CRA INTERAGENCY Q&AS | YOUR MAP TO REGULATORY CHANGE

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OVERVIEW

The OCC, Federal Reserve Board and FDIC adopted final revisions to the Interagency Questions and Answers Regarding Community Reinvestment (Q&As) based on a proposal originally issued in September 2014, addressing alternative systems for delivering retail banking services; community-development-related issued; and the qualitative aspects for performance, including innovative or flexible lending practices and the responsiveness and innovativeness of an institution's loans, qualified investments and community development services. Through these revisions, the Agencies adopted 9 of the 10 proposed Q&As with clarifications to reflect commenters' suggestions. In response to comments received, the Agencies declined not to adopt the proposed revisions to one of the Q&As that addressed the availability and effectiveness of retail banking services. Further, the Agencies also revised four additional existing Q&As based on questions and suggestions provided by the commenters.

This document has been compiled using the Interagency CRA Q&As to provide a user-friendly reference. For details, additional clarification or to read more about the comments the Agencies received when preparing this guidance, please review the [Interagency CRA Q&As within the Federal Register].

QUESTION	ANSWER
DEFINITIONS	
Does the definition of "affiliate" include subsidiaries of an institution?	**Yes.** "Affiliate" includes any company that controls, is controlled by, or is under common control with another company. An institution's subsidiary is controlled by the institution and is, therefore, an affiliate.
Do the definitions of "branch", "automated teller machine" and "remote service facility" include mobile branches, ATMs and RSFs?	**Yes.** Staffed mobile facilities that authorized as branches are considered "branches" and mobile ATMs and RSFs are considered ATMs and RSFs.
Are loan production offices branches for purposes of the CRA?	LPOs and other offices are not "branches" unless they are authorized as branches of the institution through the regulatory approval process of the institution's supervisory agency.
AFFILIATE LENDING	
If an institution, regardless of examination type, elects to have loans by its affiliates considered, may it elect to have only certain categories of loans considered?	**Yes.** An institution may elect to have only a particular category of its affiliate's lending considered.

QUESTION	ANSWER
Regardless of examination type, how is the affiliate constraint on affiliate lending applied?	The constraint prohibits one affiliate from claiming loan origination or purchase claimed by another affiliate. However, an institution can count as one purchase a loan originated by an affiliate that the institution subsequently purchases, or count as an origination a loan later sold to an affiliate provided the same loans are not sold several times to inflate their value for CRA purposes. **Refer to Page 35 of the Q&A for additional information related to affiliate lending constraints.**
ASSESSMENT AREA DELINEATION	
How to the Agencies evaluate assessment areas under the CRA?	The rule focuses on the distribution and level of an institution's lending, investments and services rather than how and why an institution delineated its AA in a particular manner.
If an institution elects to have the Agencies consider affiliate lending, will this decision affect the institution's AA?	If an institution elects to have its lending activities of its affiliates considered in the evaluation of its lending, the geographies in which the affiliate lends do not affect the institution's delineation of AA.
Can a financial institution identify a specific racial or ethnic group rather than a geographic area as its AA?	**No.**
When may an institution adjust the boundaries of an AA to include only a portion of a political subdivision?	Institutions must include whole geographies in their AA and generally should include entire political subdivisions. If including an entire political subdivision would create an area that is larger than the area the institution can reasonably be expected to service, the institution may adjust the AA to include only portions of the political subdivision.
How will examiners determine whether an institution has arbitrarily excluded low- or moderate-income geographies?	Examiners will make this determination on a case-by-case basis after considering the facts relevant to the institution's AA delineation. **See page 45 of the Q&As for details of the information that examiners may include in making this determination.**
What are the maximum limits on the size of an AA?	An institution may not delineate an AA extending substantially across the boundaries of an MSA unless the MSA is a combined statistical area. An AA also may not extend substantially across state boundaries unless the AA is located in a multistate MSA.
May an institution delineate one AA that consists of an MSA and two large counties that abut the MSA, but are not adjacent to each other?	An institution's AA should not extend beyond the boundaries of an MSA. Therefore, the MSA would be a separate AA and because two abutting counties are not adjacent to each other and, in this example, extend substantially beyond the boundary of the MSA, the institution would delineate each

QUESTION	ANSWER
	county as a separate AA assuming branches or deposit-taking ATMs are located in each county and the MSA.
PUBLIC FILE	
What happens to comments received by the Agencies?	Comments will be on file at the Agency for use by examiners. They are also available to the public unless they exempt from disclosure under the Freedom of Information Act.
Is an institution required to respond to public comments?	**No.**
May an institution include a response to its CRA performance evaluation in its public file?	**Yes.** However, the PE may not be altered or abridged in any manner.
Must an institution that elects to have affiliate lending considered include data on this lending in its public file?	**Yes.**
May an institution retain its CRA disclosure statement in electronic format in its public file rather than printing a hard copy for the public file?	**Yes.**
What is the institution's main office?	The main, home or principal office designated in the institution's charter.
May an institution maintain a copy of its Public File on an intranet or the internet?	**Yes.**
PUBLIC NOTICE	
Are there any placement or size requirements for an institution's public notice?	The notice must be placed in the institution's public lobby, but the size and placement may vary. The notice should be placed in a location and be of a sufficient size that customers can easily see and read it.
COMMUNITY DEVELOPMENT	
Are community development activities limited to those that promote economic development?	**No.** Although the definition of "community development" includes activities that promote economic development by financing small businesses or farms, the rule does not limit community development loans and services and qualified investments to those activities. Community development also includes community- or tribal-based child care, educational, health, social services or workforce developmental or job training programs targeted to low- or moderate-income persons, affordable housing for low- or moderate-income individuals, and activities that revitalize or stabilize low- or moderate-income areas or underserved or distressed non-metropolitan middle-income geographies.

