MDIs, CDFI banks serve a broader base of low-income rural communities, while MDIs generally serve more urban populations.

The table below shows the composition of the CDFI bank industry, broken down by FDIC regional boundaries: NY (New York Region), ATL (Atlanta Region), CHI (Chicago Region), KC (Kansas City Region), DAL (Dallas Region), and SF (San Francisco Region).¹ It includes information on all FDIC-insured CDFI banks, including those supervised by the OCC and Federal Reserve.

To find a specific CDFI bank, visit the FDIC's [MDI and CDFI bank locator](#).

¹For more information on FDIC regions, including states served, see <https://www.fdic.gov/about/contact/directory/region.html>.

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CDFI Bank Industry Profile as of December 31, 2019 (\$ in millions)

Indicator	All CDFIs	NY	ATL	CHI	KC	DAL	SF
Number of banks	138	12	18	11	5	81	11
Total Assets	\$58,325	\$5,045	\$5,142	\$2,487	\$1,987	\$34,731	\$8,935
Total Equity Capital	\$6,981	\$501	\$590	\$300	\$200	\$4,050	\$1,341
Return on Assets	1.15	-0.11	1.08	1.16	1.87	1.27	1.33
Return on Equity	9.80	-1.11	9.61	9.51	18.06	11.09	9.12
% Unprofitable Banks	8.70%	50.0%	0.00%	27.27%	0.0%	2.47%	9.09%

Business Need

The median MDI and CDFI bank is generally small in terms of total assets. Employees in smaller institutions often wear many hats, and the institutions find it difficult to build back-office operations to scale and attain efficiencies. MDIs, particularly smaller MDIs, have significantly higher cost structures than larger institutions and non-MDI community banks.

The FDIC's goals for partnerships are to facilitate the building of MDI and CDFI bank capacity—to provide the tools and resources to help them grow their operations so they can scale up to serve more customers more efficiently, and produce income levels that cover overhead expenses.

Many mission-driven banks also face challenges acquiring, deploying, and maintaining technology solutions for their core processing systems and customer-facing products and services. In part, this is because of their smaller size, limited budgets, and access to expertise.

Communities served by mission-driven banks were some of the hardest hit during the financial crisis and

were among the slowest to recover. Many of these communities face continuing economic challenges, including job loss, availability of affordable housing, and limited small business activity, even when broader economic indicators are positive.

African American MDIs experience these business needs more acutely. Since 2001, the number of African American MDIs has declined by more than half, with 21 FDIC-insured African American banks remaining as of December 31, 2019. Approximately one-half of the decline was due to mergers and acquisitions, with many African American banks becoming larger during this period. The other half of the decline was because of failures starting in 2008 with the onset of the financial crisis.

In terms of total assets, African American MDIs are the smallest among all MDIs. The COVID-19 pandemic has had a disproportionate impact on the communities these institutions serve. As a result, these MDIs are likely to experience additional pressure on the performance of their loan portfolios if economic conditions continue to deteriorate,

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which in turn will limit their ability to support further lending in their communities.

The needs of mission-driven banks, including African American MDIs, are additional capital to support greater lending and investment in their communities and to absorb losses in periods of economic turmoil, as well as capacity-building expertise, access to new products and services, and improvements in back-office technologies. Building scale and capacity across all MDIs and CDFI banks is vitally important to support minority and LMI customers and communities. An investment of \$1 billion to \$2 billion (2.5 percent to 5 percent of total capital of the 247 MDIs and CDFI banks) could begin to transform minority and LMI communities across the nation.



“Industrial Bank is committed to small, community-based organizations such as ours. They saw promise in what we were doing, and because of that, Industrial Bank will be our partner as long as we’re in business.”
—Timothy Walker, Elaine Ellis Center of Health.

Industrial Bank

Washington, D.C.

African American MDI and CDFI Bank

Industrial Bank provided the financing for the acquisition of the property and the construction for the Elaine Ellis Health Center in Washington, D.C. Jacquelyn Walker and Timothy Walker founded the Health Center. The mother-son team are former residents of the Deanwood community in Ward 7 and relatives of the late Elaine Ellis, for whom the organization gets its name.

The mission of the Health Center is to provide affordable, comprehensive, preventive, and primary healthcare services to underserved residents of Ward 7 and surrounding communities regardless of their ability to pay. The Health Center offers services in a clean, safe environment that meets the healthcare needs of their community. Their loan from Industrial Bank allowed the Health Center to maintain 20 existing jobs and create 10 new permanent jobs.

Industrial Bank, a \$600 million African American MDI, has served neglected communities within the Washington, D.C. area for over 80 years. It has remained staunchly committed to its community. In fact, most of its branches are in low- to moderate-income neighborhoods. Industrial’s team of dedicated employees conduct an average of 800 community and financial literacy service hours annually to over 50 nonprofit organizations, churches, and schools in the Washington, D.C. community. Industrial Bank expanded to New York and New Jersey in 2019 by purchasing another MDI.

The [Community Development Bankers Association](#) provided the information used for this impact story.

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Albert Senior Day Center provides clients with a sense of purpose, belonging, and independence, a pathway to the enjoyment of life's pleasures, and an ability to grow old with dignity.



Albert Senior Day Center provides clients with a variety of activities. A dance class is underway in this photo.

Noah Bank

Elkins Park, Pennsylvania
Asian American MDI and CDFI Bank

Pennsylvania ranks fourth in the nation for the percentage of the population over 65, and robust senior services are becoming increasingly critical for the state.

Noah Bank has supported Pennsylvania's senior community by helping to finance the Albert Senior Day Center, an adult day care facility in the Philadelphia area that serves 110 Medicaid-eligible seniors.

The center provides breakfast and lunch through the Supplemental Nutrition Assistance Program (SNAP) and a nurturing environment for the senior residents. Noah Bank's loan financed facility improvements and allowed Albert Senior Day Center to hire 10 additional employees.

Founded in 2010, Noah Bank is a \$373 million Asian American MDI and CDFI bank headquartered in Elkins Park, Pennsylvania, with branches and lending activity in New Jersey, New York, and Pennsylvania. The bank's mission is to promote community development by delivering customer-oriented banking solutions to underserved populations in its tristate market, with a strong focus on developing minority-owned small businesses. As an MDI, Noah Bank initially focused on businesses owned by immigrant and first-generation Asian Americans. It has expanded its services to ensure that it meets the needs of every demographic within its diverse region.

The [Community Development Bankers Association](#) provided the information used for this impact story.

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M&F Bank

Durham, North Carolina

African American MDI and CDFI Bank



Jim Sills and M&F Bank staff volunteer to help North Carolina MedAssist.

UDI Community Development Corporation, a nonprofit organization with a mission to raise the economic welfare, education, and social levels of low-income and underprivileged residents of Durham, North Carolina, has developed the UDI Industrial Park, which provides facilities for approximately 300 people to work and train.

M&F Bank financed the construction of expanded facilities in the industrial park, which enabled more businesses to move in and to offer more employment opportunities. “What UDI is doing

for the community is tremendous,” said Jim Sills, President and CEO of M&F Bank. “We’re very proud to have them as our client.”

M&F Bank provides more than just banking services to its community. M&F Bank also partners with North Carolina MedAssist, a statewide nonprofit pharmacy program, which regularly holds free mobile pharmacy events in Durham. These events enable low-income and uninsured local residents to access basic over-the-counter medications for common diseases such as heart disease, diabetes, and asthma.

M&F Bank is a \$291 million African American MDI and CDFI bank in Durham, North Carolina. The bank was organized in 1907 under the authority of a charter issued by the North Carolina’s state legislature. Originally named “Mechanics and Farmers Bank,” the founders and original customers represented various trades, crafts, and professions in which African Americans had achieved success and prominence in the community in the early 1900s. The bank provides financial and advisory services for small businesses, and always seeks to advance its community development mission.

The [Community Development Bankers Association](#) provided the information used for this impact story.

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Strategic Options

Private companies or philanthropic organizations can support the business needs of mission-driven banks by providing grants or making equity investments, supporting investment funds to inject capital or absorb problem loans, placing deposits, and providing technology support.

Capacity-Building Grants and Equity Investments

Private companies or philanthropic organizations could develop a grant program and invite mission-driven banks to submit proposals for building capacity and better serving their communities. Grants could increase lending or develop new products or services to benefit minority communities. Companies would develop a set of criteria to evaluate such proposals. These could include, for example, the number of jobs created from a new community development investment or the number or type of new loans generated from a new product offering.

Other types of grants could focus on improving operations, providing technical assistance, increasing development or community services, or providing more loans to consumers or small businesses. For example, companies could designate a series of grants and specify what types of lending or community investments the grants would be designed to support.

Grants would flow directly to capital, creating a multiplier effect on a bank's ability to lend to its customers. Every dollar increase to equity capital can increase lending by a multiplier of eight to ten

times, depending on the bank's regulatory capital requirements. This is because federal supervisory agencies do not require banks to hold a dollar of capital for every dollar of lending. Generally, federal supervisory agencies base regulatory capital requirements on the risk of the bank's portfolio.

Companies could invite each individual MDI or CDFI bank to develop a plan for how it would use the funds, allowing the companies to evaluate each proposal based on their grant criteria and any outcome-oriented goals.



The board of the National Association of Chinese American Bankers, shown here with Betty Rudolph (center), FDIC's National Director, Minority and Community Development Banking.

Like grants, equity investments increase capital and have a significant multiplier effect on a bank's ability to lend. Generally, equity investments up to 5 percent do not trigger regulatory scrutiny. Passive non-voting equity investments are allowed in excess of 5 percent in many cases, without triggering regulatory scrutiny. Companies can combine equity investments with

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grants to provide even more capital to mission-driven banks. Each institution may view a proposed equity investment differently, and the company and the bank would need to consider any potential regulatory impact on a case-by-case basis.

In addition to increasing lending or building capacity, mission-driven banks could also use grants or equity investments to bolster loan loss reserves to help offset any losses due to nonperforming loans. Many mission-driven banks have restructured loans to customers affected by the COVID-19 pandemic. Depending on the speed and nature of the economic recovery, some institutions may experience significant losses on their loan portfolios.

A potential use of these grants or equity investments could be to bolster capital reserves to weather this turbulent point in the economic cycle. Equity investments or grants could help many mission-driven banks sustain their operations and provide additional lending to the LMI communities they support in the event of a protracted recession. In addition, grants could help many mission-driven banks sustain their operations and provide additional lending for their LMI customers and communities.

A grant or equity investment of \$3 million to \$5 million can make a big difference in an institution that is the median size of an MDI (\$339 million). In addition, it is possible for companies or their MDI or CDFI bank partner to leverage the original company investment by finding a program that will match these funds. For example, the CDFI Fund requires a one-to-one match for its financial assistance awards,

and reports that awardees, on average, leverage each dollar awarded with \$10 of other investment. With an initial investment, mission-driven banks can leverage a company's original investment to obtain more funding through the CDFI Fund or from private investors, foundations, and others.

