# Strengthening Communities, Expanding Opportunities

## What’s Inside

<table>
<thead>
<tr>
<th>Message From Deputy Comptroller</th>
<th>District Snapshots</th>
<th>Large and Midsize Banks</th>
<th>National Initiatives</th>
<th>Community Affairs at Your Fingertips</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>3</td>
<td>13</td>
<td>15</td>
<td>23</td>
</tr>
</tbody>
</table>
Message From Deputy Comptroller Barry Wides

Community Affairs worked collaboratively with dedicated policy makers, bankers, and community stakeholders in fiscal year 2012 to strengthen communities and expand economic opportunity across the country. Community Affairs also initiated a number of activities to support the OCC’s national banks and federal savings associations (collectively, banks) and their supervisory and examination teams.

At the national level, Community Affairs’ Headquarters staff consulted with national banks to expedite public welfare investments in 863 projects totaling more than $9.4 billion (see page 18). Headquarters staff expanded Community Affairs’ outreach by producing value-added publications, telephone seminars, and webinars on community development topics and broadcasting them to the OCC’s e-mail subscribers and Web viewers (see page 21).

Community Affairs’ policy staff supported the OCC Comptroller and senior OCC staff in meeting with national and regional organizations and preparing speeches and testimony related to community reinvestment and financial reform. The staff assisted in the ongoing review of Community Reinvestment Act regulations and facilitating meetings with regulatory agencies and advocacy groups to assess recommendations for change.

The Independent Foreclosure Review, created to provide redress to borrowers harmed by improper mortgage servicing and foreclosure processes, received considerable attention as the OCC reached out to build awareness and resolve potential claims. The staff expedited public input and engaged housing counseling organizations to help in the OCC’s outreach efforts for the Independent Foreclosure Review (see page 19).

Working with Community Affairs’ District Community Affairs Officers, Headquarters staff participated in interagency meetings and conferences on community credit needs and Community Reinvestment Act opportunities, including the launch of the State Small Business Credit Initiative and my participation in a Small Business Investment Company roundtable hosted by the U.S. Senate Small Business and Entrepreneurship Committee. District Community Affairs Officers also worked with OCC field and Headquarters staff to ensure that banks transitioning from small bank to intermediate small bank received special offers for assistance in preparing for their next Community Reinvestment Act examinations.

As the OCC welcomed federal savings associations to its supervision, District Community Affairs Officers conducted more than 200 consultations, supported 169 examinations, and helped organize 279 roundtables and outreach events. The four District Community Affairs Officers who joined Community Affairs from the Office of Thrift Supervision contributed significantly to Community Affairs’ expertise and field support. A roster of Community Affairs’ district and Headquarters staff is on the back cover.

The accompanying chart helps to illustrate these accomplishments, and our Web site provides more information about our activities. Please let us know if we can be of assistance. We look forward to hearing from you.
Central District Snapshot

Conference Stimulates Interest in Appalachian Small Business Lending

Small business lending is good for the Appalachian region and for the Central District. That’s why the OCC joined the Appalachian Regional Commission (ARC), the Federal Deposit Insurance Corporation, the Federal Reserve Bank of Cleveland, and the Kentucky Bankers Association to sponsor the “Access to Capital and Credit: Strengthening Rural Businesses” conference in Lexington, Ky.

The March 2012 conference was the first in a series planned for the Appalachian states, according to Norma Polanco-Boyd, a District Community Affairs Officer and lead organizer of the conference. More than 100 bankers, examiners, representatives of nonprofit financial entities, and others came together to help stimulate the Appalachian region’s economy. “In rural Kentucky, families can find plenty of room to grow but, lacking good job possibilities, families are reluctant to settle or remain in this area,” said former Kentucky Gov. Paul Patton. ARC research shows that small business lending is crucial to this area’s growth.

“The funding and the expertise exist. Now it’s time for the Kentucky bankers to leverage those dollars and experience into economic growth,” said Earl Gohl, ARC’s federal cochair. “Banks in the region have the resources to make loans but are often reluctant to do so, and thus, the region remains stagnant.”

As a member of the examiners panel, Steve Thomas, an OCC National Bank Examiner in Louisville, Ky., addressed the benefits derived from small business lending. “Kentucky banks and their communities gain from prudent small business lending,” said Thomas. He added that small business lending can also bolster a bank’s Community Reinvestment Act performance.

The conference brought representatives of nonprofit community development financial institutions (CDFI) to the podium to talk about the financing they make available to fill gaps and reduce project risks. Bankers were encouraged to recognize CDFIs as partners rather than competitors.

As Kevin Smith, President and CEO of Community Ventures Corporation put it, CDFI fund-certified entities are the “grease that makes the wheel turn” in many complex financial deals. “Banks and CDFIs can leverage their small business lending funds and control risks using U.S. Department of Agriculture and U.S. Small Business Administration financing programs for businesses,” said OCC Community Development Expert Letty Shapiro, who is working with Polanco-Boyd and ARC to publicize these lending partnerships.

“The farther you go into the rural Kentucky market, the harder it is to deliver capital,” said Ray Moncrief, Vice President and Chief Operating Officer, Kentucky Highlands Investment Corporation. “The cure is to encourage partnerships and financial collaborations as a means of introducing banks to opportunities for making loans and investments they are unprepared to try alone.”

More than 100 bankers, community lenders, and state, local, and federal agency representatives attended an interagency conference held in Lexington, Ky. Participants examined how access to capital and credit could strengthen rural business in the Appalachian region.
Community Affairs Year in Review FY 2012

Chicago Tour Highlights Local Healthy-Food Initiative

Stephen Stovall, National Bank Examiner for Large Bank Compliance, got a first-hand look at local healthy-food initiatives when he joined District Community Affairs Officer Paul Ginger on a tour of Chicago’s Bronzeville neighborhood in September 2012.

Community leaders in this historic neighborhood used bank contributions to create the Bronzville Community Gardens, where neighbors can help themselves to fresh vegetables. The garden will also supply fresh produce to four local restaurants and retail stores as part of the proposed $9 million Bronzeville Cookin’ development.

“I learned that the Bronzeville development will create 140 jobs and provide a place for hands-on healthy food and nutrition classes and communal events,” said Stovall. “These types of projects make perfect sense. Everyone wins with improved access to fresh food and nutritious meals.”

