



**TREASURER'S OFFICE**  
**Adam L. Layne, Treasurer**  
CITY OF SAINT LOUIS | MISSOURI  
*"Transparency, Integrity, & Service"*

February 26, 2026

**To the St. Louis Banking Community:**

Pursuant to City Ordinance #64457, the Funds Committee, consisting of the Treasurer, the Mayor, and the Comptroller is required each year to evaluate the financial institutions seeking to be St. Louis City depositories.

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**SECTION A:**

**This process must be completed not later than April 24, 2026.**

According to the City of St. Louis code of ordinances, the Treasurer's office has the authority to encourage banks and financial institutions to increase their financial commitment to the revitalization of the City through mortgage and home improvement loans to credit-worthy individuals and through commercial loans to facilitate development and redevelopment throughout the City. As with past years, we are requiring banks provide a Community Reinvestment Plan as part of the Community Reinvestment Act (CRA), which establishes clear goals for lending, investing, and charitable giving for two years. This plan should also describe foreclosure prevention, servicing best practices, and targets for meaningful assistance to distressed borrowers.

Additionally, it shall be the duty of the Treasurer to advertise annually for the submission of applications from regularly organized national and state depositories insured by the Federal Deposit Insurance Corporation (FDIC) for certification as depositories for funds of the City.

This year, the application process requires the following data (on flash drive). In addition, we are asking to provide your responses in **PDFs or Word Documents**. If a question requires a table of data that is not represented in the excel template, feel free to attach and **Excel or CSV**. See Directions Sheet for formatting of data

## **SECTION B:**

1. **Residential Loans.** (St. Louis Market) Data for the last calendar year at the census tract block level. Data should include:
  - a. One-to-four family home purchase loans
  - b. Refinance home loans
  - c. Home improvement loans
  - d. Home equity loans
  - e. Multi-family loans
  - f. Loans to non-occupant owners of single-family properties
  - g. Modifications of distressed loans and type of modification, including interest rate reductions, forbearance, principal reduction, or repayment plans in which the outstanding loan amount increases, and an indication of whether the modification was executed under the Federal Home Affordable Modification Program (HAMP), another federal program, or the institution's own modification program
  - h. Defaults and delinquencies on home loans – reported for the entire city, not by census tract
  - i. Real-Estate Owned (REO) properties
2. **Small Business Loans.** Loans to small businesses with revenues above \$1 million will be reported separately from loans to small businesses under \$1 million. The depository will use the same reporting procedures as mandated by CRA.
  - a. Total number and dollar amount of small business loans for the entire city.
  - b. Total number and dollar amount of small business loans for each census tract.
  - c. Total number and dollar amount of small business loans for minority and women-owned business enterprises for the entire city.
3. **Community Development Loans and Investments.** Each loan and investments will be designated as affordable housing, small business development, economic development, community facilities, or another activity as defined by the CRA.
  - a. Total number and dollar amount of community development loans for the entire city.
  - b. Total number and dollar amount of community development loans for each census tract.
4. **Consumer Loan Data (only required by banks that choose to collect the data for CRA consideration).**
  - a. Number and dollar amount of consumer loans for the entire city.
  - b. Number and dollar amount of consumer loans for each census tract.

**5. Community Reinvestment Plan.** A Community Reinvestment Plan should establish goals in terms of loans, investments, and services for two years. The Plan should also describe current and proposed initiatives to address the financial needs of the City, its residents and businesses, including low-and-moderate income residents, minority residents, older adults, low-and-moderate income communities for residential, small business, and community development loans and investments. The Plan should also include goals for the following categories:

- a. Small consumer loans, including those that serve as an alternative to payday loans.
- b. Second-chance checking accounts or other programs for the unbanked and/or underbanked community.

**6. Bank On 2.0.** The goal of Bank On is to make sure that everyone has access to a safe and affordable bank or credit union account. Please provide proof of Bank On 2.0 certification or describe low-cost bank products which comply or come close to complying with Bank On 2.0 standards. Please attach bank marketing flyers that speak to Bank On or a similar program for us to share with our employees and residents.

**7. Group Banking Programs.** Describe any group banking products your institution has developed or will develop for St. Louis City employees (i.e., mortgage products, low-to-no fee checking accounts with benefits, preferred interest rates on personal or business loans, etc.)

