



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

The Community Reinvestment Act (CRA)

Katherine Holmes
Community Affairs Officer
Office of the Comptroller of the Currency

Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America



CRA History

CRA was enacted in 1977 to encourage regulated financial institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound banking operation.



CRA Enforcement

Regulator	Oversight
Office of the Comptroller of the Currency (OCC)	Nationally Chartered Banks Federally Chartered Savings Associations
Federal Deposit Insurance Corporation (FDIC)	State Chartered Non-FRB Member Banks
Federal Reserve Bank (FRB)	State Chartered FRB Member Banks

- **Excludes** credit unions and non-bank financial providers
- To locate the regulator of a financial institution: [BankFind](#) | www.fdic.gov



CRA Basics

- Banks engage in a variety of lending, investment, and service activities in their communities to respond to credit and community development needs
- Banks provide a record of their CRA activities to regulators to demonstrate responsiveness in meeting those needs
- Regulators evaluate the bank's CRA performance and prepare a public CRA report for each bank ("public evaluation")
- Regulators will take the bank's CRA record into account when reviewing applications for bank corporate activities, like branching and mergers



CRA Examinations

- **Small Bank:** Assets less than \$346 million*
 - Lending Test
- **Intermediate Small Bank:** Assets at least \$346 million*
 - Small Bank Lending Test and Community Development Test
- **Large Bank:** Assets at least \$1.384 billion*
 - Lending Test, Investment Test, and Service Test

**As of 1/1/2022; updated annually.*



Community Development Activities

Loans, Investments, and Services:

- Support **affordable housing** for LMI individuals
- Target **community services** for LMI individuals
- Promote **economic development** for small businesses or small farms
- **Revitalize** or **stabilize** certain geographies
 - LMI areas, rural middle-income areas, designated disaster areas



Examples: Community Development Loans

- Loan to a Native Community Development Financial Institution (CDFI)
- Construction loan to a tribal housing authority
- Loans for tribal infrastructure projects (e.g., water systems, broadband)
- Participating in federal loan guarantee programs (e.g., Section 184 and Title VI)



Examples: Qualified Investments

- Investment in a Native CDFI
- New Market Tax Credits for tribal wellness center
- Tribal Low-Income Housing Tax Credit project



Examples: Community Development Services

- Partnering with a Native CDFI for a financial literacy program
- Providing technical assistance on financial matters to tribal organizations serving LMI housing or economic revitalization and development needs
- Serving on the board of an organization that promotes credit availability in Native communities



Project REACh

Roundtable for Economic Access and Change (REACh) brings together leaders from the banking industry, national civil rights organizations, business, and technology to reduce specific barriers that prevent full, equal, and fair participation in the nation's economy.

- Affordable Homeownership
- Alternative Credit Assessment Utility
- Small and Minority Business Opportunity
- Minority Depository Institutions





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

Community Reinvestment Act (CRA) Reform Update: Overview of the Interagency CRA Notice of Proposed Rulemaking

Michou Kokodoko, Center For Indian Country Development, Federal
Reserve Bank of Minneapolis

The views expressed in this presentation are those of the author and do not necessarily reflect the views of the Federal Reserve Bank of Minneapolis or of the Federal Reserve System.

Special Thanks to This Year's Sponsors



Agenda

- Objectives
- Notice of Proposed Rulemaking (NPR) overview of Indian Country-related provisions
 - Definition of Native Land Area
 - Activities in Native Land Areas
 - Revitalization
 - Essential community facilities and infrastructure
 - Disaster preparedness and climate resiliency
 - Impact review
 - Feedback requested
 - Treatment of branches
- Comment submissions



CRA Reform Objectives

The proposal builds on previous agency proposals, feedback from stakeholders, and research. The NPR discusses the following objectives in updating the CRA regulations:

- ✓ Strengthen the achievement of the core purpose of the statute
- ✓ Adapt to changes in the banking industry, including mobile and online banking
- ✓ Provide greater clarity and consistency in the application of the regulations
- ✓ Tailor performance standards to account for differences in bank size, business model, and local conditions
- ✓ Tailor data collection and reporting requirements and use existing data whenever possible
- ✓ Promote transparency and public engagement
- ✓ Confirm that CRA and fair lending responsibilities are mutually reinforcing
- ✓ Create a consistent regulatory approach among all three banking agencies



Definition of Native Land Areas (NLAs)

- **Indian country** (as defined in 18 U.S.C. 1151)
- **Land held in trust by the United States for Native Americans** (as described in 38 U.S.C. 3765(1)(A))
- **State-established reservations for a tribe or tribes**
- **Alaska Native Villages** (as defined in 43 U.S.C. 1602(c))
- **Hawaiian Home Lands** (as defined in section 204 of the Hawaiian Homes Commission Act)
- **U.S. Census Bureau-defined areas**
 - ✓ Alaska Native Village Statistical Areas,
 - ✓ Oklahoma Tribal Statistical Areas,
 - ✓ Tribal Designated Statistical Areas,
 - ✓ American Indian Joint-Use Areas
- **State-designated Tribal Statistical Areas**



Activities in NLAs

Related to:

- Revitalization
- Essential community facilities
- Essential community infrastructure, and
- Disaster preparedness and climate resiliency



Revitalization in NLAs

Revitalization activities in NLAs need to be undertaken in conjunction with a federal, state, local, or tribal government plan, program, or initiative with explicit focus on revitalizing or stabilizing NLAs and a particular focus on low- or moderate-income households.

Revitalization activities must:

- ✓ Benefit or serve residents, including low- or moderate-income residents, in one or more of the targeted census tracts; and
- ✓ Not displace or exclude low- or moderate-income residents in the targeted census tracts



Essential Community Facilities and Infrastructure

- Facilities: financing or other support for public facilities that provide essential services generally accessible by a local community, including, but not limited to, schools, libraries, childcare facilities, parks, hospitals, healthcare facilities, and community centers.
- Infrastructure: financing and other support for infrastructure, including, but not limited to broadband, telecommunications, mass transit, water supply and distribution, and sewage treatment and collection systems.

Disaster Preparedness and Climate Resiliency

Disaster preparedness and climate resiliency activities are activities that assist individuals and communities to prepare for, adapt to, and withstand natural disasters, weather-related disasters, or climate-related risks.



Impact Review

- Activities that support an MDI, WDI, LICU, or Treasury Department-certified CDFI;
- Activities that benefit Native communities, such as qualifying activities in NLAs, will receive qualitative consideration as impactful and responsive



CDFIs

- Treasury Department-certified CDFIs: All activities would be eligible CRA activities.
- Non-Treasury Department-certified CDFIs: Activities could also qualify for CRA consideration if the activities separately met the defined eligibility criteria of a different prong of the community development definition.

Feedback Requested

- There are four questions (28, 29, 30, 38) that are specific to NLAs:
 - ✓ The definition of NLAs
 - ✓ Additional eligibility requirements for bank activities in NLAs
 - ✓ Expanding the condition of activities in conjunction with government plans, and
 - ✓ The location of the beneficiaries, inside or outside an NLA



Treatment of Bank Branches

The proposal includes a provision to obtain a positive qualitative consideration under the Retail Services and Products Test for bank branches in NLAs and in other places with low levels of branch access.



Comment Submissions

- Comment period ends on August 5, 2022.
- Comments can be submitted to any of the three agencies and all comments will be shared among the agencies. Refer to the NPR for additional details.

Board of Governors of the Federal Reserve System:

- ✓ Submit a comment using the link on:
<https://www.federalreserve.gov/consumerscommunities/community-reinvestment-act-proposed-rulemaking.htm>
- ✓ Comments can also be emailed, faxed, or mailed.

OCC:

- ✓ Submit a comment here: <https://regulations.gov/>. Enter “Docket ID OCC-2022-0002” in the search box and click “Search.”
- ✓ Comments can also be mailed or hand-delivered.

FDIC:

- ✓ Submit a comment here: <http://www.fdic.gov/regulations/laws/federal/propose.html>. Include the RIN 3064-AF81 on the subject line of the message.
- ✓ Comments can also be emailed, mailed, or hand-delivered.





