



ADAM L. LAYNE
TREASURER
CITY OF SAINT LOUIS
MISSOURI

To Whom It May Concern:

Pursuant to City Ordinance #64457, the Funds Committee, consisting of the Mayor, the Comptroller, and the Treasurer is required each year to evaluate the financial institutions seeking to be City depositories. This process must be completed not later than **May 15, 2022**.

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):

- 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



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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. **Branches and Deposits.** Number of branches and ATMs in the City as well as the address of each branch and ATM. This year we would also like deposit balances for each city location to monitor the growth for last **three years**.
5. **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.
6. **Workforce Diversity.** (St Louis, MO) Number and proportion of minorities, females, and city residents employed for each bank delineated by employees, senior management, and members of the board of directors.
7. **Annual Report.** Hyperlink for most recent annual report or SEC-10K report with quarterly financial updates.
8. **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:



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- 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.
- c. List your banks involvement with the Calls to Actions in the Forward Through Ferguson Report.
- d. Affordable check cashing and other transactional services used by consumers with limited banking accounts or experiences.
- e. Participation in City-sponsored neighborhood development programs and consortiums.
- f. Equitable contributions to community based non-profit organizations in the City that engage in neighborhood development.
- g. Provision of full-service banking in City neighborhoods.
- h. Plan to market loan products and services throughout the City to include (1) low- and moderate-income (LMI) neighborhoods, (2) minority neighborhoods, (3) LMI consumers (4) minority consumers (5) small businesses, (6) minority business enterprises and (7) female business enterprises; (8) older adults; and,
- i. The Community Reinvestment Plan shall also indicate how the bank will match or exceed peer performance in lending, investment, and services to the target group.

9. CRA Exam Evaluation. Most recent CRA exam evaluation.

10. Branch Closing Policy. A copy of the institution's branch closing policy.

11. 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 2.0 standards.

12. Financial Education Efforts in the Community. Describe in a brief narrative the activities or efforts of your institution to provide financial education in the City of St Louis. This includes but is not limited to participation in events, outreach, special projects, or resources (financial or otherwise) provided to organizations in support of financial education and empowerment.

13. 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.)



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14. COVID-19 Crisis. The Treasurer's Office is requesting information related to your institution's response to the COVID-19 crisis.

- a. How is your institution continued to support clients during the crisis? Please make sure that your response includes specific information related to elimination of overdraft, ATM, and other fees and the suspension or deferment of payments owed.
- b. How is your institution treating the CARES Act Economic Impact Payments? Will you offer or have you offered free check cashing for these checks, regardless of client relationship? Will you or have you used these payments to offset or collect on consumer debts, including overdraft/NSF fees or other negative balances?
- c. How is your institution working to develop and promote safe and affordable bank accounts during this extended crisis? Please include information related to the promotion of Bank On certified accounts, development of new Bank On accounts, and strategies to engage unbanked and underbanked populations—including making online account opening and online services available at no cost.
- d. For all crisis relief in place or under consideration, please provide specific information about any requirements to receive help. Will relief from fees, payments, interest be automatic, or will clients need to call you? Please describe any requirements necessary in order to receive help and explain how emergency assistance is possible if it is necessary for clients to call you and/or provide additional documentation—including providing current estimated wait time for customer service hotlines.
- e. Please provide any additional information about actions your institution has taken or will shortly implement to help and support the community at large, beyond your responses to the questions above.

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

In addition to submitting your annual HMDA for calendar year 2021, a copy of this letter, instructions for completion, and an Excel template for reporting purposes is located on our website at <https://www.stltreasurer.org/treasury-operations>. This information must be received in



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the Treasurer's Office, along with a signed copy of the affidavit form included in the instructions, **on a removable USB drive** no later **May 15, 2022**. We strongly encourage responses to be in a memo format with links to references as needed and data files on flash drive. Your memo response may be attached as an Exhibit in our annual report and published on our website.

If you have any questions, please contact Christina C Bennett, Assistant Treasurer at—(314) 622-3510. Thank you for your timely response on the measures you are taking for the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Layne", with a long horizontal flourish extending to the right.

Adam L Layne
Treasurer, City of St. Louis