QUESTION	ANSWER
Must a community development activity occur inside a low- or moderate-income area, designated disaster area or underserved or distressed non-metropolitan middle-income areas in order for an institution to receive CRA consideration for the activity?	**No.** Community development includes activities regardless of their location that provide affordable housing for, or community services targeted to, low- or moderate-income individuals and activities that promote economic development by financing small businesses and farms. Activities that stabilize or revitalize particular low- or moderate-income areas, designated disaster areas or underserved or distressed non-metropolitan middle-income areas (including by creating, retaining or improving jobs for low- or moderate-income persons) also qualify as community development even if the activities are not located in those areas. **EXAMPLE:** Financing a supermarket that serves as an anchor store in a small strip mall located at the edge of a middle-income areas, if the mall stabilizes the adjacent low-income community by providing needed shopping services that are not otherwise available in the low-income community.
Does the regulation provide flexibility in considering performance in high-cost areas?	**Yes.** The flexibility of the performance standards allows examiners to account in their evaluations for conditions in high-cost areas. Examiners consider lending and services to individuals and geographies of all income levels and businesses of all sizes and revenues. In addition, the flexibility in the requirement that community development loans, services and qualified investments have as their primary purpose community development allows examiners to account for conditions in high-cost areas. **EXAMPLE:** Examiners could take into account the fact that activities address a credit shortage among middle-income people or areas caused by the disproportionately high cost of building, maintaining or acquiring a house when determining whether an institution's loan to or investment in an organization that funds affordable housing for middle-income people or areas, as well as low- and moderate-income people and areas, has as its primary purpose community development.
Community Development includes activities that promote economic development by financing businesses and farms that meet certain size eligibility standards. Are all activities that finance businesses and farms that meet the size eligibility standards considered to be community development?	No. The concept of community development involves both a "size" test and a "purpose" test. An institution's loan, investment or service meets the "size" test if it finances, either directly or through an intermediary, businesses or farms that either meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs or have gross annual revenues of $1 million or less. To meet the "purpose" tests, the loan, investment or service must promote economic development. EXAMPLES

QUESTION	ANSWER
	▪ Permanent job creation, retention and/or improvement for low- or moderate-income persons or geographies; in areas targeted for redevelopment by Federal, state, local or tribal governments; by financing intermediaries that lend to, invest in, or provide technical assistance to start-ups or recently formed small businesses or small farms; or through technical assistance or supportive services for small businesses or farms ▪ Federal, state, local or tribal economic development initiatives that include provisions for creating or improving access by low- or moderate-income persons to jobs or to job training or workforce development programs
Is the definition of community development applicable to all institutions?	**Yes.**
Will activities that provide housing for middle-income and upper-income persons qualify for favorable consideration as community development activities when they help to revitalize or stabilize a distressed or underserved non-metropolitan middle-income geography or designated disaster area?	An activity that provides housing for middle- or upper-income individuals qualifies as an activity that revitalizes or stabilizes a **distressed** non-metropolitan middle-income geography or designated disaster area if the housing directly helps to revitalize or stabilize the community by attracting new, or retaining existing businesses or residents and, in the case of a designated disaster area, is related to disaster recovery. In **underserved** non-metropolitan middle-income geographies, activities that provide housing for middle- and upper-income individuals may qualify as activities that revitalize or stabilize such underserved areas if the activities also provide housing for low- or moderate-income individuals. EXAMPLE A loan to build a mixed-income housing development that provides housing for middle- and upper-income individuals in an underserved non-metropolitan middle-income geography would receive positive consideration if it also provides housing for low- or moderate-income individuals.
What activities are considered to revitalize or stabilize a low- or moderate-income geography and how are those activities considered?	Activities that revitalize or stabilize a low- or moderate-income geography are activities that help to attract new, or retain existing businesses or residents.
What is a designated disaster area and how long does it last?	A designated disaster area is a major disaster area **designated by the Federal government**. Such disaster designations include Major Disaster Declaration by FEMA, but excludes counties designated to receive only FEMA Public Assistance Emergency

QUESTION	ANSWER
	Work Category A (Debris Removal) and/or Category B (Emergency Protective Measures). Examiners will consider institution activities related to disaster recovery that revitalize or stabilize a designated disaster area for **36 months following the date of designation**.
What activities are considered to revitalize or stabilize a designated disaster area and how are those activities considered?	Activities that revitalize or stabilize designated disaster area are activities that help to attract new, or retain existing businesses or residents and is related to disaster recovery. EXAMPLES Providing financing to help retain businesses in the area that employ local residents, including low- or moderate-income individuals; providing financing to attract a major new employer that will create long-term job opportunities, including for low- or moderate-income individuals; providing financing or other assistance for essential community-wide infrastructure, community services, and rebuilding needs; and activities that provide housing, financial assistance and services to designated disaster areas and to individuals who have been displaced from those areas.
What criteria are used to identify distressed or underserved non-metropolitan middle-income geographies?	Eligible non-metropolitan middle-income geographies are those designed by the Agencies as being in distress or that could have difficulty in meeting essential community needs (underserved). A particular geography could be designed as both distressed and underserved. A non-metropolitan middle-income geography will be designated as **distressed** if it meets one or more of the following: **an unemployment rate of at least 1.5 times the national average; a poverty rate of 20% or more; or, a population loss of 10% or more between the previous and most recent decennial census or net migration loss of 5% or more over the 5-year period preceding the most recent census.** A non-metropolitan middle-income geography will be considered **underserved** if it meets criteria for **population size, density and dispersion that indicates the area's population is sufficiently small, thing and distant from a population center that the tract is likely to have difficulty in financing the fixed costs of meting essential community needs.** The Agencies will use as the basis for these designations the "urban influence codes" numbered "7", "10", "11", and "12" maintained by the Economic Research Service of the U.S. Department of Agriculture.
How often will the Agencies update the list of designated distressed and underserved non-metropolitan middle-income geographies?	**Annually.**

QUESTION	ANSWER
What activities are considered to revitalize or stabilize a distressed non-metropolitan middle-income geography and how are those activities evaluated?	An activity revitalizes or stabilizes a distressed non-metropolitan middle-income geography if it helps to attract new, or retain existing, businesses or residents. EXAMPLES Providing financing to attract a major new employer that will create long-term job opportunities, including for low- and moderate-income individuals and activities that provide essential infrastructure or facilities necessary to attract or retain businesses or residents.
What activities are considered to revitalize or stabilize an underserved non-metropolitan middle-income geography and how are those activities evaluated?	The regulation provides that activities revitalize or stabilize an underserved non-metropolitan middle-income geography is they help to meet essential community needs, including needs of low- or moderate-income individuals. EXAMPLES ▪ A new or expanded hospital that serves the entire county, including low-or moderate-income residents. ▪ An industrial park for businesses whose employees include low-or moderate-income individuals. ▪ A new or rehabilitated sewer line that serves community residents, including low- or moderate-income residents. ▪ A mixed-income housing development that includes affordable housing for low- and moderate income families ▪ A renovated elementary school that serves children from the community, including children from low-and moderate-income families ▪ A new or rehabilitated communications infrastructure, such as broadband internet service, that serves the community, including low- and moderate income residents
What are examples of community development loans?	EXAMPLES ▪ Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing of multi-family rental property serving low- and moderate-income persons ▪ Not-for-profit organizations serving primarily low- or moderate-income housing or other community development needs. ▪ Borrowers to construct to rehabilitate community facilities that are located in low- or moderate-income

