

SAMPLE STRATEGIC PLAN INSTITUTION EVALUATION\*

**PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Name of Depository Institution  
Institution's Identification Number

Address of Institution

Name of Supervisory Agency

Address of Supervisory Agency

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. 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 table of contents is a sample for a large institution, and should be adjusted, as appropriate, to reflect the requirements of Section 807 of the CRA (12 USC 2906), and each institution's operations.

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## **INSTITUTION**

***INSTITUTION'S CRA RATING:*** This institution is rated \_\_\_\_\_.

Summarize the major factors supporting the institution's rating. When evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs has been identified in the supervisory process, the conclusion must include a statement if the rating was influenced by this evidence. The conclusion should not mention any technical violations.

### **SCOPE OF EXAMINATION**

Write a short description of the scope of the examination. Discuss how CRA activities were reviewed (using full-scope or limited-scope review). Include a description of loan samples used in your analysis. When appropriate, you may also refer the reader to a chart similar to that included in Appendix A.

### **CONCLUSIONS**

Summarize the facts, data, and analyses that were used to determine the overall rating, based on the institution's plan goals and actual performance under the plan. The discussion should be organized broadly around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Write a paragraph about the institution's record of complying with laws relating to discrimination or other illegal credit practices inconsistent with helping to meet community credit needs using the following guidelines:

If no substantive violations were found, state that no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate.

When substantive violations involving discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs have been identified, state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulation(s) violated, the extent of the violation(s) (e.g., widespread, or limited to a particular office, division, subsidiary, or affiliate) and characterize management's responsiveness in acting upon the issue(s). Discuss whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices. State whether management has taken, or has committed to take, corrective action particularly with respect to voluntary corrective action resulting from self-assessment(s).

## MULTISTATE METROPOLITAN AREA

***CRA RATING FOR (Name of Multistate Metropolitan Area and States)*** \_\_\_\_\_

*[Complete for each multistate metropolitan area where an institution has branches in two or more states within the multistate metropolitan area.]*

Summarize the major factors supporting the institution's multistate metropolitan area rating. When evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs has been identified in the supervisory process, the conclusion must include a statement if the rating was influenced by this evidence. The conclusion should not mention any technical violations.

### **SCOPE OF EXAMINATION**

Write a short description of the scope of the examination within the multistate metropolitan area. Discuss how CRA activities in the multistate metropolitan area were reviewed (using full-scope or limited-scope review). When appropriate, you may also refer the reader to a chart similar to that included in Appendix A.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of Multistate Metropolitan Area)**

Describe the institution's operations within the multistate metropolitan area, including a description of each of the assessment areas that it serves within the multistate metropolitan area. Indicate how many of these assessment areas were reviewed using a full-scope review.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of Multistate Metropolitan Area and States)**

Discuss the institution's CRA performance within the multistate metropolitan area. The facts, data, and analyses that were used to form a conclusion about the rating, as well as the institution's record in assessment areas in the multistate metropolitan area that were examined using a limited-scope review, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as

applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institution's assessment area(s) are smaller than the boundaries of the multistate metropolitan area, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

## STATE

**CRA RATING FOR (Name of State):** \_\_\_\_\_

*[If the institution has branches in more than one state, complete this section for each state. Otherwise, complete the metropolitan area and nonmetropolitan statewide area presentations only, as applicable.]*

Summarize the major factors supporting the institution's state rating. When evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs has been identified in the supervisory process, the conclusion must include a statement if the rating was influenced by this evidence. The conclusion should not mention any technical violations.

### SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the state. Discuss how CRA activities in the state were reviewed (using full-scope or limited-scope review). When appropriate, you may also refer the reader to a chart similar to that included in Appendix A.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of State)

Describe the institution's operations within the state and the assessment area(s) that it serves. Information that may be important includes: total statewide assets; asset/loan portfolio mix; primary business focus; branching network; any merger or acquisition activity; and a brief description of the assessment areas within the state.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of State)

Discuss the institution's CRA performance within the state. The facts, data, and analyses that were used to form a conclusion about the rating, based on the institution's plan goals and actual performance under the plan, should be reflected in the narrative. The discussion should be organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

## METROPOLITAN AREAS

### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN *(Name of Metropolitan Area and State)*

Discuss the institution's CRA performance within the metropolitan area. The facts, data, and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the metropolitan areas that were examined using a limited-scope review, should be reflected in the performance evaluation. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institution's assessment area(s) are smaller than the boundaries of the metropolitan area, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.



