

CRA Public File / Notice Audit Program

1. Obtain and review the Board of Directors meeting minutes to determine who the bank has designated as the CRA Officer.
2. Per discussion with the Bank's CRA Officer, create a narrative to describe the review process by the CRA Officer over the bank's CRA public file including how often the public file is updated, how changes are distributed to the branches, and how the CRA Officer monitors for compliance. Determine if procedures appear adequate.
3. Go to the FDIC website at the following address, <http://www2.fdic.gov/crapes> and view the bank's most recent CRA performance evaluation (see Exhibit A for sample). Document the date of the exam (note, some evaluations can be up to 2 years behind).

Date of CRA Performance Evaluation:

CRA Public File – information available to the public ([12 CFR 228.43](#) (a))

4. Obtain the Bank's CRA Public File and review to ensure the file contains all of the items below: (under Regulation BB (12 CFR 228.43) - The bank must ensure that the information required by this section is current as of April 1ST of each year)
 - a. Ensure file contains all written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law. Note, if a comment relates to a specific branch, a copy of that comment and response must also be maintain in the related branch's public file as well as the main office public file; if no comments, describe how file represents that there are no comments;
 - b. Ensure file contains a copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the Regulator. Note, if the bank had less than a satisfactory rating, complete audit program step 10.

Bank's rating:

1. Ensure agreement between the date on the evaluation to the date on the evaluation obtained from the regulators website (step 3) to verify that it the most current version.

Date of Evaluation:

2. Obtain and review the minutes of the board of directors meeting where the last CRA performance evaluation was performed and discussed and ensure that the bank has placed this copy in the public file within 3 days after its receipt.

Date of Board Meeting:

- c. Ensure file contains a list of the bank's branches, their street addresses, and geographies;
- d. Ensure the file contains a list of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses, and geographies;
- e. Ensure the file contains a list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. At its option, a bank may include information regarding the availability of alternative systems for delivering retail banking services (e.g., ATMs, ATMs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs);
- f. Ensure the file contains a map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list; if bank's maps are in color and cannot be seen on copy to be included in the workpapers, note on workpaper if the bank had properly defined in detail the assessment area on their map in the file.
- g. Determine if file contains any other information the bank chooses. If other information is in the file, describe the contents.

CRA Public File – additional information available to the public ([12 CFR 228.43](#) (b)(1))

5. Obtain the most recent quarterly Call Report and determine the size of the bank under review. Under Regulation BB 12 CFR 228.12:

Small bank: a bank that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.109 billion

Intermediate-small bank: a small bank with assets of at least \$277 million as of December 31 of both of the prior two calendar years and less than \$1.109 billion as of December 31 of either of the prior two calendar years

Large Bank: A bank that does not meet the above two definitions of a small and intermediate small bank

(example: 2007 \$250 million, 2008 \$500 million, bank is small)

(example: 2007 \$500 million, 2008 \$750 million, bank is intermediate small)

Asset Size 12/31/___:

\$ _____

Million

Billion

Asset Size 12/31/___:

\$ _____

Million

Billion

Bank Size:

Small (skip step 6 & 7)

Intrmed/ small

Large

6. Is the bank an intermediate-small or large bank? If yes, ensure the bank includes in its public file the bank's CRA Disclosure Statement for each of the prior two calendar years. Ensure the bank places the statement in the public file within 3 business days of its receipt from the Regulator.

Disclosure Statements on file for:

Calendar Year _____

Calendar Year _____

7. Is the bank an intermediate-small or large bank? If yes, has the bank elected to have one or more categories of its consumer loans considered under the lending test? If yes, ensure the bank's public file includes the number and amount of loans for each of the prior two calendar years:

(A) To low-, moderate-, middle-, and upper-income individuals;

(B) Located in low-, moderate-, middle-, and upper-income census tracts; and

(C) Located inside the bank's assessment area(s) and outside the bank's assessment area(s); and

Consumer Loans considered under the lending test?

Y or N

CRA Public File – banks required to report Home Mortgage Disclosure Act (HMDA) data ([12 CFR 228.43 \(b\)\(2\)](#))

8. Is the bank required to report HMDA data? If yes, ensure the public file includes a copy of the HMDA Disclosure Statement provided by the Federal Financial Institutions Examination Council pertaining to the bank for each of the prior two calendar years (See sample on Exhibit C).

Bank reports HMDA?

Y or N

Disclosure Statements on file for:

Calendar Year _____

Calendar Year _____

9. Has the bank elected to have the Board consider the mortgage lending of an affiliate for any of these years? If yes, ensure the public file includes the affiliate's HMDA Disclosure Statement for those years.

Affiliate?

Y or N

Affiliate Disclosure statements on file for:

Calendar Year _____

Calendar Year _____

CRA Public File – Small Banks ([12 CFR 228.43 \(b\)\(3\)](#))

10. Was the bank a small bank or a bank that was a small bank during the prior calendar year? If yes, ensure the public file includes the bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio. *Small Bank? Y or N*

CRA Public File – Banks with Strategic Plans ([12 CFR 228.43](#) (b)(4))

11. Has the bank been approved to be assessed under a strategic plan? If yes, ensure the public file includes a copy of that plan. A bank need not include information submitted to the Board on a confidential basis in conjunction with the plan.

