NCRC

OPENING DOORS TO ECONOMIC OPPORTUNITY

WHITE PAPER

Performance Evaluation:

Facilitating Public Input on CRA via Federal Agency Websites

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ABOUT NCRC

NCRC and its grassroots member organizations create opportunities for people to build wealth. We work with community leaders, policymakers and financial institutions to champion fairness in banking, housing and business development.

Our members include community reinvestment organizations, community development corporations, local and state government agencies, faith-based institutions, community organizing and civil rights groups, minority and women-owned business associations, and social service providers from across the nation.

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EXECUTIVE SUMMARY

The National Community Reinvestment Coalition (NCRC) regularly assists our member organizations in submitting comment letters on Community Reinvestment Act (CRA) examinations or applications subject to public comment. We provide this service as a benefit of NCRC membership not only because we want to encourage our members to be more active around issues related to community reinvestment, but also because navigating the process of submitting comments through the regulatory agencies' websites is very confusing without outside knowledge. Agency websites do a poor job of communicating the information that the public needs to find opportunities to comment, even though public comments are supposed to play an important role in evaluating a bank's performance in meeting community needs. We believe that the public should not be thwarted from having a voice in these processes just because of confusing websites. To draw attention to these impediments, NCRC has conducted an evaluation of the regulatory agencies' websites and has given suggestions for how they could be improved.

	Office of the Comptroller of the Currency	Federal Reserve Board of Governors	Federal Deposit Insurance Corporation
OVERALL RATING	NEEDS TO IMPROVE	NEEDS TO IMPROVE	LOW SATISFACTORY

We gave all three banking regulatory agencies, the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Board of Governors of the Federal Reserve System (Federal Reserve), a grade on their overall performance based on the grading system used on CRA examinations. Two of the agencies, the OCC and the Federal Reserve, fail their examinations by receiving "Needs to Improve" grades. The FDIC barely passes, receiving a "Low Satisfactory" overall. Each agency has practices that they do well, which should be used as a model for the other agencies, and each has others that they do very poorly. A few of the worst and best practices are highlighted below:

Worst Practices

- The Federal Reserve's search engine for locating previous CRA examinations requires users to enter the name of the bank in an abbreviated format that is not fully explained on the website. The OCC's corporate applications tracker suffers from a similar problem. In both cases, search results are not returned unless the correctly abbreviated name is entered as the search term.

- All of the agencies' websites are extremely difficult to navigate, particularly in finding information related to submitting public comments.

Best Practices

- The FDIC reached out to community organizations and advocates in the Fall of 2014 for feedback on their websites. This feedback resulted in valuable and meaningful changes to the features and navigability of the site, which have made steps toward improving access to CRA and applications information.

- The FDIC's and OCC's CRA search engines allow users to search for previous examinations by a number of different criteria, including bank name, rating, state and year of examination. The FDIC's search engine also allows users to select which criteria they want to have displayed in the search results.

- The OCC includes electronic versions of the public portions of some applications on their website, a useful tool that cuts down on the time that community organizations and agency staff have to spend on communicating about copies of applications.

We hope that the agencies will learn from each other's best practices to make the public input system better and more consistent across all agencies. We urge them to look closely at this document and correct the issues we identified about each of their websites, and some agencies have already taken important steps to do so. We also encourage community organizations to use this document as a guide for navigating some of the more troublesome issues until they are resolved. Public input is a crucial part of determining whether or not banks are meeting their obligation to the communities they serve, and the process for soliciting and receiving these comments must be reformed to reflect its importance.

INTRODUCTION

The Community Reinvestment Act (CRA), the Bank Holding Company Act and other laws require regulatory agencies to evaluate a bank's record in meeting community needs in a responsible and non-discriminatory manner. The public is ultimately the best judge of whether or not their credit needs are being met, making public comments on a bank's performance integral to regulators' evaluations. Community members can submit comments about a bank's performance at any time, and regulatory agencies are required to consider those comments while conducting a bank's CRA examination and while evaluating an application for a bank to merge with or acquire another bank or to open a new branch. Public comments give the regulatory agencies a critical perspective into a bank's performance in the community, sometimes pointing out issues that would not otherwise be apparent to examiners in their analysis.

Information about opportunities for members of the public to comment on a bank's performance is posted on the websites of each of the prudential bank regulatory agencies: the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Board of Governors of the Federal Reserve System (Federal Reserve). Each of these agencies has a different system for communicating these opportunities, but most of them post similar content about upcoming or past CRA exams, pending applications and branch closings. Each agency has a unique system for how the public should submit comments on any of these opportunities and each also communicates their process in a different way.

Across the board, the agencies' websites present information about CRA-related opportunities for public engagement in a way that is confusing and discouraging of public input. Information that is meant for members of the general public or community organizations is buried deep within the agency websites and is communicated in language full of jargon. Some agencies' search features for finding previous CRA performance evaluations do not produce consistent results, while others choose not to list some important information, such as upcoming branch closings, at all. Contact information for community affairs representatives or other staff that could help members of the public better understand the complicated information and processes is difficult to access or sometimes non-existent.

Poorly executed public websites diminish the power of CRA and other laws to truly ensure that banks are meeting community needs. Most community organizations and members of the public rely on the regulators' websites for information about how they can submit public comments, and if the websites are not navigable or do not contain the proper information,

many people with genuine interest or concern may be intimidated by the system. Agency websites should encourage members of the public to use opportunities to comment on a bank's performance, not discourage them through inaccessibility of information and complicated systems.

The Consumer Financial Protection Bureau (CFPB) has taken great strides in encouraging members of the public to interact with the agency through their website, and the user-friendly interface and ease of navigability should serve as a positive example for its peer agencies. The home page of the CFPB's website is particularly useful in encouraging public participation, with a link titled "Submit a complaint" immediately prominent on the page. Additionally, information on the CFPB's site is available in eight languages other than English.

To shed greater light on the difficulty that members of the public have in trying to engage in CRA-related issues, the National Community Reinvestment Coalition (NCRC) conducted a performance evaluation to gauge how well each regulatory agency is encouraging public input through their websites. This document is meant to serve as a guide for the agencies to use in improving their websites, their tracking systems and their methods of communicating with members of the public. The agencies have made some small improvements to their websites over the past few years, but we hope that this evaluation will encourage greater transparency in the commenting process that results in greater public participation in CRA-related activities.

Agency Ratings

	Office of the Comptroller of the Currency	Federal Reserve Board of Governors	Federal Deposit Insurance Corporation
Navigability of Websites	Needs to Improve	Low Satisfactory	High Satisfactory
Facilitating CRA Comments	Needs to Improve	Needs to Improve	High Satisfactory
Locating Previous CRA Performance Evaluations	Outstanding	Substantial Noncompliance	Outstanding
Applications Search	Substantial Noncompliance	Needs to Improve	Low Satisfactory
Applications Tracker	Needs to Improve	High Satisfactory	Needs to Improve
Facilitating Comments on Applications	Needs to Improve	Needs to Improve	Needs to Improve
Tracking Branch Closings	Low Satisfactory	Substantial Noncompliance	Substantial Noncompliance
OVERALL	NEEDS TO IMPROVE	NEEDS TO IMPROVE	LOW SATISFACTORY

How to Use This Document

NCRC has done a comprehensive evaluation of the CRA and bank merger-related portions of the three prudential regulatory agencies' websites. To conduct this evaluation, NCRC envisioned what critical components each of the categories evaluated should include and listed those before each evaluation as the "NCRC Recommendation." We then evaluated each agency's current system, made recommendations for how the system can be improved, and gave the agency a grade based upon the grading scale used by the regulatory agencies for CRA examinations. Grades for each category were used to create an overall grade for each of the three agencies, which are listed in the grade matrix above.[1]

1 Methodology: Each possible grade on the component tests was assigned a numeric value between 0 and 4 (4 being Outstanding, 3 being High Satisfactory, 2 being Low Satisfactory, etc.) and added up each agencies' total score. This score was then divided by the total number of component tests (seven), in order to come up with an average score. This score was then rounded to the nearest whole number and associated with the appropriate written grade.

NCRC evaluated the agencies in the following areas: navigability of websites; facilitating CRA comments; locating previous CRA performance evaluations; applications search functions; applications trackers; facilitating comments on applications; and tracking branch closures. A brief description of what NCRC looked for in each of these categories is included below:

Navigability of Websites: This test examines how easily users of websites can find information related to CRA, mergers and acquisitions, or other opportunities for public comment on bank activity. NCRC looked first to make sure that the websites actually contain all of the information necessary for learning about commenting opportunities, and then evaluated whether or not there were simple paths leading from the homepage to the relevant information.

Facilitating CRA Comments: This test looks at how clearly information about upcoming CRA examinations is communicated on the agencies' websites, including upcoming exams, the process for submitting comments and contact information for the responsible staff within each agency. The agencies should make the process of commenting on a CRA exam very simple, and this test looks at how well they achieve that goal.

Locating Previous CRA Evaluations: NCRC examined each agency's search engine that locates performance evaluations from previous CRA exams. We evaluated each search engine's ease of use, the availability of more advanced search functions and whether or not it consistently produces correct and complete information.

Applications Search Function: To keep track of merger applications that are subject to public comment, most of the agencies maintain a function to search for open applications. Some agencies provide a static applications tracker instead of or in addition to the applications search, and those functions are discussed in a separate test. NCRC believes that all agencies should include a search function and a static list of open applications (an "applications tracker") to best facilitate comments, with primary emphasis on the search function. For this test, we evaluated how easy the search function is to use and how well the results communicate important information about the application, including what the application is for and the comment period closing date.

Applications Tracker: As mentioned above, some agencies maintain a static applications tracker in addition to a search function. NCRC believes that both a tracker and a search function are useful, although the search function is the more critical of the two. Here, NCRC looked at how clearly the applications trackers communicate important information about the application, including what institution submitted the application, what the application is for and when public comments are due.

Facilitating Comments on Applications: This test evaluates how clearly information about the process of commenting on an open application is explained on each agency's website, including giving contact information for agency staff that can receive comments or answer questions. This test also evaluates whether or not public portions of applications are posted online.

Tracking Branch Closings: Here, we looked at how agencies publicize upcoming branch closings on their websites. We also examined whether or not all important information is included, such as which branch is closing, contact information for relevant agency staff and the date of the branch closing.

COMPONENT TESTS

Navigability of Websites

The ease with which members of the public can navigate and access information through the financial regulatory agencies' websites directly impacts their ability to comment on CRA exams or applications subject to comment. While the content of each of the agencies' websites mostly reflects the role each agency plays in the U.S. banking system apart from ensuring compliance with CRA, all allocate a part of their websites to sharing information about how the public can comment on open applications or examinations.

NCRC Recommendation

Information about applications or examinations subject to public comment should be linked to directly from the websites' homepages via a clearly labeled link. Each regulatory agency should publicize the following information about banks under their supervision on their websites: upcoming CRA examinations, previous CRA examinations, applications subject to public comment with an open comment period (such as mergers, acquisitions and branch openings), decisions on applications subject to public comments and announced branch closings. When new information about upcoming CRA examinations is released, the regulatory agencies should issue a press release that is sent out through their email list. Contact information for appropriate agency staff should be listed on the same web page as the list of commenting opportunities or should be linked to directly, and instructions for submitting comments must be included where appropriate.

Office of the Comptroller of the Currency – *NEEDS TO IMPROVE*

While the OCC is the only agency that includes all but one of the categories identified in the NCRC recommendation, the information about applications subject to public comment is very difficult to locate on the website. Additionally, the list of upcoming CRA exams is not linked to directly from the homepage of the website.

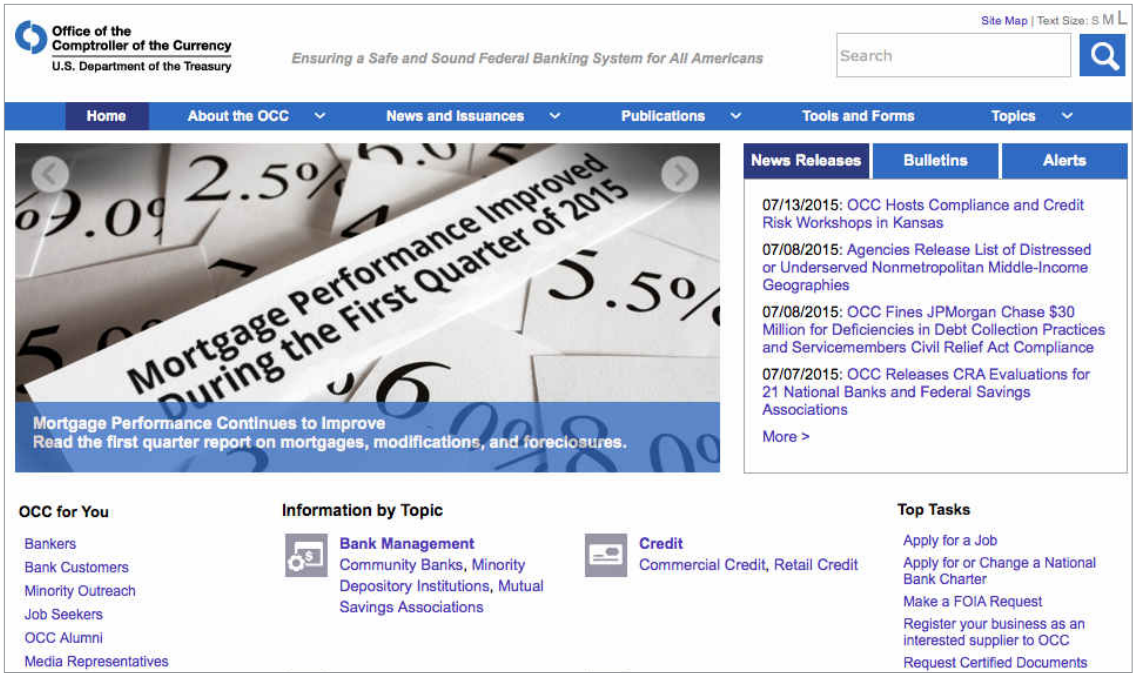

FIGURE 1: http://occ.gov/
The OCC's homepage does not have links to many of the CRA-related pages displayed prominently.

Navigating to Open Applications

Open applications subject to public comment are listed in the OCC's Weekly Bulletin. The title "Weekly Bulletin" does not clearly identify the document's purpose, and it should be retitled "Open Applications Subject to Public Comment." The current title is especially confusing because the OCC has two other pages relevant to comments from the public. One link is titled "Submit or read comments on public notices," and it leads to a list of proposed regulatory rules and guidance that are open for comment. The other is titled "Public Comments on Applications," which leads to a page that lists applications on which members of the public have submitted comments. The link that shows all of the applications that are still open for public comment needs to be labeled clearly to differentiate it from the other pages.

In addition to the confusion caused by the titles of the links, the process of accessing the Weekly Bulletin from the homepage is convoluted. A link called "Weekly Bulletin" appears on the homepage, but it first leads to a page called "Corporate Activities" where the user must click on another link called "Weekly Bulletin" in order to be sent to the actual page that lists the most recent bulletins. Users should not have to go through an additional step to access the list of open applications from the website's homepage.

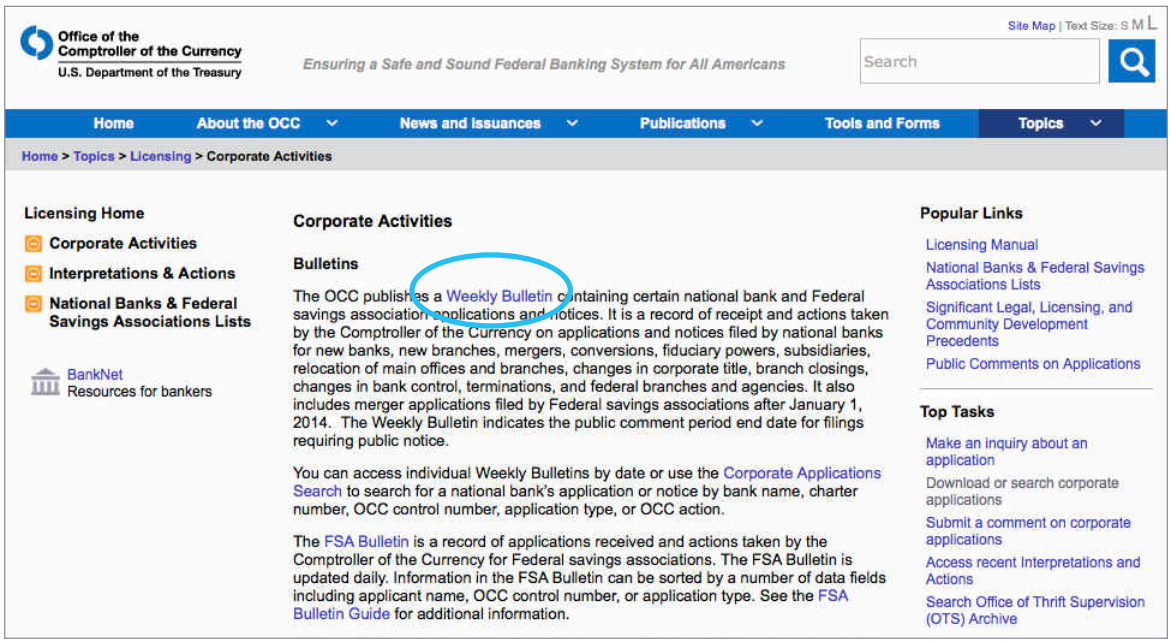

FIGURE 2: http://occ.gov/topics/licensing/corporate-activities-weekly-bulletin/index-weekly-bulletin. b -++html
The link to the Weekly Bulletin on the homepage leads to a page of explanations about the OCC's corporate activities. To actually reach the Weekly Bulletin, users must click on the highlighted link.

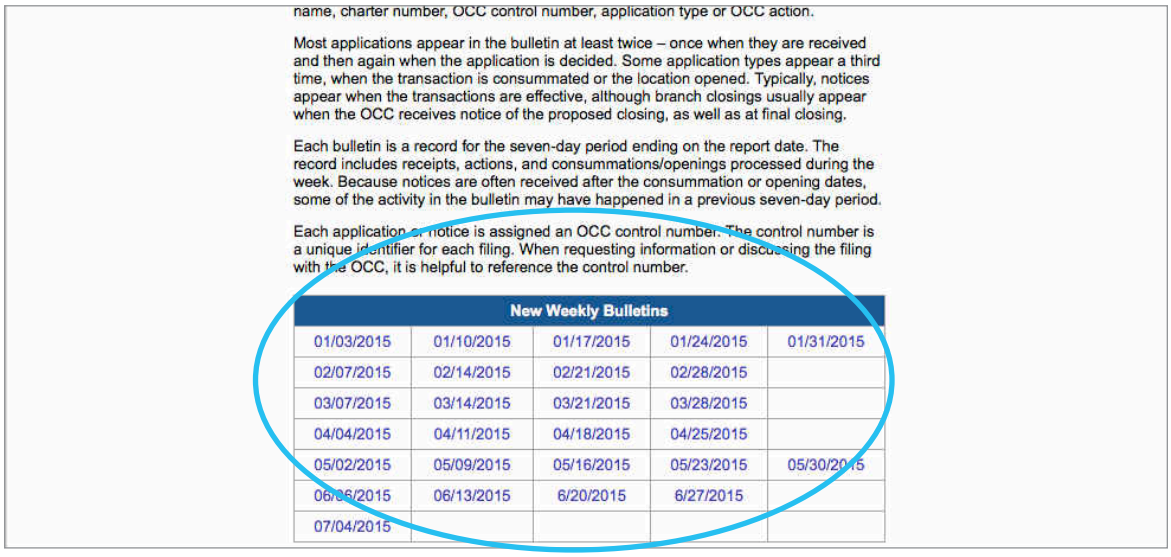

FIGURE 3: http://occ.gov/topics/licensing/corporate-activities-weekly-bulletin/weekly-bulletin-2015.html
The Weekly Bulletin page contains a long description of the Bulletin's contents and a list of the current and prior listings at the bottom of the page.

OFFICE OF THE COMPTROLLER OF THE CURRENCY
WEEKLY BULLETIN
FOR PERIOD 06/28/2015 - 07/04/2015

The absence of a comment period end date indicates the comment period has expired or a comment period is not applicable. Comments may still be submitted to OCC even after the comment period ends. For more information about commenting on an application, please refer to the Public Notice and Comments booklet by clicking here: http://www.occ.gov/publications/publications-by-type/licensing-manuals/PublicNCbooklet.pdf.

NATIONAL BANKS

	ACTION	DATE	TYPE	APPLICATION NUMBER	BANK NAME	BRANCH NAME TARGET BANK	LOCATION	CITY	STATE	COUNTY	CMT PD END
Details	CONSUMMATED EFFECTIVE	7/1/2015	215A-2: REORGANIZATION TO FORM BANK HOLDING COMPANY	2014-CE-215A2-141042	FIRST NB OF BARRY	N/A	694 BAIN BRIDGE	BARRY	IL	PIKE COUNTY	
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	DRIVE-IN SOUTH OFFICE	330 MARGARET STREET	PEKIN	IL	TAZEWELL COUNTY	
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	PARK-SHERIDAN OFFICE	2121 SHERIDAN ROAD	PEKIN	IL	TAZEWELL COUNTY	
Details	RECEIPT	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-NE-215A3-144079	NATIONAL PENN BANK	N/A	TWO CITY CENTER 645 HAMILTON ST.	ALLENTOWN	PA	LEHIGH COUNTY	
Details	CONSUMMATED EFFECTIVE	6/30/2015	BRANCH CLOSINGS	2014-LB-BRANCHCLOSING-140815	BANK OF AMERICA, N.A.	ROCKVILLE	42 EAST MAIN STREET	ROCKVILLE	CT		

FIGURE 4: http://occ.gov/topics/licensing/corporate-activities-weekly-bulletin/wb-06282015-07042015.pdf
The Weekly Bulletin is a PDF file showing applications filed with the OCC that week. In the last few years, the Weekly Bulletin has transitioned to become a screenshot of the OCC's Corporate Activity Tracker.

Navigating to CRA Exam Listings

Finally, the OCC's homepage does not include a link to the page about upcoming CRA examinations in an easily accessible manner. Ideally, a link to the list of examinations would be in the "Key Resources" section to better guide potential commenters to the proper information.