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

Building Banking Partnerships

Steve Barbier

NeighborWorks America

Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America



OCC Project REACh Native Homeownership Financing Sub-Committee

Freddie Mac	Office of the Comptroller of the Currency
Bank of America	National American Indian Housing Council
Wells Fargo	NeighborWorks America
Citibank	Native American Bank
BMO Harris	Native CDFI Network
Key Bank	
American Express	
US Bank	



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

How to Connect Financial Institutions with Native Organizations

- Oweesta Capital Access Convening
- In person at various housing or economic development conferences
- Federal Reserve Investment Connection
- Asking Other Nonprofit Organizations
- Your Own Research



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

CRA Main

[Distressed and
Underserved Tracts](#)

[CRA Ratings](#)

[Interagency Q&A](#)

[Geocoding System](#)

[Aggregate Report](#)

[Disclosure Report](#)

[National Aggregate Rpt](#)

[Accessibility](#)

[HMDA](#)

[Industry Outreach](#)



Click here to sign up for e-mail notices of website updates.

CRA

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 195, is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate. In this section of the web site, you can find out more about the regulation and its interpretation and information on CRA examinations.



About CRA

- [Background & Purpose](#)
- [CRA Examinations](#)
- [Interagency Q&A](#)
- [Regulation](#)
- [Who Reports Data?](#)

How to File

- [A Guide to CRA Data Collection and Reporting](#)
- [CRA/HMDA Newsletter](#)
- [Data Entry Software](#)
- [Edits](#)
- [File Formats](#)
- [Submitting Data](#)

Public Data

- [CRA Data Products](#)
- [CRA Examinations](#)
- [CRA Ratings](#)
- [FFIEC Census and Demographic Data](#)
- [On-Line Reports](#)

Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

[CRA Main](#)
[What's New](#)
[Distressed and
Underserved
Tracts](#)
[CRA Ratings
Search](#)
[Interagency Q&A](#)
[Geocoding
System](#)
[Aggregate Report](#)
[Disclosure
Report](#)
[National
Aggregate Rpt](#)
[Census Reports](#)
[PDF Help](#)
[HMDA](#)
[Industry
Outreach](#)

FFIEC INTERAGENCY CRA RATING SEARCH

Your search resulted in 23 matches

Row #	ID	Agency	Exam Date	Bank Name	City	State	CRA Rating	Asset Size (x 1,000)	Exam Method
1	3956	OCC	06/23/1994	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$240,150	Not Reported
2	3956	OCC	07/16/1997	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$266,100	Not Reported
3	3956	OCC	07/19/1999	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$310,657	Large bank
4	3956	OCC	03/17/2003	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$385,604	Large bank
5	3956	OCC	05/22/2006	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$372,274	Intermediate Small Institution
6	3956	OCC	08/03/2009	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$431,318	Intermediate Small Institution
7	3956	OCC	11/13/2012	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$546,906	Intermediate Small Institution
8	3956	OCC	09/26/2016	BAKER BOYER NATIONAL BANK	WALLA WALLA	WA	Satisfactory	\$601,382	Intermediate Small Institution
9	22441	FDIC	06/10/1990	BANK OF THE WEST	WALLA WALLA	WA	Satisfactory	\$35,000	Not Reported
10	22441	FDIC	01/01/1994	BANK OF THE WEST	WALLA WALLA	WA	Satisfactory	\$62,000	Not Reported
11	22441	FDIC	03/01/1996	BANK OF THE WEST	WALLA WALLA	WA	Satisfactory	\$80,628	Not Reported
12	22441	FDIC	09/01/1998	BANK OF THE WEST	WALLA WALLA	WA	Outstanding	\$101,664	Small bank
13	28489	FDIC	08/01/2003	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$2,259,414	Large bank
14	28489	FDIC	01/01/2007	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$3,391,106	Large bank
15	28489	FDIC	08/02/2010	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$4,384,613	Large bank
16	28489	FDIC	09/01/2013	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$4,019,062	Large bank
17	28489	FDIC	10/01/2017	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$9,926,921	Large bank
18	28489	FDIC	06/01/2018	BANNER BANK	WALLA WALLA	WA	Satisfactory	\$9,479,334	Large bank
19	28489	FDIC	10/01/2021	BANNER BANK	WALLA WALLA	WA	Outstanding	\$16,115,802	Large bank
20	28489	FDIC	09/01/1992	FIRST SAVINGS BANK OF WASHINGTON	WALLA WALLA	WA	Satisfactory	\$357,000	Not Reported