According to plans, another nonprofit lender in Chicago will leverage $3 million to support its work to bring healthy-food options to Chicago’s lower-wealth communities. One of the early loans went to an innovative social enterprise that uses aquaponics to grow and raise fish using zero net energy consumption. In August 2012, the OCC’s Community Affairs Department published a Community Developments Investments e-zine called “Bank Financing of Healthy-Food Initiatives.” The publication describes how banks are joining businesses and nonprofit organizations to finance such efforts to transform low-income communities lacking grocery stores into thriving markets.

“National banks are making significant contributions to the financing of healthy-food stores and fresh food projects throughout the OCC’s Central District,” said Ginger. “One community development financial institution is leveraging more than $25 million in capital from banks and foundations to fund a pipeline of retail projects in Midwestern communities lacking access to healthy foods. Many of these banks will receive positive Community Reinvestment Act consideration for their investments, loans, and contributions.”
Central District Focuses on Rural Community Development

In a meeting with Assistant Deputy Comptroller Ben Rudolph at the OCC’s Minneapolis Field Office, District Community Affairs Officer Tim Herwig welcomed the opportunity to assist the institutions that Randolph’s team supervises. Rudolph’s reply was straightforward: “Help us identify community development opportunities in rural areas.”

Having just arrived from another federal agency, Herwig was eager to complete this task. “It’s been a year of discovery,” said Herwig. In the course of his research, Herwig met with representatives of the Minneapolis-based Institute for Agriculture and Trade Policy. He also attended meetings of the Regional Economic Development (RED) Group, a gathering of rural economic development advocates convened by the McKnight and Blandin foundations to discuss rural development in Minnesota.

Herwig soon realized that the publication of a rural community development resource guide could be a useful catalyst for convening national banks and federal savings associations (collectively, banks), community organizations, governmental agencies, and bank examiners and supervisors. “Work is under way at the OCC to complete a guide focusing on the state of Minnesota. If it proves a useful tool, similar guides may be developed for other states in the Central District and beyond,” he said.

Because of this research and his new relationships, Herwig began planning an important session for bank examiners and key constituents interested in learning more about local and healthy food production and distribution, other sustainable agricultural practices, and developments in renewable energy and bioenergy production. “As examiners, we need to realize that while entities like local food and bioenergy enterprises are not traditional bank finance customers, they can be viable business enterprises and provide important growth opportunities to both our rural areas and urban communities,” said Jay Branger, National Bank Examiner (and Team Leader) in Minneapolis.

Working with the Minneapolis Federal Reserve and the Federal Deposit Insurance Corporation’s Kansas City Regional Office, Herwig and the OCC hosted an Interagency Examiner Listening Session/Webinar in July 2012 on significant trends in healthy, local food and bioenergy finance. The session focused on the outlook for private financing of enterprises engaged in food production and distribution and those rural enterprises engaged in the generation and distribution of bioenergy and other alternative energy sources.

“This was an important event for our bank examiners that shed some light on the need for credit enhancements and layered financing strategies akin to those used in urban community development transactions,” said Herwig. “Experts believe that both the food and bioenergy economies are on the threshold of breaking into private finance in significant ways. We want to be knowledgeable and ready to supervise bank involvement in this financing.”

St. Louis Conferences Emphasize Community Involvement

Norma Polanco-Boyd (left) coordinated several interagency conferences of bankers, regulators, and community groups held in St. Louis, Mo. The conferences focused on developing bank partnerships, community resources, and Community Reinvestment Act initiatives to address the credit needs of underserved communities. Mark Frumkin (right), National Bank Examiner (Compliance) in the OCC’s Evansville, Ind., field office, confers with participants at one of these conferences.
Northeastern District Snapshot

Regional Meeting Bolsters Collaboration With NeighborWorks America

Braving a power outage that nearly disrupted their long-planned event, District Community Affairs Officers Francis Baffour, Bonita Irving, and Denise Kirk-Murray led a training and outreach session for nearly 60 NeighborWorks America board and staff members attending their annual northeast regional meeting in Albany, N.Y.

“As part of a larger Community Affairs initiative [see page 17], the annual meeting provided an ideal opportunity to exchange ideas and discuss Community Reinvestment Act topics supportive of NeighborWorks’ mission to create affordable housing opportunities and preserve sustainable communities,” said Baffour.

Irving opened the session with an overview of the purpose and activities of the OCC and Community Affairs. Ted Wartell, the OCC’s Director for Community Affairs Policy, updated participants on the Independent Foreclosure Review, and Baffour discussed proposed rules for qualified residential mortgages and qualified mortgages.

“The proposed rules may have a significant impact on the mortgage marketplace,” said Baffour. “Participants were concerned that the new rules may limit their ability to provide affordable housing to low-income and first-time home buyers, particularly those who will be making small downpayments or who have low credit scores.”

A highlight of the session involved dividing participants into five groups representing states in NeighborWorks’ Northeast region. “Everyone listened carefully to each other and learned a lot about how access to banking products and services impacts consumers in each area,” said Kirk-Murray, who led the exercise. “The group exchanged valuable information that will help NeighborWorks plan new community development programs and partnerships.”

The OCC uses some of this information to establish community contacts and compile market profiles as part of the agency’s examination process for the Community Reinvestment Act. The information includes details about area and market economic conditions, credit and banking needs, community development opportunities, and bank involvement and performance in Community Reinvestment Act activities.

Commenting on the session, Deborah Boatright, NeighborWorks’s Northeast regional director, said, “One of the key goals of our annual homeownership meeting is to promote peer exchange, share best practices, and spark new strategies for success. Our collaboration with the OCC, a NeighborWorks board agency, provided a rich context for us to meet those goals, and we look forward to continuing this valuable partnership going forward.”
District Meetings Strengthen CRA Relationships

In February 2012, a number of bank Community Reinvestment Act (CRA) and Compliance Officers joined Community Affairs staff from the OCC, Federal Deposit Insurance Corporation, and the Federal Reserve to launch a series of district CRA meetings. More than 100 representatives from government, nonprofit organizations, and community-based organizations attended the first meeting held in Charlotte, N.C., to learn about CRA investment opportunities.

Designed to educate a new generation of community development leaders and professionals, the meeting began with an overview session of the national economic outlook and forecasted shifts in local community development markets. After this session, participants chose to enter a compliance session designed primarily for CRA and Compliance Officers or a session for community-based and nonprofit organizations.

The compliance officer session featured a panel of examiners from the OCC, Federal Deposit Insurance Corporation, and Federal Reserve. “Bankers attending this session wanted to know more about how regulators define community development under CRA and how they should manage the risks related to these activities,” said District Community Affairs Officer Vonda Eanes, who is also a National Bank Examiner. “The nonprofit session focused on CRA basics and regulatory requirements. The discussion included an overview of how regulators examine banks based on such factors as the institution’s size and assessment areas.”