Listed below is the supplemental data being requested for the BEE Scorecard. Again, please incorporate into **PDFs or Word Documents**. If a question requires a table of data that is not represented in the excel template, feel free to attach and **Excel or CSV**.

## **SECTION C:**

### Banking for Economic Equity Scorecard Submission Data



#### **1. Leadership Diversity – please provide:**

- a. Quantitative and any qualitative data that speaks on the diversity of the institution’s board of directors and executive level leadership. Diversity includes, but is not limited to, race/ethnicity, gender, religion, and ability.
- b. Information on leadership program pipelines designed to support diverse talent at the board of directors’ level and executive leadership level.
- c. Information on recruiting diverse talent to serve on the board of directors and in executive leadership positions at the institution.
- d. Current reporting year and prior year data needed for above items a,b, and c.

#### **2. Client-Facing Diversity – please provide:**

- a. Quantitative and any qualitative data that speaks the diversity of the institution’s management staff and client-facing staff. Diversity includes, but is not limited to, race/ethnicity, gender, religion, and ability.
- b. Information on leadership program pipelines designed to support diverse talent at the management level and client-facing staff level.
- c. Information on recruiting diverse talent to serve on the board of directors and in executive leadership positions at the institution.
- d. Current reporting year and prior year data needed for above items a,b, and c.

#### **3. Equitable Lending – please provide:**

- a. Data requested by the HMDA (Home Mortgage Disclosure Act).
- b. Data provided in **Section B, subsections 1-5** will lead into this calculation for loan approval rate for Low- & Moderate-Income areas of the city as well as disaggregated data around loan originations designated for specific populations.

**4. Customized Products & Programs – please provide:**

- a. Data provided in **Section B, subsections 6 & 7** should overlap with requests in this section. Do not feel the need to duplicate responses but respond as a whole or in combination with the previously mentioned subsections.
- b. Programs, including plans and descriptions of programs that are uniquely designed to combat economic injustice. For example, specialized lending programs for:
  - i. 1<sup>st</sup>-time, low-income homebuyers
  - ii. Aspiring homeowners in low-to-moderate income communities
  - iii. Lending programs or special banking products for MBE/WBE companies
  - iv. Lending programs or special banking products for entrepreneurs of color
  - v. Credit builder or credit forgiveness loans
  - vi. Loan approval programs for borrowers with low credit
- c. Qualitative and/or quantitative data to support the success and impact of programs that have been implemented.
- d. Information on recruiting diverse talent to serve on the board of directors and in executive leadership positions at the institution.

**5. Community Focus & Empowerment – please provide:**

- a. Quantitative data on donations (monetary and in-kind) made to community-based programs and organizations supporting impactful community development.
- b. Total amount of charitable giving for current reporting year and prior reporting year.
- c. Investments made in economic justice efforts in the City of St. Louis.
- d. Non-revenue programs led by the institution that serve underserved communities (for example: financial literacy programs, small-business support programs, youth camps, targeted internship programs).

## APPENDIX A:

### Application for City Depositories LENDING DATA FORMATTING

Please submit the following data in the format specified. Data tables are provided as templates for requested data that is currently not publicly available or regularly submitted.

Data to be provided from calendar year 2025. Dollar amounts should be reported in the \$1000s. For information requested for each census tract in the City of St. Louis, a complete list of census tracts is included on the Excel template. **An Excel workbook containing all featured tables can be downloaded from our website.**

#### 1. Residential Lending.

- a.-f. 2025 Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR), submitted in a .csv or .xls file.
- g. Loan Modifications – the number of modifications of distressed loans in the City of St. Louis, and an indication of whether the modification was executed under the federal Home Affordable Modification Program (HAMP), another federal program, or a proprietary modification program of the institution.

<b>Loan Modifications</b>	<b>Modification Through HAMP</b>	<b>Modification Through Other Federal Program</b>	<b>Modification Through Institution Program</b>
Census Tract			
<b>1011.00</b>			
<b>1012.00</b>			
TOTAL for City of St. Louis			

- h. Real Estate Owned properties – the number of real estate owned properties in the City of St. Louis by the income level of the census tract of the property location, if known.<sup>1</sup>

<b>Real Estate Owned Properties</b>	<b>Number</b>
Census Tract	
<b>1011.00</b>	
<b>1012.00</b>	
TOTAL for City of St. Louis	

- i. Defaults and Delinquencies - the number and dollar amount of defaults and delinquencies on home loans reported in the City of St. Louis.