Creating a process to invite mission-driven banks to "pitch" their proposals is likely to be one of the most effective forms of assistance, but would inevitably take more time to implement than deposits. A company would need to create a framework for the application and evaluation process. The company would determine the complexity and depth of the application process, but a simple, streamlined process would encourage participation by limiting the burden and costs of proposal development for mission-driven banks. In addition, the company may want to hold "listening" sessions to better understand MDI and CDFI bank needs.



National Bankers Association Chairman Kenneth Kelly with FDIC Chairman Jelena McWilliams at the NBA Conference in 2019. Mr. Kelly is also Chairman and CEO of First Independence Bank in Detroit, Michigan.

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Unibank

Lynnwood, Washington
Asian American MDI



Unibank's headquarters in Lynnwood, Washington.

Unibank is in the business of enabling the attainment of the “American Dream.” Founded in 2006 in Lynnwood, Washington by a group of Korean American entrepreneurs who overcame cultural barriers and financial challenges, Unibank started with one goal in mind: to make it easier for other Korean immigrants and future generations to succeed in business and attain their “American Dreams.”

Fourteen years later, Unibank has grown with the Korean American community in Washington. Through loan guarantee programs offered by the Small Business Administration (SBA) and the U.S. Department of Agriculture (USDA), Unibank can provide access to financing to potential borrowers, which would not have been possible through traditional commercial financing means. The bank continues to help many individuals who cannot access financing due to difficulties with language and financial understanding. Unibank makes an effort to find these individuals and then guides them every step of the way.

When the Covid-19 pandemic hit the Washington area, Unibank knew that they had to help their customers and community. Through the SBA's

Paycheck Protection Program (PPP), Unibank jumped into action and started contacting small businesses that might need extra help during the pandemic. Working diligently, Unibank provided 391 loans through PPP totaling \$41.4 million, with an average loan size of \$106,000.

Over the years, Unibank has learned that the aspiration to succeed financially and leave a legacy for one's children is not unique to the Korean American immigration story. Unibank now has a customer base of people of other Asian descent, and those underserved in the mainstream market. In the past, the bank sought mainstream deposits to fund Korean American borrowers, and now Unibank uses funds from Korean American depositors to assist borrowers outside of this community.

Unibank is a \$380 million Asian American MDI headquartered in Lynnwood, Washington. It is the only bank based in the Pacific Northwest that primarily serves the Asian American community. It provides commercial and retail banking services through its four branches in the Seattle-Tacoma-Bellevue metropolitan area.

Unibank provided the information used for this impact story.

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Additional resources could include the FDIC's MDI advisory subcommittee, or MDI and CDFI bank trade groups (e.g., Community Development Bankers Association, National Bankers Association, National Association of Chinese American Bankers, and the Hispanic American Bankers Association).

Investment Funds

An economic downturn can have a significant impact on the asset quality and earnings of mission-driven banks. In the wake of the COVID-19 pandemic and the ensuing recession, many mission-driven banks are likely to experience a significant uptick in credit losses. Companies, philanthropic organizations, and larger banks could collaborate in creating an investment fund that could channel investors' funds through capital injections into mission-driven banks, to help the banks absorb losses during a period of economic turmoil, preserve capital, or support new lending. An investment fund also could provide other financial support for mission-driven banks, including participations in bank loans, purchase of nonperforming assets, structured transactions, or direct grants.

Companies, philanthropic organizations, and larger banks could capitalize the fund with their own performing assets, cash, or an equity stake. The fund's investment decisions could be managed by an investment committee made up of independent advisors, trustees, and investor representatives. An investment advisor could set up the fund to:

- Maximize the benefits to the mission-driven banks and the communities they serve by providing capital preservation and growth;
- Return principal to investors without harming

mission-driven banks' capital positions;

- Provide investors a minimal return on investments;
- Maintain the passive nature of investments;
- Maintain the simplicity of the arrangements;
- Minimize setup and operational costs; and
- Focus on the mission-driven banks most in need of support.

Creating a Financial System of Inclusion and Belonging

"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. We do, however, recognize that we can do more, and 'more' in this case will require us to think outside the box.

"One of the options we are exploring to support MDIs and CDFI banks is a framework that would match these banks with investors interested in the particular challenges and opportunities facing those institutions and their communities.

"Although we are still developing the details, the idea would include a vehicle through which investors' funds would be channeled to make investments in or with MDIs and CDFIs, including direct equity, structured transactions, funding commitments to loan participations, or potential loss-share arrangements.

"This initiative seeks to accomplish several objectives, including maximizing the benefits to MDIs and the communities they serve by providing capital preservation and growth, as well as providing a minimal return to investors. We expect to release more information in the near future, and we will continue to work with stakeholders on how best to proceed."

*FDIC Chairman Jelena McWilliams
The University of Chicago Law School and American Financial
Exchange Webinar
August 26, 2020*

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Direct investments, such as through non-voting preferred stock, have the benefit of increasing capital and permitting banks to increase lending or preserve capital.

Purchasing troubled assets from mission-driven banks at a discount and managing them, structuring transactions, or liquidating troubled assets over time can help mission-driven banks move assets off their books, reduce losses they might otherwise experience, and redeploy the proceeds into new earning assets. Carrying troubled assets on the balance sheet results in additional expenses. In addition, earnings decline with additional provisions to the allowance for loan and lease losses that are needed to absorb estimated credit losses for the troubled assets. For example, legal costs often accompany foreclosing on real estate property. Institutions must maintain and protect this real estate to maximize potential recovery values. Managing this real estate brings about additional costs such as maintenance, tax, insurance, and other miscellaneous expenses, further reducing earnings. The investment fund could provide additional time to work assets and sell them to maximize their economic value and yield a profit for the investors.

Loan participations enable mission-driven banks to diversify their balance sheets and offer an opportunity for bank investors in the investment fund to expand their support for underserved communities. Direct grants, while not offering

a return, can enable investors to target a particular need or area of interest, and could be funded by reinvestments of profits from other fund investments.

Bank investors can also potentially earn credit under the Community Reinvestment Act (CRA)² for activities related to an investment fund.

Deposits

Private companies, philanthropic organizations, or other banks can place deposits into mission-driven banks fairly quickly, providing an immediate benefit to the recipient institution. Corporations or philanthropic organizations can also place deposits through a service to spread a large amount of deposits automatically in increments of \$250,000 per institution to ensure FDIC deposit insurance coverage. Deposits placed in insured financial institutions also provide some return based on rates set by each institution.

Mission-driven banks benefit from a stable deposit base, and longer-term deposits enable institutions to match lending opportunities based on deposit maturities. Mission-driven banks have different business models and strategic plans, however, and not all of these institutions are necessarily seeking deposits. A large influx of deposits can increase a bank's assets, resulting in the need to seek additional capital or to reduce lending to comply with regulatory capital requirements.

²The Community Reinvestment Act is a federal law enacted in 1977 to encourage depository institutions to meet the credit needs of LMI neighborhoods. The CRA requires federal supervisory agencies to assess how well each bank fulfills its obligations to these LMI communities. This information is used to evaluate applications for future approval of bank mergers, acquisitions, charters, branch openings, and deposit facilities.

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Companies also could consider making larger deposits, although they might want to consult with individual MDIs and CDFI banks on amounts, as some institutions may not desire additional deposits if they would have a material effect on capital.

Technology Support

Many mission-driven banks would welcome a collaborative effort to bring together resources and capacity to consider innovative technology solutions, such as developing cutting-edge tools to manage their operations or more easily reach existing or new customers. This could be as simple as sharing technology to support mortgage origination, servicing, or support, or sharing compliance systems to support anti-money laundering activities. Another way to collaborate with mission-driven banks could be to partner on the development of customer-facing tools for online account openings and other applications to facilitate safe, affordable, and accessible banking.

This strategic option would require greater resources and time commitments to determine common needs and to agree on requirements that could support multiple institutions with varying needs. This support could also be provided to MDIs or CDFI banks that successfully compete for a company's grant or equity investment.

Other Partnership Opportunities

Many additional opportunities exist for larger banks, private companies, or philanthropic organizations to partner with mission-driven banks. These opportunities may be driven by the underlying business of the partnering company. For example, merchant services providers, including larger banks, could offer "white-label" products³ such as credit and debit cards and other payment mechanisms. Mission-driven banks can benefit by rebranding such products for their own customers, and the providers can benefit by expanding their volume. Technology companies offering hardware, software, or other products and services could partner with mission-driven banks and their communities to support local businesses or institutions such as schools. The range of possibilities for these types of partnerships is considerable.

³White-label products are sold by companies or financial institutions with their own branding and logo, but the products themselves are manufactured by a third party.

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Roles and Responsibilities

The FDIC can serve in a facilitator role, helping companies understand the needs of mission-driven banks. Companies will determine the scope of their interest and the nature of any program designed to support these banks. As with any partnership, companies may also wish to consider the financial health of the MDI or CDFI bank, recognizing that

some of these financial institutions greatly need additional support for sustainability. Financial institutions will coordinate with their primary supervisor regarding any regulatory issues. The FDIC can help facilitate engagement with these institutions and support public awareness efforts to promote these partnerships.

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The Importance of Mission-Driven Banks

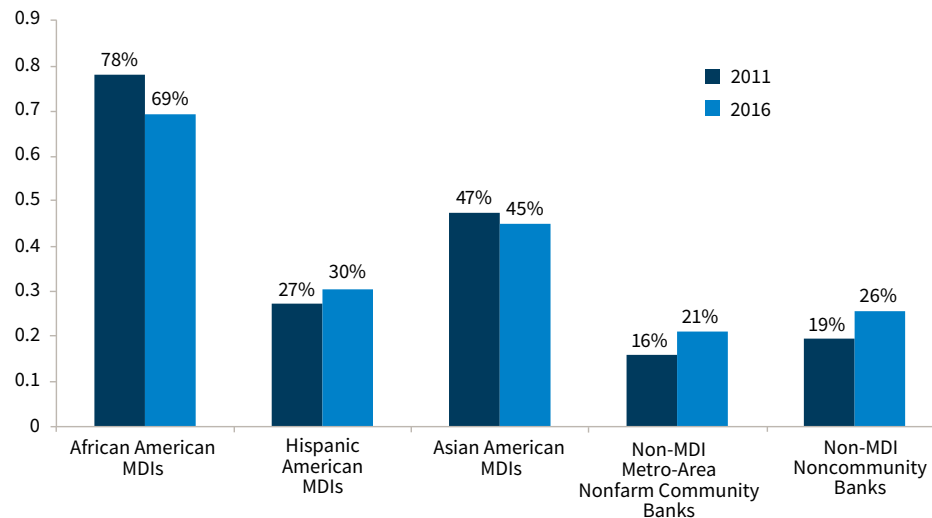
MDI Social Impact

MDIs tend to serve communities in which a higher share of the population lives in LMI census tracts and a higher share of residents are minorities, compared with non-MDI banks in communities where MDIs are located.

