SAMPLE LARGE 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.

TABLE OF CONTENTS*

*   This table of contents is a sample 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 for further guidance.

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: _____

The following table indicates the performance level of <u>name of financial institution</u> with respect to the lending, investment, and service tests.

[Indicate the performance level under each criteria by marking an "X" in the appropriate row.]

PERFORMANCE LEVELS	NAME OF FINANCIAL INSTITUTION)		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

DESCRIPTION OF INSTITUTION:

Write a brief description of the institution. Include relevant information regarding the institution's holding company and affiliates, if any, the states and assessment areas served, the institution's ability to meet various credit needs based on its financial condition and size, product offerings, prior performance, legal impediments and other factors. Other information that may be important includes total assets, asset/loan portfolio mix, primary business focus, branching network, and any merger or acquisition activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

Discuss the institution's overall CRA performance. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses and relevant information from the performance context factored into the overall institution 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.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

> When substantive violations involving illegal discrimination or discouragement are found by the [Agency] or identified through self-assessment(s), 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 regulations(s) violated, the extent of the violation(s) (e.g., widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

> If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were 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. If applicable, technical violations cited in the report of examination should be presented in general terms. Discuss whether management has [proposed/ taken] steps that [have/would if implemented] address(ed) the technical violation(s).

MULTISTATE METROPOLITAN AREA

*CRA RATING FOR (Name of Multistate Metropolitan Area, including State names)[1]:*_____
*The Lending Test is rated:*_____   *The Investment Test is rated:*_____
*The Service Test is rated:*_____

[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 illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the multistate MSA. Discuss how CRA activities in the multistate MSA were reviewed (using the examination procedures or through an analysis of available facts and data), and the time period covered in the 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 area(s) that it serves within the multistate metropolitan area.

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[1]This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Information that may be important includes: total assets; asset/loan portfolio mix; primary business focus; branching network; and any merger or acquisition activity. For each of the assessment areas served, include key information such as the number of branches within the assessment area and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the examination procedures. Other information that may be important includes population trends, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are not reviewed using the examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of MULTISTATE METROPOLITAN AREA):*

Discuss the institution's CRA performance within the multistate metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate.   Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record in assessment areas reviewed using the examination procedures in the multistate metropolitan area. 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.

STATE

CRA RATING FOR (Name of STATE)[2]: _____
The Lending Test is rated:_____ **The Investment Test is rated:**_____
The Service Test is rated:_____

[Complete for each state in which an institution has branches if the institution has branches in two or more states. For an institution that has branches in only one state, complete the Metropolitan Area and Non-Metropolitan Statewide Area presentations only for that state, as applicable in light of the location of the branches.]

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

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 (which metropolitan areas or non-metropolitan statewide areas included assessment areas that were reviewed using the full examination procedures and

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[2]For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area

which metropolitan areas were reviewed through an analysis of available facts and data), and the time period covered in the 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, including a description of the assessment area(s) served. 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 metropolitan areas, nonmetropolitan areas, and assessment areas served within the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS 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 should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into 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
*(For metropolitan areas with some or all assessment areas
reviewed using the examination procedures)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Metropolitan area and State):*

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Information that may be important includes: the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the full examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the full examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are reviewed using the limited examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Metropolitan area and State):*

Discuss the institution's CRA performance within the metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the conclusions. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the full examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record in assessment areas reviewed using the full examination procedures in the metropolitan area. 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
*(For each metropolitan area where no assessment areas were
reviewed using the examination procedures)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Metropolitan Area and State):*

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Include key information such as the number of branches within the assessment areas and the number of individuals and geographies in each income category.

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

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

a. The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].

b. The institution's [lending, investment, service] performance in the area [exceeds/ is below], the institution's [lending, investment, service] performance for the [institution/ state]; however, it does not change the rating for the [institution/ state].

NONMETROPOLITAN STATEWIDE AREAS[3]

(if some or all of the assessment areas within the non-metropolitan statewide area were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Nonmetropolitan Area and State):*

Describe the institution's operations within the nonmetropolitan statewide area, including a description of each of the assessment area(s) that it serves within the nonmetropolitan statewide area. Information that may be important includes: the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the full examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the full examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are reviewed using the limited examination procedures.

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[3]The discussion of an institution's CRA performance within a non-metropolitan statewide area, is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional because the performance in the nonmetropolitan areas have been reviewed and discussed in the overall evaluation of the institution. Examiners may wish to discuss in greater detail, however, the assessment areas within nonmetropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and nonmetropolitan areas, or for intrastate banks with branches only in nonmetropolitan areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Nonmetropolitan 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 should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the conclusions for the non-metropolitan statewide area. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the full examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed using the limited examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record in assessment areas reviewed using the full examination procedures in the nonmetropolitan statewide area. 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.

NONMETROPOLITAN STATEWIDE AREAS[4]

(if none of the assessment areas within the nonmetropolitan statewide area were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Nonmetropolitan Area and State)***:**

Describe the institution's operations within the non-metropolitan statewide area, including a description of each of the assessment area(s) that it serves. Include key information such as the number of branches within each assessment area and the number of individuals and geographies in each income category.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of NON-METROPOLITAN STATEWIDE AREA):*

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed using the limited examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

    a.   The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].

    b.   The institution's [lending, investment, service] performance in the area [exceeds/ is below], the institution's [lending, investment, service] performance for the [institution/ state]; however, it does not change the rating for the [institution/ state].

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[4]The discussion of an institution's CRA performance within a non-metropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional. Examiners may wish to discuss in greater detail, however, the assessment areas within the nonmetropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and nonmetropolitan areas, or for intrastate banks with branches only in nonmetropolitan areas.

APPENDIX A

SCOPE OF EXAMINATION

Write a short description of the scope of the examination. At a minimum, discuss the specific lending products reviewed, the names of (any) affiliates reviewed and their corresponding lending products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the full examination procedures, and the time period covered in the review.

Large institutions with multiple assessment areas or affiliates subject to examination may warrant the use of charts that convey information regarding the scope of the examination. The following chart may be used as a supplement to the discussion of the scope or in lieu thereof.

SCOPE OF EXAMINATION [*SAMPLE*]			
[Note: Example provided for clarity]			
TIME PERIOD REVIEWED	1/1/95 TO 6/30/96		
FINANCIAL INSTITUTION **XYZ State Bank, Grand Rapids, MI**			**PRODUCTS REVIEWED** **Small Business** **Small Farm** **Consumer** **Unsecured**
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED -**
XYZ Mortgage Company	**Bank subsidiary**		**Mortgage loans**
XYZ Community Investment Corporation	**Holding company subsidiary**		**Investments**
XYZ Credit Card Corporation	**Holding company subsidiary**		**Credit Cards**

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**[5]	**OTHER INFORMATION**
ILLINOIS MSA 0008 Decatur Adams County Non-MSA rural Illinois	 **Full procedures** **Ltd. procedures** **Full procedures**		**Mortgage loans not offered in non-MSA rural areas.**
MICHIGAN MSA 0001 Grand Rapids City of Marcellus Non-MSA rural Michigan	 **Full procedures** **Full procedures** **Ltd. procedures**		**The scope of examination for non-MSA rural Michigan branches, encompasses activities for the past six months, coinciding with their acquisition date.**

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[5]There is a statutory requirement that the written evaluation of a multi-state institution's performance must list the individual branches examined in each state.

14

APPENDIX B

SUMMARY OF STATE AND MULTISTATE MSA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating

15