**Community Reinvestment Act (CRA) Best Practices**

**Summary:**

Controls must be in place to ensure that your policies and procedures are being followed. Perform periodic reviews of your policies and procedures to determine whether changes are needed.

**CRA Public File – Must be updated by April 1 of each year**

* Responsibilities of Financial Institution
	+ Have written procedures
	+ Branch Information
	+ Census Reports
	+ HMDA Confirmation Letters
	+ Public HMDA Disclosure Statements
	+ Average Loan to Deposit Ratio
	+ Bank Assessment Area maps
	+ Customer Complaints
	+ Public Section of Performance Evaluation (within 30 days of receipt)
	+ CRA Policy/Disclosure Statement
	+ Services and Products

**\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\***

**CRA Working File**

* + Interview Memo’s
	+ Reports
		- CRA Qualified Loans 20XX
		- Non-Profit Customer List
		- Community Leaders and Organizations
		- WHEDA
		- Down Payment Plus
	+ Meeting Minutes
	+ Procedures
	+ Calendar
	+ CRA Service Activity Log
		- Date of Event or Service
		- Employee Name
		- Name of community organization
		- Office(s) held by employee
		- Estimated annual hours
	+ Know your Banks’ data
		- Lending
			* Loan Portfolio mix
			* New or innovative products
			* Denial rates to minorities vs. white
			* Denial comparison’s to competitors
			* Percentage of loans made in each assessment area
			* Percentage of loans made in each assessment area to low and moderate income people
		- Investment
			* List of investment made since last exam and why
			* List of historical investments made and level of performance
		- Service
			* CRA related activities by bank employees
			* Information on seminars including number of attendees
			* CRA related Donations
	+ Strategic Plan
	+ Annual Recap of Accomplishments