1 2



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

[Contact & Support](#)[Career Opportunities](#)[Personal Solutions](#)[Business Solutions](#)[About Us](#)[Financial Tools & Advice](#)[Locations](#)[Search](#)[Sign In](#)

CRA Public File

In accordance with the Community Reinvestment Act (CRA) Regulation (Regulation BB, 12 CFR 25), Banner Bank is required to maintain and, upon request, make available for public inspection a complete Community Reinvestment Act Public File. By providing the CRA Public File online, Banner is better able to keep this data up to date. The information provided is current as of April 1 of each year. If you're interested in viewing our CRA Public File, please click on the documents listed below.



Branch and Office Locations

Branch and Office locations as of April 1, 2022.

[Download locations](#)

Public Comments

View written comments received from the public for the current year, and each of the two prior calendar years, that specifically relate to the bank's performance in helping to meet community credit needs, and response to the comments by the bank.

[Public Comments](#)

CRA FDIC Performance Evaluation

Download a PDF of our most recent CRA FDIC Performance Evaluation.

[Download CRA FDIC Performance Evaluation](#)

Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

PUBLIC DISCLOSURE

April 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Banner Bank
Certificate Number: 28489

10 South First Avenue
Walla Walla, Washington 99362

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual



Ally Bank

Community Reinvestment Act Strategic Plan

January 1, 2020 – December 31, 2022

Table of Contents

SECTION I. INTRODUCTION.....	1
A. Ally Bank Product Offerings and Business Strategy.....	1
B. Ally Bank Financial Information.....	1
SECTION II. CRA STRATEGIC PLAN PROPOSAL.....	2
A. Ally Bank's Commitment to CRA.....	2
B. Overview of Strategic Plan, Effective Date and Term.....	2
SECTION III. ASSESSMENT AREA.....	3
A. Median Family Income and Population Data.....	3
B. Housing Data.....	4
C. Economic Outlook and Other Relevant Data.....	5
SECTION IV. NEEDS AND OPPORTUNITIES IN THE ASSESSMENT AREA.....	8
A. Needs in the Assessment Area.....	8
B. Opportunities in the Assessment Area	10
SECTION V. PUBLIC PARTICIPATION.....	14
A. Informal Public Suggestions.....	14
B. Formal Public Comment Solicitation.....	14
SECTION VI. ALLY BANK STRATEGIC PLAN and MEASURABLE GOALS.....	15
A. Definitions.....	15
B. Framework and Methodology.....	16
C. Measurable Goals for "Outstanding"	21
D. Measurable Goals for "Satisfactory"	22
E. Strategic Plan Ratings System and Alternate Evaluation Method.....	24
SECTION VII. REQUEST FOR APPROVAL AND CONTACT INFORMATION.....	25
A. Regulatory Criteria for Approval.....	25
B. Request for Approval of Ally Bank CRA Strategic Plan 2020-2022	25
C. Contact Information	25



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

TOPICS

[Supervision & Examination](#)[Economics](#)[Laws & Regulations](#)[Charters & Licensing](#)[Comptroller's Licensing Manual](#)[Financial Institution Lists](#)[Corporate Application Search \(CAS\)](#)[Weekly Bulletin](#)[Interpretations & Actions](#)[Licensing Filing Forms](#)[Public Comments on Applications](#)[Consumers & Communities](#)[Home](#) > [Topics](#) > [Charters & Licensing](#) > [Financial Institution Lists](#)

Financial Institution Lists

SHARE THIS PAGE:



National banks and federal savings associations are chartered and regulated by the Office of the Comptroller of the Currency.