Federal Reserve – *LOW SATISFACTORY*

While most of the categories defined in the NCRC ideal are present on the Federal Reserve's website, they are not labeled in an intuitive way for users to find open applications or CRA information.

Navigating to Open Applications

To access a listing of open applications subject to public comment, users must click the tab "Banking Information and Regulation" at the top of the homepage and then click "Actions and Applications" in the sidebar on the following page.

FIGURE 5: http://www.federalreserve.gov/
The Board of Governor's homepage splits CRA-related information between the "Banking Information & Regulation" tab and the "Community Development" tab. The "Banking Information & Regulation" tab leads to information about mergers and acquisitions.

FIGURE 6: http://www.federalreserve.gov/bankinforeg/default.htm
To find information about open applications subject to public comment, users must click on the "Banking Information & Regulation" tab and then open the "Actions and Applications" menu on the left side.

FIGURE 7: http://www.federalreserve.gov/bankinforeg/default.htm
Once the "Actions and Applications" menu is open, users can find links to the listing of open applications, decisions on applications, and other Federal Reserve activities.

From there, users must select "Applications Subject to Public Comment H2.A" and then select a link with the most recent release date to find the current listing of open applications.

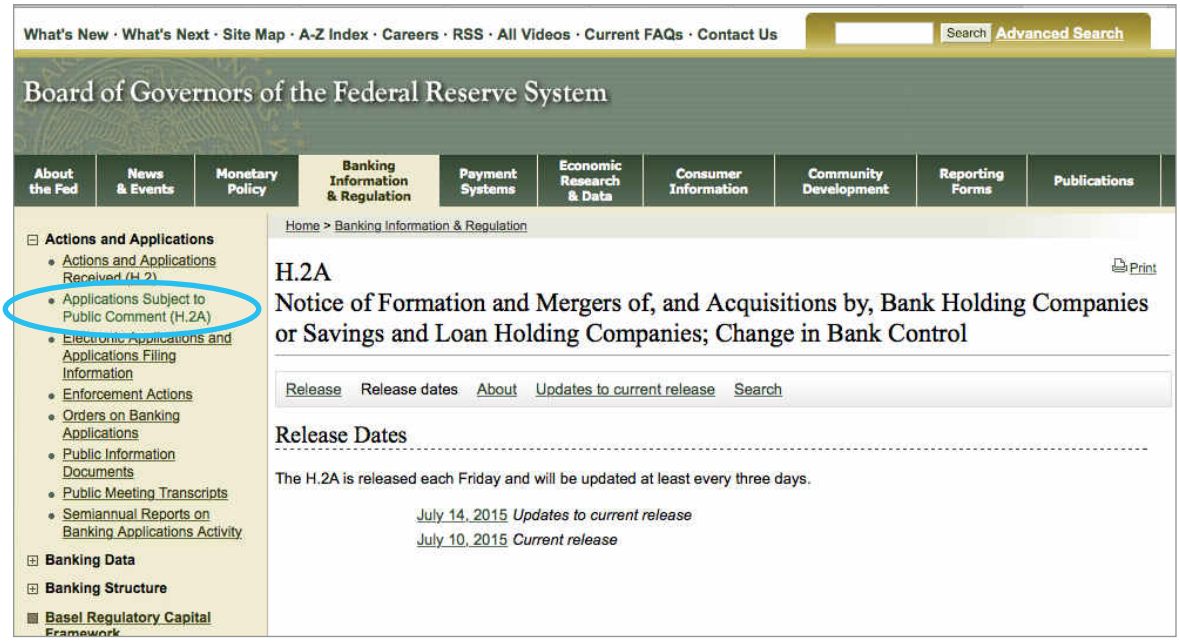

FIGURE 8: http://www.federalreserve.gov/apps/h2a/h2aindex.aspx
To find the listing of upcoming mergers and acquisitions, users select the "Applications Subject to Public Comment (H.2A)" link. This leads to a page with links to the weekly release of open applications and an update to the release.

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Print

H.2A

Notice of Formation and Mergers of, and Acquisitions by, Bank Holding Companies or Savings and Loan Holding Companies; Change in Bank Control

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Release

Release Date: July 10, 2015

The following companies and individuals seek System approval to acquire a bank holding company, a savings and loan holding company, bank or savings and loan association or a nonbanking company in a transaction that is subject to the Bank Holding company Act of 1956 (12 U.S.C. 1841 et seq.), the Change in Bank Control Act (12 U.S.C. 1817 (j)), the Home Owners' Loan Act (12 U.S.C.1467a), Regulations Y, LL, MM, or other applicable statutes and regulations. Comments regarding the applications and notices must be received in writing at the Reserve Bank indicated, or at the Board of Governors, no later than the end of the public comment period. Addresses for the Board and the Federal Reserve Banks are listed at the end of this release.

The public portions of the applications and notices, as well as other related filings required by the Board, may be obtained on an expedited basis by contacting the appropriate Federal Reserve Bank; addresses are listed at the end of this release. Applications and notices also may be obtained from the Board. Additional information on all bank holding companies may be obtained from the National Information Center website.

The database contains **138** records that match your search criteria.

Applicant or notificant	Acquiree or activity	Section of law	Reserve Bank	End of Comment Period (mm/dd/yyyy)
Andrew Sproule Love, Jr.(1), St. Louis, Missouri, acting individually, and in concert with a control group, which consists of Andrew Sproule Love, Jr.; Trust Established U/T/W of Andrew Sproule Love FBO Andrew Sproule Love, Jr., CONTINUED	to acquire voting shares of Midland States Bancorp, Inc., and thereby indirectly acquire voting shares of Midland States Bank, both in Effingham, Illinois	CIBC	St. Louis	05/30/2014
Andrew Sproule Love, Jr.(2), Andrew Sproule Love, Jr., and Bank of America, N.A., as co-trustees; Inter Vivos Trust created by Andrew Sproule Love U/I/T dated December 30, 1941, as amended by instrument dated August 3, 1959, CONTINUED	to acquire voting shares of Midland States Bancorp, Inc., and thereby indirectly acquire voting shares of Midland States Bank, both in Effingham, Illinois	CIBC	St. Louis	05/30/2014
Andrew Sproule Love, Jr.(3), Andrew Sproule Love, Jr., and Bank of America, N.A., as co-trustees; Love Group, LLC; Love Investment Company; Love Real Estate Company; and Sarah Otto Love, all of St. Louis, Missouri; CONTINUED	to acquire voting shares of Midland States Bancorp, Inc., and thereby indirectly acquire voting shares of Midland States Bank, both in Effingham, Illinois	CIBC	St. Louis	05/30/2014

FIGURE 9: http://www.federalreserve.gov/apps/h2a/h2a.aspx
The H.2A page shows a listing of mergers and acquisitions with pending decisions.

Because the Federal Reserve governs all merger activity between bank holding companies and is a commonly consulted resource on applications, merger information should be more clearly and readily available from the website's homepage.

Navigating to CRA Examinations

To find information about CRA examinations from the homepage, users can click on either the "Community Development" or "Banking Information & Regulation" tab on the homepage, and then select "Community Reinvestment Act" from the sidebar on the next page.

FIGURE 10: http://www.federalreserve.gov/
Information related to CRA examinations is all listed under either the "Community Development" tab or the "Banking Information and Regulation" tab.

FIGURE 11: http://www.federalreserve.gov/communitydev/default.htm
After clicking on the "Community Development" or "Banking Information and Regulation" tab, users must open the "Community Reinvestment Act" menu.

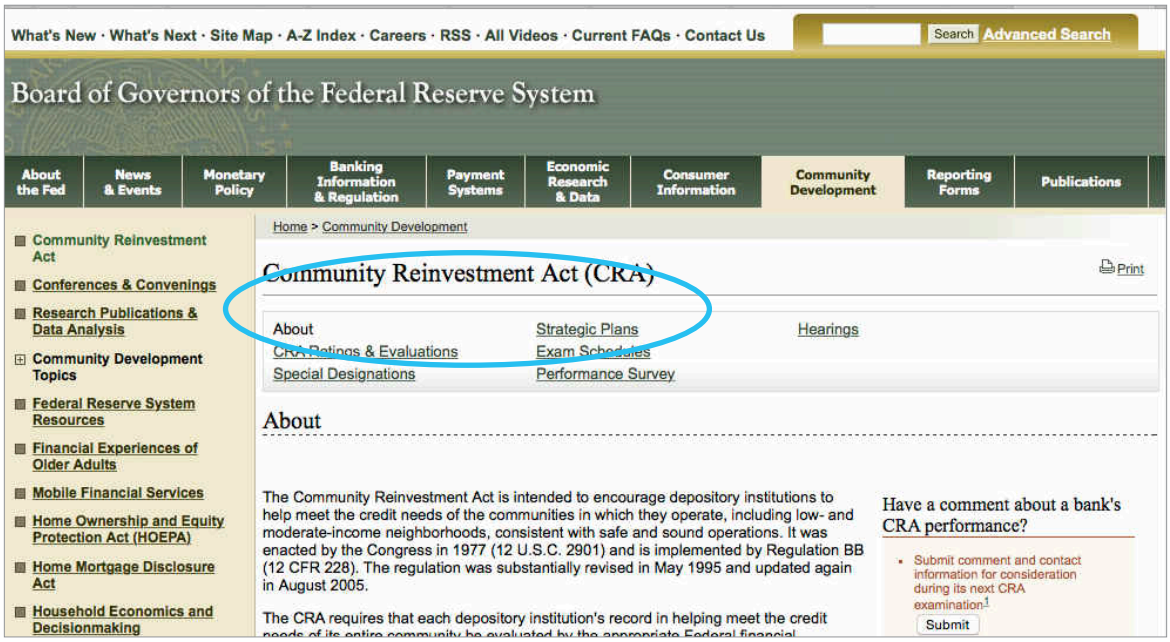


FIGURE 12: http://www.federalreserve.gov/communitydev/cra_about.htm
From the "Community Reinvestment Act" menu, users can access information about previous and upcoming CRA examinations and can submit comments.

The Federal Reserve has recently updated their website to allow users to access CRA information under the "Banking Information and Regulation" tab, which is a more logical position for the information than under the community development tab. The other regulatory agencies list their CRA information under an equivalent regulation tab, and consistency among the regulatory agencies will also help the public navigate the commenting process more easily. This is a positive step for the Federal Reserve in locating information on their website.

Emailed Notices

Additionally, the Federal Reserve does not email a press release listing CRA examinations that are scheduled in the upcoming quarter. Members of the public can better prepare for upcoming examinations if they receive advanced notice via email that a bank in their community is about to be examined.

Branch Closings

Finally, the Federal Reserve does not list upcoming branch closings on its website. Although closures do not require open public comment periods, branches that close in low- and moderate-income communities are subject to special considerations based on public input. Community members that are affected by a branch closing in a low- or moderate-income community may request that the regulator hold a meeting to discuss how to ensure that the community has safe, accessible banking alternatives. In order for community members to request meetings in the face of branch closures, the regulators should publically list the notifications they receive from the banks in their existing application portals.

Federal Deposit Insurance Corporation – *HIGH SATISFACTORY*

While the amount and quality of information on the FDIC's website is extremely valuable for members of the public who are researching financial institutions and financial regulation, a few of the key elements from the NCRC recommendation are missing from the site.

Navigating to CRA Examinations

In general, the FDIC is given high marks for the accessibility of the CRA information that is included on their site. CRA-related information is all grouped under a single "Community Reinvestment Act" page, which is linked to in two separate locations on the homepage.

FIGURE 13: https://www.fdic.gov/
The FDIC keeps all CRA-related information under the "Regulations & Examinations" tab.

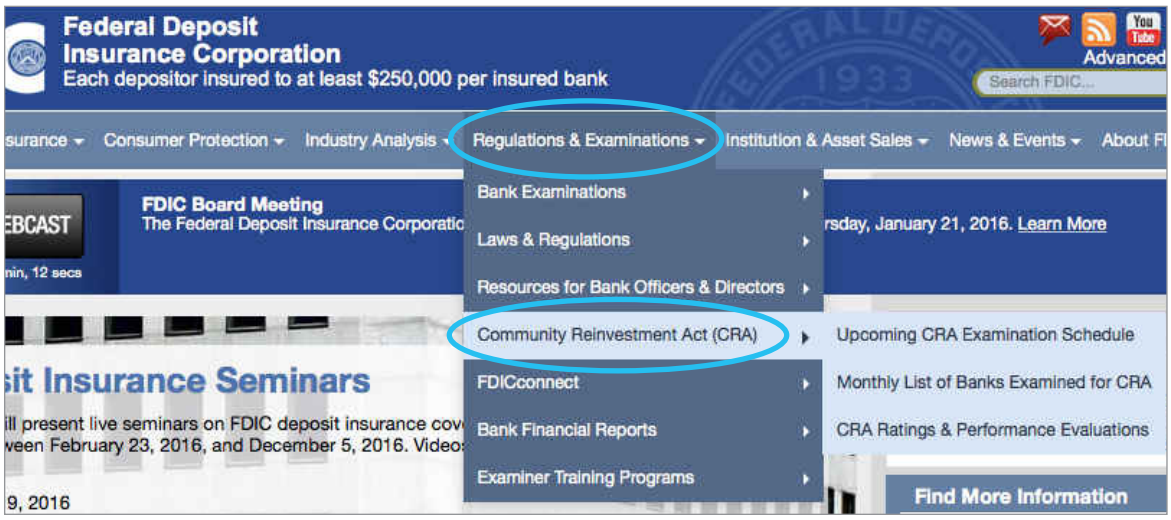


FIGURE 14: https://www.fdic.gov/
When users hover their mouse over the "Regulations & Examinations," a link called "Community Reinvestment Act" appears.

It should be noted that the FDIC reached out to community organizations in the fall of 2014 for feedback on their revised CRA-related webpage that was made public in late 2014. The changes that resulted greatly improved navigability of the website, and the inclusion of feedback from community organizations in the process is commendable.

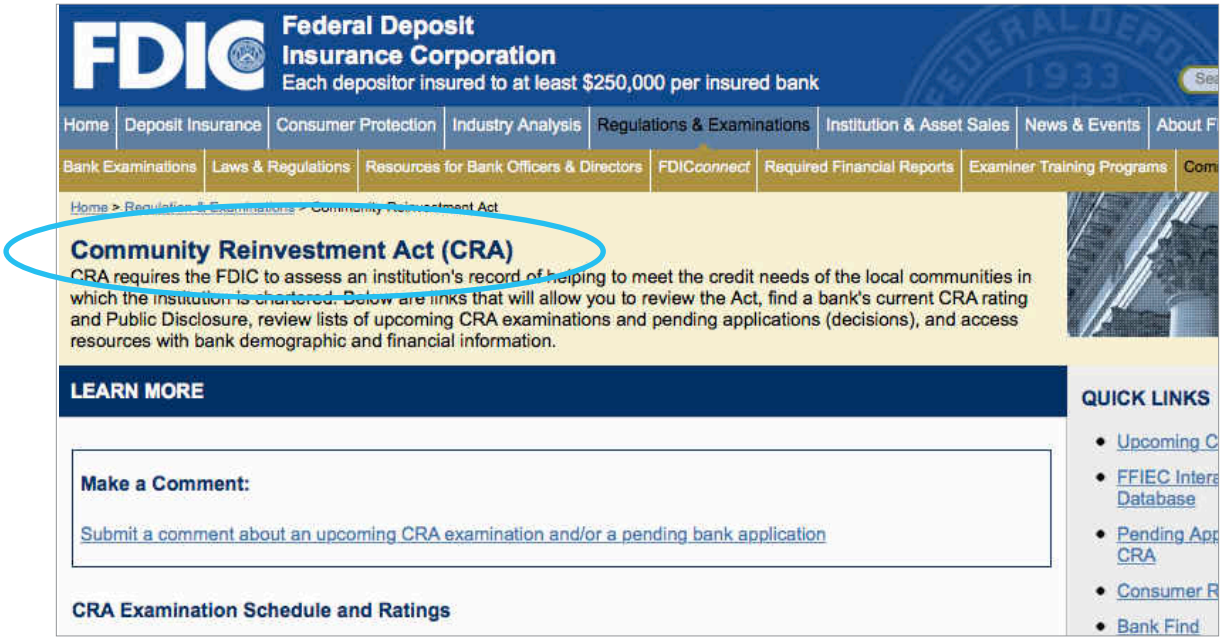


FIGURE 15: https://www.fdic.gov/regulations/cra/
The FDIC's CRA page contains all information related to CRA and applications open for public comment, including a box that allows users to submit comments for exams or pending applications.

Applications Decisions

The FDIC misses the outstanding mark because it is missing two crucial elements that are listed in the NCRC recommendation. The agency does not regularly update its website with application decisions, particularly regarding mergers and acquisitions. As of July 2015, the most recent merger application decisions listed on the FDIC's website is from 2006.

Central Trust Bank, The Jefferson City, MO July 28, 2000
Commerce Bank Laredo, TX January 11, 1999
Community Bank & Trust - Habersham Cornelia, GA November 5, 1997
Country Trust Bank, FSB Bloomington, IL February 15, 2000
Dove Creek State Bank Dove Creek, CO June 15, 1999
Farmers & Merchants Bank - Eastern Shore Olney, VA, August 10, 1999
FirstBank of Puerto Rico Santurce, PR September 27, 2002
First-Citizens Bank & Trust Company Raleigh, NC October 23, 2002
First Hawaiian Bank Honolulu, HI March 27, 2000
First Hawaiian Bank Honolulu, HI October 5, 2001
First Security Bank Bozeman, MT October 10, 2001
First State Bank Harrah, OK March 25, 1997
Frontier Trust Company, FSB (In Organization) Fargo, ND May 16, 2000
German American Bank, The Jasper, IN September 1, 2000
GMAC Automotive Bank - PDF PDF Help Midvale, UT November 15, 2006
Heritage Bank, The Hinesville, GA October 14, 1997

FIGURE 16: https://www.fdic.gov/regulations/laws/bankdecisions/Merger/
Merger approvals are not updated on the FDIC's site. The most recent approval listed on this page is from November 2006.

Branch Closings

The FDIC also does not list upcoming branch closings. For members of low- and moderate-income communities to be able to respond to branch closures by requesting public meetings, the regulators must publically list the notifications they receive from the banks on their websites.

Facilitating CRA Comments

Each of the regulatory agencies maintains a portion of their websites that lists upcoming CRA exams and gives some guidance about how the public can submit comments. Exams are scheduled on a quarterly basis, and the agencies typically post the list of upcoming exams about a month prior to the beginning of a new quarter. Members of the public who are interested in commenting on the CRA exam of a particular bank must first determine which agency serves as its regulator, and then has to monitor that agency's website to see if the bank they are interested in is included in the next quarter's list. No interagency public list is maintained that shows when a particular bank underwent its previous exam and approximately when the next one will occur, even if the next exam will not occur for a few more years. No comprehensive list of exams across agencies in a particular quarter is published, so even those who are not looking for the timing of a particular bank's exam cannot see a complete list of all of the upcoming opportunities to comment.

To submit comment letters, members of the public must identify the appropriate contact within the agency to whom they should direct their letter. Most of the regulatory agencies have a list of community affairs or community development contacts somewhere on their website.

NCRC Recommendation

Users should be able to easily determine which banks have upcoming CRA examinations, when the exams will be conducted and who within the regulatory agency accepts comments. Ideally, the agencies would send out an email announcement alerting those on their mailing list that the following quarter's examination schedule has been posted. That email would contain a link to the list of upcoming exams on the agency's website, and would include a list of contacts within the agency who can assist community organizations with the process of commenting.

On each website, users should find a listing of all of the upcoming CRA exams that that agency will conduct in the following quarter. The listing should include the full name of the bank, where the bank is headquartered, the bank's asset size and a listing of all of the states where the bank does business. Additionally, the listing should mention the approximate timing of the examination, such as the month it is anticipated to occur, and the direct contact information for an examiner or community affairs officer who is staffing the exam.

On the same webpage as the examination schedule, there should be an explanation of the process that organizations should follow as they comment, including instructions as to when comments should be submitted. The processes for submitting comments electronically or via hard copy should both be outlined. As with mergers and acquisitions, community organizations should be given a defined time period in which their comments must be submitted. The webpage should link to a complete listing of community affairs contacts that is clearly broken down by region or function so that commenters can determine the appropriate person to whom they should direct questions about the process.

Finally, once a CRA examination is complete, the agency should mail or email a copy of the performance evaluation to all of the organizations that commented on the exam.

Office of the Comptroller of the Currency – *NEEDS TO IMPROVE*

The OCC's website does a poor job of making clear which contact should receive comments on examinations. However, the OCC is the only agency that presents their list of upcoming CRA exams with the month that the exam is expected to take place, which is helpful for users who are trying to plan when they will submit comments.

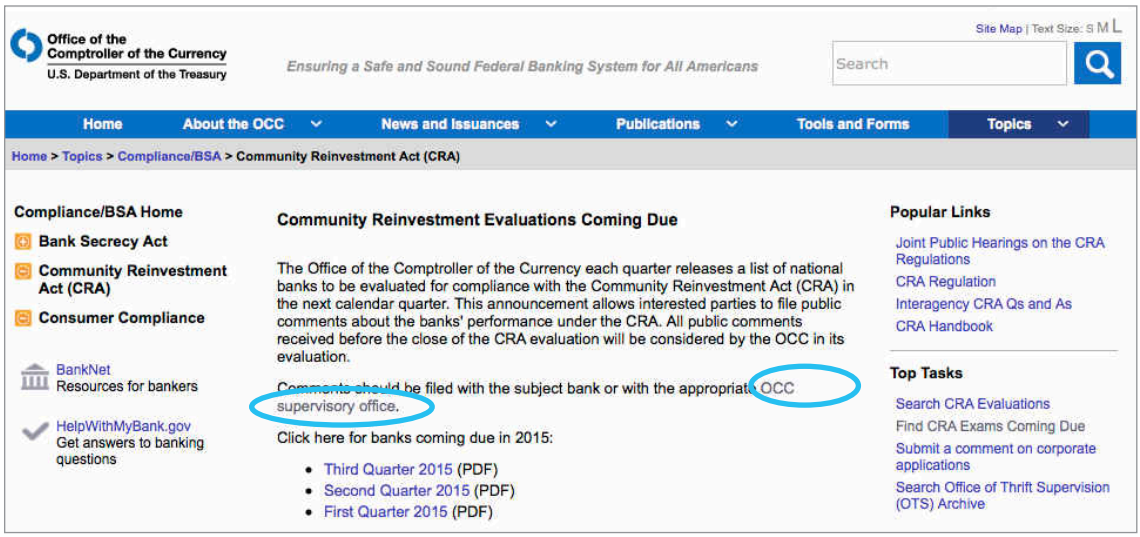


FIGURE 17: http://occ.gov/topics/compliance-bsa/cra/community-reinvestment-evaluations-coming-due.html
The OCC directs users to submit comments on CRA examinations to the appropriate OCC supervisory office, and supplies a link for finding the correct contact information.