QUESTION	ANSWER
	areas or that serve primarily low- and moderate-income individuals ▪ Businesses, in an amount greater than $1 million, when made as part of the Small Business Administration's 504 Certified Development Company Program ▪ Borrowers to finance renewable energy, energy-efficient or water conservation equipment or projects that support the development, rehabilitation, improvement or maintenance of affordable housing or community facilities
If a retail institution that is not required to report under the Home Mortgage Disclosure Act makes affordable home mortgage loans that would be HMDA-reportable home mortgage loan if it were a reporting institution, or if a small institution that is not required to collect and report loan data under the CRA makes small business and small farm loans that would be collected and/or reported if the institution were a large institution, may the institution have these loans considered as community development loans?	**No.** Although small institutions are not required to report or collect information on small businesses and small farm loans and consumer loans, and some institutions are not required to report information about their home mortgage loans under HMDA, the Agencies will consider in their CRA evaluations the institutions' originations and purchases of loans that would have been collected and reported as small business, small farm, consumer or home mortgage loans, had the institution been a collecting and reporting institution, under the CRA or HMDA. Therefore, these loans will not be considered as community development loans unless the institution is an intermediate small institution.
May an ISB that is not subject to HMDA reporting have home mortgage loans considered as community development loans?	**Yes.** In instances where ISBs are not required to report HMDA or small business or small farm loans, these loans may be considered, at the institution's option, as community development loans, provided they meet the definition of "community development". Keep in mind, loans other than multifamily dwelling loans may not be considered under both the lending test and the community development test for ISBs.
Do secured credit cards and other credit card programs targeted to low- or moderate-income individuals qualify as community development loans?	**No.**
The regulation indicates that community development includes activities that revitalize or stabilize low- or moderate-income geographies. Do all loans in a low- or moderate-income geography have a stabilizing effect?	**No.** Some loans may only provide indirect or short-term benefits to low- or moderate-income individuals or geographies. These loans are not considered to have community development purpose.
Must there be an immediate or direct benefit to the institution's assessment area to satisfy the requirement that qualified investments or community development loans or services benefit a broader state-wide or regional area that includes the AA?	**No.** The AA need not receive an immediate or direct benefit from institution's participation in the organization or activity, provided that the purpose, mandate or function of the organization or activity includes serving geographies or individuals located within the institution's AA.

QUESTION	ANSWER
What is meant by "regional area?"	A regional area may be an intrastate area or multistate area that includes the institution's AA. Regional areas typically have some geographic, demographic and/or economic interdependencies and may conform to commonly accepted delineations such as the "tri-county" area or "mid-Atlantic" states.
What is meant by the term "primary purpose" as that term is used to define what constitutes a community development loan, qualified investment or community development service?	A loan, investment or service has as its primary purpose community development when it is designed for the express purpose of revitalizing or stabilizing low- or moderate-income areas, designated disaster areas or underserved or distressed non-metropolitan middle-income areas, providing affordable housing for, or community services targeted to, low- or moderate-income persons or promoting economic development by financing small businesses or farms that meet the requirements set forth in the regulation.
In addition to meeting the definition of community development, CD services must also be related to the provision of financial services. What is meant by "provision of financial services?"	Providing financial services means providing services of the type generally provided by the financial services industry (i.e. informing community members about how to get or use credit or otherwise providing credit services or information to the community). EXAMPLE: Service on the Board of Directors of an organization that promotes credit availability or finances affordable housing, or providing technical assistance about financial services to community-based groups
Are personal charitable activities provided by an institution's employees or directors outside the ordinary course of their employment considered CD services?	**No.** Services must be provided as a representative of the institution.
What are examples of community development services?	EXAMPLES: Providing technical assistance on financial matters to non-profit, tribal or government organizations serving low- or moderate-income housing or economic revitalization and development needs; providing technical assistance on financial matters to small businesses or community development organizations; lending employees providing financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing; providing credit counseling, home-buyer and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing; establishing school savings programs; or, providing foreclosure prevention

QUESTION	ANSWER
	programs to low- or moderate-income homeowners. **Refer to Page 27 of the Q&As for additional examples of technical assistance activities.**
Community development includes community services targeted to low- or moderate-income individuals. What are examples of ways that an institution could determine that community services are offered to low- or moderate-income individuals?	EXAMPLES ▪ Service is targeted to the clients of a non-profit organization that has a defined mission of serving low- and moderate-income persons, or because of government grants, is limited to offering services only to low- or moderate-income persons ▪ Service is offered by a nonprofit that is located in and serves a low- or moderate-income geography. ▪ Service is conducted in a low- or moderate-income area and targeted to the residents of the area ▪ Service is a clearly defined program that benefits primarily low- or moderate-income persons, even if it is provided by an entity that offers other programs that serve individuals of all income levels ▪ Service is offered at a workplace to workers who are low- or moderate-income, based on readily available data for the average wage for workers in that particular occupation or industry ▪ Service is provided to students or their families from a school at which the majority qualify for free or reduced-lunch ▪ Service is targeted to individuals who receive or are eligible to receive Medicaid ▪ Service is provided to recipients of government assistance programs that have income qualifications equivalent to, or stricter than, the definitions of low- or moderate-income as defined under CRA.
Can examples of community development activities discussed in a particular Q&A also apply to other types of community development activities not specifically discussed in that Q&A if they have a similar community development purpose?	**Yes.** The Interagency Q&As provide examples of particular activities that may receive consideration as community development activities. **EXAMPLE:** One Q&A provides an example of a community development loan to a not-for-profit organization supporting primarily low- or moderate-income housing needs. Similarly, a grant to the same not-for-profit organization would be considered a qualified investment.
QUALIFIED INVESTMENT	
Does the CRA provide authority for institutions to make investments?	**No.**
Are mortgage-backed securities or municipal bonds qualified investments?	As a general rule, MBS and municipal bonds **are not** qualified investments because they do not have as their primary

