



## **United Services Automobile Association**

**Federal Savings Bank (FSB)**

**Community Reinvestment Act (CRA) Strategic Plan**



# USAA CRA Strategic Plan

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## Introduction

United Services Automobile Association, a mutual, reciprocal interinsurance exchange organization (USAA) was founded in 1922 in San Antonio, TX, providing auto insurance to its military members. The USAA Mission is to empower members to achieve financial security through competitive products, exceptional service, and trusted advice. Since its inception, USAA has expanded the services it provides to an increasing membership base to include various consumer and retail products, including an array of consumer banking products offered through its subsidiary USAA Federal Savings Bank (FSB). FSB is a large size, interstate federally chartered stock institution headquartered in Phoenix, Arizona. Per FSB's Consolidated Report of Condition and Income (Call Report) dated December 31, 2023, FSB has total assets of \$110 billion, total capital of \$10.2 billion, and total Tier 1 capital of \$9.5 billion.

As a digital-first bank, FSB's primary business strategy is to meet the unique needs of the military community and their families by providing a full range of retail deposit and loan products through the Bank's digital delivery channel. USAA and its subsidiaries have a membership-based business model, serving members comprised of retired, veteran, and Active-Duty servicemembers; reserves; National Guard; U.S. Foreign Service officers; FBI, Secret Service, and Naval Investigative Service agents; and their families. USAA's members are located throughout the United States and at military installations around the world.

Since opening for business on December 30, 1983, FSB has a record of superior financial strength and outstanding service, providing a full range of highly competitive products and services. Over the years, development of new products and expanded services through industry leading innovation helped the Bank serve its members and continue the tradition of anticipating and meeting the needs of its members. Traditional products offered include various deposit accounts, savings accounts, certificates of deposit, youth banking accounts, and credit cards. FSB provides a variety of personal loan products to meet member needs, including mortgages, auto, personal unsecured/secured, boat, and other specialized products.

FSB has been consistently recognized in various market studies over the years as a leading provider of quality products and services. In 2024, USAA was ranked #1 in Forbes annual survey assessing the "Worlds Bests Banks". The survey consisted of more than 49,000 individuals across 33 countries in 17 different languages. Respondents to the survey relayed their overall satisfaction with each bank as well as five additional criteria: trustworthiness, terms and conditions such as fees and rates, customer service, digital services, and quality of financial advice<sup>1</sup>.

## FSB Commitment to CRA

FSB has established a comprehensive CRA program that includes direction from the FSB President and Board of Directors as well as community partners and key stakeholders. The FSB Community Reinvestment Act Policy establishes parameters for FSB to assess its record of helping meet the needs of its members consistent with

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<sup>1</sup> Peachman, Rachel Rabkin, "Meet The World's Best Banks 2024," Forbes, April 16, 2024, <https://www.forbes.com/sites/rachelpeachman/2024/04/16/meet-the-worlds-best-banks-2024/?sh=10e062361074> (accessed April 2024).

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safe and sound operations of the institution. FSB has a CRA Risk Committee that is responsible for execution of CRA activities as set forth by the CRA Policy. The committee consists of the senior leadership from the lines of business, finance, risk, compliance, corporate responsibility, and legal departments. The CRA Officer is responsible for coordinating all CRA related activities, which include, but are not limited to identifying community needs, capturing and qualifying bank activities for CRA credit, adhering to data collection and integrity procedures, annual goal setting, performance analysis, partnering with lines of business to drive CRA performance and reporting to key stakeholders, including the CRA Committee, FSB President and Board of Directors.

In addition to the above-mentioned lending products, FSB provides significant levels of CRA qualified investments and service activities that help meet the needs of its community, including providing affordable housing units; facilitating job creation and economic development; and delivery of financial literacy programs to its military community.

USAA provides an excellent level of CRA-qualified investment activity through contributions, various tax credit programs, and the purchase of bonds and mortgage-backed securities. During the prior exam (2019-2021), approximately \$1.7B was contributed through charitable contributions, various tax credits, and the purchase of bonds and mortgage-backed securities. These contributions and investment activities provide affordable housing units, facilitate job creation and economic development in low- and moderate-income (LMI) areas, and deliver financial literacy programs to the military community and the local community where our members live and work.

To fully serve its members through sponsored events, initiatives, and services, USAA and FSB have partnered with various organizations that directly serve military members, families, and veterans. USAA, partnering with FSB, provides several financial literacy and financial planning tools on USAA.com, such as the Financial Wellness Assessment to assist in developing a financial plan. In addition, USAA is the sponsor of the USAA Educational Foundation that has an agreement with the Department of Defense to provide white label (free of branding) financial education materials to all 2.2 million military that are serving. Since 2018 we have gifted nearly \$12M worth of materials to this initiative. This partnership was recently recognized with the Spirit of Hope Award from the Secretary of Defense.