Locating CRA Examination Staff Contacts

The webpage listing upcoming exams says comments should be filed with "the subject bank or with the appropriate OCC supervisory office" and links to a map of OCC offices that are broken down by district.

NOTE:
On this map or via links below it, users may click on particular districts or offices, which link to a contact page for that region or office.

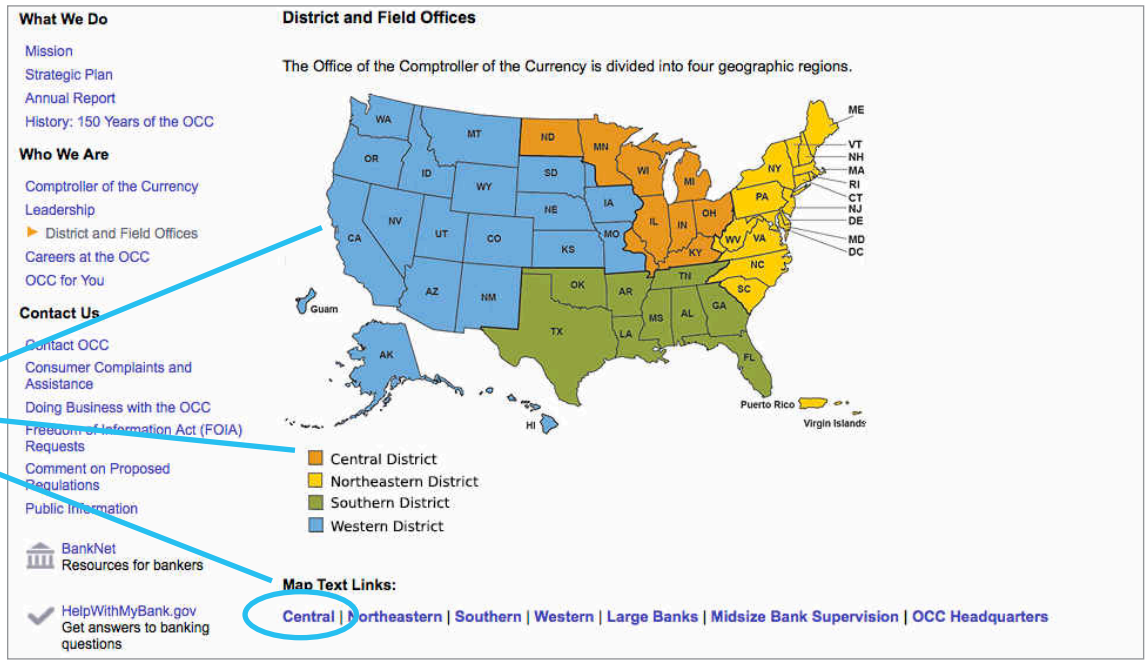


FIGURE 18: http://occ.gov/about/who-we-are/district-and-field-offices/index-organization.html
The page that is linked to in order to provide contact information for submitting CRA exams shows a map of the country broken down by district. Some of the district boundaries do not correspond to state boundaries, making it difficult to determine which district some cities fall within. Additionally, the whole system assumes that users will know in what district the bank they are interested in is located because it is not noted on the listing of upcoming exams. Users can either click on the district on the map or on the links below it to get to the district contact information.

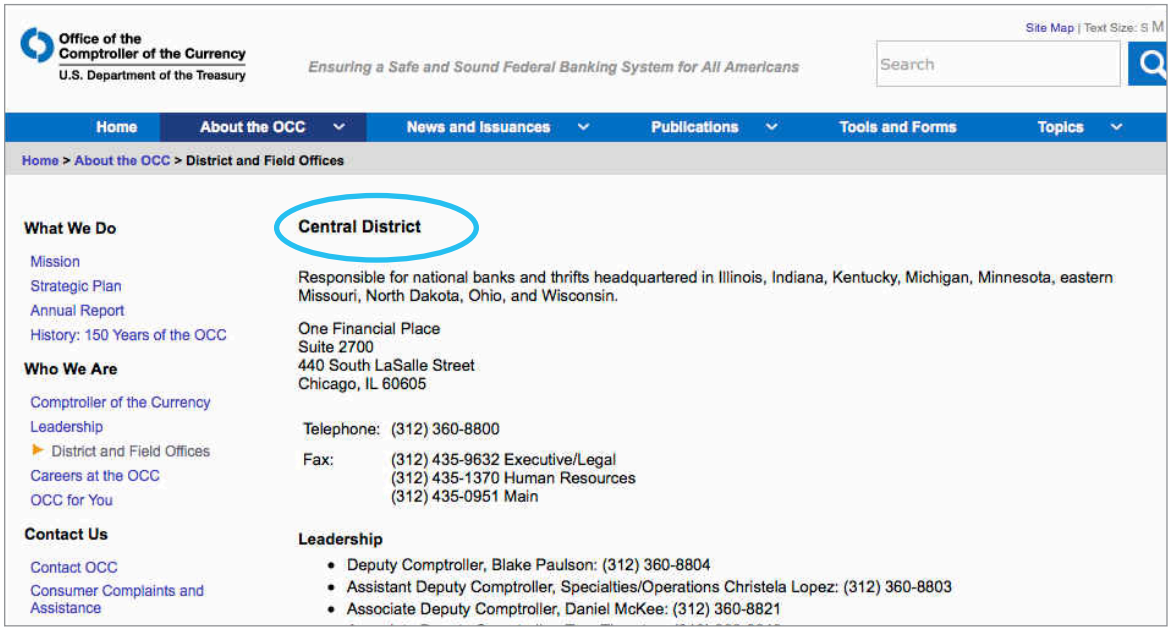


FIGURE 19: http://occ.gov/about/who-we-are/district-and-field-offices/central-district-info.html
From the page showing the map, users are linked to contact information for the district and field offices. No individual is identified as a contact at the district level and no email address is provided.

While it is helpful that the listing of exams does eventually lead to a contact page, the process assumes that users will know which district or office is overseeing a particular exam. Plus, once users reach the appropriate contact page, they still have to differentiate between a number of different contacts in different field offices or departments. To make matters more confusing, contact information for regional Community Affairs Officers is not included on these contact pages.

In order to clarify this process, the OCC should include the name of a particular office or contact that is dealing with each exam in the full listing of upcoming exams. NCRC staff often contact Community Affairs Officers to help determine the appropriate contact for submitting comments. Directing users to the appropriate Community Affairs office would make this process less cumbersome for the public, and it could be an alternative to listing a specific examiner. In either case, users need a direct line from the examination listing to the appropriate person or office to which they should submit comments. To further facilitate public participation, this same information should be included in the emailed press release about upcoming CRA exams that is sent at the beginning of each quarter.

Federal Reserve – *NEEDS TO IMPROVE*

The Federal Reserve's process for facilitating CRA comments has recently improved slightly by adding a direct link on their "Community Reinvestment Act" page to a box for submitting comments on exams. Still, a number of improvements need to be made to ensure transparency and communication between Federal Reserve staff and members of the public who are commenting.

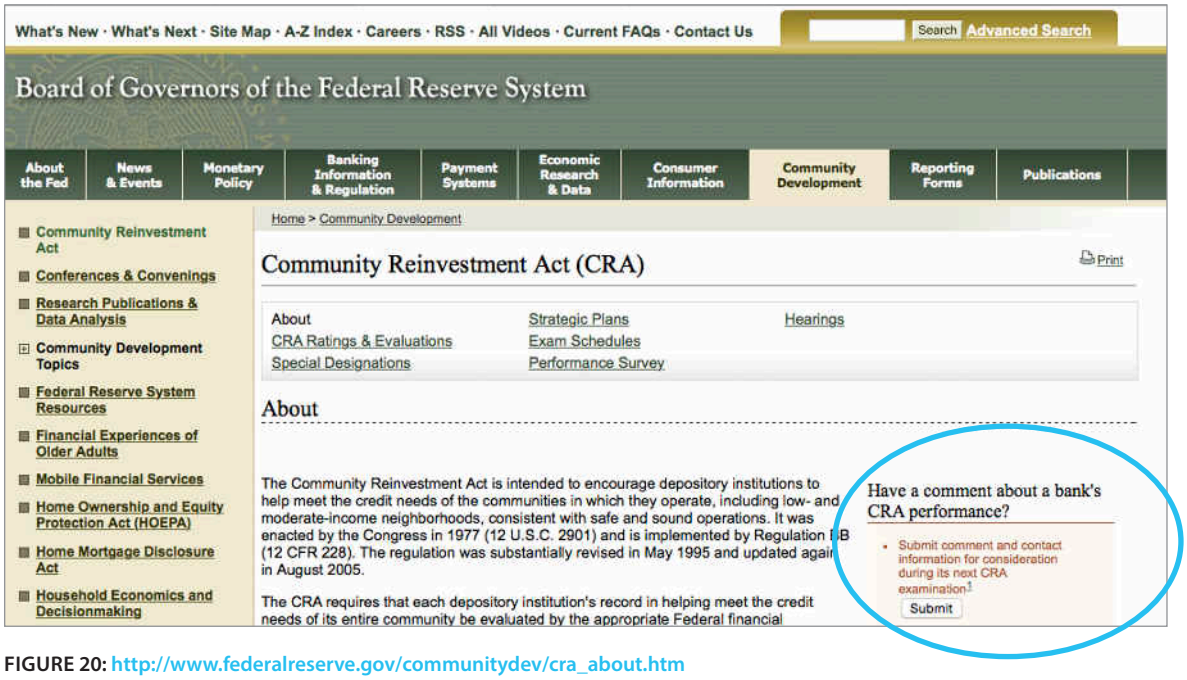


FIGURE 20: http://www.federalreserve.gov/communitydev/cra_about.htm
The Federal Reserve has added a tool allowing users to submit comments through their website.

Comment Submission Tool

Currently, the form that commenters are required to fill out has an 8,000 character maximum and does not allow documents to be attached. If members of the public are presenting data about a bank's performance that includes a graph or map, those graphics cannot be pasted into the comment box. All formatting is also lost in the process of pasting text into the box.

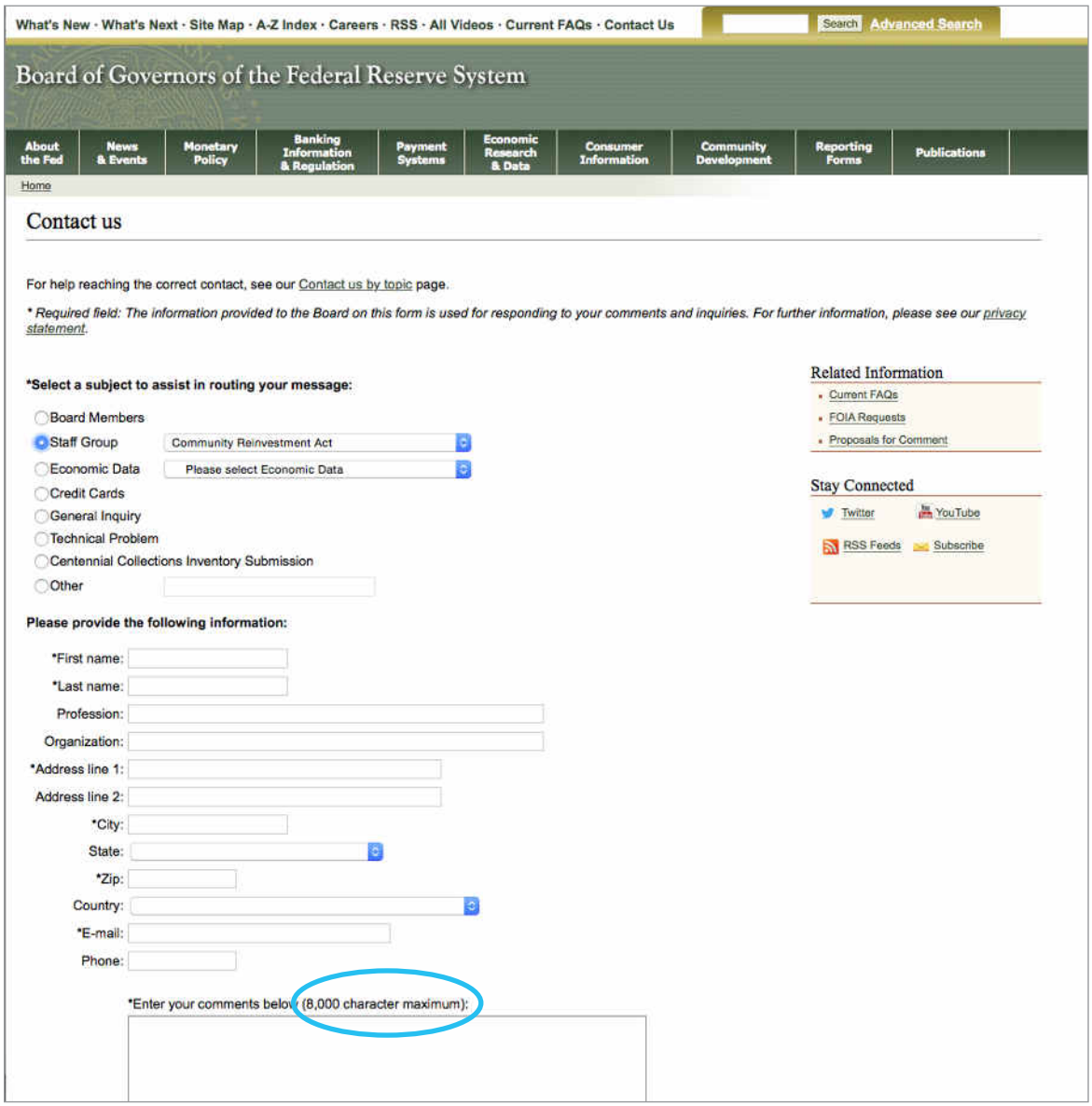


FIGURE 21: http://www.federalreserve.gov/apps/contactus/feedback.aspx?Submit=Submit
The submission tool does not allow files to be uploaded, and restricts comments to 8,000 characters, far less than the average comment letter.

Also, members of the public need to be assured that Federal Reserve staff have received their comments, but people who use the box do not receive a confirmation email or any other communication that their comment was received. The website does not make it clear whether or not commenters will receive confirmation or any kind of follow up from Federal Reserve staff after their comments have been submitted.

Locating CRA Examination Staff Contacts

Additionally, the Federal Reserve should ensure that commenters know to whom their comments should be addressed and members of the public should be provided with contact information for the appropriate person to whom they can direct questions. This information should be listed with the listing of each upcoming CRA exam. NCRC members and staff have reported difficulty in determining the appropriate staff person to send comments, both through the website and after reaching out to Federal Reserve Bank staff.

Federal Deposit Insurance Corporation – *HIGH SATISFACTORY*

Generally, the FDIC does an excellent job of facilitating CRA comments through their website. Recent updates to the website included the addition of a box for submitting comments on CRA examinations. This box allows users to attach a comment letter or type it directly into the box.

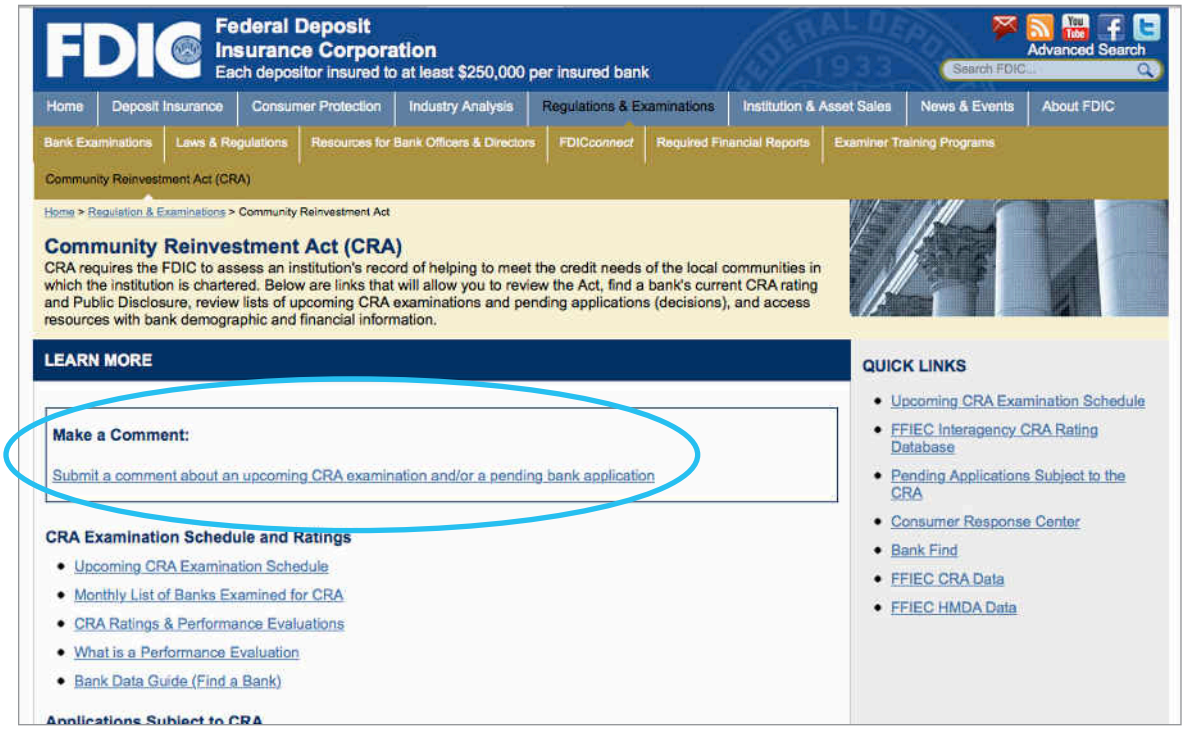


FIGURE 22: https://www.fdic.gov/regulations/cra/
The FDIC also allows for comments to be submitted directly through the website.

Comment Submission Tool

However, the feature for uploading documents only allows documents that are two megabytes or smaller. Many NCRC comment letters are 10 megabytes or greater due to the size of data analyses and other supplemental information attached to letters. Also, the 4,000 character text box is far too small for comment letters. Many of NCRC's comment letters vastly exceed 4,000 characters and any kind of character limit on comment letter submissions discourages participation in the commenting process. Similar to the Federal Reserve, the FDIC's submission tool does not send commenters a confirmation that their letter was received.

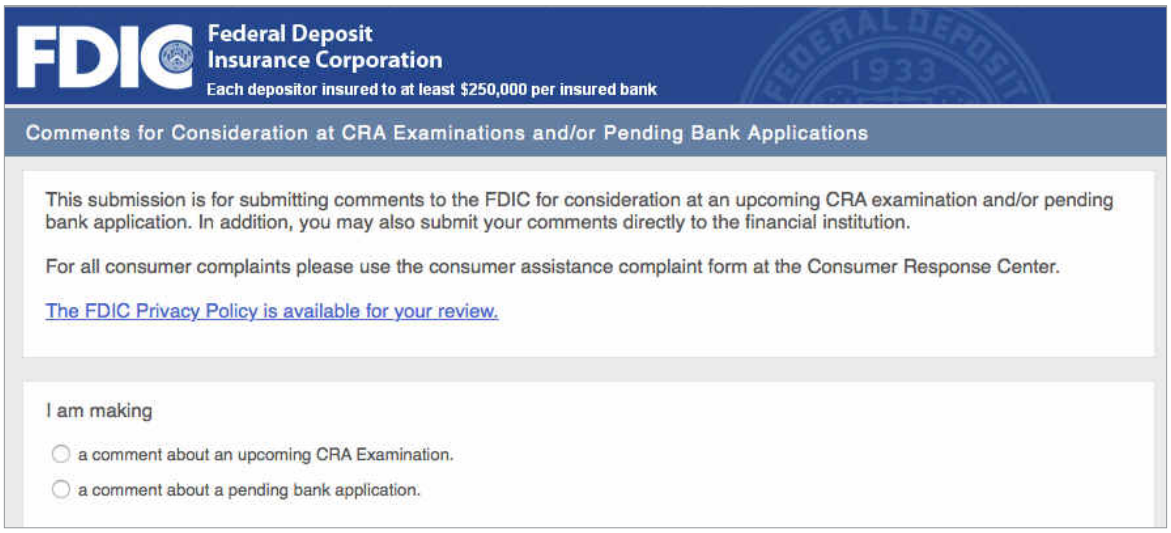


FIGURE 23A: https://fdicsurveys.co1.qualtrics.com/jfe/form/SV_2ibiZnCpt2iuAAZ
The FDIC's comment submission tool allows users to submit comments for both CRA exams and open applications.