## **NONMETROPOLITAN STATEWIDE AREAS**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Nonmetropolitan Statewide Area and State)***

Discuss the institution's CRA performance within the nonmetropolitan statewide area. The facts, data, and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the nonmetropolitan statewide area that were examined using a limited-scope review, should be reflected in the performance evaluation. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

A discussion of the assessment areas examined using a full-scope review should be included. Refer to the assessment area discussion, below.

## ASSESSMENT AREA

*(for each assessment area examined using a full-scope review)*

Charts or tables may be useful in depicting information throughout the assessment area presentation.

### DISCUSSION OF PERFORMANCE IN (ASSESSMENT AREA NAME):

**[Repeat for each assessment area.]**

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR EDEN PRAIRIE AND DAVIS COUNTIES IN MINNESOTA TO OBTAIN SATISFACTORY RATING		
Sample	Strategic Plan Goal	Actual Performance
	1. \$1.5 million in small farm loans	1. \$1.32 million in loans
	2. \$2.0 million in loans to small businesses	2. \$3.7 million in loans.
	3. \$.5 million in loans to start-up businesses	3. \$.39 million in loans.
	4. Provide construction/permanent financing for 24-unit elderly low-income housing project	4. Construction line of credit approved for \$960,000. \$100,000 disbursed to date.

Summarize the facts, data, and analyses that were used to form a conclusion on the institution's performance in the assessment area. This should compare and contrast the institution's plan goals for the assessment area and actual performance under the plan. Explain variances between the plan and actual results. If the institution has not substantially met its goals, discuss the performance context and its impact on the conclusion. The discussion should be organized around the lending, investment and service goals, as applicable. Use the chart above to supplement the written summary, and note whether the analysis was conducted using a full-scope review.

## ASSESSMENT AREA

*(for those assessment areas that were examined using a limited-scope review. Multiple assessment areas within the same multistate metropolitan area, metropolitan area, or nonmetropolitan statewide area and examined using a limited-scope review, may be combined into one presentation.)*

Charts or tables may be useful in depicting information throughout the presentation.

### **DISCUSSION OF PERFORMANCE IN *(Name of Assessment Area)***

Summarize the facts and data that were reviewed and indicate whether the institution's performance in the area reviewed is consistent with the institution's record in the multistate metropolitan area, metropolitan area, or nonmetropolitan statewide area.

APPENDIX A

**SCOPE OF EXAMINATION TABLE**

Charts that illustrate the scope of the examination may be useful for large institutions with multiple assessment areas or institution's that use data from their affiliates. Charts, such as the ones below, may be used as a supplement to the discussion of the scope or in lieu thereof.

<b>SCOPE OF EXAMINATION</b> [SAMPLE]		
[Note: Example provided for clarity]		
<b>TIME PERIOD REVIEWED</b>	1/1/95 TO 6/30/96	
<b>FINANCIAL INSTITUTION</b> XYZ National Bank, Eden Prairie, MN		<b>PRODUCTS REVIEWED</b> Small Business Small Farm
<b>FINANCIAL INSTITUTION/ AFFILIATE</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>
XYZ Bancorp, Blue Earth, MN	Holding Company	Investments
XYZ Community Development Corporation, Blue Earth, MN	Holding company subsidiary	Investments
XYZ Savings Bank, Blue Earth, MN	Thrift - Holding company subsidiary	Mortgage lending
XYZ National Bank, Tampa, FL	Holding company subsidiary	Credit Cards

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
MINNESOTA Davis County and Eden Prairie County (contiguous counties)	Full-scope review		
FLORIDA City of Tampa	Limited-scope review		

APPENDIX B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

State or Multistate Metropolitan area Name	State Rating