QUESTION	ANSWER
	purpose community development. However, MBS or municipal bonds designed primarily to finance community development **are** qualified investments.
Are FHLB stocks or unpaid dividends and membership reserves with Federal Reserve Banks qualified investments?	**No.**
What are examples of qualified investments?	**EXAMPLES:** ▪ Financial intermediaries including CDFIs, New Markets Tax Credit-eligible Community Development Entities, CDCs, minority- and women-owned financial institutions, community loan funds, and low-income or community development credit unions that primarily lend or facilitate lending in low- and moderate-income areas or to low- or moderate-income individuals in order to promote community development. ▪ Organizations engaged in affordable housing rehab and construction, including multi-family rental housing. ▪ Organizations that promote economic development by financing small businesses. ▪ Community development venture capital companies that promote economic development by financing small businesses. ▪ Facilities that promote community development by providing community services for low- and moderate-income individuals such as youth programs, home less centers, soup kitchens, healthcare facilities, battered women's centers and alcohol and drug recovery centers. ▪ Projects eligible for low-income housing tax credits. ▪ State and municipal obligations that specifically support affordable housing or other community development. ▪ Non-profit organizations servicing low- and moderate-income housing or other community development needs. ▪ Organizations supporting activities essential to the capacity of low- or moderate-income individuals or geographies to utilize credit or to sustain economic development.
Will an institution receive consideration for charitable contributions as qualified investments?	**Yes, provided they have as their primary purpose community development as defined in the regulation.**

QUESTION	ANSWER
An institution makes or participates in a community development loan. The institution provided the loan at below-market rates or "bought down" the interest rate to the borrower. Is the lost income resulting from the lower interest rate or buy-down a qualified investment?	**No.**
Will the Agencies consider as a qualified investment the wages or other compensation of an employee or director who provides assistance to a community development organization on behalf of the institution?	**No.** However, the Agencies will consider donated labor of employees or directors as a community development service if the activity meets the definition of community development service.
When evaluating a qualified investment, what consideration will be given to prior-period investments?	Examiners will consider investments that were made prior to the current examination, but are still outstanding. Qualitative factors will affect the weight given to both current period and outstanding prior period qualified investments.
How do examiners evaluate loans or investments to organizations that, in turn, invest in instruments that do not have a community development purposes and use only the income, or a portion of the income from the investment to support their community development purpose?	Examiners will give quantitative consideration for the dollar amount of funds that benefit an organization or activity that has as its primary purpose community development. If an institution invests or lends to an organization that, in turn, invests those funds in instruments that do not have as their primary purpose community development, the Agencies will consider only the amount of the investment income used to benefit the organization or activity that has a community development purpose for CRA purposes. **For additional detail and other considerations, please refer to Page 29 of the Q&As.**
AFFORDABLE HOUSING	
When determining whether a product is "affordable housing" for low- or moderate-income individuals, thereby meeting the definition of community development, will it be sufficient to use a formula that relates the cost of ownership, rental or borrowing to the income levels in the area as the only factor, regardless of whether the user or likely users, or beneficiaries of that affordable housing are low- or moderate-income individuals?	The concept of affordable housing for low- or moderate-income individuals does hinge on whether low- or moderate-income individuals benefit or are likely to benefit from the housing. It would be inappropriate to give consideration to a project that exclusively or predominantly houses families that are not low-or moderate-income simply because the rents or housing prices are set according to a particular formula. For projects that do not yet have occupants, and for which the income of the potential occupants cannot be determined in advance or other products where the income of the occupants cannot be verified examiners will review factors such as demographic, economic and market data to determine the likelihood that the housing will primarily accommodate low- or moderate-income individuals. **EXAMPLE:** Examiners may look at median rents of the assessment area and the project; the median home value of either the assessment area, low-or moderate-income geographies or the project; the low- or moderate-income

QUESTION	ANSWER
	population in the area of the project; or, the past performance record of the organization undertaking the project. Such a project could receive consideration if its express, bona fide, intent as stated for example in a prospectus, loan proposal or community development plan, is community development.
CONSUMER LOANS	
Are home equity loans considered consumer loans?	Home equity loans made for purposes other than home purchase, home improvement or refinancing home purchase or home improvement loans are consumer loans if they are extended to one or more individuals for household, family or other personal expenditures.
May a home equity line of credit be considered a consumer loan even if part of the line is for home improvement purposes?	If the predominant purpose of the line is home improvement, the line may only be reported under HMDA and may be considered a consumer loan. However, the full amount of the line may be considered a consumer loan if its predominant purpose is for household, family or other personal expenditures and to a lesser extent, home improvement, and the full amount of the line has not been reported under HMDA.
MULTIPLE PURPOSE LOANS	
How should an institution collect or report information on loans the proceeds of which will be used for multiple purposes?	If an institution makes a single loan or provides a line of credit to a customer to be used for both consumer and small business purposes, the institution should determine the predominant component of the loan or the credit line and collect or report the entire loan or credit line in accordance with the regulation's specifications for that loan type.
HOME MORTGAGE LOANS	
Does the term "home mortgage loan" include loans other than "home purchase loans"?	**Yes.** Home mortgage loan includes home improvement loans, home purchase loans and refinancing.
Some financial institutions broker home mortgage loans. They typically take the borrower's application and perform other settlement activities. However, they do not make the credit decision. The broker institution may also initially fund the mortgage loans and then immediately assign them to another lender. Because the broker institution does not make the credit decision, it does not record the loans on its HMDA LAR. May an institution receive any consideration under CRA for its home mortgage loan brokerage activities.	**Yes.** A financial institution that funds home mortgage loans but immediately assigns the loans to the lender that made the credit decision may present the information about these loans to examiners for consideration under the lending test as "other loan data".
INCOME LEVEL	