The following charts are excerpted from the FDIC’s 2019 research study, *Minority Depository Institutions: Structure, Performance, and Social Impact*, and illustrate these key points about the impact MDIs have in their communities. The comparison institutions in these charts are non-MDI community banks that are in metro areas similar to MDIs and non-MDI noncommunity banks, which are generally the largest FDIC-insured institutions.

MDIs are important service providers to minority populations, which have higher percentages of unbanked households than other population groups. MDI offices are typically located in areas with a higher share of minority populations. Analysis of the demographic characteristics of these service areas shows that in both 2011 and 2016, the minority share of estimated service area populations was much higher for MDIs than non-MDIs.

The Median Share of Estimated Service Area Population Living in LMI Census Tracts Is Higher Among MDIs



Source: FDIC

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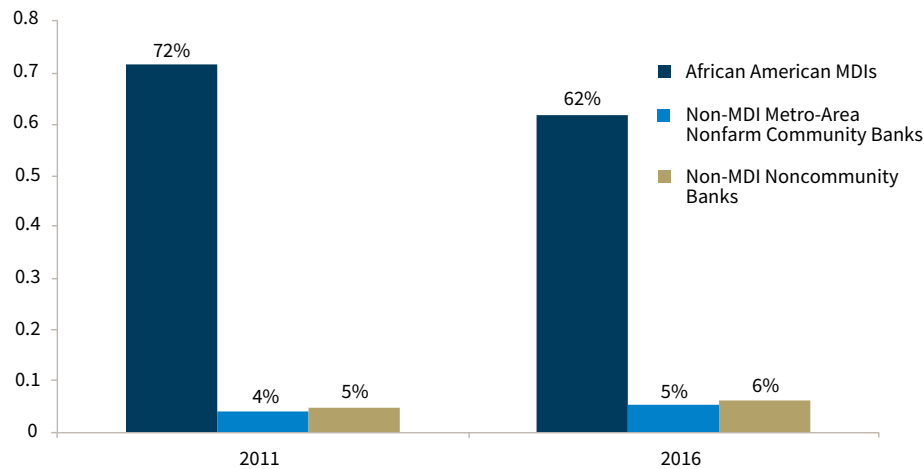
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In 2011, the median share of estimated service area population that was African American was 72 percent for African American MDIs, compared with 4 percent for non-MDI community banks.

In 2016, the median share of estimated service area population that was African American was 62 percent for African American MDIs compared with 5 percent for non-MDI community banks.

The Median Share of Estimated Service Area Population That Is African American Is Higher for African American MDIs



Source: FDIC

Hispanic American MDIs also have service area populations with a higher median share of Hispanic American residents compared with non-MDIs. In 2011, the median share of the estimated service area population that was Hispanic American was 67 percent for Hispanic American MDIs, compared with 4 percent for non-MDI community banks. In 2016, the median share of estimated service area

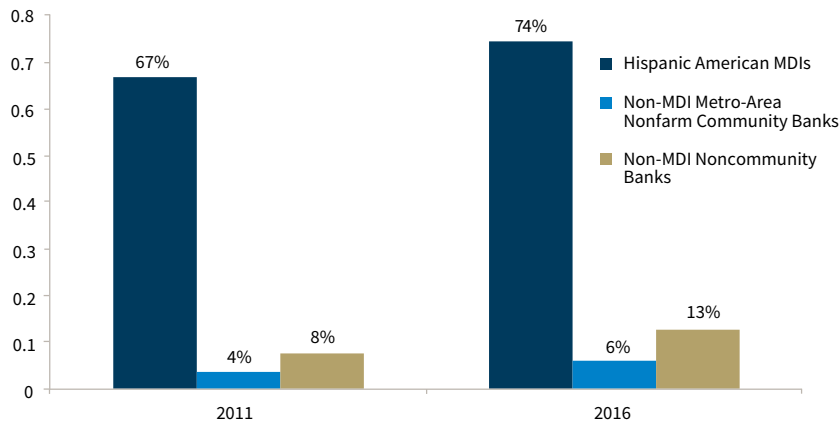
population that was Hispanic American was 74 percent among Hispanic American MDIs compared with 6 percent for non-MDI community banks.

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The Median Share of Estimated Service Area Population That Is Hispanic Is Higher for Hispanic American MDIs

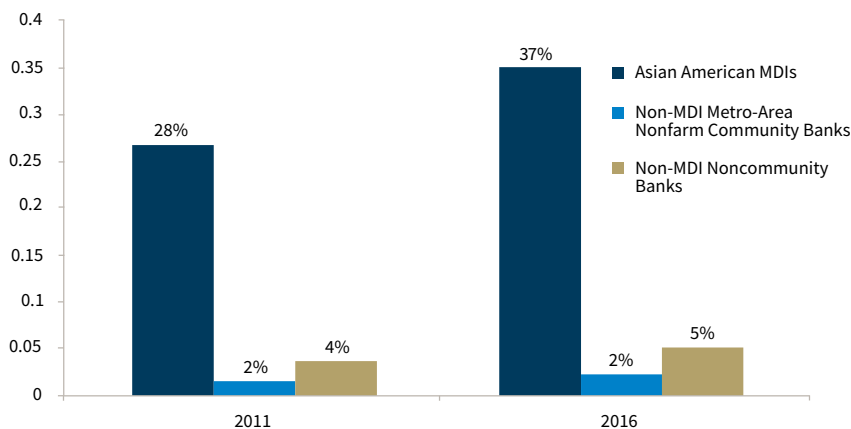


Source: FDIC

Asian American MDIs also have service area populations with a higher share of Asian Americans compared with non-MDI community banks in both 2011 and 2016. In 2011, the median share of the estimated service area population that was Asian American was 28 percent for Asian American MDIs

compared with 2 percent for non-MDI community banks. In 2016, the median share of estimated service area population that was Asian American was 37 percent among Asian American MDIs compared with 2 percent among non-MDI community banks.

The Median Share of Estimated Service Area Population That Is Asian American Is Higher for Asian American MDIs



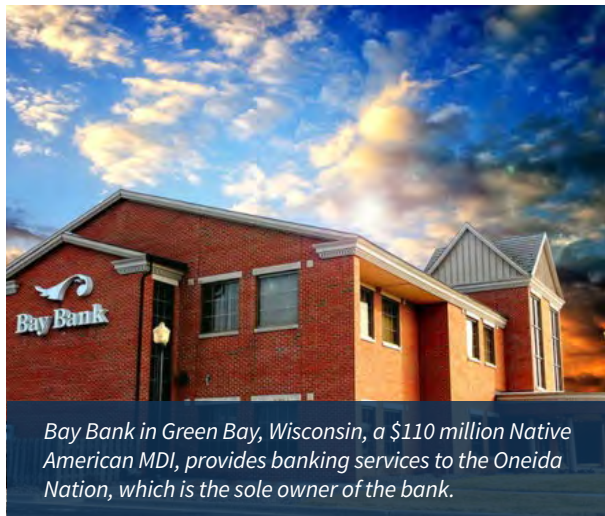
Source: FDIC

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Native American MDIs provide important services to Native American populations. The analyses of geographic service areas did not include Native American MDIs because only a minority of these MDIs have all of their branches in metropolitan areas.



Bay Bank in Green Bay, Wisconsin, a \$110 million Native American MDI, provides banking services to the Oneida Nation, which is the sole owner of the bank.

FDIC Initiatives to Support MDIs and CDFI banks

The FDIC Board of Directors originally adopted its [Policy Statement Regarding Minority Depository Institutions](#) in 1990. In 2020, the Policy Statement was updated and outlines the scope of the FDIC's MDI program, which includes outreach, technical assistance, and education and training activities to build capacity in MDIs.

In 2019, FDIC Chairman Jelena McWilliams established additional goals to increase engagement and collaboration to support MDIs. The FDIC took the following measures to help grow MDIs and improve their operations:

- Published [Minority Depository Institutions: Structure, Performance, and Social Impact](#), a research study that looks at the demographics, structural change, geography, financial performance, and social impact of MDIs over a 17-year period ending December 31, 2018.
- Hosted [three roundtable discussions](#) among executives of MDIs and large banks to facilitate greater lending and community development activities in low-income neighborhoods and to explain how such collaborations could receive favorable consideration under the CRA. See more detail on this initiative below.



FDIC Chairman Jelena McWilliams welcomes bankers to the Large Bank - Minority Depository Institution Roundtable in Washington, D.C. on June 27, 2019.

- Established a new [MDI Subcommittee](#) of the FDIC's Advisory Committee on Community Banking (CBAC). Nine executives, representing African American, Native American, Hispanic American, and Asian American MDIs across the country, serve on the MDI Subcommittee. The

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Subcommittee serves as a source of feedback for the FDIC to fulfill its statutory goals to preserve and promote MDIs. It also 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.

- Hosted, in collaboration with the OCC and Federal Reserve, an interagency [MDI and CDFI bank conference](#). This 2019 conference, *Focus on the Future: Prospering in a Changing Industry*, drew more than 80 MDI and CDFI bankers, representing 61 banks, to the two-day event held at the FDIC's Seidman Center in Arlington, Virginia.
- Facilitated the sharing of MDIs' stories. The impact that MDIs have in their communities reflects their resilience relative to historical factors that prevented minority and LMI communities from gaining access to credit at mainstream financial institutions. The FDIC has begun to record and publish videos to capture "origin stories" of many of these MDIs to highlight the important impact they have.

The origin story for Industrial Bank, an African American MDI in Washington, D.C. can be found [here](#).

The origin story for The Harbor Bank of Maryland, an African American MDI in Baltimore, Maryland can be found [here](#).

The FDIC hosted three roundtables in 2019 with executives of large banks and MDI bankers to foster collaboration to support the continued vibrancy of MDIs and their communities. At each roundtable, the FDIC outlined how both MDIs and other institutions

might realize business and regulatory benefits by developing partnerships, drawing upon the FDIC's [Resource Guide for Collaboration with Minority Depository Institutions](#), published in December 2017. In addition, the FDIC clarified how relationships with MDIs receive consideration under the CRA.



MDI Subcommittee members discuss banking trends affecting MDIs. From left: James H. Sills, III, M&F Bank; Warren Huang, Amerasia Bank; Gilbert Narvaez, Jr., Falcon International Bank; and Kyle Chavis, Lumbee Guaranty Bank.



Makada Henry-Nickie, Brookings Institute, (left) facilitated the discussion of key challenges facing minority and CDFI banks with FDIC Chairman Jelena McWilliams, OCC Senior Deputy Comptroller Grovetta Gardineer, and Federal Reserve Governor Michelle Bowman.

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During the roundtables, executives from 29 large banks and 24 MDIs discussed potential partnerships involving financial support, lending activities, or service activities, including technical assistance. On June 27, 2019, the FDIC held a roundtable for banks in the New York Region. The FDIC also held roundtables in Atlanta on October 17, 2019, and Chicago on November 7, 2019.