A combined afternoon session brought lenders, regulators, and community representatives together to share case studies and investment opportunities. “CRA programs and partnerships can help banks put earning assets on their balance sheet if they are done safely and soundly,” said Eanes. Panelists provided examples of ways that banks have served their communities in partnership with community-based organizations and offered tips on how nonprofit organizations should approach banks for funding.

The participants agreed that gaining a clear understanding of a bank’s CRA goals and objectives is an important first step in developing a long-term banking relationship. Participants also agreed that many banks and nonprofit organizations could strengthen their existing CRA relationships by supporting financial education and offering products and services to bring clients and customers into the financial mainstream.

After the successful Charlotte launch, District Community Affairs Officers Bonita Irving and Francis Baffour convened meetings in Columbia, S.C.; Charleston, W.Va.; Dover, Del.; and Baltimore, Md. Irving and Baffour held similar meetings in Massachusetts, Maine, and New Hampshire to examine business opportunities related to community development lending and investment. “These sessions gave us new insight into the best practices that many banks are using to bring affordable housing and small business capital to rural and underserved communities,” said Irving.
Banking On Success in California’s San Joaquin Valley

As part of California’s Central Valley, the San Joaquin Valley encompasses the state’s top agricultural region and excels in oil and gas production, but many of its communities face economic challenges.

A number of San Joaquin leaders joined with California bankers and a host of community organizations to tackle these challenges. They created a task force—comprising financial institutions, community-based organizations, and municipal entities—to support such projects as “Bank On Fresno” and the expansion of local Volunteer Income Tax Assistance sites.

As part of these efforts and events held throughout the Central Valley (see article on next page), the OCC, and other federal bank regulators participated in listening sessions and task force meetings to develop economic development strategies and expand regional collaboration in Fresno County, a key part of the San Joaquin Valley. Central Valley leaders suggested that the regulators convene a training session to discuss how the CRA could benefit the Valley’s low- and moderate-income residents and communities. More than 60 representatives from community-based organizations, nonprofit service providers, and local governments met in Fresno and Sacramento.

Numerous meetings followed. Participants discussed the need for additional financial services and investments and visited a number of promising initiatives. One of the most successful is the student-run bank branch opened at Fresno’s McLane High School as a partnership between a national bank and the Fresno Unified School District. “Students receive a stipend for working in the branch. They also earn a college scholarship for completing an elective course offered by the McLane Business Academy,” said branch manager Rachel Flores. “Eighteen students have graduated from the program, and four graduates are employed by the bank as part-time tellers while going to college.”

In addition to student learning, the bank established a Parents Academy at the school to offer financial education in English and Spanish for parents and guardians of McLane students. The branch makes information available on the school’s Web site and provides convenient banking services to students, faculty, parents, and administrative staff.

“Our student bankers are helping to empower their peers and their families through financial literacy,” said Union Bank Executive Vice President Julius Robinson, head of Corporate Social Responsibility. “This partnership gives teens real-world financial education and the experience they need to get a good start in life.”
CRA Training Engages Community-Based Organizations

The OCC and other bank regulators convened a series of Western District workshops for community leaders to learn about the Community Reinvestment Act (CRA) and its impact on low- and moderate-income communities. More than 60 representatives from community-based organizations, nonprofit organizations, and local governments met in Fresno, Calif., for the first daylong “CRA 101 for Community-Based Organizations” workshop in March 2012.

“The workshop uses CRA training materials originally developed by the OCC for use in new bank officer and examiner training. The trainings provide a basic understanding of CRA regulations, the CRA examination process, and how banks are rated on their performance evaluation,” said District Community Affairs Officer Susan Howard, who helped plan and organize the training.

“These materials explain how banks gain positive CRA consideration for their community development lending, investments, and services. They give examples of how community groups can leverage this activity in their own communities to promote economic development, housing, and community development services, including retail banking.

“The response was overwhelming,” said Howard. “Community Affairs held three more workshops in Las Vegas, Phoenix, and Sacramento. Their success led Community Affairs to convene other CRA listening sessions and workshops throughout the country.”

Community Affairs Supports SBA Training

District Community Affairs Officer Michael Martinez collaborated with the U.S. Small Business Administration’s (SBA) Office of Field Operations to develop an innovative “train the trainer” program for the SBA’s lending relations and export lending specialists.

“SBA is keenly aware of the recession’s impact on small business and wants to teach its specialists how to work with national banks and federal savings associations to encourage their small business lending,” said Martinez. His presentations emphasized the small business aspects of the Community Reinvestment Act and its qualifying community development activities.

For the lending relations specialist training, two representatives from each of the SBA’s 10 regions came together for weeklong training held near Sacramento, Calif. In turn, these representatives went back to their regions and trained others in the SBA’s 68 field offices.

The training of SBA export lending specialists, also held in Sacramento, focused on how lenders can combine incentives offered by the Community Reinvestment Act with new incentives for small business exporting. The SBA’s export lending specialists are based in U.S. Export Assistance Centers located nationwide.

“It would have been impractical to bring all of the SBA’s field office staff together for training,” said Jim Hammersley, retired director of SBA’s Office of Financial Assistance Loan Programs. “By training a small number of our staff to teach and train others, we were able to reach out to every SBA field office.”

Martinez continues to receive calls and maintains contact with the SBA staff who attended the initial training sessions, and other District Community Affairs Officers have conducted similar training in additional SBA field offices.

“The SBA is continuing to work with the OCC and community banks to discuss ways to support small business expansion into global markets and, by extension, the jobs they create,” said Dennis Chrisbaum, the SBA’s Director of International Trade Finance.

Moving ahead, District Community Affairs Officers will work in Colorado, Idaho, Missouri, Utah, and Washington to help increase small business credit opportunities.
I
n keeping with Atlanta’s tradition of solving problems locally, District Community Affairs Officer Karol Klim brought community leaders together at a Community Affairs-sponsored event to discuss barriers to creating and maintaining affordable housing in Atlanta, Ga. At that 2011 event, participants identified major goals and signed up for one of four task teams that took on actionable items to maintain the event’s momentum and advance agreed-upon goals.

Then Klim worked with other bank regulatory agencies to organize a day-long workshop in April 2012 to examine how community-based groups and nonprofit organizations could work with lenders, businesses, and government to tap community assets and address identified needs and opportunities.