USAA has created a Military Affairs team that advocates for current and retired military members and their families. Military Affairs continually creates and maintains relationships between the Bank and its strategic partners, military leaders, and military-related organizations so that USAA can engage, serve, and advocate for the military community. The team regularly volunteers CRA qualified service hours by providing financial management programs to military members on U.S. military installations.

## Strategic Plan Decision

USAA is committed to fulfilling its responsibility to meet the needs of the community it proudly serves and to ensuring that FSB fulfills its responsibilities under the Community Reinvestment Act (CRA). FSB has elected to have its CRA performance evaluated for the 2025-27 period under a CRA Strategic Plan, pursuant to 12 CFR 25.27, due to FSB's unique nature, product offerings, and business strategy. This CRA Strategic Plan details the

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guiding strategies that will help FSB meet the needs of its members (military and their families). The effective dates of the CRA Strategic Plan shall be January 1, 2025 – December 31, 2027. If material changes occur during the evaluation period, FSB may solicit approval for the plan to be amended, as allowed by 12 CFR 25.27(h).

The Bank's business strategy creates two unique constraints in meeting the needs of the community as it pertains to a Large Bank CRA Exam framework. The Bank's membership model and digital strategy for delivery of products and services necessitate FSB developing and operating under a CRA Strategic Plan which will enable the Bank to better direct its efforts to meet the needs of its community. The Plan will better demonstrate the Bank's commitment to meet its CRA responsibilities when performance is assessed by the appropriate regulatory agency.

## *Delivery of Products and Service*

The USAA FSB Bank strategy is to be the leading digital bank that earns member trust by delivering the Mission through simple, frictionless experiences and highly competitive products and services. FSB meets the unique needs of the military community and their families with the flexibility of alternative delivery systems allowing members to access banking products 24/7 from everywhere with continued innovative and flexible lending practices to serve the credit needs of the membership. The bank primarily serves members via usaa.com, call centers, its award-winning mobile app, and a nationwide ATM network, including 155 deposit-taking ATMs, 6,325 branded ATMs located in retail/convenience stores, and a network of more than 100,000 contracted surcharge free ATMs. Over 99 percent of all member-initiated transactions are conducted through call centers, digital channels, and ATMs. FSB operates one financial center in San Antonio with teller services (notary, teller checks, in person transactions). All new product originations (deposit accounts, savings accounts, certificates of deposit, youth banking accounts, mortgages, credit card, auto, personal unsecured/secured, boat, motorcycle, and other specialized lending) are completed through other USAA channels outside the financial center location. The Bank's deployment of ATM's is primarily focused on locations with high concentrations of members (military and families), inclusive of all income levels. Current Large Bank Exam guidelines give substantially more consideration to the location of financial centers relative to low- or moderate-income areas and products and services offered in those centers, while the Bank primarily leverages alternative delivery systems, including digital banking and ATM's.

## *Assessment Area Delineation and Membership*

In general, the geographies in which a bank has its main office, financial centers and deposit-taking ATMs, as well as the surrounding geographies in which a bank has originated or purchased a substantial portion of its loans, are used by the regulatory agencies to assess a bank's record of helping to meet the credit needs of the community it serves, including low- and moderate- income (LMI) neighborhoods under the CRA. Pursuant to the provisions of 12 CFR 25.41(f), as a military bank, USAA FSB's assessment area consists of the entire United States and its territories. FSB's products and services meet the needs of the community it serves and virtually 100% of all lending, investment and service activities are within the assessment area. Most Active-Duty military servicemembers (87.5%) are located in the United States and US territories. More than half of Active-Duty military servicemembers living in the United States live in California, Virginia, Texas, North Carolina,

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Georgia, and Florida. Rounding out the top ten states that have the highest numbers of Active-Duty military servicemembers are Washington, Hawaii, South Carolina, and Colorado, which closely mirrors USAA membership geographic distribution.

Although a nationwide military assessment area gives FSB a broad reach to serve the needs of its members, FSB's opportunities to responsibly lend to the LMI segments of the military at the same levels as other large financial institutions lend to the general population are limited given servicemembers' unique makeup and needs. The Bank lends only to the USAA membership, which does not necessarily reflect the same characteristics of the general population. For example, based on the most recent Census data, across the United States approximately 20.0% of owner-occupied housing units and 27.3% of households are in LMI census tracts. By contrast, as of 2023, only approximately 15.5% of USAA members reside in LMI census tracts (overlaying 2023 USAA membership on 2020 Census data), which does not align with the census data used in large bank examinations. The use of census demographics as a starting point to assess performance during large bank examinations makes it difficult for FSB to reach its goal of an Outstanding CRA rating. Further, FSB does not require income information as part of the membership approval process and thus does not have an accurate measure of borrower incomes of the membership base. Therefore, targeting LMI borrowers within the USAA membership is difficult.

