



CRA Questions Answered

Q. Do banks have to prepare a CRA Self-Assessment even though it's not required in the regulation? If so, should it be done yearly?

A. I highly recommend that all banks (small, intermediate and large) prepare a CRA Self-Assessment. The assessment offers an opportunity to highlight everything the bank is doing to meet the needs of low- and moderate-income residents, small businesses and neighborhoods. It should include all activities (loans, investments and services) that qualify as "community development." In addition, it should include market demographics and performance context that support the bank's efforts during the evaluation period (i.e. high cost of housing, competition, assessment area opportunities, etc.). There is no limit as to how much information you provide in your own self-assessment, so make sure you "tell your story" and back it up with hard data (articles, studies, surveys, etc.). Although some banks perform annual self-assessments (or even quarterly), I recommend that a final one be presented to the examiners covering the entire evaluation period (typically 3 years) so that they can use your assessment to help them perform the evaluation. Use your last CRA Performance Evaluation as a guide.

Erbi Blanco-True, a professional CRA consultant to the banking industry and CRA advisor to Gibraltar Private Bank and Trust, serves as AAA's voluntary CRA specialist. Ask Erbi a question at eblanco-true@gibraltarprivate.com.

This Q&A segment is intended to assist CRA Officers with common CRA-related questions. All answers are based on the opinion of a CRA expert, however, bankers are encouraged to contact their regulator if they need detailed answers on specific cases.

CRA Investment Opportunity

AAA Scholarship Foundation (AAA) provides banks with an innovative CRA investment opportunity at no cost to the corporation. You can earn CRA credit by simply redirecting your state tax liability to AAA to fund scholarships for low-income children.

AAA serves low-income children through tax credit scholarship programs in Alabama, Arizona, Florida, Georgia, Nevada and Pennsylvania, which allow a corporation to redirect a portion of their state tax liability to provide K-12 scholarships for low-income students.

There is little to no cost to the corporation as participating companies receive up to a dollar-for-dollar tax credit for their tax redirection. **By simply redirecting your taxes, you can help make a life-changing difference for a child.**

This program is extremely popular with the families we serve, as well as the companies that participate, because it gives at-risk students an increased chance at a brighter future and gives companies the satisfaction that they are utilizing their tax dollars toward building a better educated workforce.

For more information go to <http://www.aaascholarships.org/donors>.



findCRA's Community Qualifier Streamlines the Search for CRA-Aligned Nonprofits

findCRA has expanded its services for banks with Community Qualifier™, an online search tool that allows banks to identify CRA-aligned nonprofits in their communities in just seconds.

Community Qualifier is powered by CRANIA™, the company's proprietary Community Reinvestment Act Nonprofit Identification Algorithm. CRANIA incorporates data from more than 20 trusted government and industry resources including the Census Bureau, FFIEC, IRS and more. Using CRANIA, the team at findCRA reviews the millions of nonprofits in the nation to identify the less than five percent that engage in CRA activities.



The company has already completed their analysis of 23 states plus D.C., with over 500,000 nonprofits reviewed. The team also brings its decades of CRA experience to the qualification process, analyzing and curating CRANIA's output. Each nonprofit must meet at least one of the key criteria for CRA – affordable housing, economic development or community services to LMI individuals or areas – for inclusion on Community Qualifier.



As of today, findCRA has identified over 23,000 nonprofits that align with CRA requirements in nearly 3,000 communities. All of these nonprofits have online profiles on Community Qualifier, where a banker can search in any city, state, county or zip code to find the exact CRA data and relationships they need. Each unique Nonprofit Profile contains over 70 key data points to support CRA research and can be saved or printed for inclusion in CRA exam documentation. Bank users can instantly request an introduction to specific nonprofits or send the nonprofit an email, without ever leaving the website.

The company has also streamlined the CRA regulatory research process by collecting and indexing key regulatory documents and industry updates in its Learning Center website, www.learnCRA.com. Here, bankers can search regulatory guidance or sign up to receive the company's CRA Monday Briefing email every week, which accumulates industry updates from 12 regulatory agencies.

"At findCRA, we are focused on leading change in the CRA industry by providing banks with innovative tools so they can spend less time researching and more time reinvesting in their communities through building relationships," said Ben Loehle, CEO and Co-Founder of findCRA.

The company will complete their qualification of the entire United States in the coming months. Bankers interested in learning more about Community Qualifier can visit www.findCRA.com or contact the company at 1-844-2-findCRA or info@findCRA.com.

Updated CRA Information for Bank Contributors Since the community development purpose of the Tax Credit Scholarship Programs is to serve low-income children (only those that qualify for the national free or reduced lunch program), over 85 percent of AAA Scholarships are distributed to children at or below 185 percent of poverty. **These are the demographics of the children served (this information is updated each quarter): Average Family Size - 4; Single-Parent Home - 40%; Average Family Income - \$32,265*.**

*This income needs to be compared to the area median income ("AMI") of the bank's assessment areas to determine whether it's at or below 30 percent (extremely low), 50 percent (low) or 80 percent (moderate) of the AMI to insure qualifying as a CRA investment.

Board Member Spotlight

Mary Usategui has always gone the extra mile. Whether it be with her career, education or being the voice for those in need, she has never shied away from an opportunity to better herself or her community. With extensive experience in both the banking industry and non-profit realm, Mary Usategui has, and will continue to, change the lives of those around her.