“The workshop was unique in that it brought together bank Community Reinvestment Act (CRA) and compliance officers, community-based organizations, nonprofits, and community leaders to discuss a wide range of housing-related concerns.”

—Karol Klim, District Community Affairs Officer

“Piece by Piece” Initiative

Another important initiative emerging from the initial meeting, Piece by Piece, has grown into a successful regional campaign to stop the tide and damaging impact of residential foreclosures in the Atlanta metropolitan area. The initiative is coordinated by the Atlanta Neighborhood Development Partnership and sponsored by the Home Depot Foundation, Enterprise Community Partners, NeighborWorks America, and a number of other organizations.

Piece by Piece held its third annual meeting at Atlanta’s Carter Center, where supporters were recognized for their roles in promoting the initiative. Piece by Piece’s leaders reported significant progress in reclaiming and protecting Atlanta’s neighborhoods and communities, including partnerships with HomeSafe Georgia, innovative efforts to assist homeless veterans, and private sector investment in high-foreclosure neighborhoods.

Speakers stressed the importance of continuing Piece by Piece’s cooperative work to combat foreclosures and stabilize Atlanta’s distressed neighborhoods and suburban communities. “The end is not yet in sight,” said Piece by Piece’s Coordinator Susan Adams, “but we have made substantial progress working together to leverage our resources.”
Banker Workshops Focus on CRA Performance Context

Many factors influence the ability of national banks and federal savings institution governed by the Community Reinvestment Act (CRA) to help meet the credit needs of the communities they serve. Often described collectively as the bank’s CRA performance context, these factors include the condition of the local economy, the bank’s financial condition, and the availability of community development opportunities.

“Developing, documenting, and understanding the performance context is an important step in the CRA examination process for both the bank and the examiner,” says District Community Affairs Officer Scarlett Duplechain.

“Banks that successfully develop their performance context are able to see gaps, identify new partners and opportunities, and support new products and services to meet community needs.”

Training Workshop

Because developing a performance context is so critical to assessing CRA performance, the OCC and its interagency regulatory partners developed a training workshop for banks, federal savings associations, and nonprofit organizations. The workshop helps to provide a better understanding of CRA, the process used to create performance contexts, and laying the groundwork for effective national bank and nonprofit partnerships.

The workshops concluded with discussions on how effective collaboration and partnerships among national banks, federal savings associations, local governments, and nonprofit organizations can lead to effective community development strategies that successfully address community credit and banking needs.

Jenita Reon, Compliance Examiner from the OCC’s Houston Field Office, attended the Lake Charles, La., workshop. She said, “The workshop provided an excellent opportunity for banks and federal savings associations to learn about techniques that will enhance the institution’s ability to tell its story. The information presented on market data sources provided a framework for compiling and analyzing key local market information and for positively impacting the institution’s ability to capture and describe its CRA-targeted efforts and results.”

A Tennessee bank president attending the Knoxville workshop noted that “most community banks have been in the survival mode the past few years, so the meeting helped jump-start us to think about our CRA programs. I particularly appreciated the segment of the program where you stimulated our thoughts and comments on how to custom design CRA programs for our markets.”
Community Affairs Supports New Treasury Department Program

Working with state and local banking officials, District Community Affairs Officers (DCAO) Karol Klim and Nancy Gresham-Jones in the OCC’s Southern District supported the launch of the U.S. Department of the Treasury’s State Small Business Credit Initiative (SSBCI) program in Georgia and Florida.

Under the SSBCI, participating states can use federal funds to leverage private financing to help creditworthy small businesses and manufacturers. The SSBCI allows states to build on successful small business program models, including collateral support, capital access, and loan guarantees to expand and create jobs. Programs are expected to help spur up to $15 billion in lending to small businesses nationally.

In Georgia, DCAOs worked with the Georgia Bankers Association and the state’s Department of Banking and Finance to introduce the state’s $47.8 million SSBCI program to lenders. After a May 2012 kick-off meeting, officials made calls and visits to individual bankers to help them understand how the SSBCI programs could enhance their operations. Holly Hunt, Georgia’s SSBCI manager says, “The DCAOs helped us share best practices and lessons learned with our lenders. They have been very supportive and receptive to the state’s needs.”

In Florida, DCAOs helped launch the state’s $97.6 million SSBCI program. Like all participating states, Florida is required to demonstrate a minimum return of $10 in new private lending for every dollar in federal SSBCI funding. In addition to capital access and loan supports, Florida’s SSBCI includes a venture capital program, which is being administered through a partnership with the Florida Opportunity Fund.

According to Jennifer Schrader, Development Representative III of the Florida Department of Economic Opportunity, the SSBCI program is gaining momentum. DCAOs helped organize a series of seven statewide seminars and follow-up activity, resulting in increased banker participation. OCC examiners participated in the interagency regulatory panels held during the statewide seminars.

National Bank Examiner Samantha Bichard, who spoke at the Tampa, Fla., session, commented that the new credit programs assist lenders in mitigating risk and increasing their small business lending volume. “These incentives appear to be of special interest and benefit to our community banks, as they provide more flexible options than SBA (U.S. Small Business Administration) guarantees and include collateral support,” she said.

The larger seminars were followed by smaller, targeted regional meetings in Florida, where local lenders shared their concerns and experiences. Lenders walked through the program with technical assistance provided during individual consultations.

Southern District DCAOs organized meetings with bankers, community leaders, and stakeholders to discuss the State Small Business Credit Initiative. Karol Klim (not pictured) participated on a regulatory panel at this conference in Pensacola, Fla. She was introduced by Jennifer Schrader (standing), development representative for the Florida Department of Economic Opportunity.

From Schrader’s perspective, the involvement of federal and state regulatory agencies gave the program a boost and the momentum it needed to get it moving. “The federal agencies’ involvement proved to be instrumental in getting the banks’ attention, and the ensuing relationship has benefitted the state by enhancing its lender network,” she concluded.

To leverage this involvement, the OCC’s Community Affairs staff participated in two national conferences on SSBCI, and DCAOs continue to follow up with state officials to help raise awareness of SSBCI programs among lenders in areas they serve. An OCC Q&A page addresses regulatory issues concerning the SSBCI. In addition, the Community Development Investments e-zine “Strategies for Leveraging the State Small Business Credit Initiative” includes case studies of successful SSBCI programs and links to other SSBCI resources.
Large and Midsize Banks

Community Affairs Supports the OCC’s Large Bank Supervision Department

District Community Affairs Officers (DCAO) and Community Affairs’ Headquarters staff worked with the agency’s large bank examination teams to make the Community Reinvestment Act (CRA) examination process more efficient and productive in a variety of ways, including on- and off-site examination support, bank consultations, and training.