Considering the challenge in accurately reflecting the Bank's commitment to CRA and accurately assessing the bank's CRA performance as a Large Bank, USAA has elected the Strategic Plan option to provide a more appropriate assessment of how FSB meets the needs of the community and delivers on CRA responsibilities given the unique nature of the Bank's business strategy. While FSB's lending and service performance is challenged by expectations set under large bank exam guidelines, both remain critical components of how the Bank meets the needs of the military community and are critical components of the Bank's overall CRA objectives. Goals set forth below provide a more targeted approach for meeting the needs of the military community and their families.

## Military Needs Assessment

### *Industry Surveys and Analysis*

USAA proudly sponsors the Blue Star Family Lifestyle Survey, a survey that is conducted annually by Blue Star Families in collaboration with Syracuse University's Institute for Veterans and Military Families (IVMF). Both organizations build communities and provide support for military families through research and data, programs in career development and entrepreneurship, caregiver support, and local community events.

The Blue Star Family Lifestyle Survey identifies critical aspects of military life to effectively target resources, services, and programs that support the sustainability of military service. It also facilitates a holistic understanding of servicemembers, families, and veterans and their experiences so that communities and policymakers can better understand their needs.

This survey finds that active servicemembers, particularly those in the enlisted ranks, experience multiple financial barriers including lower wages than the civilian population that impede the ability to find affordable

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housing with rising costs, save money, effectively manage debt, or qualify for a loan. Due to the transient nature of military careers, military families often face a high rate of spousal unemployment or underemployment, lack of childcare resources, and the related stress and isolation from friends and community. The survey indicated a higher demand for motor vehicle, personal, and credit card loans, and less emphasis on mortgage home loans due to the relocations and the ability to live in military housing on base.

In addition to the Blue Star Families Survey, FSB also references the Military Family Advisory Network (MFAN) Military Family Support Programming Survey to assess military needs. The MFAN conducted their most recent survey in 2023 which includes currently active, enlisted members of the US military and spouses/partners of service members. Findings include:

- 51.8% of military families reported barriers to saving money that included cost of living and inflation, income constraints and lack of financial resources, unexpected expenses, and moving expenses related to the military lifestyle.
- 66.7% of the respondents indicated that they carry current debt.
- 37.9% of the veteran families and 22.2% of current serving families have less than \$500 in emergency savings while 13.5% of respondents answered they have no emergency savings fund. Enlisted families were the most likely to have low or no emergency funds.
- 79.8% of respondents carry the burden of paying more than they can comfortably afford for housing.
- 36.2% of respondents choose to live in military housing because of the location, affordability, security, and convenience.

Car ownership is ubiquitous in America, with more than 91% of households having at least one vehicle<sup>2</sup>. Cars provide substantial economic benefits, especially to those with low- and moderate-incomes. Cars get people to their jobs. In the latest available data, 69% of workers drove to work alone and 7.9% carpoolled. Excluding those who can work from home (an option not afforded to the majority of LMI workers and the military), more than 91% of commuters rely on cars to get to work. In addition to making it easier to get to a job, access to cars can improve the jobs available to workers. In one vehicle-access program 75% of people without cars who received subsidized vehicles were able to find better jobs and/or increase earnings. Moreover, access to a reliable vehicle can open opportunities for gig economy work (e.g., rideshare or delivery services), which can help those who are cash strapped or need additional income. Car ownership may open not just occupational opportunities, but also expanded educational opportunities, means by which to combat the effects of food deserts that are common in LMI communities, and improved residential options that can enhance broader economic opportunities. Automobile loans may provide a more affordable option to potential buyers as compared to paying in full.

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2 Lanning, Jonathan, "The Importance of Cars and Car Loans for People with Low and Moderate Incomes," Federal Reserve Bank of Chicago, July 15, 2022, <https://www.chicagofed.org/publications/blogs/cdps/2022/importance-cars-and-car-loans> (accessed July 2024).