Before each roundtable, the FDIC asked bankers to complete a [“collaboration inventory.”](#) Using a template, minority banks outlined the types of partnerships they were seeking, such as direct investment or deposits; loan participations as

a buyer or a seller; or technical assistance or services, ranging from sharing specialty expertise to collaborating on product development or back-office operations. Large banks identified the categories in which they had an interest in partnering. Participants exchanged inventories before the roundtable to facilitate conversations at the meeting.

Bankers who attended the roundtables reported the beginning of promising partnerships involving direct investment, deposits, and technical assistance. The FDIC is monitoring the outcomes of the roundtables and will highlight successful partnerships at future events and on its [MDI Program web page](#).

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First Choice Bank Cerritos, California Asian American MDI & CDFI Bank



“First Choice Bank provided a microloan that made a big difference in expanding our skincare line distribution. They believe in me, and I believe in our partnership.”

—Enjunaya Cantonm, Zuhuri Beauty

What can a \$1,000 loan do? To some small businesses, it’s a lot.

While First Choice Bank has been lending to businesses since opening its first branch in Cerritos, California, they learned that small businesses often do not have the resources to get a traditional small business loan.

From that realization, the bank launched a \$1,000 microloan program in 2018 with the intention to support local small business owners like start-ups and newly established businesses.

For the success and effective delivery of this program, the bank works with reputable community-based organizations that can provide small business financial literacy education to microloan applicants. Because the bank provides easy capital access to small/micro businesses with a simple and quick application process, First Choice

Bank’s microloan program is more vital than ever before for struggling small business owners during the pandemic.

What started out as a lightbulb moment to help small entrepreneurs resulted in an increase of more than 50 percent of lending in distressed, low-and moderate-income communities. This enables the bank to increase its impact for entrepreneurs of all types, particularly within minority, women, and low-to-moderate income communities.

“First Choice Bank is committed to helping people in need since the moment we opened our doors. When we developed the microloan program, we knew we had the right solution to make a difference. By working through community-based organizations, we found that we could reach people in need who would otherwise would be overlooked by the banking system. Our board and our employees are so proud of the impact we are making in our Southern California communities,” said Robert Franko, President and CEO, First Choice Bank.

Founded in 2005, [First Choice Bank](#), is a community focused financial institution with over \$2.2 billion in assets. The bank serves diverse consumers and commercial clients, specializing in loans to small businesses, commercial and industrial loans, and commercial real estate loans with a niche in providing financing for the hospitality industry. Although First Choice Bank is considered an Asian American MDI, the bank welcomes and serves all ethnicities in its communities. The bank is a Preferred Small Business Administration (SBA) Lender. With a majority of its founders being first generation immigrants, First Choice Bank’s vision is to provide flexible solutions to Southern California’s underserved communities.

[First Choice Bank](#) provided the information used for this story.

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Appendix A: Recent Commitments to Support Mission-Driven Banks

Private industry has committed to providing contributions that support mission-driven banks and other CDFIs. The list of private companies, philanthropic organizations, and banks pledging significant funds to support mission-driven banks, racial equity, and minority-owned businesses is growing every day. Below is a small sample of recent commitments, which represents only a portion of the total commitments. This is not intended to be a complete list of all recent pledges.

Bank of America

Industry: Banking

Pledge Amount: \$1 billion

Use of Funds: In June 2020, Bank of America pledged \$1 billion over four years of support to help local communities address economic and racial inequality accelerated by the pandemic. To date, it has expended \$300 million of the \$1 billion commitment to four initiatives: 1) \$25 million in grant funding in support of job initiatives; 2) \$25 million for community outreach and initiatives in underserved and minority communities and personal protection equipment; 3) \$200 million of proprietary equity investments in minority entrepreneurs, businesses, and funds; and 4) \$50 million in direct equity investments to MDIs.

The \$50 million investment to MDIs included the purchase of approximately 5 percent of the common equity in First Independence Corporation in Detroit, Michigan; Liberty Financial Services, Inc. in New Orleans, Louisiana; and SCCB Financial Corp.

(parent company of Optus Bank) in Columbia, South Carolina. This is in addition to the approximately \$100 million in deposits from Bank of America in MDIs. Bank of America also operates a \$1.6 billion CDFI portfolio with 255 partner CDFIs across all 50 states. See [Press Release](#).

Biogen Inc.

Industry: Biotechnology

Pledge Amount: \$10 million

Use of Funds: Biogen deposited \$10 million with OneUnited Bank, an African American MDI. See [Press Release](#).

Citibank

Industry: Banking

Pledge Amount: \$1 billion

Use of Funds: Citibank has pledged \$1 billion over three years to support homeownership for people of color and affordable housing by minority developers, procurement opportunities for African American-owned business suppliers and African American entrepreneurs, and to address racial equity.

Of the \$1 billion, \$100 million will support MDIs' growth and revenue generation by providing \$50 million in growth capital and another \$50 million in loan participation opportunities. Citibank will provide pro-bono technical assistance and training to MDIs to help them navigate the changing economy, improve operational efficiencies, and support talent development. Citibank will expand its Citi ATM Community Network program that removes

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out-of-network fees at Citibank ATMs for customers of participating MDIs and community development credit unions. The bank also plans to launch a new program called Citi Start CreditSM, which will work with CDFIs to help underserved entrepreneurs increase their credit scores and access more affordable credit. See Citibank's [Action for Racial Equity](#) web page and [Press Release](#).

Comerica Bank

Industry: Banking

Pledge Amount: \$10 million

Use of Funds: Comerica Bank has pledged \$10 million in deposits to MDIs. It also plans to build a mutual mentoring relationship with these institutions. Comerica so far has allocated \$7.5 million (\$2.5 million each) to First Independence Bank in Detroit, Michigan; Broadway Federal Bank in Los Angeles, California; and Unity National Bank in Houston, Texas. Comerica and the MDIs will each share their expertise in key lines of business. See [Press Release](#).

Costco Wholesale

Industry: Warehouse Clubs

Pledge Amount: \$25 million

Use of Funds: Costco Wholesale will invest \$25 million into African American communities through a new investment fund, the Black Economic Development Fund, administered by the [Local Initiatives Support Corporation](#) (LISC), a certified CDFI. The Black Economic Development Fund will invest in African American-led financial institutions and community development efforts. The fund will focus on making deposits in African American-owned banks and offering financing to minority businesses,

charter schools, affordable housing projects, and athletic facilities, to support economic development in communities of color. See [Press Release](#).

Goldman Sachs

Industry: Financial Services

Pledge Amount: \$250 million

Use of Funds: Goldman Sachs has committed \$250 million for small business lending. Goldman Sachs will not issue these loans directly since it is not an approved small business loan provider in the United States. Instead, it will provide the financing to CDFIs and other mission-driven lenders to make the loans. See [Press Release](#).

JPMorgan Chase & Co.

Industry: Banking

Pledge Amount: \$30 billion

Use of Funds: JPMorgan Chase has committed \$30 billion over five years, which includes existing spending. Of this funding, the bank will invest \$50 million in capital and deposits in African American- and Hispanic-led MDIs and CDFIs. JPMorgan Chase will use \$8 billion for originating mortgages for African American and Hispanic households. The bank plans to also fund an additional 100,000 affordable housing units for the communities that need them the most, as well as loans to African American, Hispanic and other minority small businesses. See [Press Release](#).

Microsoft

Industry: Technology

Pledge Amount: \$150 million

Use of Funds: Microsoft has committed \$100 million to invest in MDIs and will establish a \$50 million

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investment fund to support African American-owned small businesses. Microsoft will also invest to boost the number of African American-owned companies in its U.S. partner network. See [Press Release](#).

Morgan Stanley

Industry: Financial Services

Pledge Amount: \$24.6 million

Use of Funds: Morgan Stanley has provided \$24.6 million in grants to three MDIs: Industrial Bank of Washington, D.C. (\$5 million), Carver Bancorp, Inc. (\$14.6 million), New York, New York, and Citizens Trust Bank of Atlanta, Georgia (\$5 million). In addition, the grants will help the banks assist small businesses, particularly those that did not receive federal relief loans, and will support additional investments in technology systems to improve delivery of customer, mortgage, and business lending services. Morgan Stanley's grant enabled Carver Bancorp, Inc. to buy back shares and bolster its capital position and will help the bank assist small businesses and customers. See June 11, 2020 [Press Release](#) and July 30, 2020 [Press Release](#).

Netflix

Industry: Entertainment

Pledge Amount: \$100 million

Use of Funds: Netflix will invest \$100 million or up to 2 percent of its holdings with financial institutions that focus on African American communities. It will start with \$35 million, split two ways:

- 1) financing a new fund, the [Black Economic Development Fund](#), which will invest in African American financial institutions, and
- 2) supporting Hope Credit Union, which will use the

funds to fuel economic opportunity in underserved communities across the Deep South. See [Press Release](#).

PayPal

Industry: Financial Services

Pledge Amount: \$510 million

Use of Funds: PayPal has pledged \$500 million for a long-term economic opportunity fund to support African American and underrepresented minority businesses and communities. The initiative will include “bolstering the company’s relationships with community banks and credit unions serving underrepresented minority communities, as well as investing directly into African American and minority-led startups and minority-focused investment funds.” PayPal deposited \$50 million in Optus Bank, an African American MDI in Columbia, South Carolina. PayPal will use another \$10 million for grants to African American-owned businesses affected by the COVID-19 pandemic or civil unrest surrounding protests. See [Press Release](#).

Regions Bank/Regions Foundation

Industry: Banking

Pledge Amount: \$12 million

Use of Funds: Regions Bank and Foundation have made a \$12 million commitment over two years to advance programs and initiatives that promote racial equity and economic empowerment for communities of color. Of the \$12 million, \$1 million will go to the National Urban League, and they will allocate \$2 million through deposits in minority-owned banks and investments in CDFIs. In addition, the Regions Community Development Corporation, a wholly

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owned subsidiary of Regions Bank, will set aside \$2 million to support the services of minority-owned banks and CDFIs that work with minority-owned businesses. See [Press Release](#).

Square, Inc.

Industry: Financial Services

Pledge Amount: \$100 million

Use of Funds: Square, Inc. has pledged \$100 million in support of minority and underserved communities. The investment represents 3 percent of Square's cash and marketable securities as of the end of the second quarter of 2020. In 2019, Square began dedicating deposits to MDIs and CDFIs. These new investments are allocated as follows: 1) \$25 million for deposits in MDIs and CDFIs; 2) \$25 million investment in The Keepers Fund sponsored by the [National Bankers' Association](#); 3) \$25 million investment in The Black Economic Development Fund managed by [LISC](#), a certified CDFI; and 4) \$25 million reserved for future investment into social impact projects, to be announced at a later date. See [Press Release](#).

TCF Bank

Industry: Banking

Pledge Amount: \$1 billion

Use of Funds: TCF Bank has made a \$1 billion loan commitment to minority communities and minority- and women-owned small businesses, and a \$10 million grant program to assist low- to

moderate-income home buyers through its Heart and Home program. TCF plans to work with local CDFIs in the application process for small business loans of up to \$1 million. The Heart and Home program grants up to \$3,000 to help cover closing costs. Homebuyers need not repay the grant, and it is available to customers who earn less than 80 percent of the area median income or who purchase homes in a low- to moderate-income census tract. See [Press Release](#).

