***NOTICE****: The following has been provided by WBA committee and section volunteers for use by member banks.   
It should be reviewed and revised as appropriate to the user-bank’s own policies, procedures, and practices.*

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

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 memos
* 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 bank’s data
  + Lending
    - Loan portfolio mix
    - New or innovative products
    - Denial rates to minorities vs. white customers
    - Denial comparisons to competitors
    - Percentage of loans made in each assessment area
    - Percentage of loans made in each assessment area to people of low and moderate income
  + 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