Strategic Plan Assess?

Y or N

CRA Public File – Banks with Less than Satisfactory Ratings ([12 CFR 228.43](#) (b)(5))

12. Has the bank received a less than satisfactory rating during its most recent examination? If yes, ensure the public file includes a description of its current efforts to improve its performance in helping to meet the credit needs of its entire community. Ensure the bank updates the description quarterly.

Less than Satisfactory?

Y or N

CRA Public Notice – ([12 CFR 228.44](#))

13. Request a copy of the bank’s CRA lobby notice for the main office and review to ensure language is in compliance with 12 CFR 228 Appendix B(a) (see Exhibit B).

- a. Ensure all language is compliant by comparing the banks notice to Exhibit B.
- b. Ensure the Regulator name and address is accurate.
- c. Ensure the name and address of the CRA Officer is accurate by comparing the name of the CRA Officer on the notice to that approved by the Board of Directors obtained in audit program step 1 above.
- d. Does the bank have more than one assessment area? If so, ensure the bracketed material in the notice for branch offices is included as per 12 CFR 228 Appendix B.
- e. Is the Bank an affiliate of a holding company? If yes, ensure the notice includes the next to the last sentence of the notice in Appendix B.

Affiliate of Holding Co?

Y or N

- f. Is the bank an affiliate of a holding company that is not prevented by statute from acquiring additional banks? If yes, ensure the notice includes the last sentence of the notice in Appendix B.

Affiliate of Holding Co?

Y or N

Exhibit A - Sample CRA Performance Evaluation

CRA Examination Procedures **Sample Large Bank Performance Evaluation***

Public Disclosure

(Date of Evaluation)**

**Community Reinvestment Act
Performance Evaluation**

**Name of Depository Institution
Institution's Identification Number**

Mailing Address of Institution

Name of Supervisory Agency

Address of Supervisory Office

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

* This is a sample created for a large, multistate institution and should be adjusted, as appropriate, to reflect the scope of the institution's operations. Refer to the "Instructions for Writing Public Evaluations" section of this booklet for further guidance.

** Use the start date of the onsite examination reported in the type 02 or type 99 analysis that supports the CRA rating.

Exhibit B – Regulation BB 12 CFR 228 - Appendix B (a) – Notice for main offices and, if an interstate bank, one branch office in each state

Community Reinvestment Act Notice

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Federal Reserve Bank of _____ (Reserve Bank); and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from (title of responsible official), Federal Reserve Bank of _____ (address). You may send written comments about our performance in helping to meet community credit needs to (name and address of official at bank) and (title of responsible official), Federal Reserve Bank of _____ (address). Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of (name of holding company), a bank holding company. You may request from (title of responsible official), Federal Reserve Bank of _____ (address) an announcement of applications covered by the CRA filed by bank holding companies.

Exhibit C – Regulation BB 12 CFR 228.43 (B) (2) – HMDA Disclosure Statement

SUMMARY TABLE BW: LOAN PRICING INFORMATION FOR CONVENTIONAL LOANS BY INCIDENCE AND LEVEL, 2007

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INSTITUTION: 0000034259 - 3 CROWN BANK

INSTITUTION'S NATIONWIDE TOTALS

PRICING INFORMATION	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
1- TO 4-FAMILY OWNER OCCUPIED DWELLINGS (EXCLUDES MANUFACTURED HOMES)							
INCIDENCE OF PRICING							
NO PRICING REPORTED 15/	2		3	1	2		NA
PRICING REPORTED	1	2	1				NA
MEAN 30/ (POINTS ABOVE TREASURY: ONLY INCLUDE LOANS WITH APR ABOVE THE THRESHOLD 16/)	4.71	9.55	3.88				NA
MEDIAN 31/ (POINTS ABOVE TREASURY: ONLY INCLUDE LOANS WITH APR ABOVE THE THRESHOLD 16/)	4.71	9.55	3.88				NA
HOEPA STATUS							
HOEPA LOAN 17/	NA	NA					NA
NOT HOEPA LOAN	NA	NA	4	1	2		NA
MANUFACTURED HOME OWNER OCCUPIED DWELLINGS							
INCIDENCE OF PRICING							
NO PRICING REPORTED 15/							NA
PRICING REPORTED							NA
MEAN 30/ (POINTS ABOVE TREASURY: ONLY INCLUDE LOANS WITH APR ABOVE THE THRESHOLD 16/)							NA
MEDIAN 31/ (POINTS ABOVE TREASURY: ONLY INCLUDE LOANS WITH APR ABOVE THE THRESHOLD 16/)							NA
HOEPA STATUS							
HOEPA LOAN 17/	NA	NA					NA
NOT HOEPA LOAN	NA	NA					NA

Report Date: 5/22/2008