QUESTION	ANSWER
Where do institutions find income level data for geographies and individuals.	The median family income levels for geographies are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget and are updated approximately every 5 years. Geographic income data, along with detailed information about the FFIEC's calculation of MFI data, are available at www.ffiec.gov/cra.htm. The income levels for individuals are calculated annually by the FFIEC using geographic definitions from the OMB, income data from the ACS and the Consumer Price Index from the Congressional Budget Office. Individual income data, along with detailed information about the FFIEC's calculation of MFI data, are available at www.ffiec.gov/cra.htm.
SMALL INSTITUTION	
How are Federal and state branch assets of a foreign bank calculated for purposes of the CRA?	A Federal or state branch of a foreign bank is considered a small institution if it has assets that meet the threshold for small institutions.
How often will the assets size thresholds of small and intermediate small institutions be changed and how will the adjustments be communicated?	**Annually. Changes are published in the Federal Register.**
SMALL BUSINESS LOAN	
Are loans to non-profit organizations considered small business loans or are they considered community development loans?	To be considered a small business loan, the loan must meet the definition of "loans to small businesses" in the instructions to the Call Report. If a loan to nonprofit organization is reported as a small business or small farm loan, it cannot also be reported as a community development loan, except by a wholesale or limited purpose institution.
Are loans secured by commercial real estate considered small business loans?	**Yes, depending on their principal amount.** Small business loans include loans secured by "nonfarm, nonresidential properties" as defined in the Call Report in amounts of **$1 million or less.**
Are loans secured by non-farm, non-residential real estate to finance small businesses "small business loans"?	**Typically not.** If these loans promote community development they may be considered as community development loans.
Are credit cards issued to small businesses "small business loans"?	Only if they meet the definitional requirements in the Call Report instructions.
PERFORMANCE TESTS AND STANDARDS	
How will examiners apply the performance criteria?	Examiners will apply the performance criteria reasonably and fairly, in accordance with the regulations, exam procedures and interagency Q&As.

QUESTION	ANSWER
Are all community development activities weighted equally by examiners?	**No.** Examiners will consider the responsiveness to credit and community development needs as well as the innovativeness and complexity (if applicable) of an institution's community development lending, qualified investments and community development loans.
"Responsiveness" to credit and community development needs is either a criterion or otherwise a consideration in all of the performance tests. How do examiners evaluate whether a financial institution has been responsive to credit and community development needs?	There are 3 important factors that examiners consider: quantity, quality and performance context. Examiners evaluate the volume and type of an institution's activities (i.e. retail and community development loans and services and qualified investments) and the effectiveness of the activities. **For additional detail re: how responsiveness is measured, refer to Page 30 of the Q&As.**
What is meant by innovativeness?	Under CRA, all innovative practices or activities will be considered when an institution implements meaningful improvements to products, services or delivery systems that respond to customer and community needs.
What is the performance context?	The performance context is a broad range of economic, demographic and institution- and community-specific information that an examiner reviews to understand the context in which the institution's record of performance should be evaluated.
Will examiners consider performance context information provided by institutions?	**Yes.** An institution may provide examiners with any information it deems relevant, including information on the lending, investment and service opportunities in its AA.
Will examiners conduct community contact interviews as part of the examination process?	**Yes.**
Will examiners consider factors outside of an institution's control that prevent it from engaging in certain activities?	**Yes.** Examiners will take into account statutory and supervisory limitations on an institution's ability to engage in any lending, investment and service activities. **EXAMPLE:** A savings association that has made few or no qualified investments due to its limited investment authority may still receive a low satisfactory rating under the investment test if it has a strong lending record.
Can an institution's assigned rating be adversely affected by poor past performance?	**Yes.** **EXAMPLE:** An institution that received a rating of "needs to improve" in the past may receive a rating of "substantial noncompliance" if its performance has not improved.
How will examiners consider the performance of similarly situated lenders?	The performance context section of the regulation permits the performance of similarly situated lenders to be considered, for

QUESTION	ANSWER
	example, as one of a number of considerations in evaluating the geographic distribution of an institution's loans to low-, moderate-, middle- and upper-income geographies. **For additional detail, please refer to Page 31 of the Q&As.**
The CRA provides that, in assessing the CRA performance of non-minority and non-women-owned financial institutions, examiners may consider as a factor capital investments, loan participations and other ventures undertaken by the institutions in cooperation with minority- or women-owned financial institutions and low-income credit unions, provided that these activities help meet the credit needs of local communities in which the MWLIs are chartered. Must such activities also benefit the majority owned financial institution's AA?	No. Although the regulations generally provide that an institution's CRA activities will be evaluated for the extent to which they benefit the institution's AA or a broader statewide or regional area that includes the institution's AA, the Agencies apply a broader geographic criterion when evaluating capital investments, loan participations or other ventures undertaken by that institution in cooperation with MWLIs. **For examples of activities undertaken by a majority-owned financial institution in cooperation with MWLIs, consult Page 32 of the Q&As.**
Are there any types of lending activities that help meet the credit needs of an institution's AA and that may warrant favorable consideration as activities that are responsive to the needs of the institution's AA?	There are some lending activities that are likely to be responsive in helping to meet the credit needs of many communities. EXAMPLES ▪ Providing loan programs that include a financial education component about how to avoid lending activities that may be abusive or otherwise unsuitable. ▪ Establishing loan programs that provide small, unsecured consumer loans in a safe and sound manner. ▪ Offering lending programs, which feature reporting to consumer reporting agencies, that transition borrowers from loans with higher rates and fees to lower-cost alternatives. ▪ Establishing loan programs with the objective of providing affordable, sustainable long-term relief, for example, through loan refinancings, restructures or modifications, to homeowners facing foreclosure on their primary residences.
If a large retail institution is not required to collect and report home mortgage data under the HMDA, will the Agencies still evaluate the institution's home mortgage lending performance?	**Yes.** The Agencies will sample the institution's home mortgage loan files to assess its performance under the lending test.
When will examiners consider consumer loans as part of an institution's CRA evaluation?	Consumer loans will be evaluated if the institution so elects and has collected and maintained the data; an institution that elects not to have its consumer loans evaluated will not be viewed less favorably by examiners than one that does.

