



City of Cambridge

9.

IN CITY COUNCIL

October 15, 1990

COUNCILLOR WALSH

WHEREAS: The sharing of information with various sectors of the community by for-profit and non-profit institutions within the community is a community's lifeblood and, in few places is this truth more telling than in the pivotal position which financial institutions occupy in our community; and

WHEREAS: In 1978 the federal Community Reinvestment Act (CRA) was passed which requires every regulated financial institution to help meet the credit needs of the communities in which they are chartered, including the credit needs of low and moderate income residents and, to assure and advance compliance with the CRA, a CRA Rating System was initiated which specifies Performance Categories and Assessment Factors which must be considered in evaluating compliance with CRA on a bank by bank and community by community basis. (A copy of CRA Rating System Assessment Report is attached; and

WHEREAS: In 1989 a change was made in CRA whereby effective on July 1, 1990, Community Reinvestment Reports are to be made available by individual banks to the general public for examination and critique. Since this new policy has been operative for but a short time, it may be momentarily premature to expect exhaustive data to emerge at once, but the attached copies of the factors to be evaluated indicate that, among other things, there is tremendous potential and opportunity for local banks to be catalysts for affordable housing, both owned and rented, within this community whose credit needs they are urged to help; now therefore be it

RESOLVED: That it is the sense of this City Council that the Community Reinvestment Act, its evaluation process of individual banks and newly effective right of access by the public to the result of these evaluations are a powerful source of knowledge-sharing in Cambridge with the potential for mutually beneficial effects for both the Cambridge community and the financial institutions. To share this knowledge, not as adversaries but as advocates for complete community development, suggests that we begin an ongoing, long term dialogue with the principals of the banks in Cambridge so that we may assist them in meeting the high standards sought in the CRA Report so far as participation in the total life in all of Cambridge neighborhoods is concerned; and be it further

RESOLVED:

It is the request of this City Council that, as a first step, Her Honor, the Mayor, host a "Community in Conversation" get-together as soon as possible to which will be invited the Chief Executive Officer of each financial institution in Cambridge, members of this City Council, members of the School Committee, the City Manager, Deputy City Manager, Assistant City Managers and representatives of the media, for the purpose of hearing from the banks' leaders what the result of the most recent CRA evaluation of their particular bank indicates. Further, that henceforth, on a semi-annual basis, this "Community in Conversation" get-together be hosted by the Mayor of Cambridge so as to foster both the continued sharing of valuable knowledge which the CRA Reports provide and using that knowledge to increase the value of the quality of life throughout Cambridge.

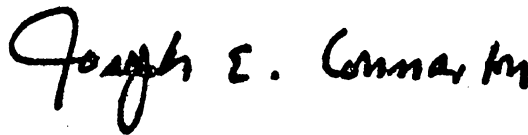
In City Council October 15, 1990.

Adopted by the affirmative vote of eight members.

Attest:- Joseph E. Connarton, City Clerk.

A true copy;

