

Guide to the Community Reinvestment Act

Qualifying, tracking, and fulfilling CRA requirements with Blackbaud's YourCause Solutions



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Key Definitions

- LMI (low- and moderate-income): The CRA classifies as low-income those geographies having a median family income of less than 50 percent of the area median income, and moderate-income those geographies having a median family income of at least 50 percent and less than 80 percent of the area median income.
- Assessment area: An area determined based on where banks have branches and deposit-taking ATMs or surrounding geographies in which they have originated or purchased loans.
- Geocoding: The process of converting an address into spatial data which can help identify the geographic location and characteristics of the communities that banks serve and impact.

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What is the CRA?

In 1977, the United States Government enacted the Community Reinvestment Act (CRA) to help meet the needs of the communities in which financial institutions and banks do business, including low- and moderate-income (LMI) neighborhoods, distressed or under-served non-metropolitan areas, and designated disaster areas.

The CRA was put into place to make sure that financial institutions were investing back into the revitalization and stabilization of specific communities. Overall, the CRA is vital to the financial health of local economies that the institutions operate in and vital to the growth of the financial institutions.

How is it evaluated?

To enforce the CRA, banks are required to undergo regular evaluations to measure whether or not they are fulfilling their CRA obligations. These evaluations are completed by one of three regulators who are responsible for the CRA:

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Bank (FRB)
- Office of the Comptroller of the Currency (OCC)

Examiners conduct lending, investment, and service tests to evaluate banks' performance in their respective assessment areas. Banks' responsibilities regarding the CRA also depend on their asset size. Qualifying community development activities include small business financing, affordable housing loans, providing financial education services, and other ways of promoting of economic development.

As linked above, each regulator has a dedicated CRA website that provides information about the financial institutions they oversee and the scoring methods they use to grade. Following each examination, the regulators issue individual CRA ratings and performance evaluations. These are made public and are considered when banks request to merge with other financial institutions or plan to expand to other locations.

The 'Final Rule' Update

On October 24, 2023, the Board, the FDIC, and the OCC issued a final rule to strengthen and modernize the agencies' CRA regulations to better achieve the purposes of the law. This was the first comprehensive interagency revision to the CRA regulations since 1995.

However, due to litigation from several prominent banking organizations and advocacy groups, the entities overseeing CRA regulations announced in the Spring of 2025 their intent to rescind the 'Final Rule' updates that were set to go into affect in 2026.

CRA Qualifiers for Employee Engagement

When evaluating services done by financial institutions, the examiners have an important and difficult job of deciding not only how well the services help meet the needs of the community, but how innovative and creative a bank has been in providing financial services that will lead to community development.



Qualified CRA services have such specific criteria that it is important that financial institutions and their employees ask these questions before engaging in a CRA Volunteer Opportunity:

- Was the location of the service in the financial institution's pre-defined CRA assessment area?
- Was the employee a representative of the financial institution while volunteering?
- Were the services provided in-line with the definition of financial services (i.e. services reflecting financial

institution employees' areas of expertise at the institution, such as human resources, information technology, and legal expertise) for the Community Reinvestment Act?

 Does the mission of the nonprofit organization meet the definition of community development?

A few examples of activities that meet the definition of community development:

- Serving on the Board of Directors for a nonprofit organization that has a mission of Community Development
- · Serving on a Loan Reviewing Committee
- Helping develop organizational tools (loan underwriting or booking systems, documents, etc.)
- Technical advice/assistance on financial matters (accounting, bookkeeping, etc.)
- · Assist in the marketing of financial services (advertising, publications, workshops, etc.)
- Assisting in fundraising, including soliciting or arranging investments

"YourCause allows us to leverage our resources and our staff time to focus on operations, strategy, and executing on that strategy; versus spending time doing administrative work. Having a technology platform in place that improves efficiency and streamlines our operations has been critical to our success."

-Gary Levante,SVP of Corporate Responsibility & Culture,Berkshire Bank

Track CRA Qualified Volunteering

As a financial institution, it is imperative to keep track of the community development activity types and categories of services that employees complete every year. Given the high engagement potential of qualified volunteering, it's essential to provide employees with a centralized platform that makes it easy to discover opportunities, log their activities, and capture meaningful data for reporting.

EMPLOYEE ENGAGEMENT PLATFORM

Having your employees log their own CRA qualified hours and services on one platform can help banks save time, be more accurate in reporting, and increase employee participation. With YourCause CSRconnect®, volunteering in your community becomes gamified and reporting yearly community development to examiners is a one-stop-shop!