Mary is a Certified Public Accountant in the State of Florida and holds two master's degrees - one in accounting from the University of Miami and the other in finance from Florida International University.

She began her career in the banking industry at 18-years-old, where she first served as a bank teller. She then went on to work at the Coconut Grove Bank for over seven years and took on various roles that eventually landed her the position of Senior Financial Officer. Now, Mary is the Executive Vice President & Chief Financial Officer at Professional Bank where she is responsible for the oversight of finance, accounting, banking operations and human resources.

Aside from her career, Mary has always had a passion for wanting to help those less-privileged. This devotion led her to the AAA Scholarship Foundation where she is now a Bank Advisory Board Member, and has been for over two years. Along with these responsibilities, she assists and mentors young individuals within her community and is adamant about teaching them the importance, and value, of an education.

Mary has a love for helping not only people, but animals as well. It had gotten to the point where Mary felt obligated to take in every stray dog she found, and at dog number four, her husband asked her to stop. Mary then became involved with the Everglades Angels Dog Rescue. This organization is an all-volunteer non-profit that puts every dollar earned towards vetting, boarding, feeding and other direct expenses for the benefit of the dogs they rescue. If Mary is ever late to anything, her co-workers won't even blink an eye. Nine out of ten times she is helping a stray dog find its home, or convincing her husband that adding one more dog to the family is doable.

When asking Mary Usategui what advice she would give to those considering donating to the AAA Scholarship Foundation, she says "If you're able to redirect your taxes, the AAA Scholarship Foundation is a great organization to partner with. It's a wonderful way to help others in your community, while also earning CRA credits. To me it's a win-win!"

Enter to Win - March 18-21, 2018

Please stop by the AAA Scholarship Foundation booth at the National Interagency Community Reinvestment Conference in Miami to learn more about the innovative CRA investment opportunity provided by tax credit scholarship programs and enter to win a \$100 gift card.

The 2018 Conference, which will be held at the Hyatt Regency Downtown Miami, is the premier training and networking event for community development professionals, including CRA officers and staff from CDFIs, nonprofits and government agencies. More information at www.frbsf.org.

Student Spotlight



When asking Tessa Ambrose how her son Andrew was adapting to his parent-selected school, she had to fight back tears. “I can’t describe the feeling,” she says. “This school has changed my son’s life as well as mine.” Now a freshman in high school, and exceeding expectations at Lake Mead Christian Academy, Tessa knows none of this would have been possible without the financial assistance from the AAA Scholarship Foundation.

A stay at home mother of three, Tessa was adamant about teaching her children the importance of education at a young age. Formerly attending their local public school, she learned early on that her son Andrew was very bright; however, he was having trouble focusing on tasks being given to him. When she found out that Andrew had Attention Deficit Disorder (ADD), Tessa was worried that the teachers at Andrew’s school would not be as empathetic to this as she hoped.

The issue actually wasn’t that the teachers didn’t want to help – it was that classroom sizes were already exceeding the normal limit, which left them little time in their day to further help students, like Andrew, receive the one-on-one attention that they needed. Andrew felt neglected, and Tessa was beginning to run out of options.

Tessa was determined to put her son in an educational setting that would address his specific learning needs, but her family’s financial standing was holding her back. With her husband being the primary source of income, Tessa was unsure of how many options, if any, they had. It was clear that Andrew needed to be in a school that was both aware of his learning disability while also nurturing of it, but the next best school was Lake Mead Christian Academy – a private school in town. Tessa simply didn’t have the financial means to make this possible, but was adamant in finding a way. After repeated visits with the financial aid office, she was ecstatic to find out about the AAA Scholarship Foundation.

According to Tessa, the overall change in Andrew since attending his new school has been extraordinary. Not only has his self-esteem grown tremendously, Tessa can’t get him to leave school! The teachers at Lake Mead Christian Academy have surpassed her expectations. They offer both before and after school assistance to all students, and if they see students struggling with a subject, they have them attend study hall where teachers and their aides are available to work with them one-on-one until they feel confident with their work. “They care about me mom, the teachers care,” says Andrew Ambrose.

Because of his learning disability, Andrew needed more time on assignments and tests than his peers. The teachers were more than understanding and allowed him as much time as possible. If for some reason he didn’t do well on a certain test, the teachers would call him back in and go over it personally with him to see what he didn’t quite understand.

“Before this school, I had to pay for tutoring, which left us low on groceries for the week,” says Tessa Ambrose. “Now I can’t get him to leave! The school truly wants their students to succeed.”

With his new-found confidence, Andrew has also auditioned for the theatre program at his school. In the most recent productions, *You’re a Good Man* and *Charlie Brown*, Andrew was cast as the lead role for both! With the additional help offered to him by his new school, Andrew now has the time to pursue his love for theater without worrying about falling behind with his grades. Andrew also loves studying world history and English – he is now in English honors and maintaining A’s and B’s on every report card. Tessa knows none of his accomplishments would have been possible without the ongoing support from the faculty members at Lake Mead Christian Academy, as well as the AAA Scholarship Foundation. One afternoon Andrew came home eager to write a letter. When Tessa asked him who the letter was for, Andrew replied “the school told me I should write a letter to AAA. I need to thank them for their help!”

“Because of the AAA Scholarship Foundation, my son has the confidence to strive for excellence,” says Tessa Ambrose. “Andrew tells me often how thankful he is for the AAA Scholarship Foundation and what a blessing it has been to him. As a parent, I appreciate all of the time the people put in to make this organization possible. I’m truly grateful.”