



ADAM L. LAYNE
TREASURER
CITY OF SAINT LOUIS

MISSOURI

To City St Louis Banking Community:

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 April 30, 2024.

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 you to provide your responses in a **memo format** to reduce document sizes. If a question requires a table of data, please respond by seeing attachment. See Directions Sheet for formatting of data.

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 investment 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 2.0 standards. Please attach bank marketing flyers that speak to Bank On or 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 memo format.



Banking for Economic Equity Scorecard Submission Data

A. Leadership Diversity – please provide:

- a. Quantitative and any qualitative data that speaks 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 a,b, and c.

B. 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 a,b, and c.

C. Equitable Lending – please provide:

- a. Data requested by the HMDA (Home Mortgage Disclosure Act)
- b. Loan approval rate for Low- & Moderate-Income areas of the city
- c. Percentage of total loan originations designated for specific populations:
 - i. Low- & moderate-income areas in STL City
 - ii. MBE/WBE businesses

D. Customized Products & Programs – please provide:

- a. Programs, including plans and descriptions of programs that are uniquely designed to combat economic injustice. For example, specialized lending programs for:
 - i. 1st-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
- b. Qualitative and/or quantitative data to support the success and impact of programs that have been implemented
- c. Information on recruiting diverse talent to serve on the board of directors and in executive leadership positions at the institution.

E. 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)

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 highlighted one part of your business.

In addition to submitting your annual HMDA for calendar year 2023, 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/city-depository/> This information must be received in the Treasurer's Office, along with a signed copy of the affidavit form included in the instructions, **on a removable USB drive** no later **April 30, 2024**. 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) 350-3916. Thank you for your timely response on the measures you are taking for the community.

Sincerely,



Adam L Layne
Treasurer, City of St. Louis

Treasurer's Office

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