Truist

Industry: Banking

Pledge Amount: \$40 million

Use of Funds: Truist has pledged \$40 million to help establish CornerSquare Community Capital, a new national nonprofit fund that will support selected CDFIs through the purchase of 25 percent loan participations. Through this nonprofit program, all funding will be allocated to racially and ethnically diverse small business owners, women, and individuals in LMI communities, with a focus on African American-owned small businesses. See [Press Release](#).

Wells Fargo

Industry: Banking

Pledge Amount: \$50 million

Use of Funds: Wells Fargo has pledged a \$50 million investment in African American MDIs. See [Press Release](#).

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Paycheck Protection Program

The SBA's Paycheck Protection Program (PPP) provided guarantees for bank loans to businesses for payroll and other related business costs following the COVID-19 pandemic. All or part of the loans may be forgiven based on certain requirements.

Financial institutions earn fees for processing PPP loans on a sliding scale based on the total dollar amount approved: 1 percent for loans of at least \$2 million; 3 percent on loans between \$350,000 and less than \$2 million; and 5 percent on loans of \$350,000 or less. Financial institutions may also earn a 1 percent interest rate on loans held that are not eligible for forgiveness.

The following banks have pledged to donate their fees from PPP to mission-driven institutions and the communities they serve.¹

Bank of America

Pledge Amount: \$775 million

Use of Funds: The bank has pledged to donate all of its earnings from PPP fees to CDFIs to reinvest and support charitable programs, including low- to moderate-income housing and small business assistance.

See [Press Release](#).

Citibank

Pledge Amount: \$25 million

Use of Funds: The bank will donate its net profits to the Citi Foundation, which will deploy \$15 million in unrestricted funding of up to \$500,000 per CDFI to support small businesses owned by people of color and low- and moderate-income individuals and communities. The remaining \$10 million was donated to support the [New York Forward Loan Fund](#), which is enabling CDFIs to make loans to small businesses, nonprofits, and small landlords for working capital, including payroll, operating, and emergency maintenance.

See [Press Release](#).

Wells Fargo

Pledge Amount: \$400 million

Use of Funds: The bank will allocate nearly \$400 million in gross processing fees to help businesses impacted by COVID-19. Wells Fargo has created the [Open for Business Fund](#) for nonprofits that serve businesses owned by racially and ethnically underrepresented individuals to provide capital, technical support, and long-term resiliency programs. See [Press Release](#).

¹Saks Frankel, Robin, "Banks Made Billions On PPP Loans. Learn What They're Doing With The Cash," *Forbes*, (July 10, 2020).

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Appendix B: Trade Association Contact List

American Bankers Association

The American Bankers Association (ABA) represents the nation's \$20.3 trillion banking industry, which is composed of small, regional, and large banks that together employ more than 2 million people, safeguard \$15.8 trillion in deposits, and extend nearly \$11 trillion in loans. The ABA was founded in 1875 and is based in Washington, D.C.

Contact

Diana C. Banks

Vice President and Senior Counsel
Fair & Responsible Banking
Email: dbanks@aba.com
Website: ABA

Community Development Bankers Association

The Community Development Bankers Association (CDBA) is the national trade association of the community development bank sector with headquarters in Washington, D.C. Community development banks, or CDFI banks, are FDIC-insured banks or thrifts certified as such by the U.S. Department of the Treasury's CDFI Fund. CDFI banks have a primary mission of promoting community development and serving low- and moderate-income communities.

Contact

Jeannine Jacokes

Chief Executive Officer
Email: jacokesj@pcgloanfund.org
Website: CDBA

Hispanic American Bankers Association

Founded in the 1980s by Cuban bankers, the Hispanic American Bankers Association's membership consists of financial institutions of all sizes, individual bankers, service-related businesses, certified public accountants, and attorneys.

Contact

Hugo Castro

Board President
Email: hugobanker@gmail.com
Website: Hispanic American Bankers Association

Independent Community Bankers Association

Founded in 1930, the Independent Community Bankers of America (ICBA) represents the nation's 5,000 community banks, which constitute 99 percent of all banks, employ nearly 750,000 Americans, and are the only physical banking presence in one in three U.S. counties. ICBA represents community banks of all sizes and charter types, including minority-owned institutions. The ICBA maintains a Minority Bank Advisory Council.

Contact

Kianga Lee

Vice President, Administrative Operations
Email: Kianga.Lee@icba.org
Website: ICBA

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National Association of Chinese Bankers

Founded in 1987, the National Association of Chinese American Bankers (NACAB) provides a platform for its members to exchange ideas, address issues of common concern, enhance professional status, and promote community outreach. NACAB assists bankers in understanding and complying with new and changing regulations, and ensures that its members' voices and concerns are heard.

Contacts

Sandy Ho

2019-2020 President

Email: Sandy.Ho@preferredbank.com

Geoffrey Liu

2020-2021 President

Email: Geoffrey.Liu@ctbcbankusa.com

Website: NACAB

National Bankers Association

Established in 1927, the National Bankers Association's membership includes African American, Hispanic American, Asian American, Native American, and women-owned banks. Member banks are in 22 states and the District of Columbia.

Contact

Kim D. Saunders

President and CEO

Email: <https://www.nationalbankers.org/contact-us>

Website: NBA

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Appendix C: List of Minority Depository Institutions

To find a specific MDI, visit the FDIC's [MDI and CDFI bank locator](#).

December 31, 2019

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	19,584
Commonwealth National Bank	MOBILE	AL	19760219	22229	N	OCC	B	1	ATLANTA	49,791
BAC Florida Bank	CORAL GABLES	FL	19731012	21265	NM	FDIC	H	2	ATLANTA	2,260,033
BanESCO USA	CORAL GABLES	FL	20060110	57815	NM	FDIC	H	2	ATLANTA	1,718,155
U. S. Century Bank	DORAL	FL	20021028	57369	NM	FDIC	H	2	ATLANTA	1,312,272
Executive National Bank	MIAMI	FL	19720607	20711	N	OCC	H	2	ATLANTA	467,405
Interamerican Bank, A FSB	MIAMI	FL	19760823	31823	SB	OCC	H	2	ATLANTA	201,400
International Finance Bank	MIAMI	FL	19831130	24823	NM	FDIC	H	2	ATLANTA	780,095
Ocean Bank	MIAMI	FL	19821209	24156	NM	FDIC	H	2	ATLANTA	4,314,163
Plus International Bank	MIAMI	FL	20010914	57083	NM	FDIC	H	2	ATLANTA	72,586
Sunstate Bank	MIAMI	FL	19990315	34643	NM	FDIC	H	7	ATLANTA	451,808
Central Bank	TAMPA	FL	20070226	58377	NM	FDIC	A	3	ATLANTA	200,413
Touchmark National Bank	ALPHARETTA	GA	20080128	58687	N	OCC	A	3	ATLANTA	407,629
Citizens Trust Bank	ATLANTA	GA	19210618	8033	SM	FED	B	1	ATLANTA	418,130
First IC Bank	DORAVILLE	GA	20000131	34998	NM	FDIC	A	3	ATLANTA	704,772
Metro City Bank	DORAVILLE	GA	20060404	58181	NM	FDIC	A	3	ATLANTA	1,636,039
PromiseOne Bank	DULUTH	GA	20081106	58657	NM	FDIC	A	3	ATLANTA	450,362
Loyal Trust Bank	JOHNS CREEK	GA	20191118	59182	NM	FDIC	A	8	ATLANTA	25,679
Embassy National Bank	LAWRENCEVILLE	GA	20070305	58413	N	OCC	A	3	ATLANTA	109,617
Carver State Bank	SAVANNAH	GA	19270101	16584	NM	FDIC	B	1	ATLANTA	42,345
Quantum National Bank	SUWANEE	GA	19951227	34110	N	OCC	A	3	ATLANTA	512,653
Mechanics & Farmers Bank	DURHAM	NC	19080301	12266	NM	FDIC	B	1	ATLANTA	265,273
Lumbee Guaranty Bank	PEMBROKE	NC	19711222	20568	NM	FDIC	N	4	ATLANTA	343,753

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List of Minority Depository Institutions

To find a specific MDI, visit the FDIC's [MDI and CDFI bank locator](#).

December 31, 2019

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
OPTUS Bank	COLUMBIA	SC	19990326	35241	NM	FDIC	B	1	ATLANTA	78,131
Citizens Bank of Chatsworth	CHATSWORTH	IL	19340101	10843	NM	FDIC	A	3	CHICAGO	33,495
American Metro Bank	CHICAGO	IL	19970129	34334	NM	FDIC	A	3	CHICAGO	80,451
GN Bank	CHICAGO	IL	19340101	29399	SB	OCC	B	1	CHICAGO	137,351
International Bank of Chicago	CHICAGO	IL	19921026	33708	NM	FDIC	A	3	CHICAGO	677,878
Pacific Global Bank	CHICAGO	IL	19951109	34089	SM	FED	A	3	CHICAGO	219,898
Millennium Bank	DES PLAINES	IL	20070702	58348	NM	FDIC	A	3	CHICAGO	153,551
Metro Bank	LOUISVILLE	KY	19970106	34308	NM	FDIC	B	6	CHICAGO	26,311
First Independence Bank	DETROIT	MI	19700514	20179	NM	FDIC	B	1	CHICAGO	295,951
Bay Bank	GREEN BAY	WI	19950821	34052	NM	FDIC	N	4	CHICAGO	108,303
Columbia Savings and Loan Association	MILWAUKEE	WI	19240101	28480	SL	FDIC	B	1	CHICAGO	21,979
Native American Bank, National Association	DENVER	CO	19870727	27026	N	OCC	N	4	DALLAS	132,849
Liberty Bank and Trust Company	NEW ORLEANS	LA	19721116	20856	NM	FDIC	B	1	DALLAS	601,545
Centinel Bank of Taos	TAOS	NM	19690301	19904	NM	FDIC	H	2	DALLAS	279,487
FirstBank	ANTLERS	OK	19010101	14331	SM	FED	N	4	DALLAS	322,210
AllNations Bank	CALUMET	OK	19010101	4051	SM	FED	N	4	DALLAS	43,346
F & M Bank	EDMOND	OK	19020101	12761	NM	FDIC	N	4	DALLAS	480,916
Bank of Grand Lake	GROVE	OK	20050609	57915	NM	FDIC	H	2	DALLAS	170,152
Bank of Cherokee County	HULBERT	OK	19081201	2327	SM	FED	N	4	DALLAS	118,707
Gateway First Bank	JENKS	OK	19350503	15118	NM	FDIC	N	4	DALLAS	1,498,327
Bank 2	OKLAHOMA CITY	OK	19030101	11521	SM	FED	N	4	DALLAS	198,963
First Security Bank and Trust Company	OKLAHOMA CITY	OK	19510406	17001	NM	FDIC	B	1	DALLAS	55,713
First National Bank and Trust Company	SHAWNEE	OK	19841029	25738	N	OCC	N	4	DALLAS	243,644
Bank of Commerce	STILWELL	OK	19030203	2320	NM	FDIC	N	4	DALLAS	131,854

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To find a specific MDI, visit the FDIC's [MDI and CDFI bank locator](#).