QUESTION	ANSWER
	However, if consumer loans constitute a substantial majority of the institution's business, the Agencies will evaluate them even if the institution does not so elect.
How are lending commitments, such as letters of credit, evaluated under the regulation?	The Agencies consider lending commitments **only at the option** of the institution, regardless of examination type.
Will examiners review application data as part of the lending test?	Application activity is not a performance criterion. However, examiners may consider this information in the performance context because it may give examiners insight on the demand for loans, for example.
May a financial institution receive consideration under CRA for home mortgage loan modification, extension and consolidation (MECA) in which is obtains home mortgage loans from other institutions without actually purchasing or refinancing the home mortgage loans?	**Yes.** In some states, MECAs are not considered loan refinancings because the existing loan obligations are not satisfied and replaced, are common. Although these transactions are not considered to be purchase or refinancings, they do achieve the same results. A small, intermediate small or large institution may present information about its MECA activities with respect to home mortgages for consideration under the lending test as "other loan data."
Will examiners take into account loans made by affiliates when evaluating the proportion of an institution's lending in its AA?	Examiners will not take into account loans made by affiliates when determining the proportion of an institution's lending in its AA, even if the institution elects to have its affiliate lending considered in the remainder of the lending test evaluation. However, examiners may consider an institution's business strategy of conducting lending through an affiliate in order to determine whether a low proportion of lending the AA should adversely affect the institution's lending test rating.
When will examiners consider loans (other than community development loans) made outside an institution's AA?	Consideration will be given for loans to low- and moderate-income persons and small business and farm loans outside the AA, provided the institution has adequately addressed the needs of borrowers within its AA.
Under the lending test applicable to small, intermediate small, or large institutions, how will examiners evaluate home mortgage loans to middle- or upper-income individuals in a low- or moderate-income geography?	Examiners will consider these mortgage loans under the performance criteria of the lending test (i.e. by number and amount of home mortgage loans, whether they are inside or outside the institution's AA, their geographic distribution and the income levels of the borrowers). Depending on the performance context, examiners could view home mortgage loans to middle-income individuals in a low-income geography very differently. **Refer to Page 34 of the Q&A for details.**
When evaluating an institution's record of community development lending under the lending test applicable to large institutions, may an examiner distinguish among community development loans on the basis of	**Yes.** When evaluating the institution's record of community development lending, it is appropriate to give greater weight to the amount of the loan that is targeted to the intended community development purpose.

QUESTION	ANSWER
the actual amount of the loan that advances the community development purpose?	
How do examiners consider community development loans in the evaluation of an institution's record of lending under the lending test applicable to large institutions?	An institution's record of making community development loan may have a positive, neutral or negative impact on the lending test rating. Community development lending is one of five performance criteria in the lending test criteria and as such, it is considered at every examination. Examiners evaluate the institution's record making community development loans in the context of an institution's business model, the needs of its community and the availability of community development opportunities in its AA or the broader statewide or regional areas that includes the AA.
INNOVATIVE OF FLEXIBLE LENDING PRACTICES	
What do examiners consider in evaluating the innovativeness or flexibility of an institution's lending under the lending test applicable to large institutions?	Examiners will not be limited to reviewing the overall variety and specific terms and conditions of a credit product. Examiners also consider whether, and to the extent which, innovative or flexible terms or products augment the success and effectiveness of the institution's community development loan programs or, more generally, of its loan programs that address the credit needs of low- or moderate-income geographies or individuals. EXAMPLES **For examples of lending practices that are considered innovative or flexible, refer to Page 35 of the Q&As.**
INVESTMENT TEST	
May an institution, regardless of examination type, receive consideration under the CRA regulation if its invests indirectly through a fund, the purpose of which is community development, as defined by CRA regulation?	**Yes.** The direct or indirect nature of the qualified investment does not affect whether an institution will receive consideration under the CRA regulations.
In order to receive CRA consideration, what information may an institution provide that would demonstrate that an investment in a nationwide fund with a primary purpose of community development will directly or indirectly benefits one or more of the institution's AA or a broader statewide or regional area that includes the institution's AA?	The Agencies will consider any information provided by an institution that reasonably demonstrates that the purposes, mandate or function of the fund includes serving geographies or individuals located within the institution's AA or a broader or regional area that includes the institution's AA. **For additional details, please refer to Page 37 of the Q&As.**
Even though the regulations state that an activity that is considered under the lending or service tests cannot also be considered under the investment test, may	Yes. In some instances the nature of an activity may make it eligible for consideration under more than one of the performance tests.

QUESTION	ANSWER
parts of an activity be considered under one test and other parts be considered under another test?	EXAMPLE Certain investments and related support provided by a large retail institution to a CDC may be evaluated under the lending, investment and service tests. **To determine how each test would be applied, please refer to Page 37 of the Q&As.**
If home mortgage loans to low- or moderate-income borrowers have been considered under an institution's lending test, may the institution that originated or purchased them also receive consideration under the investment test if it subsequently purchases mortgage-backed securities that are primarily or exclusively backed by such loans?	**No.**
When applying the 4 performance criteria, may an examiner distinguish among qualified investments based on how much of the investment actually supports the underlying community development purpose?	**Yes**. By applying all the criteria, a qualified investment of a lower dollar amount may be weighed more heavily under the investment test than a qualified investment with a higher dollar amount has fewer qualitative enhancements.
How do examiners evaluate an institution's qualified investment in a fund, the primary purpose of which is community development?	When evaluating qualified investments that benefit an institution's AA or a broader statewide or regional area that includes the AA, examiners will look at the following four performance criteria: 1) Dollar amount of qualified investments. 2) Innovativeness of complexity of qualified investments. 3) Responsiveness of qualified investments to credit and community development needs. 4) The degree to which the qualified investments are not routinely provided by private investors. **For additional details, please refer to Page 37 of the Q&As.**
SERVICE TEST	
How do examiners evaluate retail banking services and community development services under the large institution service test?	Retail banking services and community development services are the two components of the service test and both are important in evaluating a large institution's performance. In evaluating retail banking services, examiners consider the availability and effectiveness of an institution's systems for delivering banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals; the range of services provided in low-, moderate-, middle- and upper-income geographies; and the degree to which the services are tailored to meet the needs of those geographies. **Examples are provided on Page 38 of the Q&As.**