National Banks & Federal Branches and Agencies active as of 05/31/2022

- sorted by bank name: [Excel](#) | [PDF](#)
- sorted by state and city: [Excel](#) | [PDF](#)

Trust Banks active as of 05/31/2022

- sorted by bank name: [Excel](#) | [PDF](#)
- sorted by state and city: [Excel](#) | [PDF](#)

Federal Savings Associations active as of 05/31/2022

- sorted by bank name: [Excel](#) | [PDF](#)
- sorted by state and city: [Excel](#) | [PDF](#)

<https://www.occ.treas.gov/topics/charters-and-licensing/financial-institution-lists/index-financial-institution-lists.html>



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

BANK BRANCH DASHBOARD

Questions? Contact Us Instructions

Total Branches

24

Bank Name

All Banks

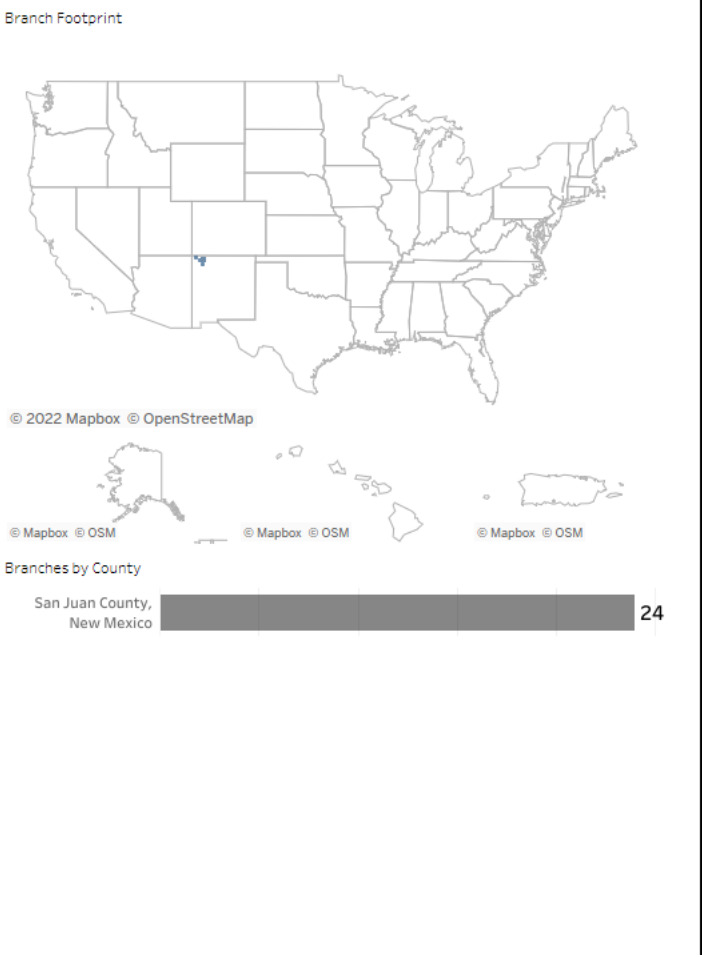
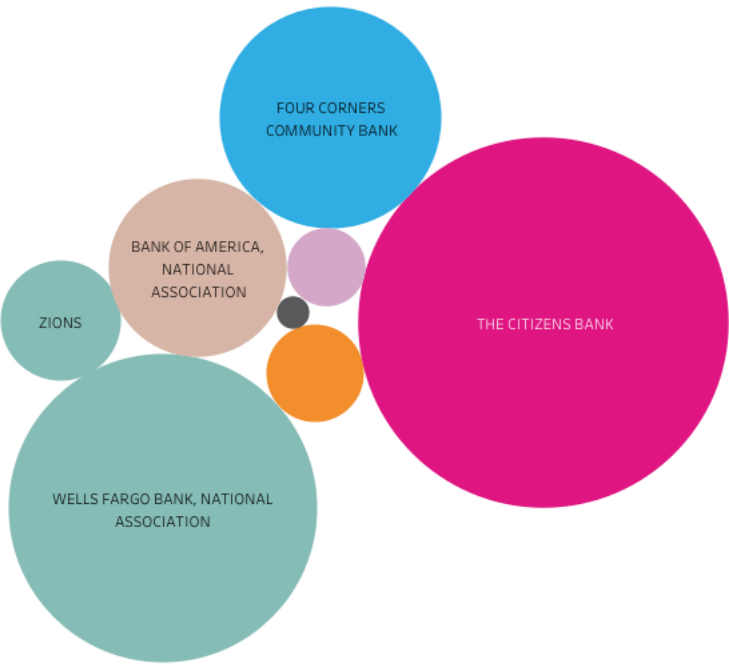
Area

