

CRA Support

CRA Partners understands the challenges community banks face meeting regulatory requirements. With rule changes and staff turnover, it can be difficult to determine the best path forward for your bank to fulfill community reinvestment goals and obligations, track them, and clearly communicate value to examiners. Our CRA Support can help bridge any gaps your bank may be facing and set you on the best path forward.

CRA Training

We provide in-person and virtual training for CRA Department Staff, bank employees and Board of Directors on:

- Community Development activities - what qualifies
- Small business/small farm reporting
- HMDA reporting
- Consumer loan reporting

CRA Ratings Appeal

- Challenge CRA rating of “Needs to Improve” or “Substantial Noncompliance” within regulator’s challenge criteria

Self-Assessment

- Conduct review of assessment area demographics, lending, branching, and Community Development activities
- Develop performance context to include mitigating factors related to perceived deficiencies in performance
- Provide detailed, written assessment following FFIEC Exam Procedures (appropriate for your bank)

Assessment Area Analysis

- Evaluate delineated assessment areas to determine appropriateness

Branch Distribution Analysis

- Determine any issues with branch distribution relative to serving low- and moderate-income people and geographies

Community Development Activity Evaluation

- Review and evaluate loans, investments, donations, and services to determine CRA qualification as well as community impact
- Ensure documentation and description demonstrates qualification and impact

Strategic Plan Development

- Determine appropriateness of Strategic Plan option
- Solicit public comments
- Write or update CRA Strategic Plan

Peer Analysis

- Determine bank “peers” for comparative purposes

CRA Community Contacts

- Perform community contacts to help determine credit and community development needs and opportunities in delineated assessment areas
- Community contacts conducted in conformance with regulatory guidance

CRA Action Plan

- Help establish a meaningful and targeted approach to improving CRA performance at the institution, state, and product levels based on either self-identified deficiencies or less than satisfactory ratings

CRA Compliance Program Review

- Review overall CRA program, including management reporting, goals, and deficiencies
- Provide tangible recommendations for program enhancement
- Provide action plan for implementing targeted results