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$'000)
Oklahoma State Bank	VINITA	OK	19380713	15611	NM	FDIC	N	4	DALLAS	154,754
Tri-State Bank of Memphis	MEMPHIS	TN	19461216	16511	NM	FDIC	B	1	DALLAS	85,617
Citizens Savings Bank and Trust Company	NASHVILLE	TN	19040104	10319	NM	FDIC	B	1	DALLAS	97,321
International Bank of Commerce	BROWNSVILLE	TX	19841009	25679	NM	FDIC	H	2	DALLAS	1,074,874
One World Bank	DALLAS	TX	20050404	57901	NM	FDIC	A	3	DALLAS	106,645
State Bank of Texas	DALLAS	TX	19871019	27074	NM	FDIC	A	3	DALLAS	853,091
United Bank of El Paso del Norte	EL PASO	TX	20010501	57119	SM	FED	H	2	DALLAS	236,063
Freedom Bank	FREER	TX	19580712	17881	NM	FDIC	H	2	DALLAS	48,148
American First National Bank	HOUSTON	TX	19980518	34656	N	OCC	A	3	DALLAS	1,904,248
Golden Bank, National Association	HOUSTON	TX	19850503	26223	N	OCC	A	3	DALLAS	1,022,609
Southwestern National Bank	HOUSTON	TX	19971103	34319	N	OCC	A	3	DALLAS	590,447
Unity National Bank of Houston	HOUSTON	TX	19850801	26351	N	OCC	B	1	DALLAS	106,140
Commerce Bank	LAREDO	TX	19820331	23772	NM	FDIC	H	2	DALLAS	508,218
Falcon International Bank	LAREDO	TX	19861210	26856	NM	FDIC	H	2	DALLAS	1,294,446
International Bank of Commerce	LAREDO	TX	19660902	19629	NM	FDIC	H	2	DALLAS	8,724,864
Bank of South Texas	MCALLEN	TX	19860708	26727	NM	FDIC	H	2	DALLAS	137,980
Greater State Bank	MCALLEN	TX	19740101	31762	NM	FDIC	H	2	DALLAS	89,273
Rio Bank	MCALLEN	TX	19850211	25886	NM	FDIC	H	7	DALLAS	544,956
Texas National Bank	MERCEDES	TX	19201126	3337	N	OCC	H	2	DALLAS	330,035
Lone Star National Bank	PHARR	TX	19830124	24347	N	OCC	H	2	DALLAS	2,418,865

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Citizens State Bank	ROMA	TX	19780515	22657	NM	FDIC	H	2	DALLAS	87,941
First State Bank	SHALLOWATER	TX	19601008	18301	NM	FDIC	A	3	DALLAS	95,194
Wallis Bank	WALLIS	TX	19721028	20845	NM	FDIC	A	3	DALLAS	796,690
International Bank of Commerce	ZAPATA	TX	19840206	24961	NM	FDIC	H	2	DALLAS	384,273
Zapata National Bank	ZAPATA	TX	19611116	18454	N	OCC	H	2	DALLAS	86,614
Pinnacle Bank	MARSHALLTOWN	IA	19270505	252	SM	FED	N	4	KANSAS CITY	215,130
CBW Bank	WEIR	KS	18920101	13959	NM	FDIC	A	3	KANSAS CITY	86,916
Woodlands National Bank	HINCKLEY	MN	19081001	1417	N	OCC	N	4	KANSAS CITY	207,944
People's Bank of Seneca	SENECA	MO	19960315	34146	NM	FDIC	N	4	KANSAS CITY	238,507
Turtle Mountain State Bank	BELCOURT	ND	20071203	58586	NM	FDIC	N	4	KANSAS CITY	35,753
Industrial Bank	WASHINGTON	DC	19340818	14679	NM	FDIC	B	1	NEW YORK	530,840
Leader Bank, National Association	ARLINGTON	MA	20020508	57134	N	OCC	A	3	NEW YORK	1,583,299
The Harbor Bank of Maryland	BALTIMORE	MD	19820913	24015	NM	FDIC	B	6	NEW YORK	311,321
KEB Hana Bank USA, National Association	FORT LEE	NJ	19860916	26790	N	OCC	A	3	NEW YORK	243,086
New Millennium Bank	FORT LEE	NJ	19990719	35151	NM	FDIC	A	8	NEW YORK	389,647
Ponce Bank	BRONX	NY	19600331	31189	SB	OCC	H	7	NEW YORK	1,051,663
Amerasia Bank	FLUSHING	NY	19880620	27267	NM	FDIC	A	3	NEW YORK	691,915
NewBank	FLUSHING	NY	20060929	58203	NM	FDIC	A	3	NEW YORK	451,432
Abacus Federal Savings Bank	NEW YORK	NY	19841129	32257	SB	OCC	A	3	NEW YORK	353,374
Carver Federal Savings Bank	NEW YORK	NY	19480101	30394	SB	OCC	B	6	NEW YORK	571,987

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Eastbank, National Association	NEW YORK	NY	19841126	25749	N	OCC	A	3	NEW YORK	175,530
Global Bank	NEW YORK	NY	20070312	58263	NM	FDIC	A	3	NEW YORK	202,466
Piermont Bank	NEW YORK	NY	20190701	59154	NM	FDIC	A	8	NEW YORK	45,298
Popular Bank	NEW YORK	NY	19990102	34967	SM	FED	H	7	NEW YORK	10,055,910
Shinhan Bank America	NEW YORK	NY	19901018	33188	NM	FDIC	A	8	NEW YORK	1,627,721
United Orient Bank	NEW YORK	NY	19810409	23373	NM	FDIC	A	3	NEW YORK	82,908
Noah Bank	ELKINS PARK	PA	20060717	58196	NM	FDIC	A	3	NEW YORK	390,453
Asian Bank	PHILADELPHIA	PA	19990609	34759	SM	FED	A	3	NEW YORK	238,451
United Bank of Philadelphia	PHILADELPHIA	PA	19920323	33568	NM	FDIC	B	1	NEW YORK	49,442
Banco Popular de Puerto Rico	HATO REY	PR	19990102	34968	SM	FED	H	7	NEW YORK	41,627,000
Banco Santander Puerto Rico	SAN JUAN	PR	19721002	20828	NM	FDIC	H	7	NEW YORK	6,005,654
Oriental Bank	SAN JUAN	PR	19650325	31469	NM	FDIC	H	7	NEW YORK	9,253,736
FirstBank Puerto Rico	SANTURCE	PR	19490117	30387	NM	FDIC	H	7	NEW YORK	12,597,360
First Commercial Bank (USA)	ALHAMBRA	CA	19970520	34496	NM	FDIC	A	8	SAN FRANCISCO	692,103
New OMNI Bank, National Association	ALHAMBRA	CA	19800212	23086	N	OCC	A	3	SAN FRANCISCO	460,253
American Plus Bank, N.A.	ARCADIA	CA	20070808	58469	N	OCC	A	3	SAN FRANCISCO	563,445
First Choice Bank	CERRITOS	CA	20050818	57966	SM	FED	A	3	SAN FRANCISCO	1,690,431
American Continental Bank	CITY OF INDUSTRY	CA	20031006	57444	NM	FDIC	A	3	SAN FRANCISCO	269,874
United Pacific Bank	CITY OF INDUSTRY	CA	19820511	23805	NM	FDIC	A	3	SAN FRANCISCO	149,364

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Community Commerce Bank	CLAREMONT	CA	19761001	26363	NM	FDIC	H	2	SAN FRANCISCO	279,859
US Metro Bank	GARDEN GROVE	CA	20060915	58310	NM	FDIC	A	3	SAN FRANCISCO	542,288
California Business Bank	IRVINE	CA	20051101	58037	NM	FDIC	A	3	SAN FRANCISCO	82,608
Commercial Bank of California	IRVINE	CA	20030515	57417	NM	FDIC	H	2	SAN FRANCISCO	1,084,381
Bank of Hope	LOS ANGELES	CA	19860318	26610	NM	FDIC	A	8	SAN FRANCISCO	15,666,543
Broadway Federal Bank, f.s.b.	LOS ANGELES	CA	19470226	30306	SB	OCC	B	1	SAN FRANCISCO	438,033
Cathay Bank	LOS ANGELES	CA	19620419	18503	NM	FDIC	A	3	SAN FRANCISCO	18,066,529
COMMONWEALTH BUSINESS BANK	LOS ANGELES	CA	20050303	57873	SM	FED	A	3	SAN FRANCISCO	1,162,520
CTBC Bank Corp. (USA)	LOS ANGELES	CA	19650427	19416	NM	FDIC	A	8	SAN FRANCISCO	3,673,681
Eastern International Bank	LOS ANGELES	CA	19850226	32277	NM	FDIC	A	3	SAN FRANCISCO	128,700
Hanmi Bank	LOS ANGELES	CA	19821215	24170	NM	FDIC	A	8	SAN FRANCISCO	5,530,677
Open Bank	LOS ANGELES	CA	20050610	57944	NM	FDIC	A	3	SAN FRANCISCO	1,179,378
Pacific City Bank	LOS ANGELES	CA	20030918	57463	NM	FDIC	A	3	SAN FRANCISCO	1,746,302
Preferred Bank	LOS ANGELES	CA	19911223	33539	NM	FDIC	A	3	SAN FRANCISCO	4,630,165
Royal Business Bank	LOS ANGELES	CA	20081118	58816	NM	FDIC	A	8	SAN FRANCISCO	2,783,284
Gateway Bank, F.S.B.	OAKLAND	CA	19900608	33103	SB	OCC	A	3	SAN FRANCISCO	128,563
Metropolitan Bank	OAKLAND	CA	19830901	25869	NM	FDIC	A	3	SAN FRANCISCO	181,441