ATTEST:-



Joseph E. Connarton
City Clerk

CRA Rating System

Performance Categories and Assessment Factors	Outstanding ✓	Satisfactory ✓	Needs To Improve ✓	Substantial Noncompliance ✓
I. Ascertainment of Community Credit Needs				
(A) Activities to ascertain credit needs and efforts to communicate with community				
• contact with individuals and groups	Ongoing, meaningful	Regular contact	Limited contact	Few if any
• contact with government officials and community leaders	Ongoing	Regular contact	Limited contact	Few if any
* participation in public programs	Active	Some effort	Marginal effort	Nominal or none
* relationships with private nonprofit developers and financial intermediaries resulting in public-private partnerships	Established and productive	Regular contacts	Lack of productive contact	Few if any
• collection and analysis of local demographic data regarding lending activities	Regularly collected and analyzed	Periodically reviewed	Occasionally considered or analyzed	Unaware or ignorant of
• responsiveness of board of directors and senior management in addressing community credit needs through product development and lending	Proactive attitude and highly responsive	Satisfactory	Limited	Rare or never
• senior management review of lending services	Systematic and regular	Informal	Infrequent	Rare or none
* credit products structured or varied to meet identified needs; may include government-insured and publicly sponsored programs	Well-suited products, including those that make use of government-insured or publicly sponsored programs	Reasonably suited products, including those that make use of government-insured and publicly sponsored programs	May not meet needs; insignificant participation in government-insured and publicly sponsored programs	Rare or none; nominal or no participation in government-insured and publicly sponsored programs
• board of directors and senior management efforts to explore and offer conventional products with special features and more flexible lending criteria within safe and sound practices	Demonstrated willingness	May explore and offer	Limited effort	Little or no effort
(C) Board of directors participation in formulating policies and reviewing institution's CRA performance				
• Extent of participation and review	Integral part of CRA process and activities	Generally involved	Limited involvement	Rare or no involvement
• CRA program with goals, objectives, and methodology for self-assessment	Formal, written program	Articulated and generally understood, but possibly not explicitly reflected in formal program	Inadequate program	No program
• policy oversight of CRA activities	Active oversight	Oversight exercised	Some oversight	Little or no oversight
• review of CRA activities and performance	Regular review	Occasional review	Infrequent review	Rare or no review
• analysis of disposition of loan applications to check fairness and nondiscrimination compliance	Annual or more frequent analysis	At least annual analysis	Only limited analysis	Rare or no analysis
• activities designed to develop, improve, and enhance local community	Personally involved	Some involvement	Limited involvement	Rare or no involvement
• prudent but innovative underwriting criteria to address community credit needs	Consistent support	Consideration given	May be reluctant to consider	Reluctant to consider
• CRA training of personnel	Active support	Adequate support	Limited support	Little if any support
• Expanded CRA Statement adoption	Yes; includes self-assessment and documentation of performance	Yes, but might not be fully descriptive of institution's performance	No	No
• CRA technical regulatory requirements being met	Effective efforts to ensure compliance	Generally ensures	Lax	Rarely or never
II. Marketing and Types of Credit Extended				
(B) Extent of marketing and special credit-related programs				
• marketing and advertising programs	Sound programs, approved, reviewed, and monitored by senior management and board	Adequate, but exist outside formal oversight of senior management and board	Limited oversight by senior management and board	If exist, are inadequate
• programs inform all segments of the community of products and services offered	Yes	Designed to inform	May require revision or expansion	No
• advertisements of credit services throughout community	Designed to stimulate awareness	Ads carried in widely circulated local media	Ads designed only to promote general financial services provider image	No
• use of special advertisement media aimed at particular segments of community	Yes	Additional targeted advertising may be needed	No	No

Copyright 1990. American Bankers Association - Reprinted with permission. All rights reserved. The ABA thanks the Individual Banking Regulatory Compliance Division of Chase Manhattan Bank, N.A., for developing the grid.