Farmington, NM

Reset

Export CSV

Deposit Market Share



National Community Reinvestment Coalition

<https://ncrc.org/bank-branch-locator/>





Blackfeet Reservation

Explore key demographic and economic indicators



CENTER FOR
INDIAN COUNTRY
DEVELOPMENT



FEDERAL RESERVE BANK OF MINNEAPOLIS

About Us



Data & Resources



Events & Speeches

Publications

Research Papers



Connect

Demographics

Unless otherwise noted, the data in this section come from the 2013-2017 American Community Survey. For more information see [About the Data](#).

NOTE: AIANa includes only individuals who self-identify racially as American Indian or Alaska Native **alone**, whereas AIANac includes AIANa individuals and also those who self-identify as American Indian or Alaska Native **in combination** with other races.

Population

Group	Population	Share
AIANa	8,593	78.6%
AIANac	8,770	80.2%
Total	10,938	100.0%

Median Age (All)

Geography	Male	Female	Total
-----------	------	--------	-------

Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual



Investing In CDFIs

- CDFIs can help banks reach and serve the needs of underserved populations and communities because they have access to and expertise in serving these populations and geographies, or because they offer customized products that meet unique needs.
- Banks partner with CDFIs to deliver lending products that are outside of the banks' risk profile or business model
- Investments and loans may result in CRA credit in subsequent years following the original investment if the investment/loan is still on the books of the financial institution



Building The Relationship

- Researching the types of projects the Lending Institution has supported in the past
- Taking the Time to Educate Your Prospective Partner Education
- Tell your story but focus on solutions
- Impact



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

What Funders Look for In a Project

- Project that provide a return to the bank....growth in the banks customer base or a financial return to the bank,
- Will the project provide CRA credit opportunities over an extended period of time?
- If a project tells a comprehensive story of the organization responding to community's needs it will be more attractive to a financial institution

*Federal Reserve
Bank of St. Louis*



What Funders Look for In An Organization/Partner

1. Alignment with Organizations Stated mission or purpose
2. Financial and operational stability
3. Partners willing to maintain a dialogue & communicate impact and outcomes of the activity.
4. Share ways to mitigate risk (credit enhancements...loan guarantee....partners with track record of success)?