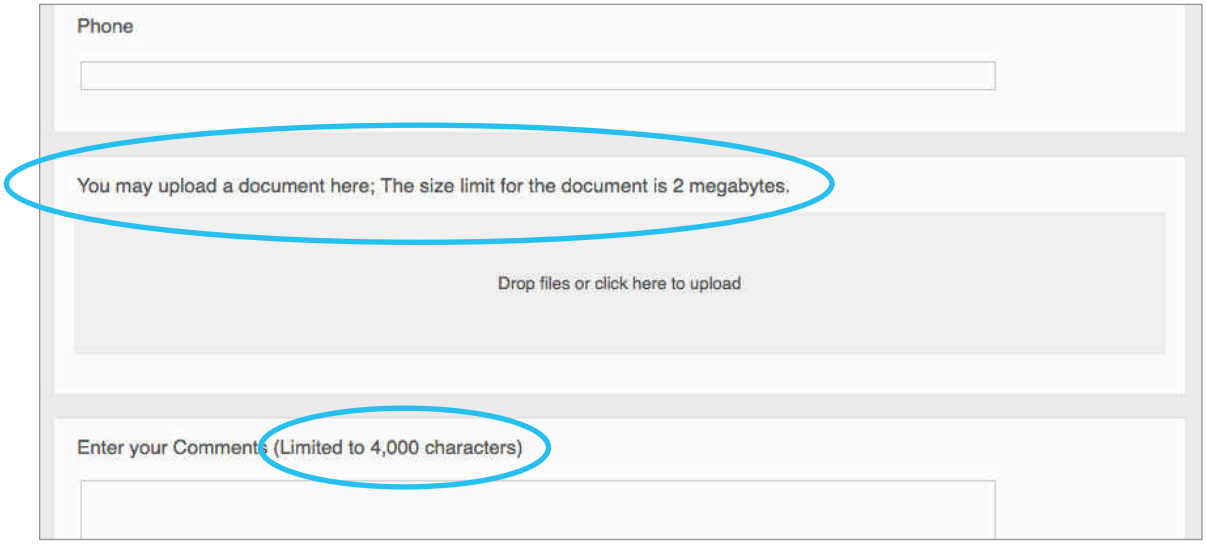
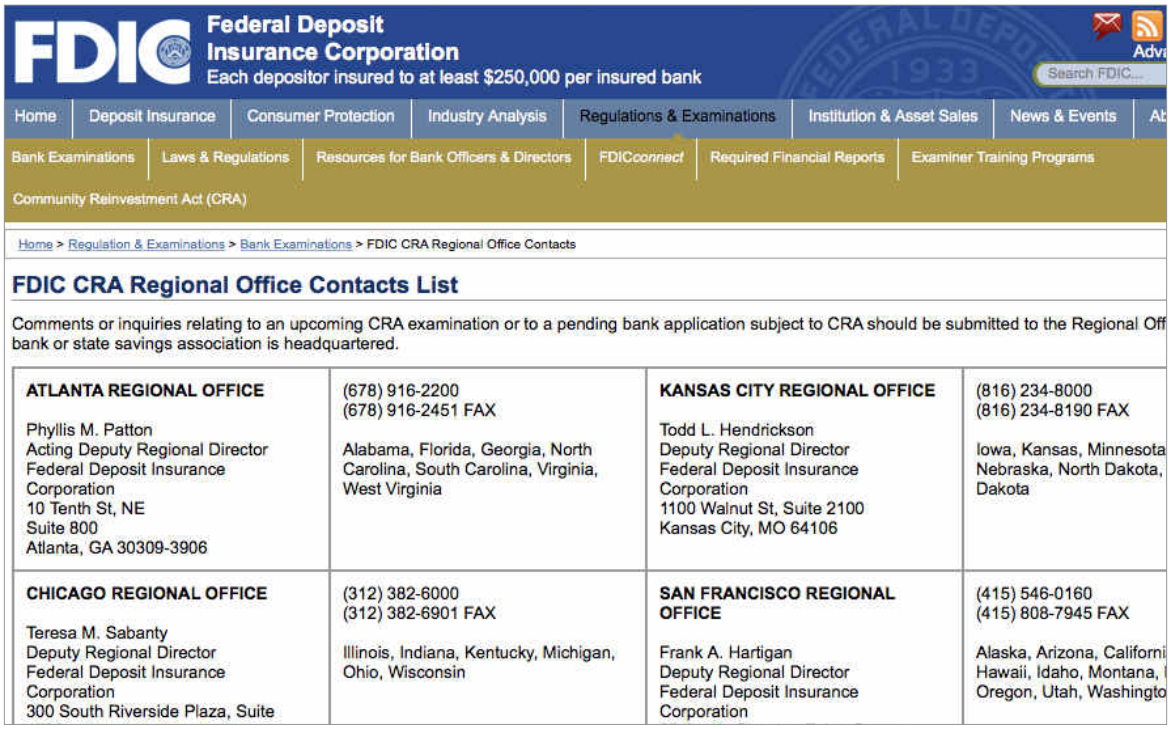


FIGURE 23B: https://fdicsurveys.co1.qualtrics.com/jfe/form/SV_2ibiZnCpt2iuAAZ
The tool does allow for documents to be uploaded, but limits the file size to two megabytes. Typed comments are limited to 4,000 characters.

Locating CRA Examination Staff Contacts

To further facilitate the submission of comments, contact information for the examiner or community affairs representative in charge should also be provided. The pages that list upcoming examinations by region do not provide contact information for the person to whom users should direct questions about examinations. The quarterly examination schedule page should link to "FDIC CRA Regional Contacts" with the explanation that these are the appropriate contacts for CRA comments.



FDIC Federal Deposit Insurance Corporation
Each depositor insured to at least $250,000 per insured bank

Home | Deposit Insurance | Consumer Protection | Industry Analysis | Regulations & Examinations | Institution & Asset Sales | News & Events

Bank Examinations | Laws & Regulations | Resources for Bank Officers & Directors | FDICconnect | Required Financial Reports | Examiner Training Programs

Community Reinvestment Act (CRA)

Home > Regulation & Examinations > Bank Examinations > FDIC CRA Regional Office Contacts

FDIC CRA Regional Office Contacts List

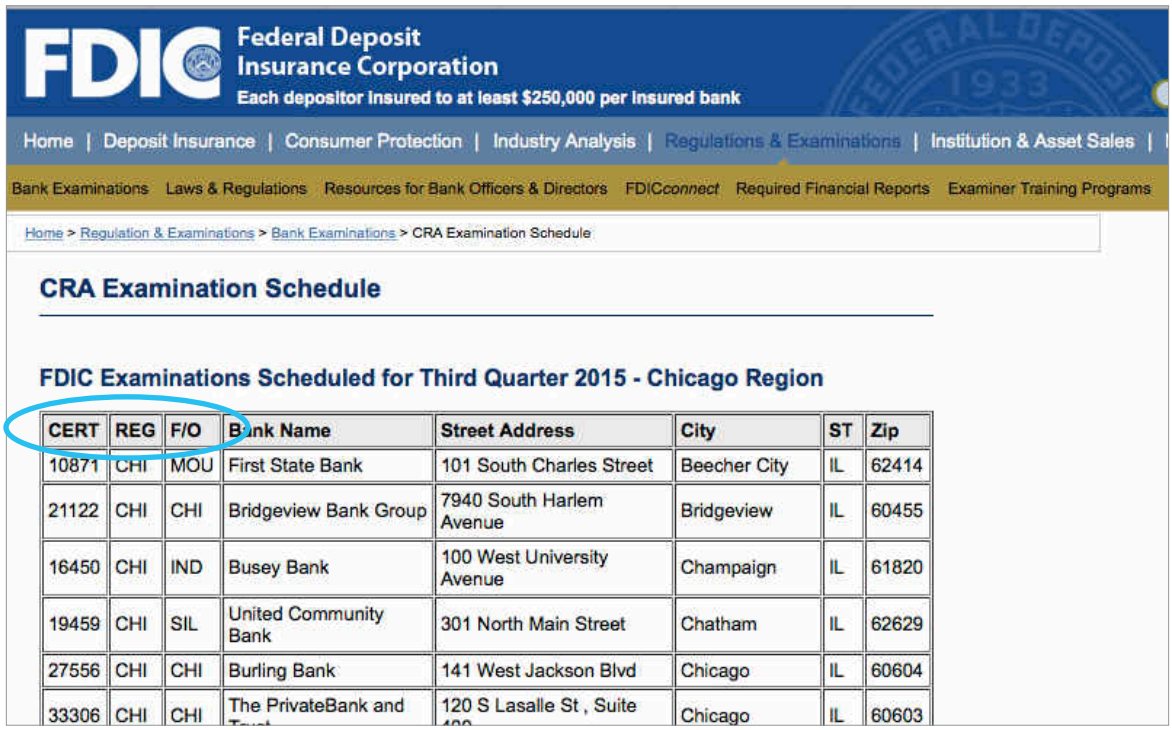
Comments or inquiries relating to an upcoming CRA examination or to a pending bank application subject to CRA should be submitted to the Regional Off
bank or state savings association is headquartered.

ATLANTA REGIONAL OFFICE Phyllis M. Patton Acting Deputy Regional Director Federal Deposit Insurance Corporation 10 Tenth St, NE Suite 800 Atlanta, GA 30309-3906	(678) 916-2200 (678) 916-2451 FAX Alabama, Florida, Georgia, North Carolina, South Carolina, Virginia, West Virginia	**KANSAS CITY REGIONAL OFFICE** Todd L. Hendrickson Deputy Regional Director Federal Deposit Insurance Corporation 1100 Walnut St, Suite 2100 Kansas City, MO 64106	(816) 234-8000 (816) 234-8190 FAX Iowa, Kansas, Minnesota Nebraska, North Dakota, Dakota
CHICAGO REGIONAL OFFICE Teresa M. Sabanty Deputy Regional Director Federal Deposit Insurance Corporation 300 South Riverside Plaza, Suite	(312) 382-6000 (312) 382-6901 FAX Illinois, Indiana, Kentucky, Michigan, Ohio, Wisconsin	**SAN FRANCISCO REGIONAL OFFICE** Frank A. Hartigan Deputy Regional Director Federal Deposit Insurance Corporation	(415) 546-0160 (415) 808-7945 FAX Alaska, Arizona, Californi Hawaii, Idaho, Montana, Oregon, Utah, Washingto

FIGURE 24 https://www.fdic.gov/regulations/community/cra_contacts.html
The quarterly CRA examination schedule should link to this page to allow commenters to find the appropriate contact within the agency.

Jargon in CRA Examination Listings

Additionally, the FDIC should make sure that information on CRA examination listings is labeled in a way that the general public can understand. Within the table listing exams in each regional schedule page, there are abbreviations used in the column headers. Presumably, "REG" means "region" and "F/O" means "field office," but these and other abbreviations are never clarified for users. All of the regulators should strive to avoid using jargon on any webpage that is meant to facilitate interaction with the public.



CERT	REG	F/O	Bank Name	Street Address	City	ST	Zip
10871	CHI	MOU	First State Bank	101 South Charles Street	Beecher City	IL	62414
21122	CHI	CHI	Bridgeview Bank Group	7940 South Harlem Avenue	Bridgeview	IL	60455
16450	CHI	IND	Busey Bank	100 West University Avenue	Champaign	IL	61820
19459	CHI	SIL	United Community Bank	301 North Main Street	Chatham	IL	62629
27556	CHI	CHI	Burling Bank	141 West Jackson Blvd	Chicago	IL	60604
33306	CHI	CHI	The PrivateBank and	120 S Lasalle St , Suite	Chicago	IL	60603

FIGURE 25: https://www.fdic.gov/regulations/community/exam/chi15cra3.html
The FDIC's listing of upcoming examinations includes columns titled with odd jargon referring to the regional and field offices that handle the exams.

Locating Previous CRA Performance Evaluations

Members of the public can search for any bank's previous CRA examinations on the appropriate regulator's website. The completed exams are posted to the Internet and are also supposed to be made available in bank branches. These previous exams contain material that is valuable to members of the public – including information about how well the bank has served community needs through lending, investing and services.

To determine which website to visit, users have to figure out which agency regulates the bank, often through the website of the Federal Financial Institutions Examinations Council (FFIEC). Users can link directly to the appropriate agency's website from the FFIEC and can look up the performance evaluation on that site. The regulatory agencies all use a search function that allows users to search for financial institutions' previous CRA examinations, typically by the bank's name or charter number.

NCRC Recommendation

To best facilitate easy access to information about previous exams, the regulatory agencies should all use a simple search engine function that allows users to search for performance evaluations by the name or charter number of the financial institution, by geographic location of the bank, by year or by rating. The search function should use standard best practices for search engines, such as matching search results with the terms users type in, and not require that a bank's full, proper name be entered to populate search results.

Users should be able to sort search results to better facilitate finding appropriate information. Subsidiaries of the same bank holding company appearing together in search results should be noted as such. When users select a particular bank from the search results, all previous CRA examinations for that institution should appear together in chronological order, including exams that were performed while the bank did business under a different name or had a different primary regulator.

Office of the Comptroller of the Currency – *OUTSTANDING*

The OCC's CRA search platform has improved dramatically in recent months, and is now a model for how CRA search functions should operate. Prior to this update, the search function did not consistently produce correct results and was difficult to navigate. The clean interface, search options, and ability to sort results are a vast improvement over the old system.

To help further differentiate between banks with similar names, the OCC should add the bank's asset size at the time of examination to the search results.

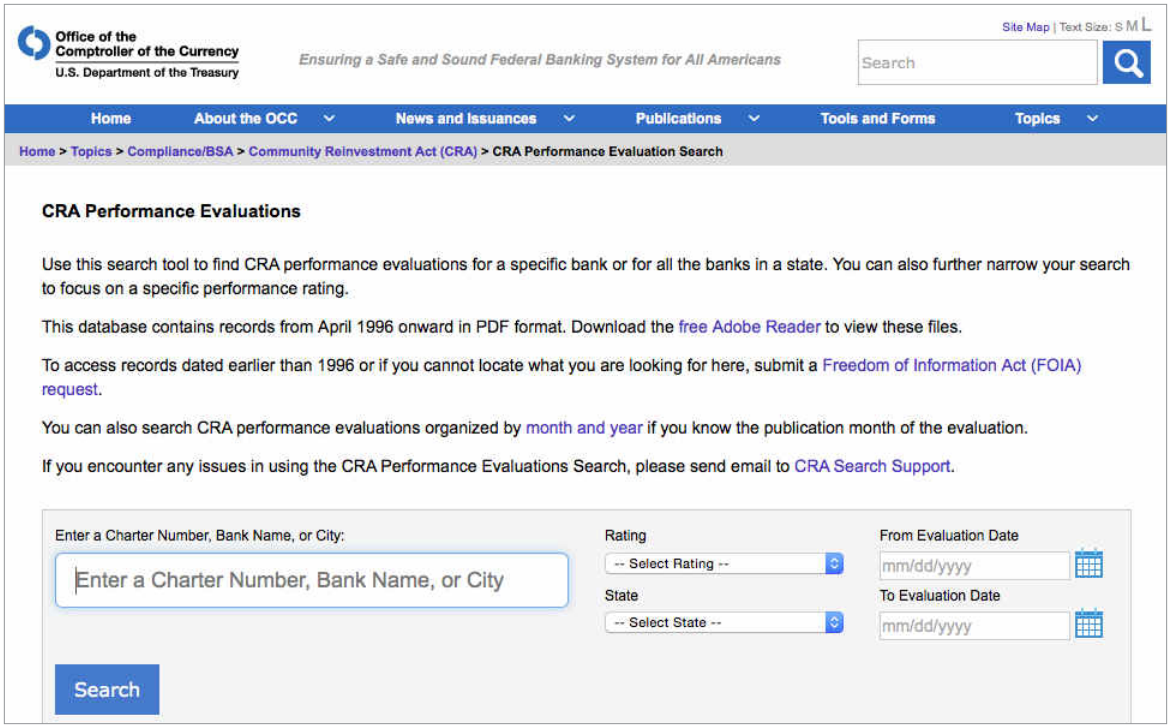


FIGURE 26: http://apps.occ.gov/crasearch/default.aspx
The OCC's updated CRA search function is a vast improvement over the old tool.

Federal Reserve – *SUBSTANTIAL NONCOMPLIANCE*

The Federal Reserve's search platform inhibits users' abilities to find previous performance evaluations and must be improved to allow members of the public to effectively find information.

FIGURE 27: http://www.federalreserve.gov/apps/crape/BankRating.aspx
The Federal Reserve's CRA search tool requires users to enter bank names in an abbreviated format. This is not explained on the page itself, but can only be found by following links to search tips or frequently asked questions.

CRA Performance Evaluation Search Tool

The Federal Reserve uses an unfamiliar and unintuitive system of abbreviations for the banks that it supervises called the "Federal Reserve National Information Center RSSD ID," and searches on the Federal Reserve CRA Ratings Search website require users to format bank names following the conventions of the abbreviation system. This system presents a major barrier to members of the public who are hoping to access information about a bank's past CRA history, because although the bank's name must be typed in this format to successfully search for its previous exams, the main page of the search makes no mention of this abbreviation system nor gives any kind of key as to how to format the name.

Users must follow the link to "Frequently Asked Questions" in order to be told that they have to enter bank names using abbreviations. A further disappointment is that this page does not give a comprehensive listing of the abbreviations that may need to be used, but instead directs users to look up the bank's Federal Reserve National Information Center RSSD ID in order to enter the correct search term.

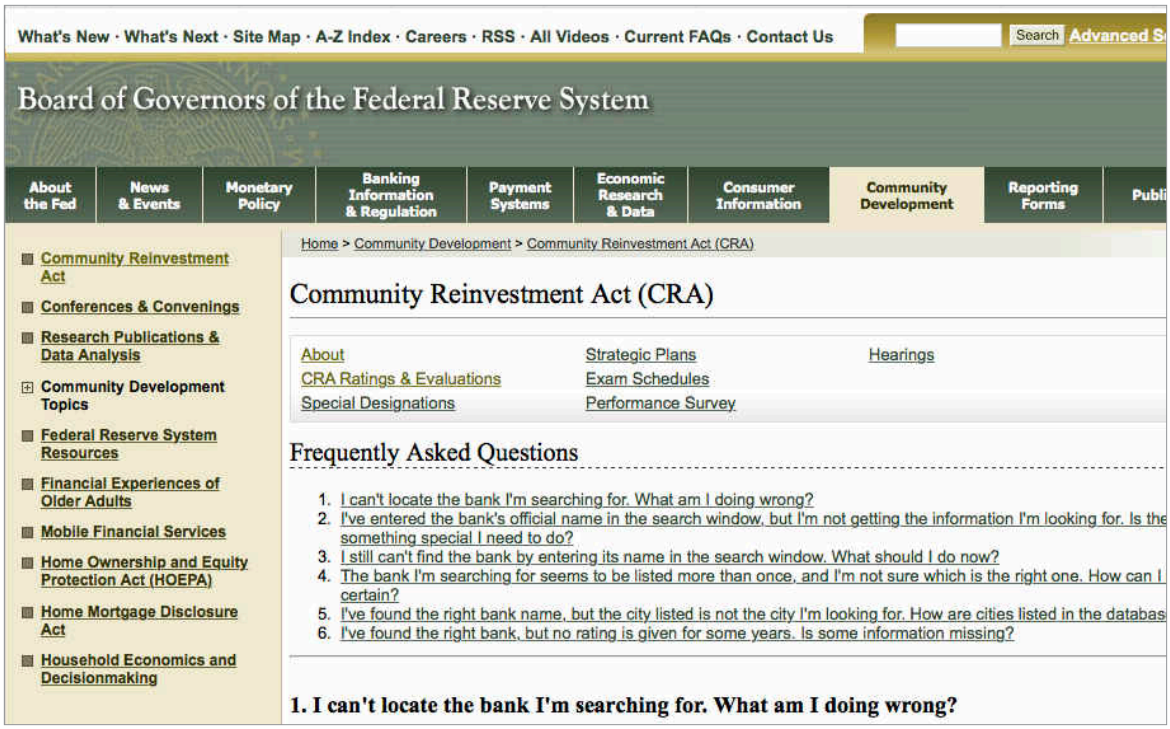


FIGURE 28: http://www.federalreserve.gov/communitydev/cra_faqs.htm
The "Frequently Asked Questions" page tells users that they have to enter bank names in an abbreviated format called the National Information Center's RSSD ID. It then links to a site where users can look up the bank's RSSD ID in order to search for the CRA exam.

For example, if a user wanted to find the previous CRA history of CCB Community Bank, he or she would have to type "CCB CMNTY BK" into the search bar in order for the results to appear. If the user typed in the full name, no results would be returned, as is illustrated below. In order to facilitate ready access to public information, the Federal Reserve should allow for users to search using a bank's full name or, at the very least, they should prominently display a key that shows how users must format names in order to find the appropriate results. Simply linking to an explanation of how to find the RSSD ID is not sufficient.

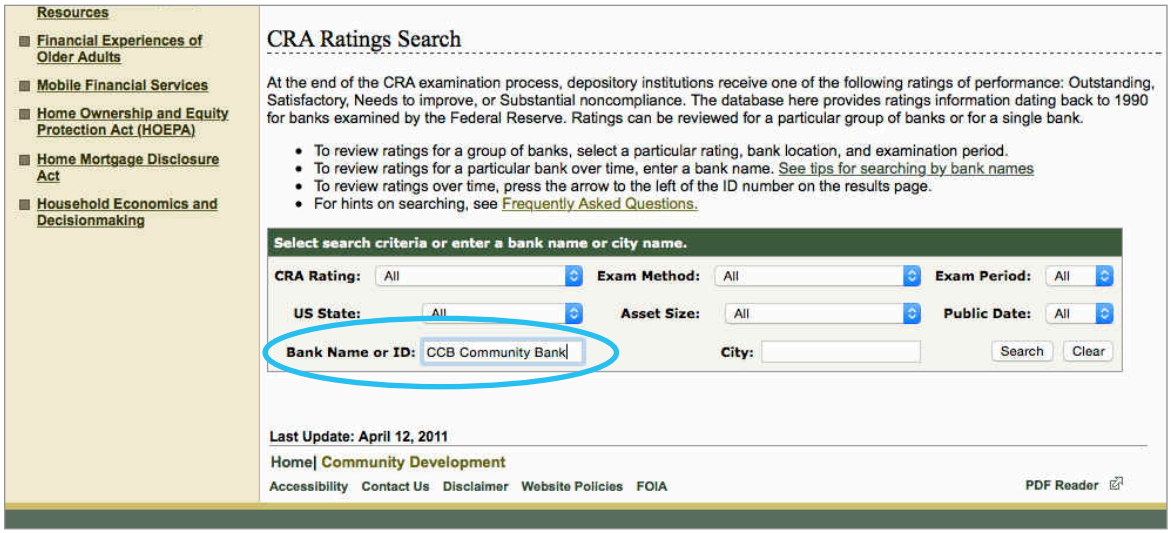


FIGURE 29: Webpage http://www.federalreserve.gov/apps/crape/BankRating.aspx with "CCB Community Bank" entered in the bank name or ID. A search for CCB Community Bank's CRA exam demonstrates the issue.