Performance Categories and Assessment Factors

	Outstanding ✓	Satisfactory ✓	Needs To Improve ✓	Substantial Noncompliance ✓
• maintenance of advertising and marketing records	Complete, readily available	Adequate	Limited	Insufficient
• review of advertising and marketing programs to ensure compliance with applicable laws and regulations	Internally reviewed	Occasionally reviewed; may have established but limited policies and procedures	Infrequently reviewed	Rarely or never reviewed
• personnel involvement to assist individuals and groups applying for credit	Routinely provide assistance	Generally provide assistance	Limited effort	Little if any effort
(I) Origination or purchase of loans within community				
* meeting identified community credit needs through origination and purchase of loans	Affirmatively addresses a substantial portion of identified needs	Addresses significant portion of needs	Marginal	Minimal
• lending levels in response to community credit needs	Exceptional responsiveness to most pressing needs	General responsiveness	Marginal responsiveness	Little if any responsiveness
• number of loans within delineated community	Substantial majority	Significant volume	Significant volume may be outside delineated community	Substantial majority outside delineated community
• loan volume relative to institution's resources and community's needs	Exceeds expectations	Adequate	Low	Excessively low
• CRA Statement lists credit products available from the institution	Correctly listed	Majority correctly listed	Not accurately listed	Statement is materially inaccurate
* (J) Participation in governmentally insured, guaranteed, or subsidized loan programs				
• approach to meeting identified community credit needs	Assumes leadership role	Generally takes some steps	Sometimes becomes involved	Rarely or never involved
* • level of participation	Affirmatively participates	Frequently participates	Infrequently participates	Rarely or never participates
III. Geographic distribution and record of opening and closing offices				
(*) Reasonableness of delineated community	Meets CRA purpose and does not exclude low- and moderate-income areas	Meets CRA purpose and does not exclude low- and moderate-income areas	Delineation unreasonable and may exclude low- and moderate-income areas; delineation guidelines need revision	Delineation unreasonable and excludes low- and moderate-income areas; delineation guidelines need substantial revision
*not included as one of the 12 assessment factors, but considered under this category				
(E) Geographic distribution of credit extensions, applications, and denials				
• geographic distribution within delineated community	Documented analysis reflects reasonable penetration of all segments of community	Reasonable penetration of all segments of community	Unjustified, disproportionate pattern within delineated community compared with outside community, or regarding distribution within community	Unreasonable lending pattern inside and outside delineated community
• procedures formulated to identify geographic distribution	Yes	N/A	N/A	N/A
• geographic data documented and used by board and senior management to establish policies, products and services, and marketing plans	Yes	May be documented and used	N/A	N/A
• awareness of board and senior management of geographic distribution	N/A	N/A	Unaware	Disregards
• review by board and senior management of lending policies and practices and effect on geographic distribution	N/A	N/A	Inadequate or no review	N/A
• corrective action on previously identified unreasonable lending patterns	N/A	N/A	Inadequate or no action	Limited or no action
* • loan policies and procedures impact on local community	N/A	N/A	N/A	Contain restrictions that adversely affect loan availability
(G) Record of opening and closing offices and providing services				
• accessibility of offices to all segments of community	Readily accessible	Reasonably accessible	Difficult to access	Limited access

Performance Categories and Assessment Factors	Outstanding ✓	Satisfactory ✓	Needs To Improve ✓	Substantial Noncompliance ✓
• accommodation through business hours and services	Tailored to convenience and needs; ongoing review	Reviewed periodically to assure accommodation	May be inconvenient and infrequently reviewed	Inconsistent and rarely if ever reviewed
• assessment of potential adverse impact of office closings	Detailed assessment prior to closing, including consultation with community members	Adequate, including contacts with community members	Inadequate; needs revision or expansion	Rare or none
• record of opening and closing offices as it affects local community, particularly low- and moderate-income areas	No adverse impact	Level of service available in low- and moderate-income areas not adversely affected	Adverse impact; may be unintentional	Continuing pattern of adverse impact
IV. Discrimination and Other Illegal Credit Practices				
(D) Practices to discourage applications for types of credit set forth in CRA Statement				
• solicitation of credit applications from all segments of community	Affirmatively solicits; strong focus on low- and moderate-income areas	Generally solicits from all segments of community	Possibility of isolated, illegal discouraging or prescreening	Rarely if ever considers credit applications from all segments of community; volume of applications from low- or moderate-income areas low or nonexistent
• board of directors and senior management development of policies, procedures, and training programs to prevent illegal discouragement and prescreening of applicants	Effectively assures absence of illegal discouragement and prescreening of applicants	Adequate; minor revision or expansion may be required	Inadequate; requires significant revision or expansion	Nonexistent or needs substantial revision
• adequacy of review and reporting mechanisms to assure nondiscriminatory policies, procedures, and training programs	Regularly assessed	Periodically assessed	Improvement needed	Inadequate and requires substantial revision; or no mechanisms exist
(F) Evidence of prohibited discriminatory or other illegal credit practices				
• compliance with antidiscrimination laws and regulations	In substantial compliance	In compliance with substantive provisions	Not in compliance with substantive provisions	In substantial noncompliance
• violations and corrective action	N/A	Nonsubstantive; promptly corrected	Substantive violations on isolated basis; violations may be repeated from previous exams	Demonstrates pattern or practice of prohibited discrimination or committed large number of substantive violations; violations may be repeated from previous exams
V. Community Development				
(H) Participation, including investments, in local development and redevelopment projects and programs				
• awareness of programs	Thoroughly aware	Generally aware	Limited awareness	Unaware of or ignores programs
• level or frequency of participation in programs	High level of participation, often in leadership role	Periodic participation	Rarely seeks out or participates	Little or no effort made to participate
(K) Ability to meet community credit needs consistent with institution's characteristics				
• role in development projects to foster economic revitalization and growth	Leadership role	Generally supports projects	Limited role	Small if any role
• level of contact with government and private sector representatives to identify community development needs and opportunities	Has established good working relationships	Informed others of interest and involved in aspects of planning or implementation	Rare	Little or none
(L) Participation in other activities not covered under other performance categories that bear on extent to which institution meets community credit needs				
	Engages in other meaningful activities	Demonstrates willingness to explore	Demonstrates willingness to consider only when approached	Exhibits little or no interest