Location ▼ Gallup NM



MY DATA

BOUNDARIES

Demographics

Incomes & Spending

Housing

Lending

Quality of Life

Economy

Education

Health

Federal Guidelines

Analytics

LAYER

Concentrated persistent poverty, as of 2014. ⓘ ☆

Source: Census, Brown University, and PolicyMap

Year

Variable

2014 ▾

Type ▾



Insufficient Data



Persistent Poverty Tract



Not a Persistent Poverty Tract

☒ US Data

☐ Map Extent Data

Shaded By

Census Tract, 2010 ▾



BOUNDARIES



Census Tracts (2000) ⓘ

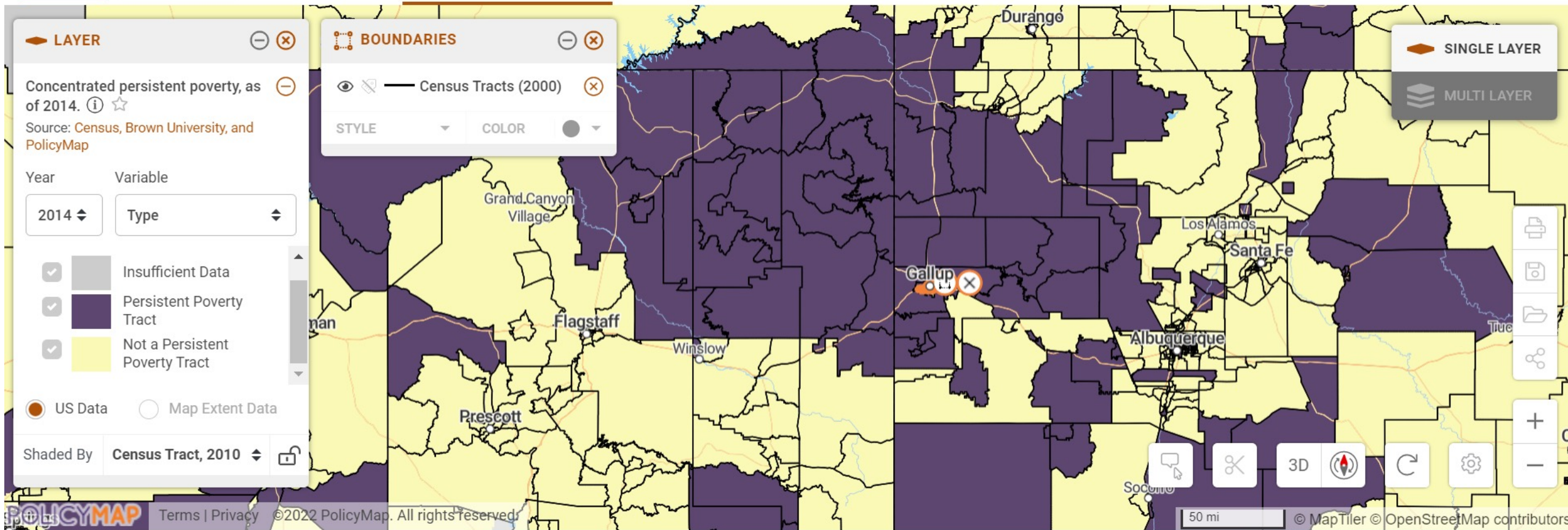
STYLE ▾

COLOR



SINGLE LAYER

MULTI LAYER



Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual

1. How to look up financial institutions currently operating in a specific market?
 - a. Data Browser—provides loan level data by institution service area, but doesn't include institution name:
<https://ffiec.cfpb.gov/data-browser/data/2020?category=states>
 - i. <https://ffiec.cfpb.gov/data-browser/maps/2020?geography=state>
 - ii. <https://www.lei-lookup.com/> - can be used to lookup the LEI on the HMDA export (Legal Entity Identifier)
 - b. Explanation of fields: <https://ffiec.cfpb.gov/documentation/2018/lar-data-fields/>
 - c. Aggregate Report by Loan Type/size/count (Purchases/Originations for small business, small farm, and community development lending activity)—overall or breakdown by financial institution:
<https://www.ffiec.gov/craadweb/aggregate.aspx>
 - d. Disclosure Report by Institution/Loan Type: <https://www.ffiec.gov/craadweb/DisRptMain.aspx>
 - e. Flat Files--combined flat files represent all of the CRA Aggregate and Disclosure report data:
<https://www.ffiec.gov/cra/craflatfiles.htm>
 - f. National Information Center—allows you to search for financial institutions in a specific City/State:
<https://www.ffiec.gov/NPW>
2. Where to find their last CRA report and ratings
 - a. Ratings search by headquarters location/institution/rating, etc:
<https://www.ffiec.gov/craratings/default.aspx>
 - b. Ratings Database Download - https://www.ffiec.gov/craratings/Rtg_spec.html
 - c. Reports – public file is either available on their website or something you have to request directly from the financial institution
3. What types of projects they have funded in the past
 - a. Bank's CRA File available at the Institution or Online as well as the CRA Office
4. Policy map: <https://www.policymap.com/newmaps#/>
5. Investment Connection <https://www.stlouisfed.org/community-development/cpi/investment-connection/training-videos>