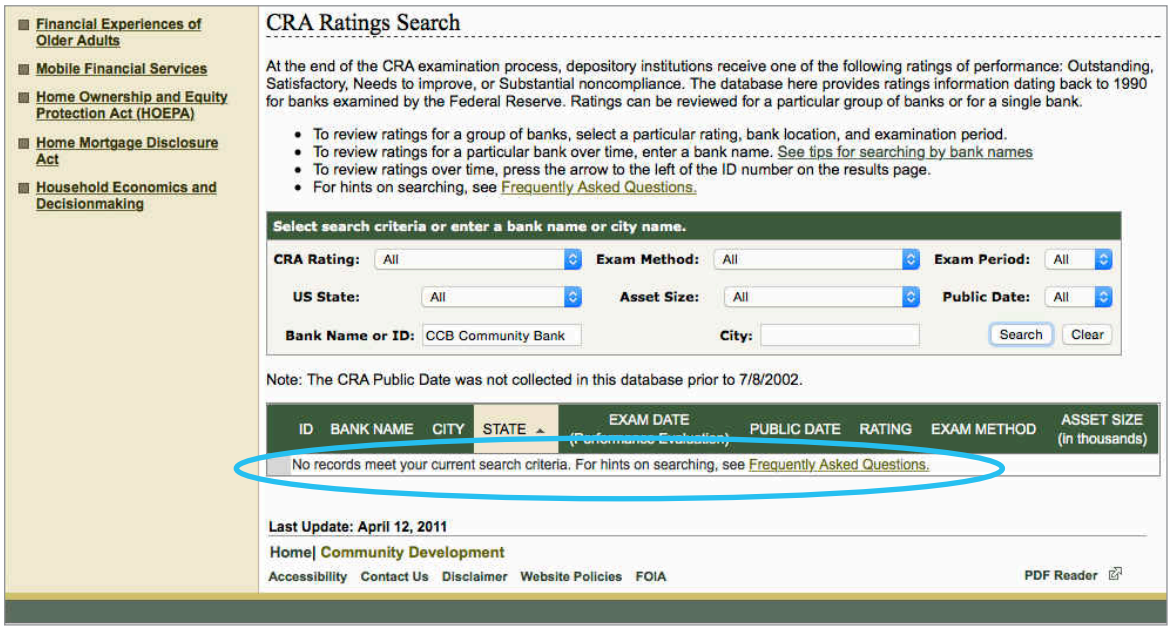


FIGURE 30: Webpage http://www.federalreserve.gov/apps/crape/BankRating.aspx after hitting "search" from Figure 29. No results are found when the bank's full name is entered.

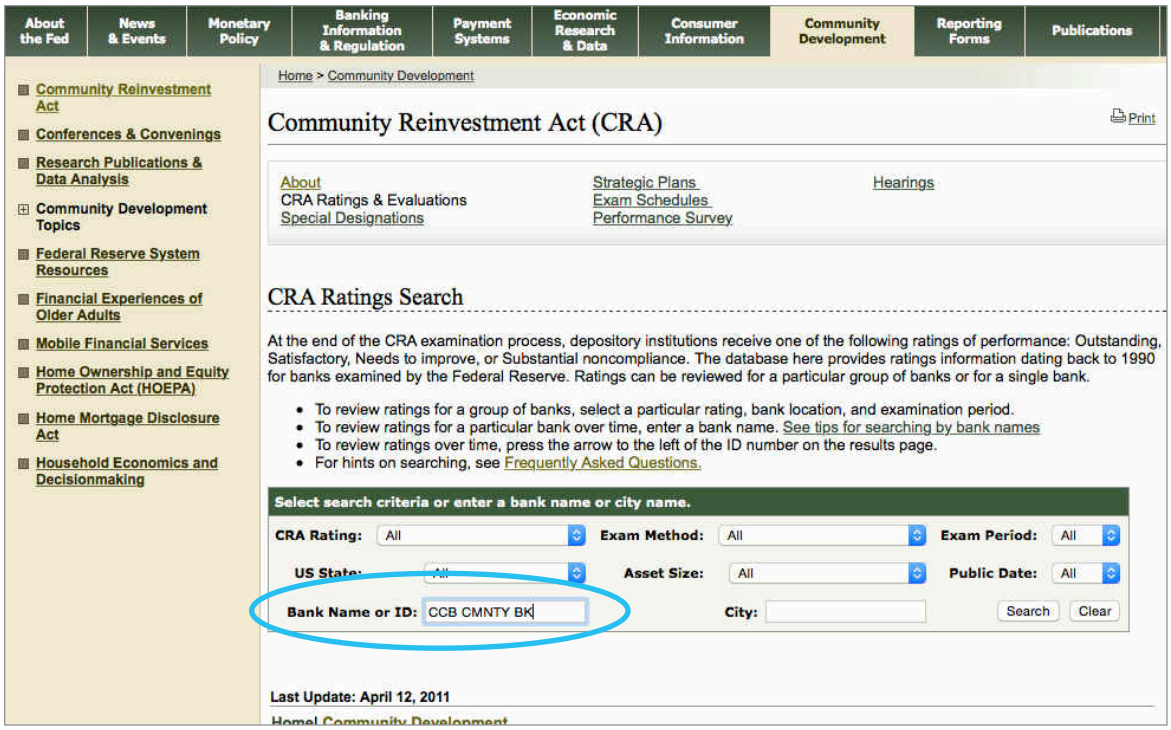


FIGURE 31: Webpage http://www.federalreserve.gov/apps/crape/BankRating.aspx with "CCB CMNTY BK" entered in the bank name or ID. The bank's abbreviated name, CCB CMNTY BK, is entered.

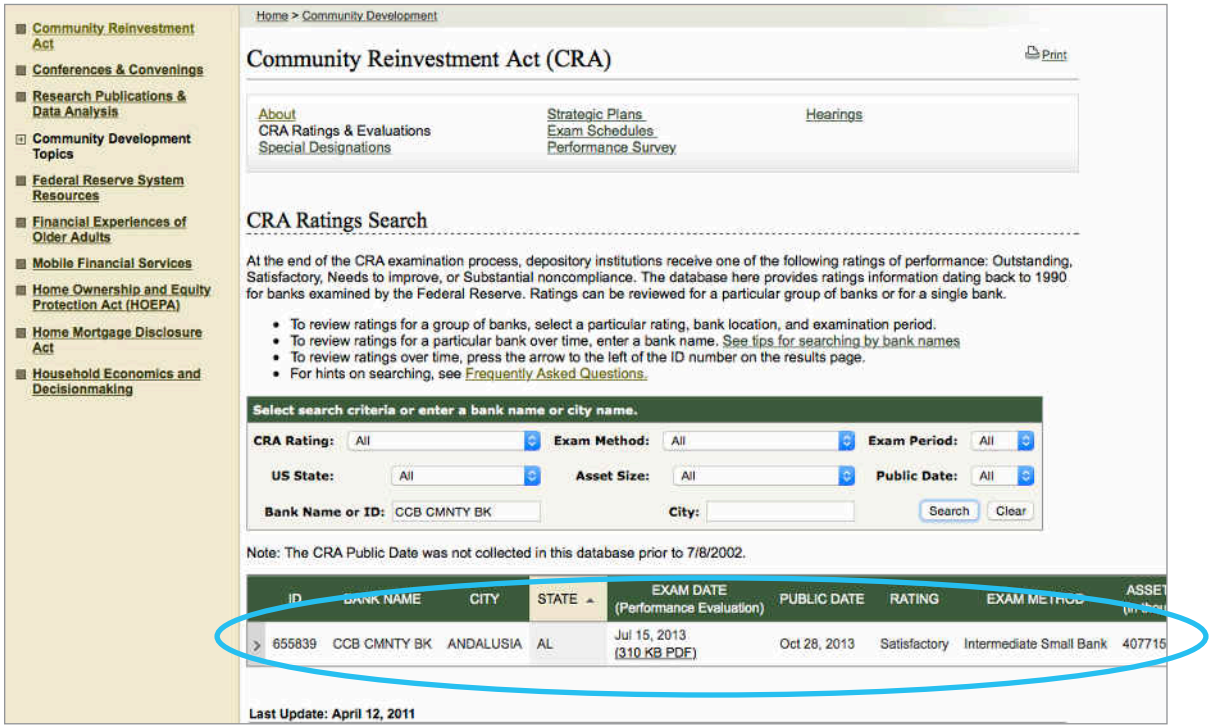


FIGURE 32: Webpage http://www.federalreserve.gov/apps/crape/BankRating.aspx after hitting "search" from Figure 31. The abbreviated name returns the correct results.

Displaying Search Results

Additionally, once results are returned in a search, only the most recent CRA examination is displayed and previous examinations are hidden unless the user clicks on an arrow symbol next to the result. While this system is useful for grouping all of a bank's results together, the arrow button is not labeled as "Expand" unless the user scrolls their mouse over the arrow. The arrow button should always be labeled "Expand" to show that there are hidden results, or all results should automatically be listed in chronological order.

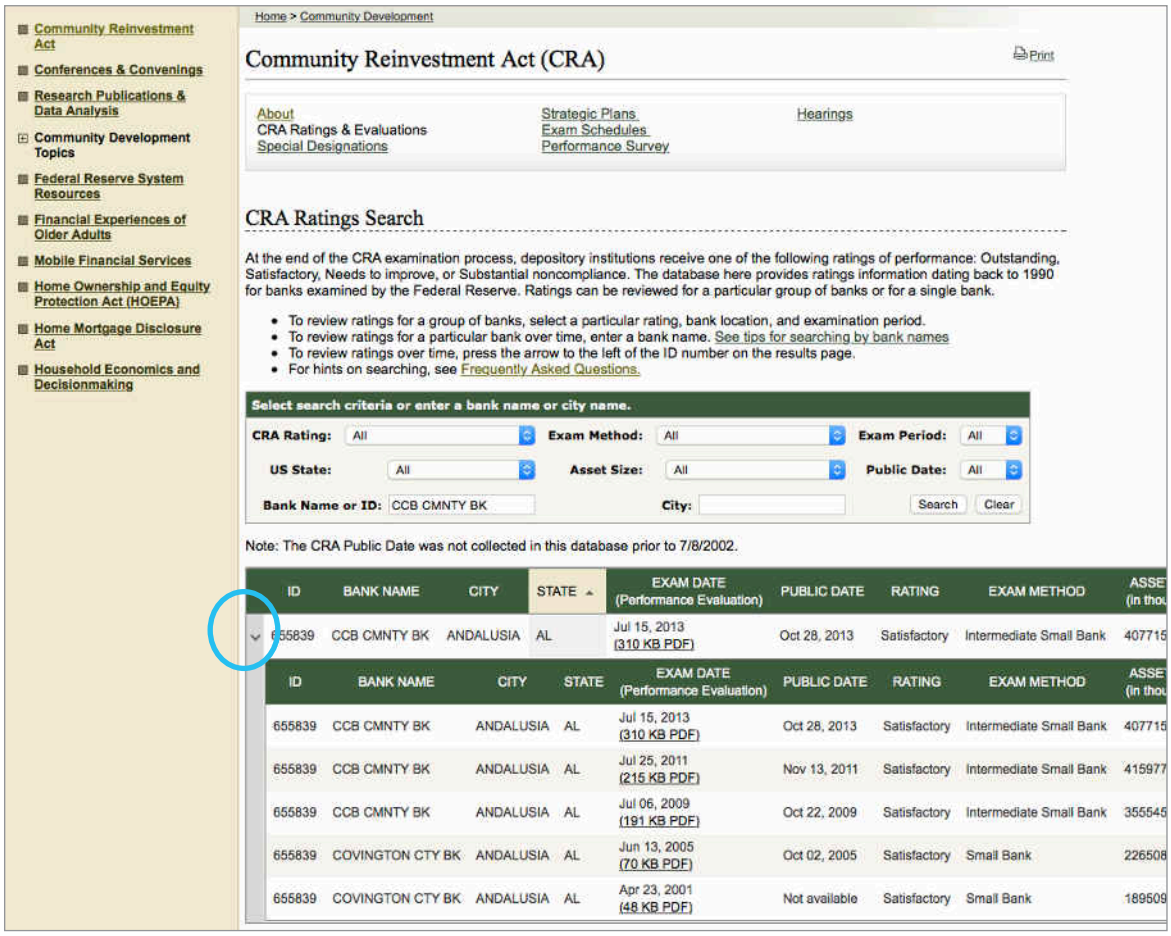


FIGURE 33: Webpage http://www.federalreserve.gov/apps/crape/BankRating.aspx after clicking on the expand arrow from Figure 32. In order to find exams prior to the most recent exam, users must click on the small arrow next to the bank's ID number to expand the listings

Federal Deposit Insurance Corporation - *OUTSTANDING*

The FDIC's search function allows members of the public to query the database by all of the categories outlined in the NCRC recommendation. Additionally, the search function allows users to select which fields they would like to have displayed in the search results. These features improve the public's experience in searching for performance evaluations in meaningful ways and lead to an overall sense of transparency.

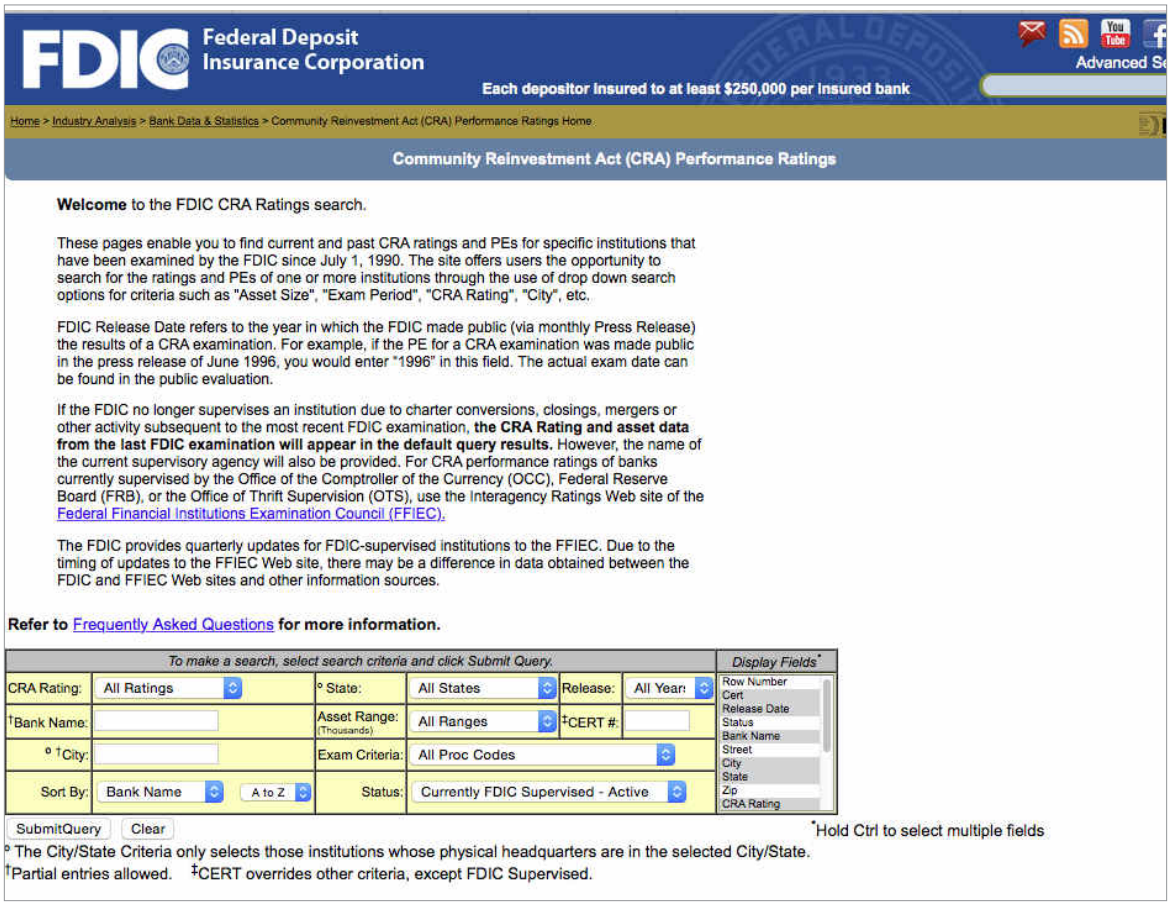


FIGURE 34: https://www2.fdic.gov/crapes/
The FDIC's CRA search function allows users to search for previous exams by a large number of factors.

Applications Search Function

Most applications for a bank or bank holding company to merge with or acquire another bank or bank holding company are subject to public comment. The regulatory agencies use these comments to help determine the impact that a merger or acquisition would have on a community, and the agencies weigh these comments in their ultimate decision to approve or deny the application. The public typically has 30 days after a merger application has been filed to submit comments, meaning that quick, ready access to a list of pending applications is important for the public to be engaged in the process.

Applications search functions allow users to search application listings by the name of bank or other criteria like geography or application type. These tools help users parse a great deal of information by allowing them to find applications that fit only their search criteria.

NCRC Recommendation

Applications search tools should allow users to quickly find applications by type, bank name, state or date. Applications with open comment periods and those that are already closed should both be included in the search function so that users can see a bank's past application activity. Search results should indicate whether or not the comment period is still open, and if it is, it should clearly indicate how users can contact the regulatory agency and submit comment letters.

Office of the Comptroller of the Currency – *SUBSTANTIAL NONCOMPLIANCE*

The Corporate Activities Search (CAS) is the OCC's platform that allows users to search for applications that have been submitted to the agency. The search platform sometimes requires users to enter bank names in abbreviated formats that are not explained on the site, and if users do not use these abbreviated names, no results are returned. Additionally, branch, merger and other regulatory applications are listed together without regard to the nature of the transaction, and the webpage does not include a comprehensive list of all of the possible application types that may be included.

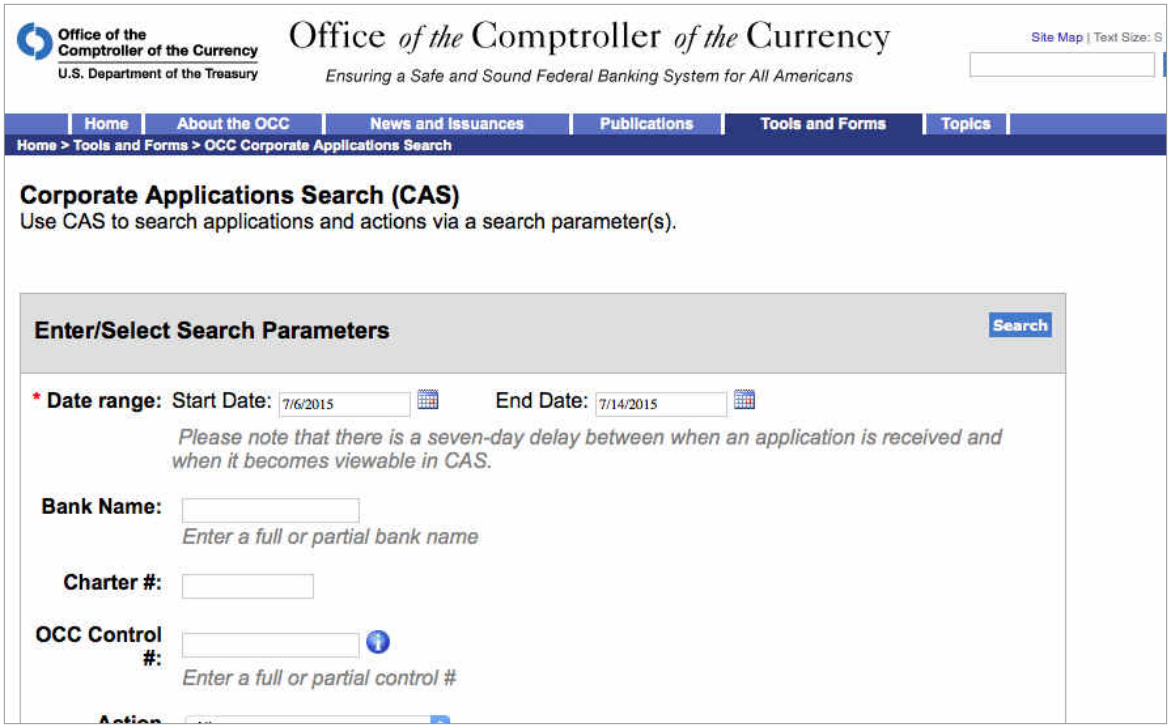


FIGURE 35: http://apps.occ.gov/CAAS_CATS/default.aspx
The Corporate Activities Search (CAS) is the OCC's applications search function.

Abbreviated Search Terms

Members of the public can search for application listings using a number of different parameters on the CAS. Unfortunately, search results are not always consistent due to odd abbreviations that users must type in to find applications from banks. For example, when searching for applications from Valley National Bank, users have to type in "Valley NB" or just "Valley" to get correct search results. ***Without exception, all of the banking regulatory agencies need to create search functions that will return correct search results when users type in the full name of the bank.***

FIGURE 36: Webpage http://apps.occ.gov/CAAS_CATS/default.aspx with date range as 5/1/2015 through 7/10/2015 and bank name as "Valley National Bank." The CAS does not always produce consistent results when searching by the bank name.

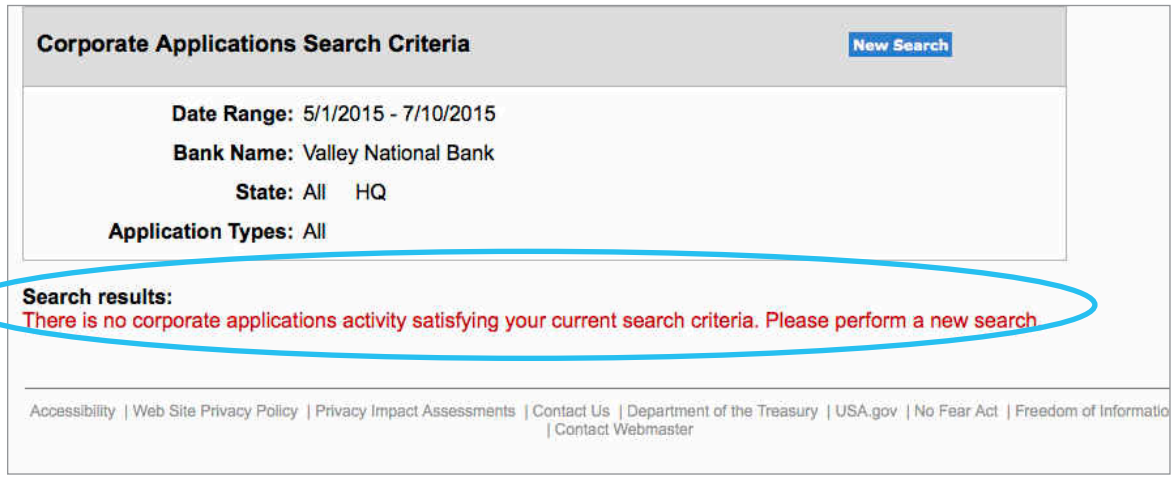


FIGURE 37: Webpage http://apps.occ.gov/CAAS_CATS/default.aspx (hitting search from figure 36) When entering "Valley National Bank" as the bank name, no results are returned.