CAMBRIDGE CITY COUNCIL

CITY HALL, CAMBRIDGE, MASSACHUSETTS 02139

(617) 498-9094

William H. Walsh
City Councillor

BY HAND

October 11, 1990

MEMORANDUM:

TO: Joseph E. Connarton
City Clerk

FROM: David Noonan, for
Councillor Walsh

RE: Correction in Council Order filed for October 15, 1990
regarding Community Reinvestment Act

This will confirm and request you to assure inclusion in the above order the correction to the text which I referenced in my conversation with Deputy City Clerk John Flynn via our telephone conversation on October 10, 1990.

On page 2, paragraph 2 of the text, after the words, "...members of this Council ", please insert the words, "...members of the School Committee " prior to the words, " the City Manager ".

I apologize for this inconvenience.

Thank you for your usual attention.

(ENCLOSURE)



City of Cambridge

IN CITY COUNCIL

Councillor Walsh

October 15, 1990

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WHEREAS: In 1978 the federal Community Reinvestment Act (CRA) was passed which requires every regulated financial institution to help meet the credit needs of the communities in which they are chartered, including the credit needs of low and moderate income residents and, to assure and advance compliance with the CRA, a CRA Rating System was initiated which specifies Performance Categories and Assessment Factors which must be considered in evaluating compliance with CRA on a bank by bank and community by community basis. (A copy of CRA Rating System Assessment Report is attached). And,

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(ATTACHMENT)

please make notation at this point

CRA Rating System

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• use of special advertisement media aimed at particular segments of community	Yes	Additional targeted advertising may be needed	No	No

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III. Geographic distribution and record of opening and closing offices				
(*) Reasonableness of delineated community	Meets CRA purpose and does not exclude low- and moderate-income areas	Meets CRA purpose and does not exclude low- and moderate-income areas	Delineation unreasonable and may exclude low- and moderate-income areas; delineation guidelines need revision	Delineation unreasonable and excludes low- and moderate-income areas; delineation guidelines need substantial revision
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(E) Geographic distribution of credit extensions, applications, and denials				
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• procedures formulated to identify geographic distribution	Yes	N/A	N/A	N/A
• geographic data documented and used by board and senior management to establish policies, products and services, and marketing plans	Yes	May be documented and used	N/A	N/A
• awareness of board and senior management of geographic distribution	N/A	N/A	Unaware	Disregards
• review by board and senior management of lending policies and practices and effect on geographic distribution	N/A	N/A	Inadequate or no review	N/A
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**Performance Categories
7 and Assessment Factors**

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<ul style="list-style-type: none"> adequacy of review and reporting mechanisms to assure nondiscriminatory policies, procedures, and training programs 	Regularly assessed	Periodically assessed	Improvement needed	Inadequate and requires substantial revision; or no mechanisms exist
(F) Evidence of prohibited discriminatory or other illegal credit practices				
<ul style="list-style-type: none"> compliance with antidiscrimination laws and regulations 	In substantial compliance	In compliance with substantive provisions	Not in compliance with substantive provisions	In substantial noncompliance
<ul style="list-style-type: none"> violations and corrective action 	N/A	Nonsubstantive; promptly corrected	Substantive violations on isolated basis; violations may be repeated from previous exams	Demonstrates pattern or practice of prohibited discrimination or committed large number of substantive violations; violations may be repeated from previous exams
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WHEREAS: In 1978 the federal Community Reinvestment Act (CRA) was passed which requires every regulated financial institution to help meet the credit needs of the communities in which they are chartered, including the credit needs of low and moderate income residents and, to assure and advance compliance with the CRA, a CRA Rating System was initiated which specifies Performance Categories and Assessment Factors which must be considered in evaluating compliance with CRA on a bank by bank and community by community basis. (A copy of CRA Rating System Assessment Report is attached; and