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

Flagstar Bank

Brandon Lewis – VP, Community Reinvestment

Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

Flagstar Bank Products and Business Activities

- Mortgage lending
- Consumer loans
- Full suite of retail products available through physical branch network
- Community development lending and investment
 - Affordable housing debt and equity
 - CDFI investment
 - SBIC investment
- Philanthropy

Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America



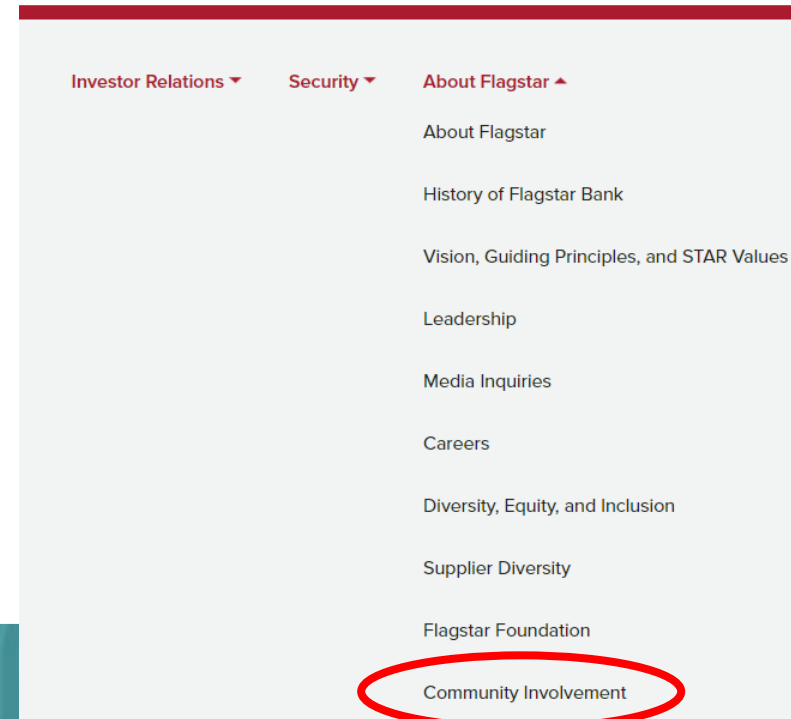


Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual

Establishing Bank Relationships: Getting In The Door

- Search bank websites for direct access information
 - Community reinvestment business lines might have links like:
 - “Community” or “CRA” or “Community Involvement”
 - Philanthropic access points may be on bank home pages under:
 - “Corporate Responsibility” or “Giving Back”
- Use banks’ general customer service lines until you get directed to a professional at the bank who can satisfactorily answer your questions
- Collect contact information from bank’s CRA public notices posted in their branches



Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening
June 28-30, 2022 • Virtual



Garfield Landing – Sault Ste. Marie, MI

- Low Income Housing Tax Credit development
- Partners: Community Housing Network, Inc.; The Chippewa County Community Foundation; the Sault Ste. Marie Tribe of Chippewa Indians; Flagstar Bank
- Converting the former Garfield School in Sault Ste. Marie, Michigan into a 100% affordable development consisting of 36 high quality one and two-bedroom units.
- The development will combine the adaptive re-use of the Garfield School, creating 10 units, with 26 new construction units built on the site.
- Located in federally designated Opportunity Zone and close to business district and public transportation
- Project is guaranteed to remain affordable for 45 years



Special Thanks to This Year's Sponsors



Northwest Area
Foundation

Bank of America



Interagency Resources

- [CRA NPR](#)
- [CRA NPR Fact Sheet](#)
- [Project REACH | OCC](#)
- [Fed Communities | FRB](#)
- [Economic Inclusion | FDIC](#)
- [Bank Partnerships with CDFIs and Benefits of CDFI Certification | OCC](#)





Amplifying Our Collective Voice

7th Annual Native CDFI Capital Access Convening June 28-30, 2022 • Virtual