QUESTION	ANSWER
How do examiners evaluate the availability and effectiveness of an institution's systems for delivering retail banking services?	Convenient access to full service branches within a community is an important factor in determining the availability of credit and non-credit services. Therefore, the service test performance standards place primary emphasis on full service branches while still considering alternative systems.
How do examiners evaluate an institution's activities in connection with Individual Development Accounts?	Although there is no standard IDA program, IDAs typically are deposit accounts targeted to low- and moderate-income families that are designed to help them accumulate savings for education or job training, down payment and closing costs on a new home or start up capital for a small business. Once participants have successfully funded an IDA., their personal IDA savings are matched by a public or private entity. Financial institution participation in IDA programs varies. As such, examiners evaluate the actual services and products provided by an institution in connection with IDA programs as or more of the following: community development services, retail banking services, qualified investments, home mortgage loans, small business loans, consumer loans or community development loans.
How to examiners evaluate alternative systems for delivering retail banking services?	Examiners evaluate the extent to which the alternative delivery systems are available and effective in providing financial services to low- and moderate-income geographies and individuals. **Refer to Page 38 of the Q&As for details.**
Are debit cards considered under the service test as an alternative delivery method?	By themselves, No. However, if debit cards are part of a larger combination of products that allows an institution to deliver needed services to low- and moderate-income areas and individuals in its community, the overall delivery system that includes the debit card feature would be considered an alternative delivery system.
How do examiners evaluate the range of services provided in low-, moderate-, middle- and upper-income geographies and the degree to which those services are tailored to meet the needs of those geographies?	Examiners review both information from the institution's public file and other information provided related to the range of services offered and how they are tailored to meet the needs of low- and moderate-income geographies.
Under what conditions may an institution receive consideration for community development services offered by affiliates or 3rd parties?	At an institution's option, the Agencies will consider services performed by an affiliate or by a 3rd party on the institution's behalf under the service test if the services provided enable the institution to help meet the credit needs of its community.
In evaluating community development services, what quantitative and qualitative factors do examiners review?	The Agencies evaluate the extent to which the financial institution provides community development services as well as the innovativeness and responsiveness of such services. **For details, please refer to Page 39 of the Q&As.**

QUESTION	ANSWER
LENDING BY CONSORTIUM OR 3RD PARTY	
Will equity and equity-type investments in a 3rd party receive consideration under the lending test?	If an institution has made an equity or equity-type investment in a 3rd party, community development loans made by the 3rd party may be considered under the lending test. However, asset-backed and debt securities that do not represent an equity-type interest in a 3rd party will not be considered under the lending test unless the securities are booked by the purchasing institution as a loan.
Regardless of examination type, how will examiners evaluate loans made by consortia or 3rd parties?	Loans originated or purchased by consortia in which an institution participates or by 3rd parties in which an institution invests will be considered only if they qualify as community development loans and will be considered only under the community development criterion. However, loans originated directly on the books of an institution or purchased by the institution are considered to have been made or purchased directly by the institution, even if the institution originated or purchased the loans as a result of its participation in a loan consortium.
In some circumstances, an institution may invest in a 3rd party, such as a community development bank, that is also an insured depository institution and is this subject to CRA requirements. If the investing institution requests its supervisory agency to consider its pro rata share of community development loans made by the 3rd party, may the 3rd party also receive consideration for these loans?	**Yes.** Regardless of examination type, as long as the financial institution and the 3rd party are not affiliates.
SMALL INSTITUTION PERFORMANCE STANDARDS	
When evaluating a small or intermediate small institution's performance, will examiners consider at the institution's request, retail and community development loans originated or purchased by affiliates, qualified investments made by affiliates or community development services provided by affiliates?	**Yes.** However, a small institution that elects to have examiners consider affiliate activities must maintain sufficient information that the examiners may evaluate these activities under the appropriate performance standards and ensure the activities are not claimed by another institution.
When is an institution examiners as an ISB?	When a small institution has met the ISB asset threshold for 2 consecutive calendar years, the institution may be examined as an ISB.
May examiners consider, under one or more of the performance criteria of small institution performance standards, lending-related activities such as community development loans and lending-related qualified investments, when evaluating a small institution?	**Yes. Refer to Page 40 of the Q&As for details.**

QUESTION	ANSWER
What is meant by "as appropriate" when referring to the fact that lending-related activities will be considered "as appropriate" under the small institution criteria?	"As appropriate" means that lending-related activities will be considered when it is necessary to determine whether an institution meets or exceeds the standards for a satisfactory rating.
When evaluating a small institution's lending performance, will examiners consider, at the institution's request, community development loans originated or purchased by a consortium in which the institution participates or by a 3rd party in which the institution has invested?	**Yes.** However, the institution must maintain sufficient information for the examiners to evaluate these activities.
Under the small institution lending performance standards, will examiners consider both loan originations and purchases?	**Yes.**
Under the small institution lending test performance standards, how will qualified investments be considered for purposes of determining whether a small institution receives a satisfactory CRA rating?	Examiners will consider only lending-related qualified investments for the purpose of determine whether a small institution that is not an ISB receives a satisfactory CRA rating.
How is the loan-to-deposit ratio calculated?	It is calculated by dividing the institution's net loans and leases by its total deposits.
How is the "reasonableness" of a loan-to-deposit ratio evaluated?	No specific ratio is reasonable in every circumstance and each small institution's ratio is evaluated in light of information from the performance context, including the institution's capacity to lend, demographic and economic factors present in the AA and the lending opportunities available in the AA. If a small institution's LTD ratio appears unreasonable after considering this information, lending performance may still be satisfactory under this criterion taking into consideration the number and dollar volume of loans sold to the secondary market or the number and amount and innovativeness or complexity of community development loans and lending-related qualified investments.
If an institution makes a large number of loans off-shore, will examiners segregate the domestic LTD ratio from the foreign LTD ratio?	**No.** Examiners will look at the net LTD ratio for the whole institution.
Must a small institution have a majority of its lending in its AA to receive a satisfactory performance rating?	**No.** The percentage of loans and, as appropriate, other lending-related activities located in the AA is but one of the performance criteria upon which small institutions are evaluated. If the percentage of loans and other lending-related activities in an institution's AA is less than a majority, then the institution does not meet the standards for satisfactory performance only under this criterion. The effect on overall performance rating of the institution, however, is