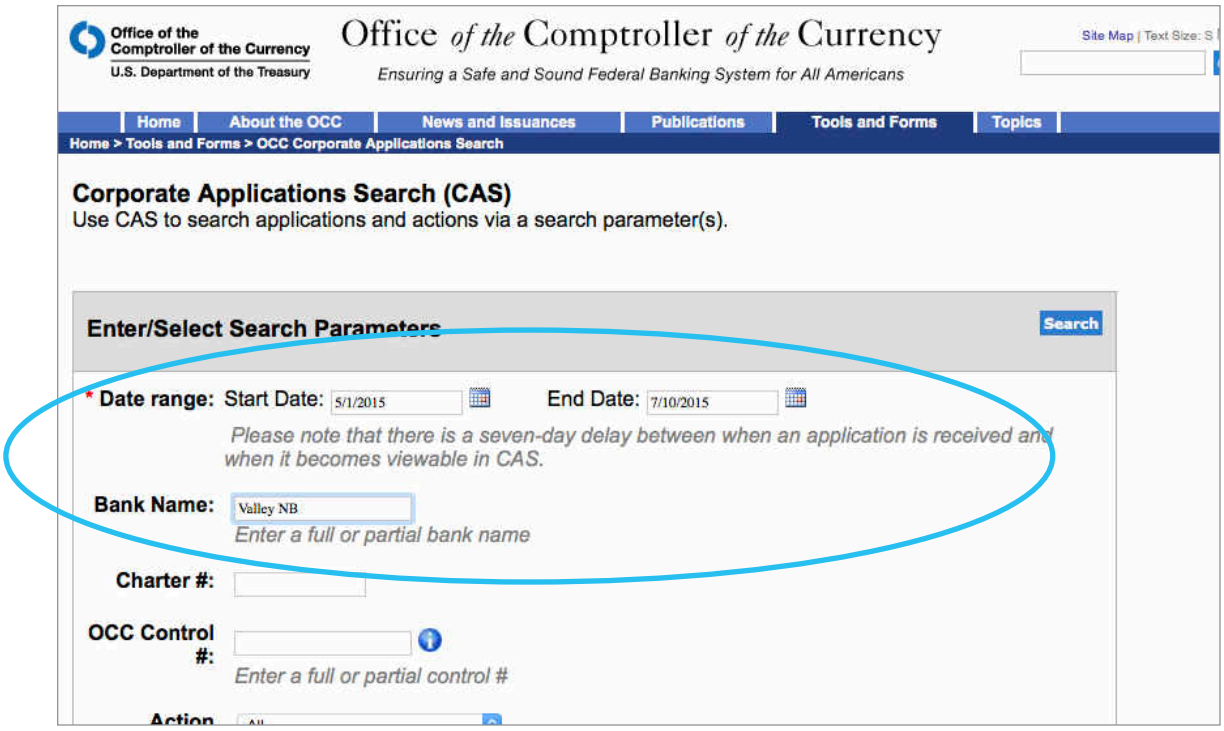
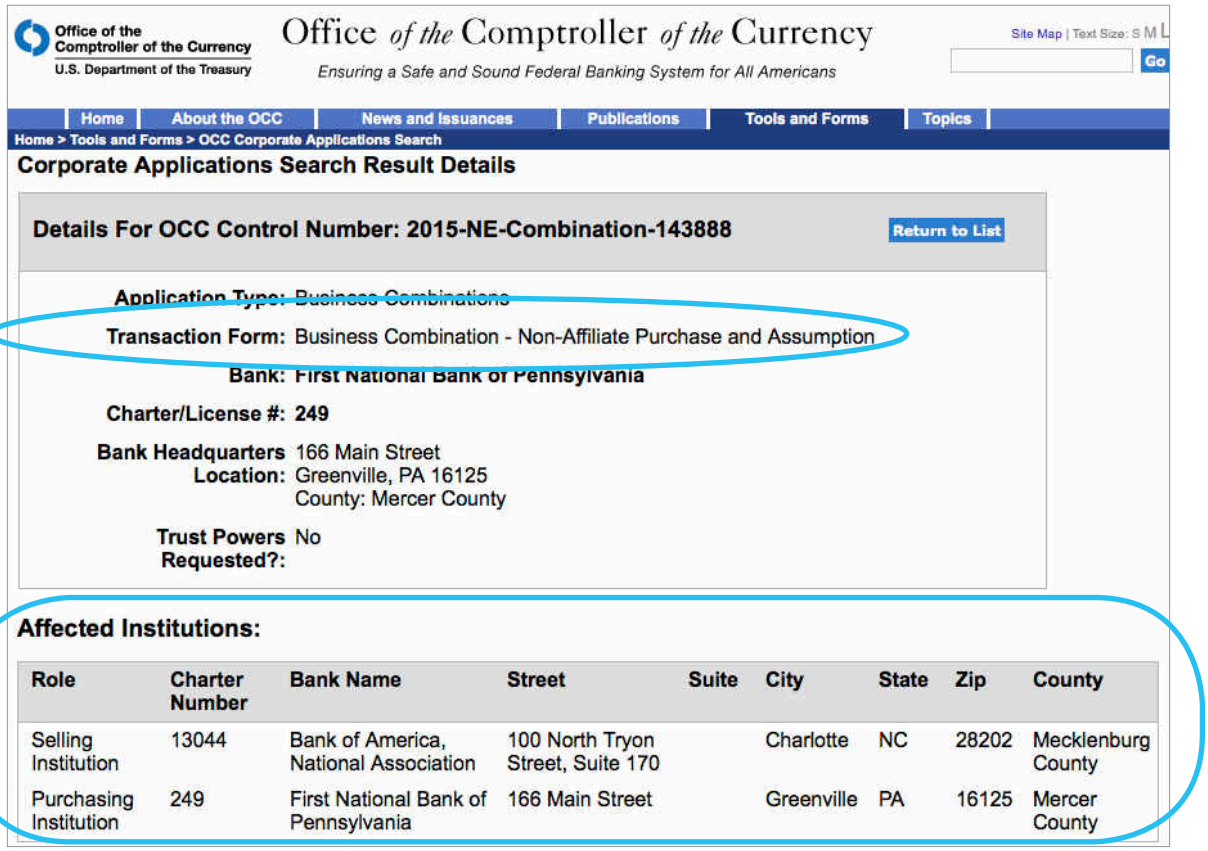


FIGURE 38: Webpage http://apps.occ.gov/CAAS_CATS/default.aspx (with date range 5/1/2015 through 7/10/15 and bank name as "Valley NB"). "Valley NB" is entered as the search term instead.

FIGURE 39: http://apps.occ.gov/CAAS_CATS/default.aspx (hitting search from figure 38)
This abbreviated name returns the correct results, including a merger application that was still open for public comment at the time of the search

Search Results

The CAS has improved recently by removing some of the abbreviations from the application names, although jargon still pervades the search tool, keeping users from having clarity on what kind of transaction is taking place. For example, the difference between a full merger or acquisition and the purchase of a branch or set of branches from another bank is not clearly stated in the CAS. The transaction form for a regular, non-affiliate merger is titled "Business Combination – Non-Affiliate Merger," while the title for a branch or deposit purchase is "Business Combination – Non-Affiliate Purchase and Assumption." Nowhere on the page listing the application does it specify that the "Purchase and Assumption" transaction means that only a portion of the target bank, either a branch or assets, will be acquired in the transaction. While trained experts may recognize the difference between these kinds of activities, the average user is unlikely to see the distinction between the two titles and understand the difference in the activities.



Role	Charter Number	Bank Name	Street	Suite	City	State	Zip	County
Selling Institution	13044	Bank of America, National Association	100 North Tryon Street, Suite 170		Charlotte	NC	28202	Mecklenburg County
Purchasing Institution	249	First National Bank of Pennsylvania	166 Main Street		Greenville	PA	16125	Mercer County

FIGURE 40: http://apps.occ.gov/CAAS_CATS/CAAS_Details.aspx?FilingTypeID=11&FilingID=143888&FilingSubtypeID=1036
The search results of the CAS are also confusing. In this example, it appears that Bank of America is being acquired by First National Bank of Pennsylvania. In fact, First National Bank of Pennsylvania is just buying a Bank of America branch, but this is not made clear by the transaction code called "Business Combination – Non-Affiliate Purchase and Assumption."

Federal Reserve – *NEEDS TO IMPROVE*

The Federal Reserve does not maintain a search function for applications subject to public comment. The public would be well-served by the Federal Reserve providing users with a means of searching for applications instead of only having the option of looking through the static H2.A list. We believe that a search engine is an important tool for users trying to find information about upcoming mergers and acquisitions, but because the Federal Reserve provides a listing of applications through the H2.A list, this omission is not as great.

Federal Deposit Insurance Corporation – NEEDS TO IMPROVE

The FDIC does not clearly link to contact information for agency staff related to applications and does not post electronic version of applications online.

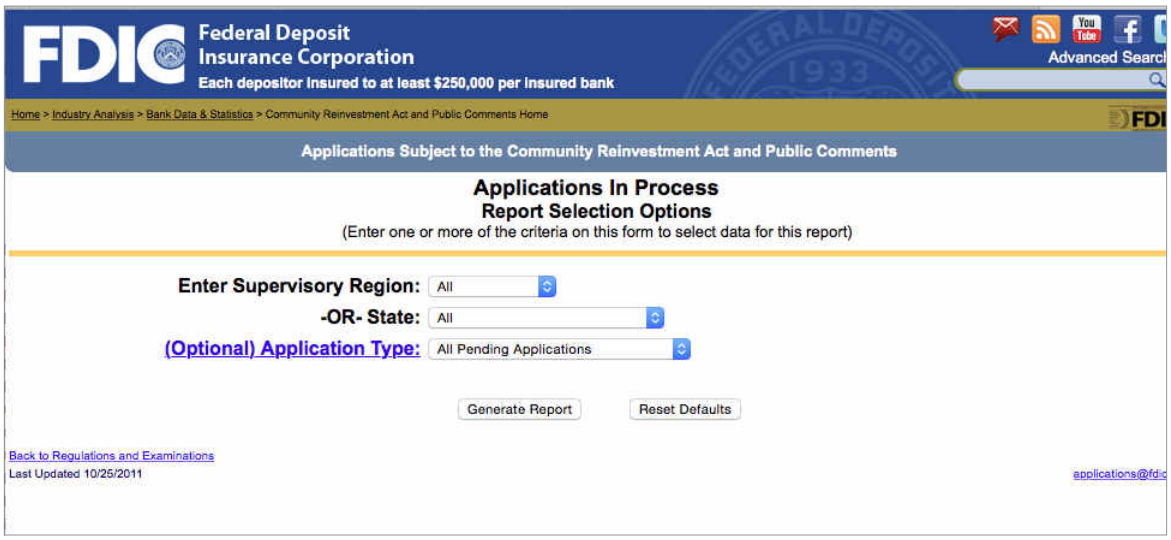
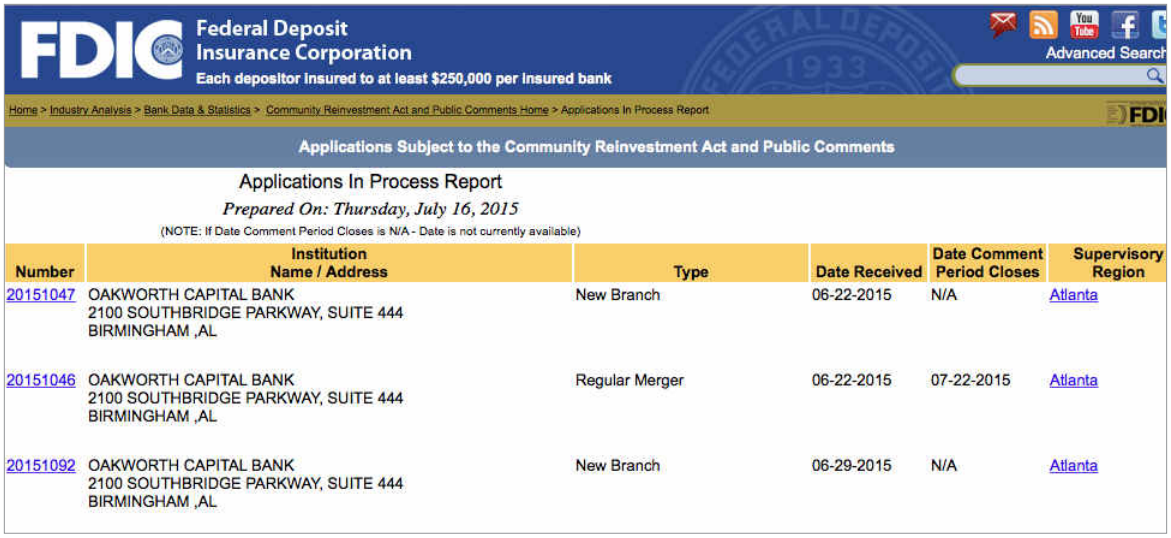


FIGURE 41: https://www2.fdic.gov/cra/
The FDIC's application search does not allow users to search by the bank's name.



Number	Institution Name / Address	Type	Date Received	Date Comment Period Closes	Supervisory Region
20151047	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	New Branch	06-22-2015	N/A	Atlanta
20151046	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	Regular Merger	06-22-2015	07-22-2015	Atlanta
20151092	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	New Branch	06-29-2015	N/A	Atlanta

FIGURE 42: https://www2.fdic.gov/cra/Crarp001.asp
The application search also does not show applications that are no longer open for public comment.

Locating Applications Staff Contact Information

Despite the generally helpful interface, no link to direct contact information is provided on the main search page or within individual application listings. Please see more on this below in the FDIC's "Facilitating Comments on Applications Subject to Public Comment" section.

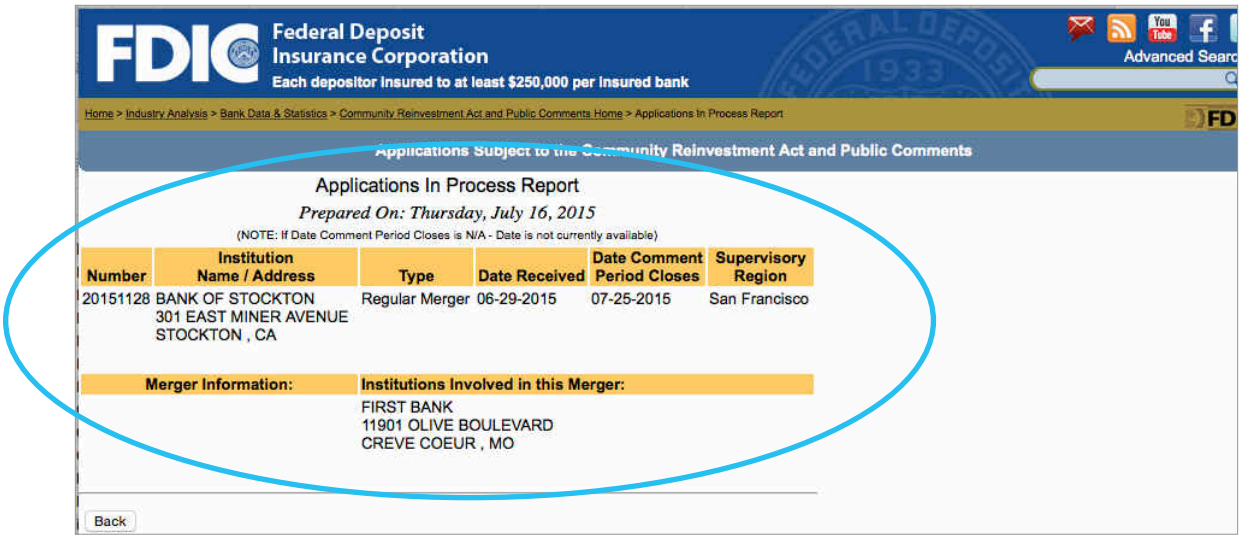


FIGURE 43: https://www2.fdic.gov/cra/cram02.asp?inApplNb=20151128&inApplType=MERGER
No contact information is listed in the listings of applications open for public comment.

Previous Applications Search

Additionally, the search function would be significantly more useful if it also allowed users to search for applications that no longer have an open comment period. Particularly because the FDIC does not currently list merger decisions on its website, the public needs to be able to find records of applications that banks have submitted in the past.

Applications Tracker

Most of the regulatory agencies maintain a tracker, or a static list of merger applications that are currently open for public comment, on their websites in addition to or instead of a search function. These static trackers can be useful for people who are interested in seeing a full list of open applications or a list of applications that were recently filed.

NCRC Recommendation

Applications trackers are useful for commenters to know what applications have open comment periods, and as such, the trackers should be easily accessible from agencies' homepages. Applications trackers are typically static documents and should be updated regularly, ideally daily, so that users have ample time within the 30-day comment period to submit comments. Trackers should clearly indicate what the application is for (e.g. merger, change in bank control, etc.), what bank or bank holding company submitted the application, what institution they hope to acquire, the comment period closing date, instructions for submitting comments and contact information for agency staff monitoring that application.

Office of the Comptroller of the Currency – *NEEDS TO IMPROVE*

The OCC's applications tracker, the "Weekly Bulletin" provides a great deal of information in a single document, but the information is difficult for users to decipher and does not include all applications currently open for public comment.

OFFICE OF THE COMPTROLLER OF THE CURRENCY
WEEKLY BULLETIN
FOR PERIOD 06/28/2015 - 07/04/2015

The absence of a comment period end date indicates the comment period has expired or a comment period is not applicable. Comments may still be submitted to OCC even after the comment period ends. For more information about commenting on an application, please refer to the Public Notice and Comments booklet by clicking here: http://www.occ.gov/publications/publications-by-type/licensing-manuals/PublicNCbooklet.pdf.

NATIONAL BANKS

	ACTION	DATE	TYPE	APPLICATION NUMBER	BANK NAME	BRANCH NAME TARGET BANK	LOCATION	CITY	STATE	COUNTY	CMT PD END
Details	CONSUMMATED EFFECTIVE	7/1/2015	215A-2: REORGANIZATION TO FORM BANK HOLDING COMPANY	2014-CE-215A2-141042	FIRST NB OF BARRY	N/A	694 BAIN BRIDGE	BARRY	IL	PIKE COUNTY	
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	DRIVE-IN SOUTH OFFICE	330 MARGARET STREET	PEKIN	IL	TAZEWELL COUNTY	
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	PARK-SHERIDAN OFFICE	2121 SHERIDAN ROAD	PEKIN	IL	TAZEWELL COUNTY	

FIGURE 44: http://occ.gov/topics/licensing/corporate-activities-weekly-bulletin/wb-06282015-07042015.pdf
The Weekly Bulletin can be difficult to decipher and does not list all applications open for public comment, just the ones from the last week.

Older Open Applications

Users looking to find information about upcoming mergers or other regulatory activity can find a snapshot of applications received by the OCC during a particular timeframe in the "Weekly Bulletin." The Weekly Bulletin was recently redesigned by the OCC, and now consists of a PDF file of the Corporate Activities Search (CAS) results (see more on the CAS below). The Weekly Bulletin is therefore a static version of the CAS, showing only transactions posted in the appointed week. This is problematic because it means that applications that are still open for comment are not captured in each week's bulletin because they are only listed on the week they are received. Instead of formatting the Weekly Bulletin in this way, the OCC should create a comprehensive weekly list of all applications open for public comment that can be sorted by the different column headers.

Corporate Activities Search Problems

In addition to the challenges posed by posting only newly filed applications, choosing to use a screen capture of the CAS means that the Weekly Bulletin suffers from some of the same drawbacks as the search tool itself. More about these drawbacks are included in the "Applications Search" section.

Federal Reserve – *HIGH SATISFACTORY*

Overall, the Federal Reserve lists applications that are subject to public comment in a way that is relatively straightforward for users.

H.2A Interface

Applications are listed in a table on the Federal Reserve's H2.A website, and can be sorted by applicant, comment period closing date or other factors. Still, the interface is clunky, and application listings often use jargon or odd formatting that could be confusing to members of the public. To make viewing applications simpler, the page should include a "Display on One Page" option for all applications.

