

regulatory bodies, everything from the comptroller of the currency, right on down to the FDIC and FSLIC and all of the other regulatory entities, whether it's for the insurance side or the general oversight of the banking activities. But by July 1, 1990, these are to be in place, which is running considerably ahead of what Nebraska is going to do by virtue of telling the director to establish such a program and have it in place. What I think is important is some of the things that are in this new program. For the CRA to be an effective CRA, coming up, and you'll find on your desk a sheet that I passed out that has the four rating categories that they are going to be rating the institutions on. And as you'll see in those ratings, and those are going to be made public, so any public institution, or even any private individual who is about to invest in any institution functioning in the State of Nebraska, and that is any institution, not just out-of-state holding companies coming in, but institutions that are already here, can see those ratings and decide how that institution, if they have several choices as to what institution they want to invest their funds in, they can look at those ratings and decide how responsive those institutions are, based on those ratings. Now, what are some of the things in the ratings? This is coming right off a recent update, one of the first things it says is, ascertain the community credit needs, including those of low and moderate income areas. That's one of the things that will go into those ratings. A second one is to establish a dialogue with the community spokespersons. They must prove that they have a dialogue going along with the community spokespersons to see if that institution is being responsive to that community. Develop or change products and services in response to the community credit needs. We talk about the ever-changing environment, whether we're talking about the agricultural, or industrial, or economic development opportunities in the community, we're talking about developing a change in their products. And they must show responsiveness in those products. We look at the market and...market and advertise financial products and services in response to those community needs. Analyze actions on loan applications regularly to protect against discriminatory treatment. Again, looking at the kinds of things that I think this amendment is attempting to do. Assign a senior officer or committee to coordinate and monitor the CRA process. So we've got someone in the institution following up on it as well. Train employees regarding CRA compliance. Maintain records documenting the bank CRA performance. Conduct an annual review of the bank CRA statements to ensure compliance with the actual