QUESTION	ANSWER
	considered in light of the performance context, including information regarding economic conditions; loan demand; the institution's size, financial condition, business strategies and branching network; and other aspects of the institution's lending record.
How will a small institution's performance be assessed under lending distribution criteria?	Distribution of loans, like other small institution performance criteria, is considered in light of the performance context. **See Page 41 of the Q&A for specific details.**
How will the community development test be applied flexibly for ISBs?	An institution may not simply ignore one or more community development categories, nor to the regulations prescribe a required threshold for community development loans, qualified investments and community development services. **See Page 41 of the Q&A for specific details.**
What will examiners consider when evaluating the provision of community development services by an ISB?	EXAMPLES ▪ Low cost deposit accounts. ▪ Electronic benefit transfer accounts and POS terminal systems. ▪ Individual development accounts. ▪ Free or low cost government, payroll or other check cashing services. ▪ Reasonably priced international remittance services. **See Page 42 of the Q&A for additional examples.**
When evaluating an ISB's community development record, what will examiners consider when reviewing the responsiveness of community development lending, qualified investments and community development services to the community development needs of the area?	Examiners will consider not only quantitative measures of performance, such as number and amount of community development loans, qualified investments and community development services, but also qualitative aspects of performance (e.g. responsiveness of the institution's community development activities in light of the institution's capacity, business strategy, the needs of the community and the number of types of opportunities for each type of community development activity).
How can a small institution that is not an ISB achieve an outstanding performance rating?	A small institution that is not an ISB that meets each of the standards in the lending test for a satisfactory rating and exceeds some or all of those standards may warrant an outstanding performance rating. **See Page 42 of the Q&As for additional details.**
ASSIGNED RATINGS	
Are innovative lending practices, innovative or complex qualified investments and innovative community development services required for a satisfactory or outstanding rating?	No. The performance criterion of innovativeness applies only under the lending, investment and service tests applicable to large institutions and the community development test applicable to wholesale and limited purpose institutions. **Please refer to Page 43 of the Q&A for additional details.**

QUESTION	ANSWER
How are institutions with domestic branches in more than one state assigned a rating?	The evaluation of an institution that maintains domestic branches in more than one state will include a written evaluation and rating of its CRA record of performance as a whole and in each state in which it has a domestic branch.
How are institutions that operate only within a single state assigned a rating?	The institution will be assigned a rating of its CRA record based on its performance within that state.
How to the Agencies weight performance under the lending, investment and service tests for large retail institutions?	A rating of outstanding, high satisfactory, low satisfactory, needs to improve or substantial noncompliance based on a judgement supported by facts and data will be assigned under each performance test. Points will then be assigned to each rating. **See Page 43 for rating matrix details.**
How is performance under the quantitative and qualitative performance criteria weighed when examiners assign a CRA rating?	The lending, investment and service tests each contain a number of criteria deigned to measure whether an institution is effectively helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods in a safe and sound manner.
What is meant by discriminatory or other illegal credit practices?	An institution engages in discriminatory credit practices if it discourages or discriminates against credit applicants or borrowers on a prohibited basis. **See Page 44 of the Q&As for specific examples.**
DATA COLLECTION, REPORTING & DISCLOSURE	
When must an institution collect and report data under the CRA regulations?	All institutions except small institutions are subject to data collection and reporting requirements.
Should an institution develop its own program for data collection or will the regulators require a certain format?	An institution may use the free software provided by the FFIEC or develop its own program.
How should an institution report data on lines of credit?	Lines of credit are considered originated at the time the line is approved or increased; and an increase is considered a new origination. **See Page 46 of the Q&As for additional details**.
When should merging institutions collect data?	There are specific scenarios addressed within the Q&As. **Refer to Page 46 of the Q&As for details.**
Must institutions collect and report data on all commercial loans of $1 million or less at origination?	**No.** institutions that are not exempt from data collection and reporting are required to collect and report only those commercial loans captured in Call Report Schedule RC-C, Part II.
Doe loans defined as small business loans, what information should be collected and maintained?	**Refer to Page 47 of the Q&As for a detailed listing.**
Will farm loans need to be segregated from business loans?	**Yes.**

QUESTION	ANSWER
Should institutions collect and report data on all agricultural loans of $500,000 or less at origination?	Institutions are to report those farm loans they capture in Call Report Schedule RC-C, Part II.
For additional information regarding data collection and reporting requirements refer to the Q&As, Page 47.	
WHOLESALE INSTITUTION	
What factors will the Agencies consider in determining whether an institution is in the business of extending home mortgage, small business, small farm or consumer loans to retail customers?	The Agencies will consider whether: ▪ The institution holds itself out to the retail public as providing such loans. ▪ The institution's revenues from extending such loans are significant when compared to its overall operations, including off-balance sheet activities.
LIMITED PURPOSE INSTITUTIONS	
What constitutes a "narrow product line" in the definition of "limited purpose institution"?	An institution offers a narrow product line by limiting its lending activities to a product line **other than** a traditional retail product line required to be evaluated under the lending test (e.g. home mortgage, small business and small farm loans). **EXAMPLE:** An institution engaged in making only credit card or motor vehicle loans.
What factors will the Agencies consider to determine whether an institution that, if limited purpose, makes loans outside a narrow product line, or if wholesale, engaged in retail lending, will lose its limited purpose or wholesale designation because of too much other lending?	Wholesale institutions may engage in some retail lending without losing their designation if this activity is incidental and done on an accommodation basis. Similarly, limited purpose institutions continue to meet the narrow product line requirement if they provide other types of loans on an infrequent basis. **Refer to Page 28 of the Q&A for a detailed listing of the factors that the Agencies will consider.**
Do "niche institutions" qualify as limited purpose or wholesale institutions?	**Generally, no.** Institutions that are in the business of lending to the public, but specialize in certain types of retain loans (e.g. home mortgage or small business loans) to certain types of borrowers (e.g. high-end income level customers or to corporations or partnerships of licensed professional practitioners) generally would not qualify as limited purpose of wholesale institutions.
SPECIAL PURPOSE INSTITUTIONS	
Is the list of special purpose institutions exclusive?	**No.** There may be other examples of special purpose institutions. These institutions engage in specialized activities that do not involve granting credit to the public in the ordinary course of business; they typically serve as correspondent banks, trust companies or clearing agents or engage only in specialized services, such as cash management controlled disbursement services. **A financial institution does not become**

QUESTION	ANSWER
	a special purpose institution merely by ceasing to make loans and, instead, making investments and providing other retail banking services.
To be a special purpose institution, must an institution limit its activities in its charter?	**No.** A special purpose institution may, but is not required to, limit the scope of activities in its charter, articles of association or other corporate organizational documents. **An institution that does not have legal limitations on its activities, but has voluntarily limited its activities, however, would no longer be exempt from CRA requirements if it subsequently engaged in activities that involve granting credit to the public in the normal course of business.**
MISCELLANEOUS Q&As	
Publication of Planned Examination Schedule	Page 51 of the Q&As
Effect of CRA Performance on Applications	Page 44 of the Q&As
CRA Strategic Plans	Page 42 of the Q&As
Community Development Test for Wholesale or Limited Purpose Institutions	Page 39 of the Q&As
Geographic Areas for Institutions Other than Wholesale or Limited Purpose Institutions	Page 45 of the Q&As