WHEREAS: In 1989 a change was made in CRA whereby effective on July 1, 1990, Community Reinvestment Reports are to be made available by individual banks to the general public for examination and critique. Since this new policy has been operative for but a short time, it may be momentarily premature to expect exhaustive data to emerge at once, but the attached copies of the factors to be evaluated indicate that, among other things, there is tremendous potential and opportunity for local banks to be catalysts for affordable housing, both owned and rented, within this community whose credit needs they are urged to help; now therefore be it

RESOLVED: That it is the sense of this City Council that the Community Reinvestment Act, its evaluation process of individual banks and newly effective right of access by the public to the result of these evaluations are a powerful source of knowledge-sharing in Cambridge with the potential for mutually beneficial effects for both the Cambridge community and the financial institutions. To share this knowledge, not as adversaries but as advocates for complete community development, suggests that we begin an ongoing, long term dialogue with the principals of the banks in Cambridge so that we may assist them in meeting the high standards sought in the CRA Report so far as participation in the total life in all of Cambridge neighborhoods is concerned; and be it further

RESOLVED:

It is the request of this City Council that, as a first step, Her Honor, the Mayor, host a "Community in Conversation" get-together as soon as possible to which will be invited the Chief Executive Officer of each financial institution in Cambridge, members of this City Council, members of the School Committee, the City Manager, Deputy City Manager, Assistant City Managers and representatives of the media, for the purpose of hearing from the banks' leaders what the result of the most recent CRA evaluation of their particular bank indicates. Further, that henceforth, on a semi-annual basis, this "Community in Conversation" get-together be hosted by the Mayor of Cambridge so as to foster both the continued sharing of valuable knowledge which the CRA Reports provide and using that knowledge to increase the value of the quality of life throughout Cambridge.