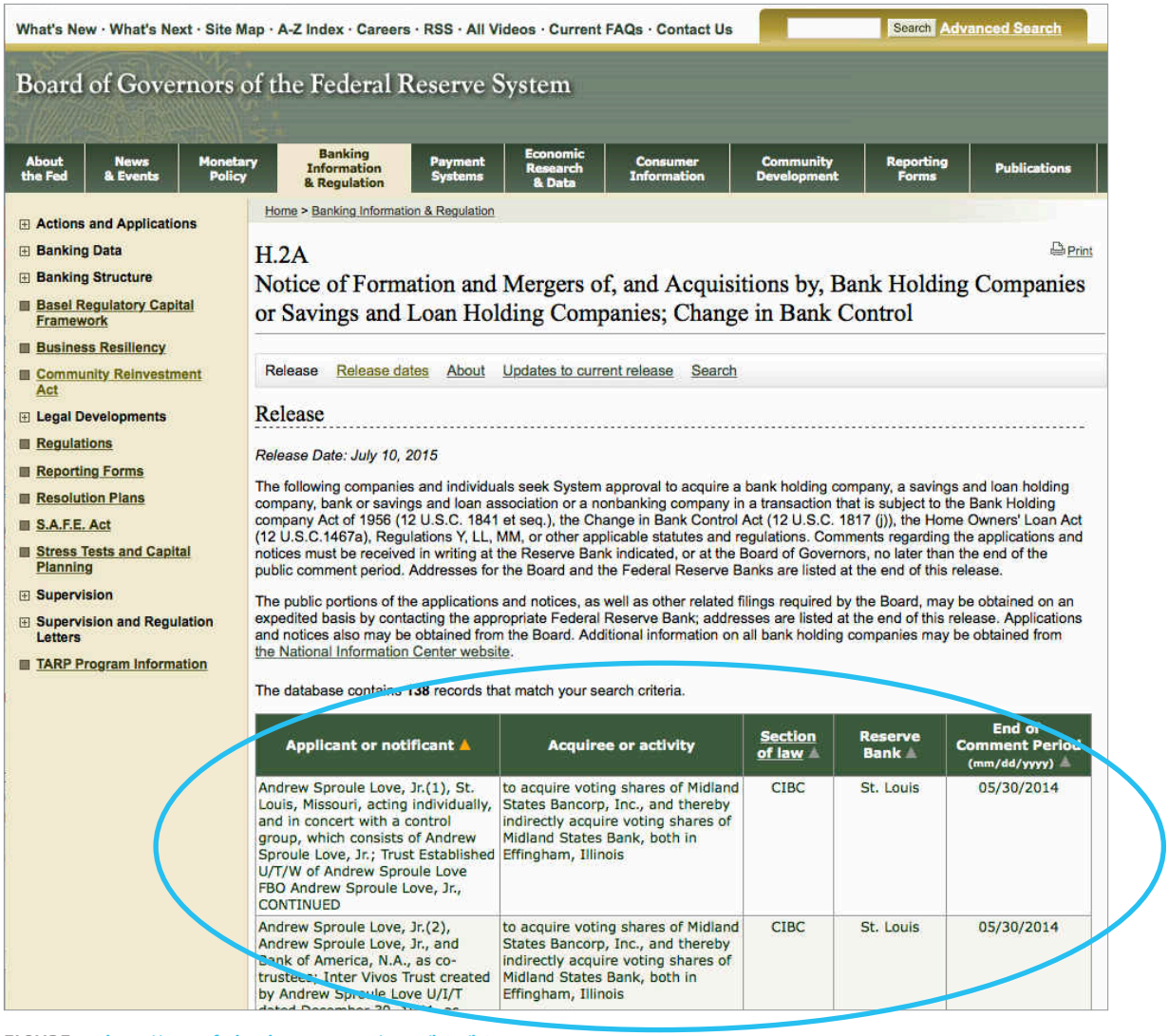
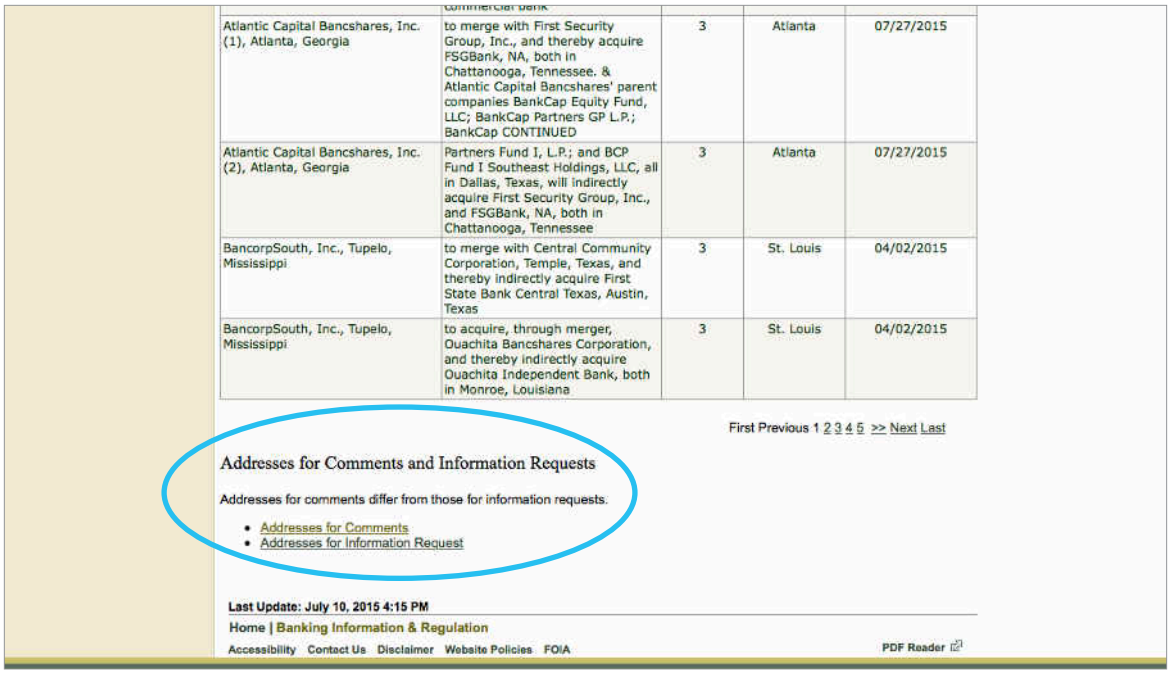


FIGURE 45: http://www.federalreserve.gov/apps/h2a/h2a.aspx
The H.2A is formatted strangely and uses some jargon.



Atlantic Capital Bancshares, Inc. (1), Atlanta, Georgia	to merge with First Security Group, Inc., and thereby acquire FSGBank, NA, both in Chattanooga, Tennessee. & Atlantic Capital Bancshares' parent companies BankCap Equity Fund, LLC; BankCap Partners GP L.P.; BankCap CONTINUED	3	Atlanta	07/27/2015
Atlantic Capital Bancshares, Inc. (2), Atlanta, Georgia	Partners Fund I, L.P.; and BCP Fund I Southeast Holdings, LLC, all in Dallas, Texas, will indirectly acquire First Security Group, Inc., and FSGBank, NA, both in Chattanooga, Tennessee	3	Atlanta	07/27/2015
BancorpSouth, Inc., Tupelo, Mississippi	to merge with Central Community Corporation, Temple, Texas, and thereby indirectly acquire First State Bank Central Texas, Austin, Texas	3	St. Louis	04/02/2015
BancorpSouth, Inc., Tupelo, Mississippi	to acquire, through merger, Ouachita Bancshares Corporation, and thereby indirectly acquire Ouachita Independent Bank, both in Monroe, Louisiana	3	St. Louis	04/02/2015

FIGURE 45B: http://www.federalreserve.gov/apps/h2a/h2a.aspx
Links listing contact information for submitting comments and requesting information are difficult to find at the bottom of the H.2A page.

Locating Applications Staff Contact Information

While the H2.A website lists contact information for staffers who can assist with information requests or receive public comments, the links to that information are at the bottom of the page and are not very prominent. Please see more related to this concern in the Federal Reserve's "Facilitating Comments on Applications Subject to Public Comment" section below.

Federal Deposit Insurance Corporation – *NEEDS TO IMPROVE*

The FDIC does not maintain a static list of all open merger applications like the OCC's Weekly Bulletin or the Federal Reserve's H2.A, but instead requires users to use an application search function. While maintaining both a search function and a static list would be ideal, the search function allows for a more flexible approach to find applications. However, for users who are not comfortable with search engines, a static list is more useful. Therefore, agencies should provide both options.

Facilitating Comments on Applications Subject to Public Comment

After members of the public determine that they would like to submit a comment on a merger or other application, they need to obtain a copy of the application and find out who can answer questions or accept their comments within the regulatory agency.

Receiving a copy of the application is important because it allows people to make a better determination of what kind of impact a bank's action will have on their community. Financial institutions lay out how their planned merger will provide a benefit to the public and also often list things like branch closures and discontinued products in the merger application.

NCRC Recommendation

On both the applications tracker and applications search pages, each agency should post clear instructions for how members of the public can comment on open applications. The processes for submitting comments electronically or via hard copy should both be outlined. Each application listing should include contact information, including email addresses, for the appropriate licensing or community affairs representative who can assist the public in commenting, as well as a link to an electronic version of the public portion of the application. If agencies choose not to post public portions of all applications online, the listing should give clear instructions for how the applications may be requested.

Office of the Comptroller of the Currency – *NEEDS TO IMPROVE*

The OCC is the only agency that maintains both an applications tracker and an applications search function, and it needs to ensure that people accessing applications listings from either perspective have clear instructions on how to obtain and comment on applications. The OCC is also the only agency that posts electronic versions of applications online through their Freedom of Information Act (FOIA) Reading Room, which is a useful tool that reduces the burden of requesting applications on commenters and the regulatory agencies.

Locating Contact Information and Directions

The Weekly Bulletin, the static applications tracker, does not give clear instructions on how the public can comment on applications. The Weekly Bulletin currently directs users to the Comptroller's Licensing Manual on Public Notice and Comments to get more information on commenting on applications. While this manual contains useful information, a link to contact information for community affairs contacts or a more succinct description of the commenting process would be of greater value to the general public. To best facilitate public engagement, there should be information listed at the top of each Weekly Bulletin that describes the process of commenting and links to the FOIA Reading Room.

OFFICE OF THE COMPTROLLER OF THE CURRENCY
WEEKLY BULLETIN
FOR PERIOD 06/28/2015 - 07/04/2015

The absence of a comment period end date indicates the comment period has expired or a comment period is not applicable. Comments may still be submitted to OCC even after the comment period ends. For more information about commenting on an application, please refer to the Public Notice and Comments booklet by clicking here: http://www.occ.gov/publications/publications-by-type/licensing-manuals/PublicNCbooklet.pdf.

NATIONAL BANKS

	ACTION	DATE	TYPE	APPLICATION NUMBER	BANK NAME	BRANCH NAME TARGET BANK	LOCATION	CITY	STATE	COUNTY
Details	CONSUMMATED EFFECTIVE	7/1/2015	215A-2: REORGANIZATION TO FORM BANK HOLDING COMPANY	2014-CE-215A2-141042	FIRST NB OF BARRY	N/A	694 BAIN BRIDGE	BARRY	IL	PIKE COUNTY
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	DRIVE-IN SOUTH OFFICE	330 MARGARET STREET	PEKIN	IL	TAZEWELL COUNTY
Details	APPROVED	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-CE-215A3-142558	PEKIN NB	PARK-SHERIDAN OFFICE	2121 SHERIDAN ROAD	PEKIN	IL	TAZEWELL COUNTY
Details	RECEIPT	6/30/2015	215A-3: MERGERS WITH NON-BANK AFFILIATES	2015-NE-215A3-144079	NATIONAL PENN BANK	N/A	TWO CITY CENTER 645 HAMILTON ST.	ALLENTOWN	PA	LEHIGH COUNTY

FIGURE 46: http://occ.gov/topics/licensing/corporate-activities-weekly-bulletin/wb-06282015-07042015.pdf
The Weekly Bulletin includes a "Details" link that give more information about the application.

Each "Details" page coming from the CAS or the Weekly Bulletin specifies the appropriate district or office that is monitoring the application and links to the "Applications Contact" page (not to be confused with the "District and Field Offices" page, which looks very similar).

Home | About the OCC | News and Issuances | Publications | Tools and Forms | Topics
Home > Tools and Forms > OCC Corporate Applications Search

Corporate Applications Search Result Details

Details For OCC Control Number: 2015-LB-215a3-144047 Return to List

Application Type: 215a-3: Mergers with Non-Bank Affiliates
Transaction Form: Merger with Non-Bank - National Bank Survives
Bank: **JPMorgan Chase Bank, National Association**
Charter/License #: **8**
Bank Headquarters Location: 1111 Polaris ParkwaySuite 0460
Columbus, OH 43240
County: Delaware County

Public Comment Information:

Comment Period Start Date	Comment Period End Date	Adjusted Period Start Date	Adjusted Period End Date	OCC Contact
				Large Banks Contact Info

FIGURE 47: http://apps.occ.gov/CAAS_CATS/CAAS_Details.aspx?FilingTypeID=17&FilingID=144047&FilingSubtypeID=1001
To find out more about an application, users follow the link given under "OCC Contact." In this case, because a very large bank is involved, users are directed to the "Large Banks" division.

From there, users can click on the appropriate district, where they are linked to the office's address, a generic email address and a phone number that goes directly to a group voicemail. When one NCRC staff member left a voicemail for a district office to learn more about commenting on a particular merger application, she never received a reply.

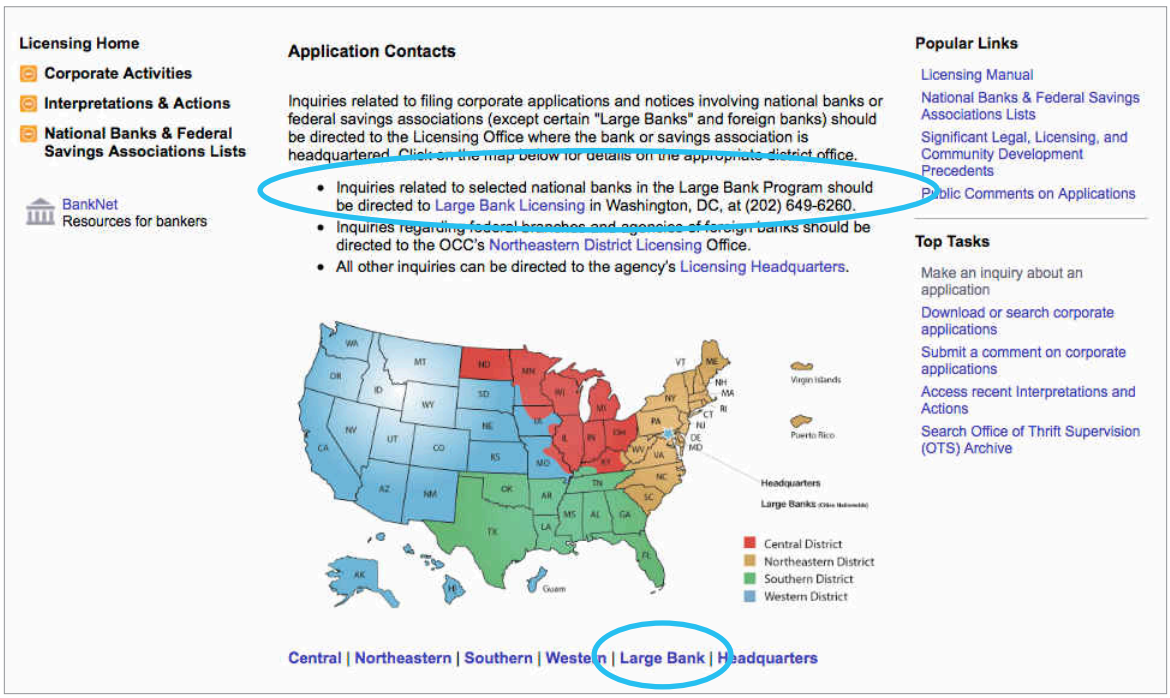


FIGURE 48: http://www.occ.gov/topics/licensing/application-contacts.html
Confusingly, this page is slightly different than the other page showing a map for contact information. In this case, the country is still split into different districts, but also includes a separate "Large Bank" section.

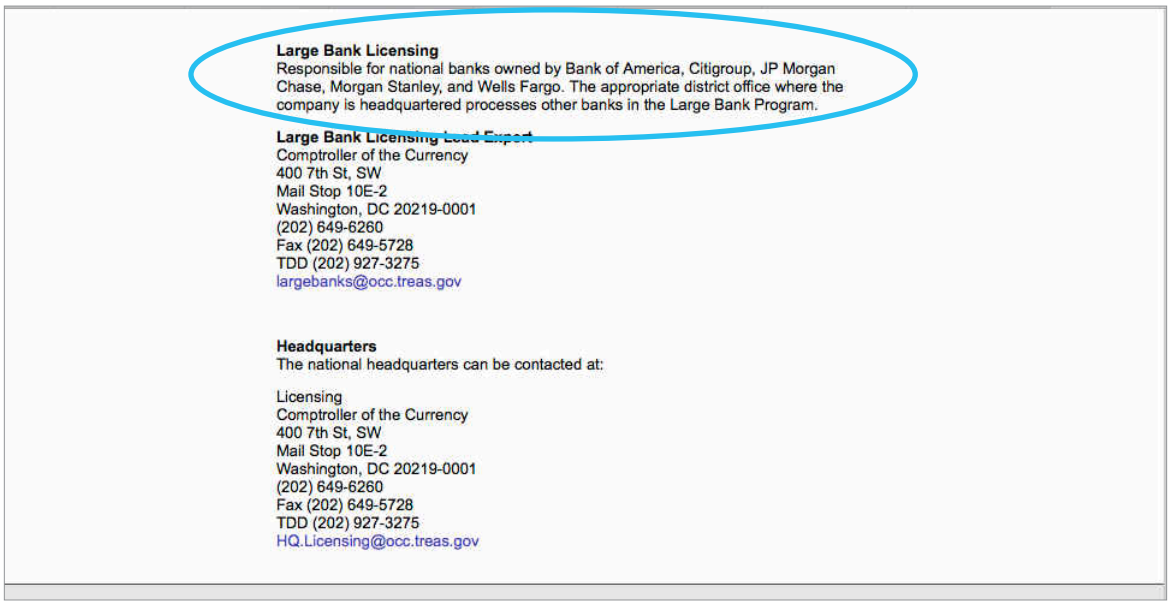


FIGURE 49: http://www.occ.gov/topics/licensing/application-contacts.html#lb
Individual's contact information is not provided in the applications contacts section, meaning that users are left to reach out for anonymous email addresses and phone numbers.

The OCC hosts an additional search function called the "FOIA Reading Room," which allows users to search for and download public documents submitted to the OCC. This tool is particularly helpful for users interested in commenting on merger applications, because the documents can be downloaded directly from the Internet. Although the portal itself is useful, the interface and search function are cumbersome, which makes finding specific applications difficult.

FIGURE 50: https://foia-pal.occ.gov/palMain.aspx
The FOIA Reading Room allows users to search for the text of applications online.

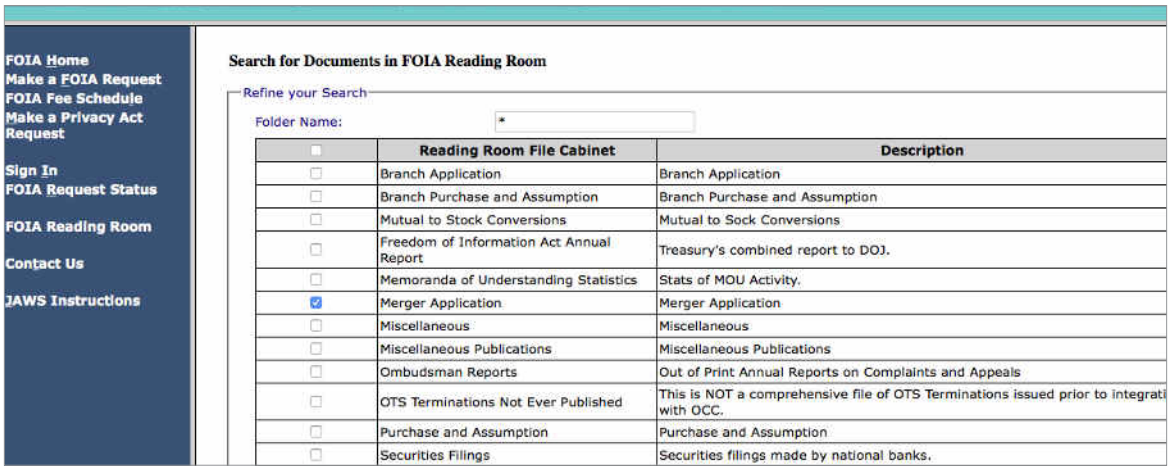


FIGURE 51: https://foia-pal.occ.gov/palMain.aspx
The interface in the FOIA Reading Room is clunky and difficult to use.

New Public Comments Page

The OCC should be commended on a recent improvement to their facilitation of public comments – the creation of a page that lists all public comment on applications with additional information about those mergers. The page also allows users to directly submit comments on the applications listed on this page. The OCC should expand this practice of allowing for direct comments via regulations.gov or another portal to all open applications subject to public comment. Links should be available on the CAS details page, allowing commenters to submit their feedback directly.

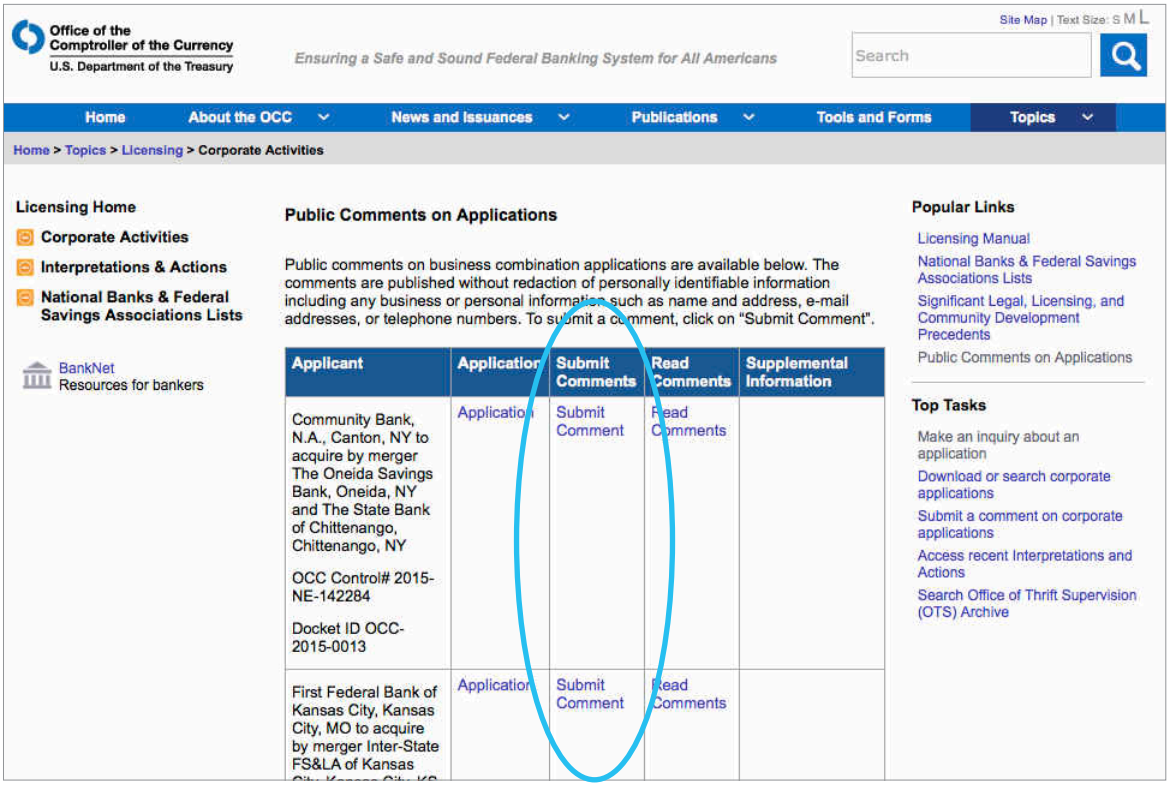


FIGURE 52: http://www.occ.gov/topics/licensing/corporate-activities-weekly-bulletin/public-comments-on-applications.html
This page is a new feature on the OCC's website and allows users to submit comments on applications that have already received public comments, as well as view other comments and the application.