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
East West Bank	PASADENA	CA	19720101	31628	SM	FED	A	8	SAN FRANCISCO	44,181,503
EverTrust Bank	PASADENA	CA	19950503	34010	NM	FDIC	A	8	SAN FRANCISCO	945,202
Pacific Alliance Bank	ROSEMEAD	CA	20061227	58234	NM	FDIC	A	3	SAN FRANCISCO	269,124
First General Bank	ROWLAND HEIGHTS	CA	20051013	58060	NM	FDIC	A	3	SAN FRANCISCO	977,318
Bank of the Orient	SAN FRANCISCO	CA	19710317	20387	SM	FED	A	3	SAN FRANCISCO	894,124
California Pacific Bank	SAN FRANCISCO	CA	19801016	23242	NM	FDIC	A	3	SAN FRANCISCO	77,392
Mission National Bank	SAN FRANCISCO	CA	19820216	23749	N	OCC	A	3	SAN FRANCISCO	250,037
Asian Pacific National Bank	SAN GABRIEL	CA	19900725	33013	N	OCC	A	3	SAN FRANCISCO	56,537
Mega Bank	SAN GABRIEL	CA	20080205	58401	NM	FDIC	A	3	SAN FRANCISCO	389,990
Universal Bank	WEST COVINA	CA	19541117	30722	SB	OCC	A	3	SAN FRANCISCO	417,227
California International Bank, N.A.	WESTMINSTER	CA	20051130	57974	N	OCC	A	3	SAN FRANCISCO	42,943
Bank of Whittier, National Association	WHITTIER	CA	19821220	24211	N	OCC	A	3	SAN FRANCISCO	73,884
ANZ Guam, Inc.	HAGATNA	GU	19910111	33316	NM	FDIC	A	8	SAN FRANCISCO	335,195
Bank of Guam	HAGATNA	GU	19721211	20884	NM	FDIC	A	3	SAN FRANCISCO	1,944,695
BankPacific, Ltd	HAGATNA	GU	19530101	30692	SL	FDIC	A	3	SAN FRANCISCO	154,562
Finance Factors, Ltd.	HONOLULU	HI	19520514	25158	NM	FDIC	A	3	SAN FRANCISCO	589,208
Hawaii National Bank	HONOLULU	HI	19600916	18296	N	OCC	A	3	SAN FRANCISCO	665,004
Ohana Pacific Bank	HONOLULU	HI	20060601	58231	NM	FDIC	A	3	SAN FRANCISCO	183,814

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
OneUnited Bank	BOSTON	MA	19820802	23966	NM	FDIC	B	1	SAN FRANCISCO	654,051
Eagle Bank	POLSON	MT	20060725	58282	NM	FDIC	N	4	SAN FRANCISCO	70,491
UniBank	LYNNWOOD	WA	20061101	58407	NM	FDIC	A	3	SAN FRANCISCO	347,435
Total			Count	144						248,619,176
			<u>Count</u>	<u>Minority Status</u>						
			21	B - Black or African American						
			33	H - Hispanic American						
			73	A - Asian or Pacific Islander American						
			17	N - Native American or Alaskan Native American						
			0	M - Multi-racial American						
			<u>Class</u>	<u>Definitions of Class Types</u>						
			94	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>						
			96	FDIC - Federal Deposit Insurance Corporation						
			33	OCC - Office of the Comptroller of the Currency						
			15	FED - Federal Reserve						
			<u>Count</u>	<u>Minority Status</u>						
			18	1 - Black or African American						
			25	2 - Hispanic American						
			61	3 - Asian or Pacific Islander American						
			17	4 - Native American or Alaskan Native American						
			0	5 - Multi-racial American						
			3	6 - Minority Board and Serving African American Community						
			8	7 - Minority Board and Serving Hispanic Community						
			12	8 - Minority Board and Serving Asian or Pacific Islander Community						
			0	9 - Minority Board and Serving Native American or Alaskan Native American Community						
			0	10 - Minority Board and Serving Multi-Racial Community						

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Appendix D: List of CDFI Banks

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
THE FIRST NATIONAL BANK & TRUST	ATMORE	AL	19150101	2779	N	OCC			ATLANTA	157,662
UNITED BANK	ATMORE	AL	19040104	58	NM	FDIC			ATLANTA	711,540
ROBERTSON BANKING COMPANY	DEMOPOLIS	AL	18700101	39	NM	FDIC			ATLANTA	327,866
MERCHANTS & FARMERS BANK GREENE COUNTY, ALABAMA	EUTAW	AL	19000101	855	NM	FDIC			ATLANTA	77,494
FIRST BANK OF LINDEN	LINDEN	AL	19040507	15695	NM	FDIC			ATLANTA	80,480
COMMONWEALTH NATIONAL BANK	MOBILE	AL	19760219	22229	N	OCC	B	1	ATLANTA	49,791
SOUTHERN INDEPENDENT BANK	OPP	AL	20061204	58357	NM	FDIC			ATLANTA	252,696
WEST ALABAMA BANK & TRUST	REFORM	AL	19440729	16175	NM	FDIC			ATLANTA	644,050
THE SAMSON BANKING COMPANY INC	SAMSON	AL	19300101	16185	NM	FDIC			ATLANTA	81,106
FRIEND BANK	SLOCOMB	AL	19340101	2828	NM	FDIC			ATLANTA	134,153
THE BANK OF VERNON	VERNON	AL	19111111	51	NM	FDIC			ATLANTA	161,991
CITIZENS TRUST BANK	ATLANTA	GA	19210618	8033	SM	FED	B	1	ATLANTA	418,130
CARVER STATE BANK	SAVANNAH	GA	19270101	16584	NM	FDIC	B	1	ATLANTA	42,345
SOUTH GEORGIA BANKING COMPANY	TIFTON	GA	19700611	20198	NM	FDIC			ATLANTA	473,972
MECHANICS & FARMERS BANK	DURHAM	NC	19080301	12266	NM	FDIC	B	1	ATLANTA	265,273
SECURITY FEDERAL BANK	AIKEN	SC	19220101	31100	NM	FDIC			ATLANTA	962,701
OPTUS BANK	COLUMBIA	SC	19990326	35241	NM	FDIC	B	1	ATLANTA	78,131

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
VCC BANK	RICHMOND	VA	20080820	58658	SM	FED			ATLANTA	222,228
FIRST EAGLE BANK	CHICAGO	IL	19850214	25883	SM	FED			CHICAGO	538,085
GN BANK	CHICAGO	IL	19340101	29399	SB	OCC	B	1	CHICAGO	137,351
INTERNATIONAL BANK OF CHICAGO	CHICAGO	IL	19921026	33708	NM	FDIC	A	3	CHICAGO	677,878
PACIFIC GLOBAL BANK	CHICAGO	IL	19951109	34089	SM	FED	A	3	CHICAGO	219,898
PULASKI SAVINGS BANK	CHICAGO	IL	18900101	28611	SI	FDIC			CHICAGO	46,418
PAN AMERICAN BANK & TRUST	MELROSE PARK	IL	19951222	34108	NM	FDIC			CHICAGO	367,131
METRO BANK	LOUISVILLE	KY	19970106	34308	NM	FDIC	B	6	CHICAGO	26,311
FIRST INDEPENDENCE BANK	DETROIT	MI	19700514	20179	NM	FDIC	B	1	CHICAGO	295,951
BAY BANK	GREEN BAY	WI	19950821	34052	NM	FDIC	N	4	CHICAGO	108,303
COLUMBIA SAVINGS & LOAN ASSOCIATION	MILWAUKEE	WI	19240101	28480	SL	FDIC	B	1	CHICAGO	21,979
MITCHELL BANK	MILWAUKEE	WI	19070101	13029	NM	FDIC			CHICAGO	47,240
SOUTHERN BANCORP BANK	ARKADELPHIA	AR	18840301	1528	SM	FED			DALLAS	1,495,986
FNBC BANK	ASH FLAT	AR	19120101	1294	SM	FED			DALLAS	529,463
FBT BANK & MORTGAGE	FORDYCE	AR	19340101	1028	SM	FED			DALLAS	166,957
PARTNERS BANK	HELENA	AR	19400401	15729	N	OCC			DALLAS	206,427
BANK OF LAKE VILLAGE	LAKE VILLAGE	AR	19340101	15547	SM	FED			DALLAS	64,086
UNION BANK & TRUST COMPANY	MONTICELLO	AR	18870401	1753	NM	FDIC			DALLAS	207,960
FIRST SOUTHWEST BANK	ALAMOSA	CO	20040709	57741	NM	FDIC			DALLAS	332,974

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS Alpha	MINORITY STATUS Num.	FDIC REGION	TOTAL ASSETS (\$000)
NATIVE AMERICAN BANK, NATIONAL ASSOCIATION	DENVER	CO	19870727	27026	N	OCC	N	4	DALLAS	132,849
FARMERS-MERCHANTS BANK & TRUST COMPANY	BREAUX BRIDGE	LA	19340101	9327	NM	FDIC			DALLAS	334,893
COLFAX BANKING COMPANY	COLFAX	LA	19010101	8140	NM	FDIC			DALLAS	113,206
CALDWELL BANK & TRUST COMPANY	COLUMBIA	LA	19020101	11785	NM	FDIC			DALLAS	162,847
HOMELAND FEDERAL SAVINGS BANK	COLUMBIA	LA	19860312	32459	SB	OCC			DALLAS	343,253
COTTONPORT BANK	COTTONPORT	LA	19020702	8798	NM	FDIC			DALLAS	370,041
COMMERCIAL CAPITAL BANK	DELHI	LA	19990222	34784	NM	FDIC			DALLAS	167,203
GUARANTY BANK & TRUST COMPANY OF DELHI, LOUISIANA	DELHI	LA	19661015	19638	NM	FDIC			DALLAS	296,830
CATAHOULA - LASALLE BANK	JONESVILLE	LA	19340101	10532	NM	FDIC			DALLAS	181,897
PROGRESSIVE NATIONAL BANK	MANSFIELD	LA	19830328	24443	N	OCC			DALLAS	74,975
BOM BANK	MONTGOMERY	LA	19031005	1373	NM	FDIC			DALLAS	506,584
LIBERTY BANK & TRUST COMPANY	NEW ORLEANS	LA	19721116	20856	NM	FDIC	B	1	DALLAS	601,545
TENSAS STATE BANK	NEWELLTON	LA	19220101	8533	NM	FDIC			DALLAS	159,349
ST LANDRY HOMESTEAD FEDERAL SAVINGS BANK	OPELOUSAS	LA	19020902	29804	SB	OCC			DALLAS	218,640
BANK OF ST FRANCISVILLE	SAINT FRANCISVIL	LA	19781030	22739	NM	FDIC			DALLAS	153,202
CROSS KEYS BANK	SAINT JOSEPH	LA	19020402	9322	NM	FDIC			DALLAS	403,601
CONCORDIA BANK & TRUST COMPANY	VIDALIA	LA	19030701	8527	NM	FDIC			DALLAS	533,363
DELTA BANK	VIDALIA	LA	19860110	26564	NM	FDIC			DALLAS	309,638