OCT. 15 1990

City Council _____

Adopted by the affirmative vote

of 8 members

Joseph E. Connaman
City Clerk

CRA Rating System

Performance Categories and Assessment Factors

	Outstanding	✓	Satisfactory	✓	Needs To Improve	✓	Substantial Noncompliance	✓
I. Ascertainment of Community Credit Needs								
(A) Activities to ascertain credit needs and efforts to communicate with community								
• contact with individuals and groups	Ongoing, meaningful		Regular contact		Limited contact		Few if any	
• contact with government officials and community leaders	Ongoing		Regular contact		Limited contact		Few if any	
* participation in public programs	Active		Some effort		Marginal effort		Nominal or none	
* relationships with private nonprofit developers and financial intermediaries resulting in public-private partnerships	Established and productive		Regular contacts		Lack of productive contact		Few if any	
• collection and analysis of local demographic data regarding lending activities	Regularly collected and analyzed		Periodically reviewed		Occasionally considered or analyzed		Unaware or ignorant of	
• responsiveness of board of directors and senior management in addressing community credit needs through product development and lending	Proactive attitude and highly responsive		Satisfactory		Limited		Rare or never	
• senior management review of lending services	Systematic and regular		Informal		Infrequent		Rare or none	
* credit products structured or varied to meet identified needs; may include government-insured and publicly sponsored programs	Well-suited products, including those that make use of government-insured or publicly sponsored programs		Reasonably suited products, including those that make use of government-insured and publicly sponsored programs		May not meet needs; insignificant participation in government-insured and publicly sponsored programs		Rare or none; nominal or no participation in government-insured and publicly sponsored programs	
• board of directors and senior management efforts to explore and offer conventional products with special features and more flexible lending criteria within safe and sound practices	Demonstrated willingness		May explore and offer		Limited effort		Little or no effort	
(C) Board of directors participation in formulating policies and reviewing institution's CRA performance								
• Extent of participation and review	Integral part of CRA process and activities		Generally involved		Limited involvement		Rare or no involvement	
• CRA program with goals, objectives, and methodology for self-assessment	Formal, written program		Articulated and generally understood, but possibly not explicitly reflected in formal program		Inadequate program		No program	
• policy oversight of CRA activities	Active oversight		Oversight exercised		Some oversight		Little or no oversight	
• review of CRA activities and performance	Regular review		Occasional review		Infrequent review		Rare or no review	
• analysis of disposition of loan applications to check fairness and nondiscrimination compliance	Annual or more frequent analysis		At least annual analysis		Only limited analysis		Rare or no analysis	
• activities designed to develop, improve, and enhance local community	Personally involved		Some involvement		Limited involvement		Rare or no involvement	
• prudent but innovative underwriting criteria to address community credit needs	Consistent support		Consideration given		May be reluctant to consider		Reluctant to consider	
• CRA training of personnel	Active support		Adequate support		Limited support		Little if any support	
• Expanded CRA Statement adoption	Yes; includes self-assessment and documentation of performance		Yes, but might not be fully descriptive of institution's performance		No		No	
• CRA technical regulatory requirements being met	Effective efforts to ensure compliance		Generally ensures		Lax		Rarely or never	
II. Marketing and Types of Credit Extended								
(B) Extent of marketing and special credit-related programs								
• marketing and advertising programs	Sound programs, approved, reviewed, and monitored by senior management and board		Adequate, but exist outside formal oversight of senior management and board		Limited oversight by senior management and board		If exist, are inadequate	
• programs inform all segments of the community of products and services offered	Yes		Designed to inform		May require revision or expansion		No	
• advertisements of credit services throughout community	Designed to stimulate awareness		Ads carried in widely circulated local media		Ads designed only to promote general financial services provider image		No	
• use of special advertisement media aimed at particular segments of community	Yes		Additional targeted advertising may be needed		No		No	

Performance Categories and Assessment Factors

	Outstanding ✓	Satisfactory ✓	Needs To Improve ✓	Substantial Noncompliance ✓
• maintenance of advertising and marketing records	Complete, readily available	Adequate	Limited	Insufficient
• review of advertising and marketing programs to ensure compliance with applicable laws and regulations	Internally reviewed	Occasionally reviewed; may have established but limited policies and procedures	Infrequently reviewed	Rarely or never reviewed
• personnel involvement to assist individuals and groups applying for credit	Routinely provide assistance	Generally provide assistance	Limited effort	Little if any effort
(I) Origination or purchase of loans within community				
* meeting identified community credit needs through origination and purchase of loans	Affirmatively addresses a substantial portion of identified needs	Addresses significant portion of needs	Marginal	Minimal
• lending levels in response to community credit needs	Exceptional responsiveness to most pressing needs	General responsiveness	Marginal responsiveness	Little if any responsiveness
• number of loans within delineated community	Substantial majority	Significant volume	Significant volume may be outside delineated community	Substantial majority outside delineated community
• loan volume relative to institution's resources and community's needs	Exceeds expectations	Adequate	Low	Excessively low
• CRA Statement lists credit products available from the institution	Correctly listed	Majority correctly listed	Not accurately listed	Statement is materially inaccurate
* (J) Participation in governmentally insured, guaranteed, or subsidized loan programs				
• approach to meeting identified community credit needs	Assumes leadership role	Generally takes some steps	Sometimes becomes involved	Rarely or never involved
* level of participation	Affirmatively participates	Frequently participates	Infrequently participates	Rarely or never participates
III. Geographic distribution and record of opening and closing offices				
(*) Reasonableness of delineated community	Meets CRA purpose and does not exclude low- and moderate-income areas	Meets CRA purpose and does not exclude low- and moderate-income areas	Delineation unreasonable and may exclude low- and moderate-income areas; delineation guidelines need revision	Delineation unreasonable and excludes low- and moderate-income areas; delineation guidelines need substantial revision
*not included as one of the 12 assessment factors, but considered under this category				
(E) Geographic distribution of credit extensions, applications, and denials				
• geographic distribution within delineated community	Documented analysis reflects reasonable penetration of all segments of community	Reasonable penetration of all segments of community	Unjustified, disproportionate pattern within delineated community compared with outside community, or regarding distribution within community	Unreasonable lending pattern inside and outside delineated community
• procedures formulated to identify geographic distribution	Yes	N/A	N/A	N/A
• geographic data documented and used by board and senior management to establish policies, products and services, and marketing plans	Yes	May be documented and used	N/A	N/A
• awareness of board and senior management of geographic distribution	N/A	N/A	Unaware	Disregards
• review by board and senior management of lending policies and practices and effect on geographic distribution	N/A	N/A	Inadequate or no review	N/A
• corrective action on previously identified unreasonable lending patterns	N/A	N/A	Inadequate or no action	Limited or no action
* loan policies and procedures impact on local community	N/A	N/A	N/A	Contain restrictions that adversely affect loan availability
(G) Record of opening and closing offices and providing services				
• accessibility of offices to all segments of community	Readily accessible	Reasonably accessible	Difficult to access	Limited access