DCAOs assigned to each team served as a quick link to Community Affairs’ resources and expertise. DCAOs worked side-by-side with examiners on several on-site data integrity and CRA examinations, reviewing bank documentation of community development loans and services and qualified investments to determine whether these activities met the CRA definition of community development.

With support from Headquarters staff, DCAOs completed the first annual round of community profiles for 37 metropolitan areas identified by Large Bank Compliance staff as those most common to national banks and federal savings associations under Large Bank Supervision. Each profile includes demographic data, updated statistics on housing, poverty levels and unemployment rates, and assessments of community credit needs and opportunities.

DCAOs also conducted numerous meetings with community contacts and nonprofit organizations to help determine credit and community development needs in urban and rural communities. Understanding this part of an institution’s “performance context” is a key to conducting a fair evaluation of an institution’s performance under CRA. DCAOs maintain information about profiled assessment areas in accessible databases.

Bank consultations provided another way for DCAOs to add value to the supervision process. Examiners and bankers requested input from DCAOs and Headquarters staff on particularly complex or unfamiliar investment and credit vehicles, public welfare investments, and activities for which guidance is subject to interpretation.

To optimize internal performance, Community Affairs staff provided training for the OCC’s large bank compliance EXCEL team in Charlotte, N.C. EXCEL is a program that accelerates the professional development of the OCC’s generalist examiners. “The EXCEL team members participating in this training found it very helpful. It introduced them to the many ways that DCAOs can help them plan and execute their CRA examinations,” said EXCEL Team Leader Patricia Surrano.

The training covered the role of Community Affairs, introduced tools for developing community profiles with contacts, and explained the types of assistance DCAOs can provide to compliance staff in connection with CRA exams. The training included a discussion on the public welfare authority, which allows banks and federal savings associations to make qualified community development investments, and introduced available resources and tools.

To convey this information to a wider audience, Beth Castro, Community Affairs’ Director for Community Development, participated in a “Knowledge Sharing Call” with the OCC’s Large Bank Supervision Compliance Network Group. “This group promotes communication and information sharing and encourages consistency in implementation of supervision policies,” said Castro.
DCAOs Assist Midsize and Credit Card Bank Supervision Teams

Community Affairs is committed to supporting the OCC’s bank supervision teams. As with large bank teams, Community Affairs assigns District Community Affairs Officers (DCAO) to specific midsize and credit card bank teams to provide examination support, community and bank outreach, and consultative services. Here are some of the ways that Community Affairs has helped.

• DCAOs responded to several examiner inquiries and requests for assistance involving complex or unusual investment vehicles and structures. One case involved a bank acquired via a “shelf” charter. The examiner-in-charge inquired about when the Community Reinvestment Act (CRA) examination for that bank should occur. Other requests were for information on investment opportunities in geographic areas confronting difficult local markets.

• A DCAO assisted with the CRA examination of a bank primarily focused on commercial lending. The DCAO reached out to organizations engaged in direct business lending and advocated for economic development benefitting low- or moderate-income areas and small businesses. The DCAOs interviewed three Community Action Agencies and an economic development corporation offering the U.S. Small Business Administration’s Section 504 and micro-loan products. The results were tabulated and sent to the examination team. Moreover, the DCAO served as a resource for the teams other CRA community development questions.

• A DCAO participated in examiner planning calls and provided input to the examiners and bank staff regarding the bank’s performance under its strategic plan and its proposed renewal of that plan. The DCAO forwarded comments to the bank’s principal supervisors and to those in the OCC’s Compliance Policy Group responsible for strategic plan final approvals. The plan was approved pursuant to the input.

• A DCAO coordinated a community development tour in Columbus, Ohio. The DCAO and examiner-in-charge met with the bank’s Community Development Director and various community development staff before embarking on a daylong tour to visit with several of their community partners. The bank highlighted affordable housing projects and a community development loan that financed a kitchen incubator and microenterprise organization.

• A DCAO and examiner attended a community development tour in Detroit, Mich., and visited three community groups. A bank CRA manager organized the tour. Most of the organizations visited were involved in affordable housing and foreclosure prevention. The DCAO also met with several of the bank’s community development staff and toured a few of the bank’s branches, one of which is in an inner-city grocery store.

“DCAOs make many valuable contributions to the OCC’s midsize and credit card bank examination teams,” said Daphne Whistler, OCC Midsize Bank Compliance Lead. “For example, they participate in our examinations by conducting community contacts, compiling performance context information, providing input on selection of full-scope assessment areas, and assisting with data integrity reviews. By partnering with our examiners, the DCAOs provide unique expertise and perspective that result in a higher quality, more efficient CRA examination process.”

Scarlett Duplechain confers with Eric Robertson, President of Community LIFT, in Memphis, Tenn. Like other DCAOs, she provides OCC examiners with invaluable information about community credit needs and bank performance contexts.
National Initiatives

Community Affairs Promotes Financial Capability

Each year, Community Affairs takes part in a number of activities that support improving the financial capability of Americans. From Earned Income Tax Credit Awareness Day to America Saves Week and Financial Literacy Month, Community Affairs distributes information to help people make better-informed financial decisions.

Community Affairs staff participated in many events to promote financial capability across the country. One of these events was sponsored by an organization supported for many years—the Society for Financial Education and Professional Development (SFEPD). SFEPD gives personal money management, investing, and credit management seminars to college-age students enrolled at historically black colleges and universities.

SFEPD asked Community Affairs to present a credit management seminar to incoming freshmen at Alabama A&M University in Huntsville, Ala. The seminar covered credit and debit cards, student loans, credit reports and credit scores, and financial management. “Several students commented that this was their first exposure to this information and for many, the first time they were responsible for managing their own finances,” said Community Development Specialist Denise Murray. “The message conveyed was that making right—or wrong—financial choices could have lasting effects on their lives.”

Community Affairs staff also participated in the nationwide Banking On Our Future volunteer events sponsored by Operation HOPE. Twice a year, volunteers

Continued on next page
Continued from previous page

Around the country go to local classrooms to teach the curriculum. Students learn about banking, credit, and money management during the half-day sessions. Community Affairs works with the OCC’s employee networking groups to recruit volunteers for these events. OCC volunteers report that they appreciate the opportunity to share their financial successes and failures with students and leave impressed by students’ questions and interest in learning more about personal finance.