Federal Reserve – *NEEDS TO IMPROVE*

The Federal Reserve provides contact information for staff members who can help with application or information requests, but does not post electronic versions of applications online.

Locating Contact Information

While the H2.A website lists contact information for agency staff that can assist with information requests or receive public comments, the links to that information are at the bottom of the page and are not very prominent. These links are critical, because the staff contact for information requests must be notified for commenters to receive merger applications. Email addresses are not included in this contact information, which makes reaching staff quickly more difficult. Additionally, as of July 2015, at least one of the contacts listed on the "Addresses" page was no longer employed by the Federal Reserve Bank where she is listed as the point of contact.

Evans, Jacksonville, North Carolina, and Laurence Arnold Schiffer, St. Louis, Missouri	Midland States Bank, both in Effingham, Illinois			
Athens Bancshares Corporation, Athens, Tennessee, a savings and loan holding company	to become a bank holding company upon the conversion of its savings and loan subsidiary, Athens Federal Community Bank, Athens, Tennessee, to a commercial bank	3	Atlanta	07/14/2015
Atlantic Capital Bancshares, Inc. (1), Atlanta, Georgia	to merge with First Security Group, Inc., and thereby acquire FSGBank, NA, both in Chattanooga, Tennessee. & Atlantic Capital Bancshares' parent companies BankCap Equity Fund, LLC; BankCap Partners GP L.P.; BankCap CONTINUED	3	Atlanta	07/27/2015
Atlantic Capital Bancshares, Inc. (2), Atlanta, Georgia	Partners Fund I, L.P.; and BCP Fund I Southeast Holdings, LLC, all in Dallas, Texas, will indirectly acquire First Security Group, Inc., and FSGBank, NA, both in Chattanooga, Tennessee	3	Atlanta	07/27/2015
BancorpSouth, Inc., Tupelo, Mississippi	to merge with Central Community Corporation, Temple, Texas, and thereby indirectly acquire First State Bank Central Texas, Austin, Texas	3	St. Louis	04/02/2015
BancorpSouth, Inc., Tupelo, Mississippi	to acquire, through merger, Ouachita Bancshares Corporation, and thereby indirectly acquire Ouachita Independent Bank, both in Monroe, Louisiana	3	St. Louis	04/02/2015

FIGURE 53: http://www.federalreserve.gov/apps/h2a/h2a.aspx?mode=pending
Contact information for staff who can help facilitate comments or provide applications is difficult to find at the bottom of the H.2A page.

Federal Reserve Bank of Minneapolis
Federal Reserve Bank of Minneapolis Rachel Millington 90 Hennepin Avenue Minneapolis, MN 55480-0291 TEL: 612-204-5058 FAX: 612-204-5163

Federal Reserve Bank of Kansas City
Federal Reserve Bank of Kansas City Dennis Denney 1 Memorial Drive Kansas City, MO 64198-0001 TEL: 816-881-2633 FAX: 816-881-2252

Federal Reserve Bank of Dallas
Federal Reserve Bank of Dallas Vince Pacheco, Director - Applications P.O. Box 655906 Dallas, TX 75265-5906 TEL: 214-922-6244 FAX: 214-922-6302

Federal Reserve Bank of San Francisco
Federal Reserve Bank of San Francisco Elisa Johnson, Manager, Applications 101 Market Street, MS #615, San Francisco, CA 94105, TEL: 415-974-3005 FAX: 415-974-3031

Board of Governors of the Federal Reserve System
Board of Governors of the Federal Reserve System Freedom of Information Office 20th & C Street, N.W. Washington, D.C. 20551 TEL: 202-452-3684 FAX: 202-872-7562, and 202-872-7565

Addresses for Comments

Comments on the applications and notices may be sent to the appropriate Federal Reserve Bank or the Board.

Federal Reserve Bank of Boston
Federal Reserve Bank of Boston (Prabal Chakrabarti, Senior Vice President) 600 Atlantic Avenue, Boston, Massachusetts 02210-2204

Federal Reserve Bank of New York
Ivan J. Hurwitz, Vice President, 33 Liberty Street, New York, NY 10045-0001

Federal Reserve Bank of Philadelphia
Dede Myers, Vice President and Community Affairs Officer, 100 North 6th Street, Philadelphia, PA 19105-1521

Federal Reserve Bank of Cleveland
Nadine Wallman, Vice President, 1455 East Sixth Street, Cleveland, OH 44101-2566

Federal Reserve Bank of Richmond

FIGURE 54: http://www.federalreserve.gov/apps/h2a/h2aAddresses.aspx#comments
The staff lists are not kept updated on the websites. The contact for the St. Louis Federal Reserve is no longer there.

Obtaining Merger Applications

The Federal Reserve will only distribute paper copies of applications to members of the public. To better facilitate sharing public information, the Federal Reserve should also maintain online versions of applications that can be readily accessed, similar to the OCC's FOIA Reading Room.

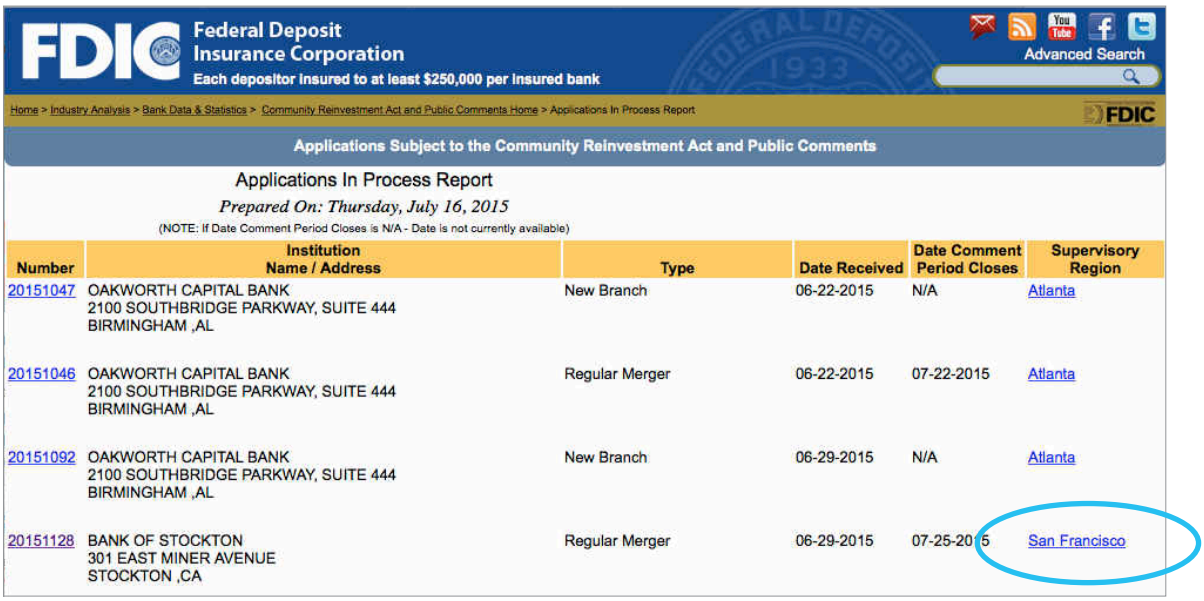
Federal Deposit Insurance Corporation – *SUBSTANTIAL NONCOMPLIANCE*

The FDIC does not clearly link to contact information for agency staff related to applications and does not post electronic version of applications online.

Locating Contact Information

To find contact information for FDIC staff that can be contacted with questions, to request applications, or to submit comments, users must click on the appropriate "Supervisory Region" listed within the search results on the application search function.

Clicking on the listed region used to lead to a contact page titled "Contacts at Headquarters and Regional Offices," and then briefly led to an error page. Now the region link leads to a full organizational directory of the FDIC. Users must then click on the name of the regional or field office to find a listing of contacts, but this listing does not indicate the correct contact for submitting comments on applications.



FDIC Federal Deposit Insurance Corporation
Each depositor insured to at least $250,000 per insured bank
Advanced Search

Home > Industry Analysis > Bank Data & Statistics > Community Reinvestment Act and Public Comments Home > Applications In Process Report

Applications Subject to the Community Reinvestment Act and Public Comments

Applications In Process Report
Prepared On: Thursday, July 16, 2015
(NOTE: If Date Comment Period Closes is N/A - Date is not currently available)

Number	Institution Name / Address	Type	Date Received	Date Comment Period Closes	Supervisory Region
20151047	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	New Branch	06-22-2015	N/A	Atlanta
20151046	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	Regular Merger	06-22-2015	07-22-2015	Atlanta
20151092	OAKWORTH CAPITAL BANK 2100 SOUTHBRIDGE PARKWAY, SUITE 444 BIRMINGHAM ,AL	New Branch	06-29-2015	N/A	Atlanta
20151128	BANK OF STOCKTON 301 EAST MINER AVENUE STOCKTON ,CA	Regular Merger	06-29-2015	07-25-2015	San Francisco

FIGURE 55: https://www2.fdic.gov/cra/Crarp001.asp
Contact information for the appropriate supervisory region is included next to the application listing on the FDIC's merger listing.

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Advanced Search
Search FDIC...

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Mission & Purpose | Advisory Committees | Careers with the FDIC | Management Team | Plans & Reports | What We Can Do for You | Diversity and Inclusion

Home > About FDIC > Organization Directory and Office Contacts

Organization Directory and Office Contacts

Headquarters

- Board of Directors
- Deputy to the Chairman and Chief Operating Officer, Chief of Staff
- Deputy to the Chairman & Chief Financial Officer
- Deputy to the Chairman for External Affairs
- Deputy to the Chairman
- Chief Information Officer/Chief Privacy Officer
- Division of Administration
- Division of Depositor and Consumer Protection
- Division of Finance
- Division of Information Technology
- Division of Insurance and Research
- Division of Resolutions & Receiverships
- Division of Risk Management Supervision
- Legal Division
- Corporate University
- Office of Complex Financial Institutions
- Office of Minority and Women Inclusion
- Office of Inspector General
- Office of Legislative Affairs
- Office of the Ombudsman
- Office of Communications
- Office of Corporate Risk Management

Regional/Field Offices

- Atlanta
- Boston
- Chicago
- Dallas
- Kansas City
- Memphis
- New York
- San Francisco

Key to Headquarters Buildings and Addresses

FIGURE 56: https://www.fdic.gov/about/contact/directory/#SANFRANCISCO
After clicking on the supervisory region next to the application, users are led to a page listing the FDIC's entire organization directory.

San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300,
San Francisco, CA, 94105-2780
Toll-free: (800) 756-3558
Local: (415) 546-0160
Area of responsibility: Alaska, Arizona, California, Guam, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington, Wyoming

Division of Risk Management Supervision (San Francisco)

Regional Director
Stan Ivie (415) 808-8052

Deputy Regional Director (Risk Management)
Kathy Moe
(415) 808-8019

Field Offices (San Francisco)

Billings
Billings, MT
(406) 656-0079

Los Angeles - North
Monrovia, CA
(626) 359-7152

Los Angeles - West
Los Angeles, CA
(323) 545-9260

Orange County
Mission Viejo, CA
(949) 582-2858

Phoenix
Phoenix, AZ
(602) 275-3683

Portland
Lake Oswego, OR
(503) 598-0835

Sacramento
Roseville, CA
(916) 789-8580

Salt Lake City
Salt Lake City, UT
(801) 263-3090

San Francisco
San Francisco, CA

Seattle
Seattle, WA

FIGURE 57: https://www.fdic.gov/about/contact/directory/#SanFrancisco
If users find and then click on the supervisory region associated with the application they are researching, they are led to a page with a variety of contact information. There is no clear indication of who should be contacted regarding applications.

Information about requesting an application is not listed anywhere on the applications pages, and the only clear contact is a very small link in the corner of each application listing that reads "applications@fdic.gov."

FIGURE 58: https://www2.fdic.gov/cra/cram02.asp?inApplNb=20151128&inApplType=MERGER
Within the application listing itself, no contact information is provided except for a very small, anonymous email address in the far corner of the page.

Tracking Branch Closings

When a bank closes a branch in a low- or moderate-income community, members of the public who live in that census tract may request that the appropriate bank regulator hold a meeting to discuss alternatives to closing the branch or other ways that the community can be served. Customers who bank at the closing branch are required to be sent notification in the mail, but members of the community who are not considered customers of that particular branch are still affected.[1] Most of the regulatory agencies do not post notice of upcoming branch closings on their website.

NCRC Recommendation

After receiving notice from the bank, all upcoming branch closings should be listed on the regulator's website on a page designated for that purpose. The page should indicate that members of the public can request a meeting if the branch is located in a low- or moderate-income tract, and it should give instructions for doing so. The listing should also provide the name of the bank, the name and address of the branch and the final closing date. Additionally, if the branch is located in a low- or moderate-income census tract, that should be made apparent. The listing should also include contact information for an agency staffer who can answer questions about the closing or accept letters requesting a meeting.

1 How it is determined whether or not a person who banks with the relevant financial institution is a customer of a particular branch is unclear, and is not specified in any of the regulatory agencies' branch closing manuals.

Office of the Comptroller of the Currency – *LOW SATISFACTORY*

The OCC is the only regulatory agency that lists upcoming branch closings on their website. The closings are included in the CAS.

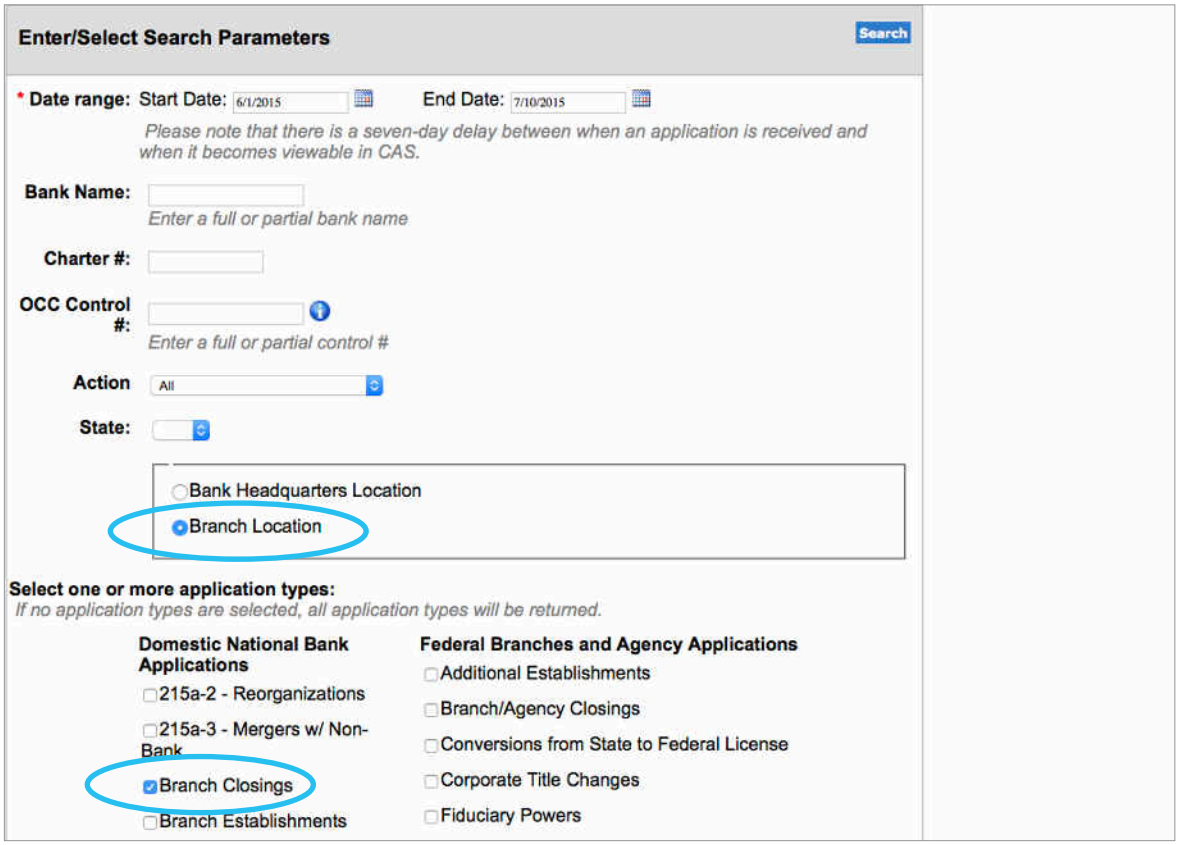

FIGURE 59: Webpage http://apps.occ.gov/CAAS_CATS/default.aspx after hitting search with date range as 6/1/2015 – 7/10/15, "Branch Locations" selected, and "branch closures" checked.
Users can search for a list of all upcoming branch closings on the OCC's site.

The listing of closures produced by the CAS is somewhat confusing, because it lists when the original notification is received and when the branch actually closes as two different lines in the search results. The closing is first listed as a "Receipt," and is later listed as "Consummated/ Effective." The two listings may not appear together, so unless the user clicks on "Details," they may not know that a branch listed under "Receipt" may have already closed.

Corporate Applications Search Criteria New Search

Date Range: 6/1/2015 - 7/10/2015
State: All BR
Application Types: • Branch Closings

Search results:

Action		Date	Type	Application Number	Branch Name	Location	City	State	County	End Cmt P
Details	Consummated/Effective	2015-06-01	Branch Closings	2015-LB-BranchClosing-143750	MONMOUTH NORTH MB	1123 MAIN STREET	MONMOUTH	IL	Warren County	
Details	Receipt	2015-06-01	Branch Closings	2015-LB-BranchClosing-143760	POWER INN/GERBER BRANCH	7960 GERBER ROAD	SACRAMENTO	CA	Sacramento County	
Details	Receipt	2015-06-02	Branch Closings	2015-CE-BranchClosing-143817	Amberg	W 7912 Amberg Street	Amberg	WI	Marinette County	
Details	Receipt	2015-06-02	Branch Closings	2015-CE-BranchClosing-144234	Eastside Branch	3310 East Hamilton Avenue	Eau Claire	WI	Eau Claire County	
Details	Consummated/Effective	2015-06-02	Branch Closings	2015-LB-BranchClosing-141360	GATEWAY BOULEVARD BRANCH	11691 GATEWAY BOULEVARD	FORT MYERS	FL	Lee County	
Details	Consummated/Effective	2015-06-02	Branch Closings	2015-LB-BranchClosing-141363	JOPPATOWNE	1016 JOPPA FARM ROAD	JOPPA	MD	Harford County	
Details	Consummated/Effective	2015-06-02	Branch Closings	2014-LB-BranchClosing-141278	Lower Mills	100 RIVER ST	Mattapan	MA	Suffolk County	
Details	Receipt	2015-06-02	Branch Closings	2015-CE-BranchClosing-144235	Mondovi Branch	695 E. Main Street	Mondovi	WI	Buffalo County	
Details	Receipt	2015-06-02	Branch Closings	2015-LB-BranchClosing-143750	MONMOUTH NORTH MB	1123 MAIN STREET	MONMOUTH	IL	Warren County	
Details	Filed Erroneously	2015-06-02	Branch Closings	2015-SO-BranchClosing-142581	MUSKOGEE HOMELAND	2410 CHANDLER ROAD	MUSKOGEE	OK	Muskogee County	
Details	Receipt	2015-06-02	Branch Closings	2015-NE-BranchClosing-143766	WASHINGTON BOULEVARD	600 WASHINGTON BOULEVARD	STAMFORD	CT	Fairfield County	

FIGURE 60: Webpage http://apps.occ.gov/CAAS_CATS/default.aspx after hitting search on Figure 58.
The search results are confusing, particularly because an application is sometimes listed twice, once as "Reciept" and once as "Consummated/Effective." These results don't always appear next to each other. Additionally, the name of the bank closing the branch is not always included in the search results.

Home > Tools and Forms > OCC Corporate Applications Search

Corporate Applications Search Result Details

Details For OCC Control Number: 2015-LB-BranchClosing-141363 Return to List

Application Type: Branch Closings
Transaction Form: Branch Closing - 90-Day Advance Notice
Bank: **Bank of America, National Association**
Charter/License #: 13044
Bank Headquarters Location: 100 North Tryon Street, Suite 170
Charlotte, NC 28202
County: Mecklenburg County

Affected Branches:

Branch Name	Street Address	Suite	City	State	Zip	County	Certificate #
JOPPATOWNE	1016 JOPPA FARM ROAD		JOPPA	MD	21085	Harford County	024599A

Public Comment Information:

Comment Period Start Date	Comment Period End Date	Adjusted Period Start Date	Adjusted Period End Date	OCC Contact
				Large Banks Contact Info

Filing Status:

Action	Date
Receipt	2015-01-30
Consummated/Effective	2015-06-02

Figure 61: http://apps.occ.gov/CAAS_CATS/CAAS_Details.aspx?FilingTypeID=14&FilingID=141363&FilingSubtypeID=1007
The bank name is only visible after the user clicks on "Details." In this case, the branch has already closed.

Branches located in low- and moderate-income tracts are not specifically noted, so users have to use the FFIEC website to geocode the address and determine the income level of the census tract.

Finally, the branch closing listings suffer from the same issue as other CAS results in linking to contact information.

Federal Reserve – *SUBSTANTIAL NONCOMPLIANCE*

The Federal Reserve does not list branch closures on its website.

Federal Deposit Insurance Corporation – *SUBSTANTIAL NONCOMPLIANCE*

The FDIC does not list branch closures on its website.

CONCLUSION

While the websites of banking regulatory agencies may be a small component of the overall process of promoting better bank accountability to low- and moderate-income communities, updates and improvements to these websites would have outsized impacts on the ability of the public to participate in the process. Much of the success of the Community Reinvestment Act and other laws governing banks' relationships with low- and moderate-income communities depends on input and feedback from residents and community organizations that serve those populations. With resources growing increasingly tight at many community organizations, their ability to participate in these crucial processes is deterred because the systems are difficult and resource-intensive. The banking regulators must do their best to ensure that their websites and other public-facing features invite participation in the process instead of discouraging it.

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