Time-Saving

The first of many benefits that come from tracking your employees' CRA qualified activities is the time saved. From planning service opportunities to executing events, having all of your data in the same place reduces the time spent filling out spreadsheets which lets you use your time more strategically. One YourCause financial institution customer calculated spending approximately 70% less time administering programs now that they have moved over to our platform.

Once employees have completed the CRA qualified activities, they simply log into their company's instance of CSRconnect to log their service hours and respond to a CRA survey about their volunteer service. An automated email notification alerts CRA reviewers at the bank when new CRA services have been logged by employees and are ready for review. With the platform's built-in census geocoding data, reviewers can immediately confirm if services were within the institution's designated geographic reinvestment area.



Accuracy in Reporting

Another major benefit to utilizing a platform like CSRconnect to help track your employees' CRA qualified activities is the reporting capabilities. When it's time to submit a report to the federal regulator of your corporation's completed CRA services, all of your data is readily available.

Once all employees' CRA activities have been approved by your organization's reviewers, each service will be shown in a complete report including details about the employees who participated, the Tract Code, MSA Code, County Code, survey responses, and more. When examination time comes, all of the service data can be exported and approved with a few clicks and attached in one report for the federal agencies, including built-in census geocoding that pre-approves the location of services.

Increase in Employee Participation

Implementing a centralized tracking platform like CSRconnect is a proven way to boost employee participation over time. By equipping staff with the right resources and simplifying the process of discovering and logging eligible volunteer opportunities, banks can remove barriers to engagement. One financial institution using CSRconnect exceeded its CRA service goals by more than 530%, thanks to the platform's ability to make qualified opportunities easy to find, register for, and report—all within a single, streamlined system.





+530%

of CRA service goal exceeded with CSRconnect tools

Education

If your employees don't know why their services are needed, they won't be as enthusiastic to lend a hand. Make it known to your employees that the institution CAN'T do it without them!

Scoring well on the CRA evaluation is a complete team effort and by contributing to the community, employees are giving back to their neighbors, their peers, and their futures at the company. Through Engagement Elements, which are highly flexible content tiles on CSRconnect's homepage, corporations can include FAQs on what the community reinvestment act is and how employees can play a role in helping the bank achieve its CRA goals.

Volunteer Opportunities

When it comes to providing CRA qualified services to low- to moderate- income communities, skills-based volunteering opportunities are crucial in aligning the skill-sets of employees with the needs of community members. Make it easy for employees to provide financial guidance, marketing help, or even management assistance by matching opportunities to self-identified skills on their profiles and plugging in a wide selection of CRA qualified volunteer opportunities.

With the help of our platform, financial institution customers saw a 70% increase in volunteer events participation. You can even use CSRconnect Engagement Elements to highlight upcoming skills-based opportunities with nonprofits that serve the mission

of community development to boost employee participation and achieve CRA service requirements.

70%

increase in volunteer event participation with CSRconnect

Track CRA Qualified Grants

When it comes to CRA qualified investments, tracking the details and impact of your corporate grants is essential. The key factors involved in scoring CRA qualified community development investments are the dollar amount and duration, the innovativeness and complexity, the responsiveness to community needs, and the geographic or demographic distribution of impact.

GRANTS MANAGEMENT SYSTEM

Purpose-built to help corporate grantmakers in their community investment efforts, YourCause GrantsConnect® is a grants management system that can help you manage programs of all shapes and sizes, including monetary gifts, in-kind donations, sponsorships, and so much more.

From streamlining the grant application experience, evaluation, and approval flows to effectively handling communication, disbursement, and impact reporting, GrantsConnect can provide a lot of benefit in managing and tracking CRA qualified grants.

Capturing Relevant Data

GrantsConnect holds the ability to track awards and manage multiple programs of all sizes across regions. Key details around budgets, program specifics, and impact are captured through dashboards, Sustainable Development Goals insights, advanced ad hoc reporting, and so much more.

Given the importance of identifying whether community investment is benefiting low- and moderate-income (LMI) neighborhoods, geographical data is top of mind.

An 'Address' field is available on applicant and grant manager forms in GrantsConnect to help you easily collect the location of an applicant or event. This field auto-completes the address and verifies that it's correct.