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<sup>1</sup> The reports of income level designations are to be consistent with designations and definitions used by the FFIEC and in HMDA and CRA reports.

Defaults and delinquencies on home loans	Number		Dollar Amount in (000s)	
	Defaults	Delinquencies	Defaults	Delinquencies
TOTAL for City of St. Louis				

**2. Small Business Lending.**

- a. Total number and dollar amount of small business loans for the entire city.
- b. Total number and dollar amount of small business loans for each census tract in the city.

Small Business Lending	Number		Dollar Amount in (000s)	
	Revenue above \$1 million	Revenue under \$1 million	Revenue above \$1 million	Revenue under \$1 million
Census Tract				
<b>1011.00</b>				
<b>1012.00</b>				
TOTAL for City of St. Louis				

- c. **Small Business Loans to Minority-Owned Businesses and Women-Owned Businesses in the City of St. Louis.** The number and dollar amount of loans originated, separated by revenue of business.

Small Business Lending for MBEs/WBEs	Number		Dollar Amount (in 000s)	
	Revenue above \$1 million	Revenue under \$1 million	Revenue above \$1 million	Revenue under \$1 million
TOTAL in the City of St. Louis				
Loans to minority-owned businesses				
Loans to women-owned businesses				

**3. Community Development Loans and Investments.**

- a. The total number and dollar amount of community development loans and investments made within the **City of St. Louis**. Please report the total number and dollar amount by the designated purpose of the loans and investments. Designated purpose definitions are consistent with the CRA regulations and include the purpose of affordable housing, community services, economic development, revitalization or stabilization, or another activity defined by the CRA.

Community Development Loans	Affordable Housing	
	Number	Dollar Amount (in 000s)
Census Tract		
<b>1011.00</b>		
<b>1012.00</b>		
TOTAL for City of St. Louis		

**4. Consumer Loan Data.**

- a. Number and dollar amount of consumer loans for the entire city.
- b. Number and dollar amount of consumer loans for each census tract.

<b>Consumer Loans</b>	<b>Number</b>	<b>Dollar Amount (in 000s)</b>
Census Tract		
<b>1011.00</b>		
<b>1012.00</b>		
TOTAL for City of St. Louis		

These requests for information give us an opportunity to have a complete picture of your financial institution, as the Home Mortgage Disclosure Act (HMDA) report previously submitted only highlighted one part of your business.

A digital copy of this application, instructions for completion, and an excel template for reporting purposes can also be found on our website at <https://www.stltreasurer.org/city-depository/>. This information must be received in the Treasurer's Office, along with a signed copy of the affidavit form **on a removable USB drive or via Encrypted Email** no than later **April 24, 2026**. We strongly encourage responses to be in a memo format with links to references as needed and data files on flash drive. Your responses may be attached as an exhibit in our annual report and published on our website. Materials can be sent to the address below:

**Treasurer's Office**  
Attn: Christina Cavazos Bennett, Assistant Treasurer  
City of St. Louis  
1200 Market Street,  
Room 220  
St. Louis, MO 63103

If you have any questions, please contact Christina Cavazos Bennett, Assistant Treasurer at (314) 350-3916. Thank you for your timely response on the measures you are taking to transform St. Louis.

Sincerely,

A handwritten signature in black ink that reads "Adam Layne". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adam L Layne  
Treasurer, City of St. Louis

**AFFIDAVIT:**

With each application for certification as a depository for City funds, the Treasurer shall obtain signatures by either the chairman of the board, the chief executive officer, or another officer acceptable to the Treasurer, of the applying depository affirming that it has adopted the affidavit below.

**Affidavit for Depositories**

We pledge not to arbitrarily reject any loans for any properties or projects within the City of St. Louis, or within any specific geographic area in the City of St. Louis, because of the location and/or age of the property, or in the case of prospective borrowers, to arbitrarily vary the terms of loans or the application procedures for loans because of race, color, religion, national origin, age, sex or marital status. In addition, we pledge to make loans available on residential property in neighborhoods of all income levels in the City of St. Louis within the limits of legal restrictions and prudent financial practices. All collateral security agreements governing depositories, institutional banking and investments must be in a form acceptable to the City Treasurer.

\_\_\_\_\_  
Name of Financial Institution

\_\_\_\_\_  
Date

\_\_\_\_\_  
CEO, Financial Institution or Local Market Executive

\_\_\_\_\_  
Date