At the request of the OCC’s External Outreach and Minority Affairs Department, Community Affairs conducted personal money management seminars for Congressional Black Caucus interns. “These seminars help these college-age students focus on the importance of credit and good money management skills,” said the OCC’s Glenda Cross, Senior Advisor for Outreach and Minority Affairs. “The Congressional Black Caucus reports that the seminar also helped the students understand how to manage their internship stipend, connecting that activity with a life skill they will need once they graduate and become part of the workforce.”

Recognizing that lasting change begins at home, Community Affairs joined with the OCC’s Human Resources Department to offer retirement planning during Financial Literacy Month. At brown-bag lunches held in April 2012, representatives from the Thrift Savings Plan and OCC’s 401(k) provider presented tips on maximizing retirement savings. An overwhelming majority of the attendees said the events provided valuable retirement planning information and requested additional OCC-sponsored financial literacy events that are in the works.

Throughout the year, Community Affairs kept pace with its annual schedule of outreach events and distribution of the OCC’s financial capability information. These events included the U.S. Department of Defense’s Financial Readiness Fair at the Pentagon, National Consumer Protection Week event on Capitol Hill, and Financial Literacy Day on Capitol Hill. Community Affairs represented the OCC at meetings and conferences of the American Savings Education Council, the JumpStart Coalition for Personal Financial Literacy, and SFEPD.

In addition, Community Affairs continued its policy work on financial capability, participating in planning working groups and initiatives sponsored by the Financial Literacy and Education Commission (FLEC). “FLEC held a national webinar where CA presented information about the National Financial Literacy Strategy and ways to implement the strategy in local communities,” said Karen Bellesi, the OCC’s Community Development Manager.

Community Affairs participated in other FLEC working groups, including the group focusing on research and communication and outreach. “Community Affairs played a key role in helping the U.S. Department of the Treasury gather data sets from across the federal government that will help inform researchers in the field of financial literacy and education,” said Bellesi. To make it accessible to everyone, the Treasury Department posted the data on MyMoney.gov.

Through these groups, Community Affairs helped review recommendations on financial literacy and education put forth by the Organisation for Economic Co-Operation and Development’s International Network on Financial Education. The recommendations have international implications. Going into fiscal year 2013, FLEC continued its initiatives to refocus the federal government’s financial literacy efforts, including a new youth-directed financial literacy initiative that Community Affairs staff helped plan and initiate.
The OCC enjoys a special relationship with NeighborWorks America that goes beyond the Comptroller’s congressional appointment to this organization’s board of directors. “OCC and NeighborWorks staff work together nationally and locally to support NeighborWorks’ mission to strengthen communities, create economic opportunities, and sustain affordable housing,” said Barry Wides, Deputy Comptroller for Community Affairs. “In addition, many affiliates have formed partnerships with banks undertaking community revitalization activities. These affiliates provide the OCC with valuable information about bank performance, community context, and credit needs through community contacts and public comments.”

Each year, OCC volunteers join the annual NeighborWorks Week neighborhood revitalization campaign. In recent years, OCC staff has participated in foreclosure mitigation forums and workout sessions held around the country. Community Affairs staff also participates in many of the outreach activities conducted by NeighborWorks’ 235 local affiliates, providing regulatory updates and examples of best practices to local affiliates.

District Community Affairs Officers (DCAO) Vonda Eanes and Scarlett Duplechain visited NeighborWorks’ Washington, D.C., offices to present the latest updates on Community Reinvestment Act (CRA) regulations and guidelines to NeighborWorks’ senior management and headquarter staff. Eanes and Duplechain described what the law requires and how CRA exam criteria vary based on an institution’s size. They also discussed how banks receive positive CRA consideration for their loans, investments, and services and how NeighborWorks affiliates can collaborate with institutions taking advantage of this opportunity.

After their presentation, NeighborWorks senior staff suggested that affiliates could benefit by learning more about CRA opportunities and offered to arrange training sessions for NeighborWorks staff and affiliate staff in each of the OCC’s four districts. With this invitation, DCAOs held webinars in the Central and Western districts and participated in NeighborWorks meetings in the Southern and Northeastern Districts.

DCAO Michael Martinez spoke during the Western District webinar, which attracted about 30 NeighborWorks executive directors and homeownership managers representing 11 states. DCAO Paul Ginger represented the OCC for the Central District webinar. The fall program, which drew about 30 affiliates from 13 states, followed a CRA presentation by DCAO Norma Polanco-Boyd to the board of the greater Cincinnati, Ohio, NeighborWorks affiliate.

DCAOs Francis Baffour, Denise Kirk-Murray, and Bonita Irving joined Director for Community Affairs Policy Ted Wartell at the Northeastern District meeting held in Albany, N.Y., which focused on foreclosures issues and opportunities to promote homeownership (see page 6).

As part of the Southern District meeting in Memphis, Tenn., DCAO Duplechain and Community Relations Expert Hershel Lipow went on a neighborhood tour conducted by the local NeighborWorks affiliate. More than 100 NeighborWorks executive directors and board members attended the meeting, which included a session titled “Building Powerful Partnerships With Financial Institutions.”

“Collectively, we reached more than half of NeighborWorks’ affiliates and engaged in a productive conversation about CRA and how it can support NeighborWorks’ mission,” said Wides. “We hope to have more of these sessions next year and continue this important dialogue.”
Public Welfare Investments Respond to Community Needs and Opportunities

National banks have an eye to the future when using the OCC’s public welfare investment authority. National banks had a banner year, making 863 investments in projects totaling more than $9.4 billion.

The public welfare investment authority is a tool that enables banks to structure investments that make the most of the public- and private-sector resources and expertise available within their service areas. Banks may receive positive consideration for many of their public welfare investments under the Community Reinvestment Act.

Under the public welfare investment authority, national banks invested more than $9.4 billion in 863 community development projects. Some of these projects also took advantage of the federal energy investment tax credit program to promote activities like this wind-energy project.

The national bank public welfare investment authority requires that investments primarily promote the public welfare, such as by providing housing, services, or jobs. A national bank or its subsidiary may make an investment directly or indirectly if the investment primarily benefits low- and moderate-income individuals, low- and moderate-income areas, or other areas targeted by a governmental entity for redevelopment, or if the investment would receive consideration as a qualified investment under 12 CFR 25.23 of the Community Reinvestment Act. Further, a bank’s public welfare investment must not expose it to unlimited liability.

