

*Helping you safely navigate the regulatory waters*

JSL Compliance Services LLC, 7558 W Thunderbird Rd., Ste. 1-458, Peoria, AZ 85381  
[jslcompl@jsslcomplianceservices.com](mailto:jslcompl@jsslcomplianceservices.com)

623-847-3760 (O)  
623-764-0612 (M)

## CRA Public File Update Due 4/1/2024



While we have all been focused on the Community Reinvestment Act Modernization, it is important to not lose sight of existing requirements. Although most of the changes will not go into effect until 2026 or later, there are changes

which are effective April 1<sup>st</sup> due to the requirement the CRA Public File be updated and current as of April 1<sup>st</sup> of each year.

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### What Must Be Maintained in the CRA Public File?

1. All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping meet community credit needs, and any response to the comments by the bank.
2. A copy of the public section of the bank's most recent CRA performance evaluation prepared by its federal regulator.
3. A list of the bank's branches, their street addresses, and census tracts.
4. A list of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses, and census tracts.
5. A list of retail banking services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. A bank may elect to include information regarding the availability of other systems for delivering retail banking services (e.g., mobile or online banking, loan production offices, and bank-at-work or mobile branch programs).
6. **REVISED: A map of each facility-based assessment area and retail lending assessment area, as applicable, showing the boundaries of the area and identifying the census tracts contained within the area, either on the map or in a separate list.**
7. Any other information the bank chooses.
8. **NEW: The CRA Public File is to be maintained on the bank's website if the bank maintains one.**
9. For banks subject to CRA data reporting requirements: the bank's CRA Disclosure Statement.
10. For banks subject to HMDA data reporting requirements: a written notice that the bank's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's [CFPB] website.
11. For small banks or banks that met the definition of small bank during the prior calendar year: the bank's loan-to-deposit ratio for each quarter of the prior calendar year, and, at its option, additional data on its loan-to-deposit ratio.