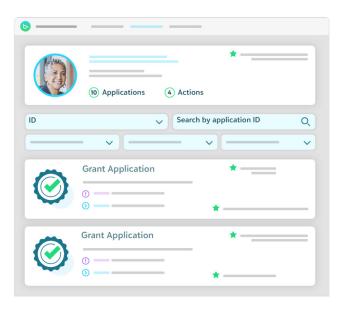
Additionally, you can enable a 'Capture extended address information (CRA)' option to capture geocoded Community Reinvestment Act (CRA) information such

as Tract Code, MSA Code, State Code, and County Code, should your organization need it for auditing and reporting.

You can also include Address fields and their related Community Reinvestment Act (CRA) information in your Ad Hoc reports.

Accessible and User-friendly Applications

When awarding grants as part of community development investment program, it is critical to ensure that you are creating grant applications that are easy to navigate and set up for the appropriate purpose.



GrantsConnect uses pre-qualification surveys, open or invite-only program settings, as well as a custom form builder with standard demographic fields and CRA questions. This makes it possible to determine how likely grants are to be CRA qualified early in the process.

Streamlining Reviews and Payments

For a smooth evaluation and grant review, GrantsConnect powers automated workflows, a range of collaboration features, as well as auditable and downloadable activity trails. From a CRA perspective, this means qualified investments are able to be approved and disbursed in a timely manner, to meet any reporting deadlines.

Consolidate Data Across Social Impact Programs

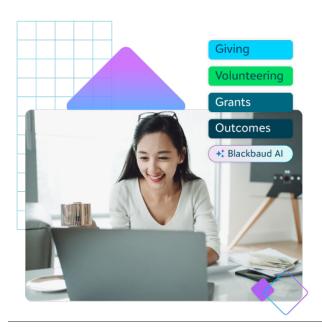
Given the broad range of activities that a bank may be involved in that are relevant to CRA reporting, having a way to consolidate several sources of data and tell a combined story can be immensely helpful.

Blackbaud's Impact Edge™ is an Al-powered, social impact reporting and storytelling solution. This can help you create a compelling picture of your organization's social impact by bringing together employee engagement, philanthropic programs, and other trusted external data sources.

CENTRALIZED DASHBOARDS

Dashboards are a great visual representation of important information. Within Impact Edge, the Impact Dashboard gives a snapshot of recent activity from volunteerism, employee giving, and community investment, all with numerous filter and datavisualization options.

You can create custom goals and track progress on department and regional participation, empowering you to pinpoint areas for opportunity to increase engagement. This can centralize the programs across your CRA strategy and provide live tracking on progress towards your goals.





LEVERAGING GENERATIVE AI

With the recent advancements in artificial intelligence and especially generative AI, it is clear that this technology has the potential to revolutionize how organizations approach community impact.

Blackbaud AI is a proprietary, private, and precise AI-chat feature within Impact Edge that generates narrative responses about your company's social impact data and story, based on your prompts.

When dealing with large and disparate data sets, such as in the case of CRA programs, generative AI tools like this can offer digestible summaries that can be inserted into a report or an email to executives.

You can also uncover specifics about your volunteering activity - not only can you ask for summaries about how many hours were volunteered with an organization, but Blackbaud AI can dig deeper and extract details about what was accomplished at the event, equipping you with narratives that go beyond data points and translate into real stories of impact.

Additionally, Blackbaud AI can turn data points into visuals. Ask it to generate a chart or graph and almost instantly, you'll have visualizations of your data at your fingertips!



At YourCause® from Blackbaud®, we have been helping companies support employee engagement initiatives that connect to corporate purpose and drive meaningful change towards critical social issues since 2007. We support over 500 organizations from Fortune 500 companies to small and medium sized business to drive employee engagement in giving, volunteering, DEI programs and more. Our clients in the Global Good Network™ engage employees from 116 countries with opportunities to drive social impact. The tips, best practices, and resources are curated by our team of experts that help companies maximize the use of the YourCause platform, launch new programs, grow and scale.

LEARN MORE ➤



About Blackbaud

Blackbaud unleashes the potential of the people and organizations who change the world. As the leading software provider exclusively dedicated to powering social impact, Blackbaud expands what is possible across the nonprofit and education sectors, at companies committed to social responsibility, and for individual change makers. Built specifically for fundraising, nonprofit financial management, digital giving, grantmaking, corporate social responsibility and education management, Blackbaud's essential software accelerates impact through unmatched expertise and powerful data intelligence. Millions of people across more than 100 countries connect, give, learn, and engage through Blackbaud platforms.