**Performance Categories
and Assessment Factors**

	Outstanding ✓	Satisfactory ✓	Needs To Improve ✓	Substantial Noncompliance ✓
• accommodation through business hours and services	Tailored to convenience and needs; ongoing review	Reviewed periodically to assure accommodation	May be inconvenient and infrequently reviewed	Inconsistent and rarely if ever reviewed
• assessment of potential adverse impact of office closings	Detailed assessment prior to closing, including consultation with community members	Adequate, including contacts with community members	Inadequate; needs revision or expansion	Rare or none
• record of opening and closing offices as it affects local community, particularly low- and moderate-income areas	No adverse impact	Level of service available in low- and moderate-income areas not adversely affected	Adverse impact; may be unintentional	Continuing pattern of adverse impact
IV. Discrimination and Other Illegal Credit Practices				
(D) Practices to discourage applications for types of credit set forth in CRA Statement				
• solicitation of credit applications from all segments of community	Affirmatively solicits; strong focus on low- and moderate-income areas	Generally solicits from all segments of community	Possibility of isolated, illegal discouraging or prescreening	Rarely if ever considers credit applications from all segments of community; volume of applications from low- or moderate-income areas low or nonexistent
• board of directors and senior management development of policies, procedures, and training programs to prevent illegal discouragement and prescreening of applicants	Effectively assures absence of illegal discouragement and prescreening of applicants	Adequate; minor revision or expansion may be required	Inadequate; requires significant revision or expansion	Nonexistent or needs substantial revision
• adequacy of review and reporting mechanisms to assure nondiscriminatory policies, procedures, and training programs	Regularly assessed	Periodically assessed	Improvement needed	Inadequate and requires substantial revision; or no mechanisms exist
(F) Evidence of prohibited discriminatory or other illegal credit practices				
• compliance with antidiscrimination laws and regulations	In substantial compliance	In compliance with substantive provisions	Not in compliance with substantive provisions	In substantial noncompliance
• violations and corrective action	N/A	Nonsubstantive; promptly corrected	Substantive violations on isolated basis; violations may be repeated from previous exams	Demonstrates pattern or practice of prohibited discrimination or committed large number of substantive violations; violations may be repeated from previous exams
V. Community Development				
(H) Participation, including investments, in local development and redevelopment projects and programs				
• awareness of programs	Thoroughly aware	Generally aware	Limited awareness	Unaware of or ignores programs
• level or frequency of participation in programs	High level of participation, often in leadership role	Periodic participation	Rarely seeks out or participates	Little or no effort made to participate
(K) Ability to meet community credit needs consistent with institution's characteristics				
• role in development projects to foster economic revitalization and growth	Leadership role	Generally supports projects	Limited role	Small if any role
• level of contact with government and private sector representatives to identify community development needs and opportunities	Has established good working relationships	Informed others of interest and involved in aspects of planning or implementation	Rare	Little or none
(L) Participation in other activities not covered under other performance categories that bear on extent to which institution meets community credit needs				
	Engages in other meaningful activities	Demonstrates willingness to explore	Demonstrates willingness to consider only when approached	Exhibits little or no interest

Order # 9

50 965

Councillor Walsh re: Community
Reinvestment Act.

In City Council,

October 15, 1990

Order adopted