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CITIZENS PROGRESSIVE BANK	WINNSBORO	LA	19180101	10531	NM	FDIC			DALLAS	165,257
FRANKLIN STATE BANK & TRUST COMPANY	WINNSBORO	LA	19080101	11792	NM	FDIC			DALLAS	179,153
WINNSBORO STATE BANK & TRUST COMPANY	WINNSBORO	LA	19020902	10533	NM	FDIC			DALLAS	230,525
BANK OF ZACHARY	ZACHARY	LA	19340101	306	NM	FDIC			DALLAS	240,440
AMORY FEDERAL SAVINGS AND LOAN ASSOCIATION	AMORY	MS	19340601	28949	SB	OCC			DALLAS	80,565
BANK OF ANGUILLA	ANGUILLA	MS	19040101	8243	NM	FDIC			DALLAS	139,592
FARMERS & MERCHANTS BANK	BALDWIN	MS	19410310	15801	SM	FED			DALLAS	347,381
FIRST SECURITY BANK	BATESVILLE	MS	19520701	17120	NM	FDIC			DALLAS	580,035
MAGNOLIA STATE BANK	BAY SPRINGS	MS	19750804	22081	NM	FDIC			DALLAS	339,343
BANKPLUS	BELZONI	MS	19090101	5903	NM	FDIC			DALLAS	2,971,297
GUARANTY BANK & TRUST COMPANY	BELZONI	MS	19430517	15953	NM	FDIC			DALLAS	1,040,564
BANK OF BROOKHAVEN	BROOKHAVEN	MS	20000131	35439	NM	FDIC			DALLAS	163,577
CITIZENS BANK	BYHALIA	MS	19191101	11432	NM	FDIC			DALLAS	76,189
THE CLEVELAND STATE BANK	CLEVELAND	MS	19080208	12201	NM	FDIC			DALLAS	230,782
CITIZENS BANK	COLUMBIA	MS	19140715	324	NM	FDIC			DALLAS	421,145
BANKFIRST FINANCIAL SERVICES	COLUMBUS	MS	18880601	8870	SM	FED			DALLAS	1,278,148
THE COMMERCIAL BANK	DE KALB	MS	19141201	9356	NM	FDIC			DALLAS	162,688
THE JEFFERSON BANK	GREENVILLE	MS	19010103	11445	NM	FDIC			DALLAS	124,815

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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 COMMERCE	GREENWOOD	MS	19040804	9359	NM	FDIC			DALLAS	569,937
STATE BANK & TRUST COMPANY	GREENWOOD	MS	18981101	8878	NM	FDIC			DALLAS	1,150,836
THE FIRST A NATIONAL BANK ASSOCIATION	HATTIESBURG	MS	19960805	34217	N	OCC			DALLAS	3,934,554
COPIAH BANK	HAZLEHURST	MS	19340101	8231	SM	FED			DALLAS	227,306
MERCHANTS & FARMERS BANK	HOLLY SPRINGS	MS	18990315	11446	NM	FDIC			DALLAS	102,939
PLANTERS BANK & TRUST COMPANY	INDIANOLA	MS	19200410	8235	NM	FDIC			DALLAS	1,098,217
FIRST AMERICAN NATIONAL BANK	IUKA	MS	19640905	19226	N	OCC			DALLAS	274,497
BANK OF KILMICHAEL	KILMICHAEL	MS	19040916	9775	NM	FDIC			DALLAS	178,940
HOLMES COUNTY BANK & TRUST COMPANY	LEXINGTON	MS	19320101	321	NM	FDIC			DALLAS	120,102
PRIORITYONE BANK	MAGEE	MS	19750127	21906	NM	FDIC			DALLAS	696,736
CITIZENS BANK & TRUST CO.	MARKS	MS	19170817	9777	NM	FDIC			DALLAS	146,951
PIKE NATIONAL BANK	MCCOMB	MS	19850930	26379	N	OCC			DALLAS	253,845
BANK OF FRANKLIN	MEADVILLE	MS	19120112	10594	NM	FDIC			DALLAS	146,168
PEOPLES BANK	MENDENHALL	MS	19081105	9366	NM	FDIC			DALLAS	309,299
GREAT SOUTHERN BANK	MERIDIAN	MS	19340101	8552	SM	FED			DALLAS	294,044
THE CITIZENS NATIONAL BANK OF MERIDIAN	MERIDIAN	MS	18880101	4993	N	OCC			DALLAS	1,421,227
UNITED MISSISSIPPI BANK	NATCHEZ	MS	19730514	21083	NM	FDIC			DALLAS	350,113
BNA BANK	NEW ALBANY	MS	18960101	19448	NM	FDIC			DALLAS	515,398
BANK OF OKOLONA	OKOLONA	MS	19310131	5902	NM	FDIC			DALLAS	206,590

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FNB OXFORD BANK	OXFORD	MS	19101010	5005	SM	FED			DALLAS	367,278
OXFORD UNIVERSITY BANK	OXFORD	MS	20001127	57034	NM	FDIC			DALLAS	168,631
MERCHANTS & MARINE BANK	PASCAGOULA	MS	19320111	12203	NM	FDIC			DALLAS	576,804
MERCHANTS & PLANTERS BANK	RAYMOND	MS	19060201	327	NM	FDIC			DALLAS	91,107
RICHTON BANK & TRUST COMPANY	RICHTON	MS	19310101	11817	NM	FDIC			DALLAS	55,663
SYCAMORE BANK	SENATOBIA	MS	19000313	11423	NM	FDIC			DALLAS	227,265
RIVERHILLS BANK	VICKSBURG	MS	18900201	8234	NM	FDIC			DALLAS	327,551
MECHANICS BANK	WATER VALLEY	MS	18920101	12206	NM	FDIC			DALLAS	230,335
FIRST STATE BANK	WAYNESBORO	MS	19390501	15663	NM	FDIC			DALLAS	809,576
BANK OF WINONA	WINONA	MS	18850615	12207	NM	FDIC			DALLAS	122,938
BANK OF CHEROKEE COUNTY	HULBERT	OK	19081201	2327	SM	FED	N	4	DALLAS	118,707
BANK 2	OKLAHOMA CITY	OK	19030101	11521	SM	FED	N	4	DALLAS	198,963
SECURITY STATE BANK OF OKLAHOMA	WEWOKA	OK	19111205	8980	NM	FDIC			DALLAS	263,177
INSOUTH BANK	BROWNSVILLE	TN	18690101	22020	NM	FDIC			DALLAS	331,525
TRI-STATE BANK OF MEMPHIS	MEMPHIS	TN	19461216	16511	NM	FDIC	B	1	DALLAS	85,617
CITIZENS SAVINGS BANK & TRUST COMPANY	NASHVILLE	TN	19040104	10319	NM	FDIC	B	1	DALLAS	97,321
SECURITY BANK AND TRUST COMPANY	PARIS	TN	19340101	9172	NM	FDIC			DALLAS	468,632
GOLDEN BANK, NATIONAL ASSOCIATION	HOUSTON	TX	19850503	26223	N	OCC	A	3	DALLAS	1,022,609
TEXAS NATIONAL BANK	MERCEDES	TX	19201126	3337	N	OCC	H	2	DALLAS	330,035
CBW BANK	WEIR	KS	18920101	13959	NM	FDIC	A	3	KANSAS CITY	86,916

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SUNRISE BANKS NATIONAL ASSOCIATION	SAINT PAUL	MN	19620717	18561	N	OCC			KANSAS CITY	1,179,926
CENTURY BANK OF THE OZARKS	GAINESVILLE	MO	18940724	8296	SM	FED			KANSAS CITY	178,904
CENTRAL BANK OF KANSAS CITY	KANSAS CITY	MO	19500810	17009	NM	FDIC			KANSAS CITY	238,195
LEGACY BANK & TRUST COMPANY	ROGERSVILLE	MO	19071017	22319	SM	FED			KANSAS CITY	302,620
NEW HAVEN BANK (Formerly START COMMUNITY BANK)	NEW HAVEN	CT	20101220	58952	SM	FED			NEW YORK	147,685
CITY FIRST BANK OF D.C. NATIONAL ASSOCIATION	WASHINGTON	DC	19981124	34352	N	OCC			NEW YORK	366,154
INDUSTRIAL BANK	WASHINGTON	DC	19340818	14679	NM	FDIC	B	1	NEW YORK	530,840
THE HARBOR BANK OF MARYLAND	BALTIMORE	MD	19820913	24015	NM	FDIC	B	6	NEW YORK	311,321
PONCE BANK	BRONX	NY	19600331	31189	SB	OCC	H	7	NEW YORK	1,051,663
SPRING BANK	BRONX	NY	20071026	58668	NM	FDIC			NEW YORK	193,627
CARVER FEDERAL SAVINGS BANK	NEW YORK	NY	19480101	30394	SB	OCC	B	6	NEW YORK	571,987
QUONTIC BANK	NEW YORK	NY	20050314	57807	SB	OCC			NEW YORK	394,658
SAVOY BANK	NEW YORK	NY	20080115	58641	NM	FDIC			NEW YORK	382,692
NOAH BANK	ELKINS PARK	PA	20060717	58196	NM	FDIC	A	3	NEW YORK	390,453
UNITED BANK OF PHILADELPHIA	PHILADELPHIA	PA	19920323	33568	NM	FDIC	B	1	NEW YORK	49,442
AMERICAN PLUS BANK N A	ARCADIA	CA	20070808	58469	N	OCC	A	3	SAN FRANCISCO	563,445
FIRST CHOICE BANK	CERRITOS	CA	20050818	57966	SM	FED	A	3	SAN FRANCISCO	1,690,431
COMMUNITY COMMERCE BANK	CLAREMONT	CA	19761001	26363	NM	FDIC	H	2	SAN FRANCISCO	279,859

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BROADWAY FEDERAL BANK fsb	LOS ANGELES	CA	19470226	30306	SB	OCC	B	1	SAN FRANCISCO	438,033
ROYAL BUSINESS BANK	LOS ANGELES	CA	20081118	58816	NM	FDIC	A	8	SAN FRANCISCO	2,783,284
BENEFICIAL STATE BANK	OAKLAND	CA	20070627	58490	NM	FDIC			SAN FRANCISCO	1,036,536
COMMUNITY BANK OF THE BAY	OAKLAND	CA	19960722	34210	NM	FDIC			SAN FRANCISCO	493,806
FIRST GENERAL BANK	ROWLAND HEIGHTS	CA	20051013	58060	NM	FDIC	A	3	SAN FRANCISCO	977,318
NEIGHBORHOOD NATIONAL BANK	SAN DIEGO	CA	19970919	34548	N	OCC			SAN FRANCISCO	67,366
MISSION NATIONAL BANK	SAN FRANCISCO	CA	19820216	23749	N	OCC	A	3	SAN FRANCISCO	250,037
MISSION VALLEY BANK	SUN VALLEY	CA	20010712	57101	NM	FDIC			SAN FRANCISCO	355,050
ONEUNITED BANK	BOSTON	MA	19820802	23966	NM	FDIC	B	1	SAN FRANCISCO	654,051
Total			Count	138						58,325,151

<u>Count</u>	<u>Minority Status</u>
18	B - Black or African American
3	H - Hispanic American
10	A - Asian or Pacific Islander American
4	N - Native American or Alaskan Native American
0	M - Multi-racial American

<u>Class</u>	<u>Definitions of Class Types</u>
93	NM - State bank, not a member of the Federal Reserve
19	SM - State bank, member of the Federal Reserve
16	N - National bank
8	SB - State or Federal savings bank
1	SI - Savings Institution
1	SL - State or Federal savings and loan association

<u>Regulator</u>	<u>Definitions by Primary Federal Supervisory Agency</u>
95	FDIC - Federal Deposit Insurance Corporation
24	OCC - Office of the Comptroller of the Currency
19	FED - Federal Reserve

FDIC

