***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