“The genius of the public welfare investment authority lies in its flexibility to respond appropriately to changing community needs and opportunities, as well as its alignment with other public policy objectives,” said Community Development Manager Karen Bellesi. “The OCC has approved public welfare investments ranging from transitional housing, charter schools, food kitchens, and drug rehabilitation centers to small business incubators and manufacturing facilities.”

Similar to previous years, a significant percent of bank public welfare investments involved federal low-income housing tax credits and new markets tax credits in fiscal year 2012. Banks undertook innovative transactions and complex financing structures, including those taking advantage of the federal energy tax credit program authorized under 26 USC 48. Investment tax credits reduce federal income taxes by offering a 30 percent tax credit to owners or long-term lessees for qualified property that meets established performance and quality standards.

The energy investment tax credit program encourages the use of
renewable energy, including projects that involve solar, qualified fuel cell property or qualified micro-turbine property, combined heat and power system property, qualified small wind-energy property, or equipment that uses the ground or ground water as a thermal energy source.

One bank used both the energy investment tax credit and new markets tax credits to make a public welfare investment in a fund to finance the construction and operation of six wind turbines. The energy from the wind turbines will provide power to an impoverished, low- and moderate-income area. Further, the project is located in a local Renewal Community and Economic Hot Zone and will have economic and community impact in terms of job creation and prominence as the first on-site wind project for a port in the United States.

**Federal Savings Associations**

Federal savings associations are also forward thinking when it comes to community development investments. Community Affairs conducted training for their examiners and received several inquiries from federal savings associations about the kinds of investment that would be permitted and how they might notify the OCC about their investments. In fiscal year 2013, the OCC plans to propose revisions to its public welfare investments regulations to include these federal savings associations.

More information on public welfare investments, including the process used to submit information to the OCC, can be found on the OCC’s Public Welfare (12 CFR 24) Resource Directory Web page. Inquiries may be directed to District Community Affairs Officers or Community Affairs staff in Washington.
Small Business Provides Gateway to Economic Growth

Small businesses create two out of every three new jobs in the United States. When the economy is growing, it is usually because small businesses are healthy and growing.

The recent economic upheaval focused new light on the need to stimulate small business lending, investment, and, in turn, job creation. The Community Affairs staff engaged OCC-supervised banks in myriad ways to bring attention to best practices and information about federal programs and Community Reinvestment Act regulations.

Community Affairs published reports and newsletters, organized webinars and field meetings, and sponsored conferences and roundtables. Community Affairs helped launch the U.S. Department of the Treasury’s State Small Business Credit Initiative programs (see page 12). With help from the U.S. Small Business Administration’s program managers, Community Affairs organized two well-attended small business investment corporation webinars, and Community Affairs’ Deputy Comptroller Barry Wides served on a panel at the Independent Community Bankers of America’s annual conference that discussed the regulatory considerations of bank investments in small business investment corporations.

District Community Affairs Officers Vonda Eanes and Paul Ginger participated in another webinar on microenterprise hosted by the Association for Enterprise Opportunity, a national nonprofit membership organization. The webinar provided information on the Community Reinvestment Act and forming microenterprise and small business partnerships with financial institutions.

District Community Affairs Officers also participated in such meetings as the Annual Small Business Conference in Southeast Louisiana, where in addition to workshops, a panel of bankers and Small Business Administration experts offered guidance on available small business products and services and discussed factors that banks look for when reviewing business loan applications.

At the Las Vegas, Nev., Small Business Forum, representatives from the OCC and other regulatory agencies described the financing and steps that small businesses and business lenders can take to apply for federal and state program funds that supplement or guarantee private financing.

At the Knoxville, Tenn., small business lending forum, participants shared information on regional lending programs and discussed how public lending leverages private capital, underscoring the role that banks can play in supporting small business. Participants also discussed the small business climate and highlighted model small business lending projects in East Tennessee.

At other sessions, District Community Affairs Officers worked in tandem with such federal agencies as the Federal Reserve Bank, the Small Business Administration, and the Export-Import Bank of the United States. At the Interagency Small Business Roundtable held in Georgetown, Del., representatives from several federal agencies offered information about small business loan guaranty and other small business financing programs. District Community Affairs Officers and agency representatives answered questions from bankers on program eligibility and qualifying for Community Reinvestment Act consideration. In response to banker interest, District Community Affairs Officers held similar forums in Montgomery, Ala.; Phoenix, Ariz.; Manchester, N.H.; Columbia, Md.; Burlington, Vt.; Cleveland, Ohio; and Houston, Texas.

Donning “I Dig My Farmer” shirts provided by the Institute for Agriculture and Trade Policy, food service staff from a K-12 Minnesota school regularly purchases fresh produce from local farmers (see related article on page 4).
Community Affairs supports national banks and federal savings institutions (collectively, banks) interested in providing community development financing and retail services by offering many publications targeted to industry players and stakeholders. These publications reach nearly 20,000 subscribers, including national banks, federal savings associations, state and local governments, community development organizations, trade associations, developers, and investors.

Community Affairs’ publications address policies and regulations related to affordable housing and economic development and highlight national and local efforts to expand credit markets and stabilize communities. They cover topics ranging from federal tax credit programs to affordable housing, small business lending, rural economic development and housing, Native American banking, and the unbanked and underbanked.

*Insights* reports discuss how selected bank products or initiatives operate, why they should be of interest to other banks, and the associated risks or regulatory considerations. Our online newsletters, or e-zines, capture the creative ideas of bankers and community development practitioners investing in community development and identify common features that can be applied to other investments.

Community Affairs published five new *Insights* reports and e-zines focusing largely on financing for small business and efforts to finance supportive housing for the homeless and healthier food. These five publications are described below.

**U.S. Department of Agriculture’s Business and Industry Guaranteed Loan Program:** This report summarizes how small and midsized lenders can utilize this federal loan guarantee to expand their activities in rural areas. The program allows lenders to leverage both the loan guarantee that is the cornerstone of the program and the staff expertise in 47 state and local Agriculture Department offices across rural America to lend money to businesses for business acquisitions, construction, conversion, expansion, repair, modernization, and development or for start-up costs and working capital.

**SBA 504 Loan Program:** This report highlights the SBA’s 504 Loan Guarantee Program. The program is used to finance long-term assets, such as owner-occupied
commercial real estate and heavy machinery, at below market rates.

**Bank Financing of Healthy-Food Initiatives:** This e-zine surveys the growing number of efforts to change low-income communities lacking grocery stores into healthy markets. Included are examples of financing tools that banks use to participate in this process. These investments expand food options, create jobs, help revitalize distressed communities, and, importantly, open new markets for farmers to sell their products, which can provide an economic boost to rural America.

**Ending Homelessness: Financing Permanent Supportive Housing:** Banks play a key role in the national effort to reduce homelessness by financing permanent supportive housing, partnering with local nonprofit organizations, making charitable grants, and providing leadership on local boards, community groups, and community projects. This e-zine reviews some of the financing methods banks use to make those investments. Banks across the nation are helping many of the 230 communities developing permanent supportive housing projects for their homeless populations. More opportunities become available as more communities adopt plans to end homelessness. The e-zine’s release coincided with a webinar that registered almost 600 participants.

On the OCC’s Web site, at www.occ.gov/communityaffairs, Community Affairs maintains more than two dozen **Community Developments Fact Sheets** and **Resource Directories**, as well as other publications.

The Web site also includes Community Affairs’ bimonthly newsletter, **Financial Literacy Update**, which lists upcoming events, initiatives, and resources offered by the OCC, other government agencies, and financial literacy providers.
Community Affairs at Your Fingertips

OCC District Community Affairs Officers and Their Areas of Coverage

Western District
- Susan Howard
- Michael Martinez
- Dave Miller

Central District
- Paul Ginger
- Tim Herwig
- Norma Polanco-Boyd

Southern District
- Scarlett Duplechain
- Nancy Gresham Jones
- Karol Klim
- Aaron Satterthwaite

Northeastern District
- Francis Baffour
- Vonda Eanes
- Bonita Irving
- Denise Kirk-Murray

E-mail and telephone information for the OCC's District Community Affairs Officers is available at www.occ.gov/cacontacts

How to Contact Us

OCC’s Community Affairs staff comprises professionals with diverse expertise in all aspects of community development. District Community Affairs Officers are located throughout the country in district and field offices (see map).

The Deputy Comptroller for Community Affairs and other Headquarters staff members may be reached by calling (202) 649-6420 or e-mailing communityaffairs@occ.treas.gov. District Community Affairs Offices may be reached by calling the numbers listed on page 24.

For more information, visit our Web site at www.occ.gov/communityaffairs

Community Affairs Department
Comptroller of the Currency
400 7th St. SW
Washington, DC 20219

FY 2012 Year in Review

Deputy Comptroller
Barry Wides

Editorial Staff
- Beth Castro
- Ted Wartell
- Francis Baffour
- Tim Herwig
- Hershel Lipow
- Jason Boulmeris
- Courtney Cook
- Dan Gibbard

Design Staff
- Victor Battista
- Rick Progar

For questions or comments, please call (202) 649-6420.
Community Affairs


Back row, from left: Beth Castro, Denise Kirk-Murray, Barry Wides, Bill Reeves, David Miller, David Harris, Paul Ginger, Ammar Askari, David Black, Norman Hatton, Denise Murray, Francis Baffour, Dakota Bidgood, Al Mitchell, Aaron Satterthwaite, Tim Herwig, Ted Wartell, Karol Klim, Michael Martinez.

Community Affairs Staff Directory

<table>
<thead>
<tr>
<th>Headquarters</th>
<th>District Community Affairs Officers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name</strong></td>
<td><strong>Title</strong></td>
</tr>
<tr>
<td>Barry Wides</td>
<td>Deputy Comptroller for Community Affairs</td>
</tr>
<tr>
<td>Beth Castro</td>
<td>Director for Community Development</td>
</tr>
<tr>
<td>Ted Wartell</td>
<td>Director for Community Affairs Policy</td>
</tr>
<tr>
<td>Karen Bellesi</td>
<td>Community Development Manager</td>
</tr>
<tr>
<td>Bill Reeves</td>
<td>Community Development Lending Manager</td>
</tr>
<tr>
<td>Ammar Askari</td>
<td>Community Development Expert</td>
</tr>
<tr>
<td>David Black</td>
<td>Community Development Expert</td>
</tr>
<tr>
<td>Jason Bouleris</td>
<td>Technical Assistant</td>
</tr>
<tr>
<td>Sharon Canavan</td>
<td>Community Relations Expert</td>
</tr>
<tr>
<td>Michael Carrier</td>
<td>Community Development Expert</td>
</tr>
<tr>
<td>Courtney Cook</td>
<td>Technical Assistant</td>
</tr>
<tr>
<td>David Harris</td>
<td>Secretary to Director</td>
</tr>
<tr>
<td>Norman Hatton</td>
<td>Secretary to Deputy Comptroller</td>
</tr>
<tr>
<td>Hershel Lipow</td>
<td>Community Relations Expert</td>
</tr>
<tr>
<td>Denise Murray</td>
<td>Community Development Specialist</td>
</tr>
<tr>
<td>Juanita Page</td>
<td>Technical Assistant</td>
</tr>
<tr>
<td>Letty Shapiro</td>
<td>Community Development Expert</td>
</tr>
</tbody>
</table>

Northeastern

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Francis Baffour</td>
<td>(917) 344-4487</td>
</tr>
<tr>
<td>Vonda Eanes</td>
<td>(704) 350-8377</td>
</tr>
<tr>
<td>Bonita Irving</td>
<td>(617) 737-2528 x223</td>
</tr>
<tr>
<td>Denise Kirk-Murray</td>
<td>(212) 790-4053</td>
</tr>
</tbody>
</table>

Southern

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scarlett Duplechain</td>
<td>(832) 325-6952</td>
</tr>
<tr>
<td>Nancy Gresham-Jones</td>
<td>(813) 664-1006 x238</td>
</tr>
<tr>
<td>Karol Klim</td>
<td>(770) 280-4435</td>
</tr>
<tr>
<td>Aaron Satterthwaite</td>
<td>(214) 720-2844</td>
</tr>
</tbody>
</table>

Central

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paul Ginger</td>
<td>(312) 360-8876</td>
</tr>
<tr>
<td>Tim Herwig</td>
<td>(312) 660-8713</td>
</tr>
<tr>
<td>Norma Polanco-Boyd</td>
<td>(216) 274-1247 x 275</td>
</tr>
</tbody>
</table>

Western

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Susan Howard</td>
<td>(818) 240-5175</td>
</tr>
<tr>
<td>Michael Martinez</td>
<td>(720) 475-7670</td>
</tr>
<tr>
<td>Dave Miller</td>
<td>(913) 384-6005 x224</td>
</tr>
</tbody>
</table>