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## *FSB Community Partnerships*

Additional needs assessment analysis was completed using information requested by FSB as part of its non-profit due diligence processes prior to entering relationships with nonprofits. FSB gathers relevant information including the organization's Mission; programs and services provided; and primary community needs with the targeted audience including military and their families. Examples of these partnerships and the needs they help meet include:

- **Elizabeth Dole Foundation**, which seeks to strengthen and empower US military caregivers and their families by raising awareness, driving research, championing policy, and leading collaborations that make a significant impact on caregivers' lives.
- **The Tragedy Assistance Program for Survivors (TAPS)**, which provides a myriad of resources such as emotional support, grief and trauma resources for adults and children, and 24/7 resource and information helpline for all those affected by a military death.
- **Hiring Our Heroes**, a nationwide initiative to help veterans, transitioning servicemembers, and military spouses find meaningful employment opportunities.
- **Junior Achievement**, which provides financial education programs in the core content areas of work readiness, entrepreneurship and financial literacy ignite the spark in young people to experience and realize the opportunities and realities of work and life in the 21<sup>st</sup> century.
- **Money Management International**, which provides financial readiness workshops that focus on budgeting, building credit, and managing debt; first-time homebuyer workshops; community outreach; and community resources including asset-building programs.
- **Team Rubicon**, a veteran-led humanitarian organization, built to serve communities before, during, and after disasters and crises.
- **Armed Services YMCA**, which focuses on military families with preschool and school-age children. Through programs like Operation Hero, military children develop emotionally and academically. Operation Hero is an afterschool program which helps elementary and middle-school children improve their academic and social skills as they adapt to the unique challenges of military life, such as multiple moves and family separation.
- **Face the Fight**, founded by USAA, is a coalition of corporations, foundations, nonprofit and veteran-focused organizations joined together to help end veteran suicide by providing education, resources, and support to veterans who are struggling with mental health challenges.



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## *Public Participation*

FSB solicited formal public comment on this CRA Strategic Plan for 30 days by publishing notice<sup>3</sup> in at least one newspaper of general circulation within the Bank's assessment area or in a published military publication,, as required by 12 CFR 25.27(d), (e) and provide copies to members of the public who request it during the timeframe. This notice was published on August 1, 2024, in the San Antonio Express News and The Arizona Republic (Phoenix), which are both newspapers of general circulation in the Bank's assessment area. The Bank did not receive any requests for the Strategic Plan or any public comments during the required 30-day time frame. Additionally, the Bank reached out to key non-profit partnerships for a direct response or input to the Strategic Plan. The Bank did not receive any public comments in response to the strategic plan.

## *Summary of Identified Needs*

Based on the needs assessment completed above which included industry analysis, military surveys, FSB community partnership and public feedback, FSB has identified the following community needs and is working to meet the needs of our community (military and families):

1. **Educational Opportunities** – financial literacy education including budgeting, building credit, managing debt and savings. Educational resources and opportunities for children of military families.
2. **Economic and Financial Support** – job training and employment opportunities for veterans, transitioning servicemembers, and military spouses in need of meaningful employment opportunities.
3. **Family and Social Services** – including supporting care givers, grief and trauma resources for adults and children, mental health, and emotional support.
4. **Affordable Housing** – including multifamily housing that provides an affordable solution to military members and their families and meets the needs of the broader community where our members live and work.
5. **Automobile Loans** – may provide a more affordable option as compared to paying in full for a vehicle. Cars provide substantial economic benefits, especially to those with low- and moderate-incomes.

## Goal Setting Process

FSB reviewed the lending, investment and service needs of the USAA membership and compared those needs to the FSB products, overall business strategy and USAA Mission. Goals are established to align with the USAA Mission, with a focus on meeting the needs of our members and in line with the Bank's capacity to deliver banking products in a safe and sound manner. The Bank considered similarly situated non-traditional banks operating under OCC, FRB, or FDIC approved CRA Strategic Plans. The Bank considered asset size, Tier 1 Capital levels, products offered, assessment area delineations, and goal framework when benchmarking against industry approved Strategic Plans.

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<sup>3</sup> See Appendix A.

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## 2025 – 2027 CRA Goals

### *Lending Test (50%)*

As discussed, the Bank's unique membership model creates constraints in meeting traditional Large Bank lending goals that leverage census demographics and comparison to peers (see "Strategic Plan Decision" above). Additionally, a notable percentage of servicemembers, particularly those with lower incomes, live on military bases, limiting mortgage and consumer lending opportunities to lower income members. Additionally, the military offers Basic Allowance for Housing (BAH) benefits to Active-Duty personnel, early career service members in lower pay grades and military service members who may relocate numerous times throughout their career. Many of these members utilize this BAH benefit to secure rental housing, particularly in certain high-cost areas, instead of pursuing home ownership.

Therefore, FSB has set its lending goals as the total CRA qualified loan volume (\$) as a % of Bank assets, consistent with most industry approved Strategic Plans. The Bank expects to meet the needs of the community through the origination or purchase of auto and home mortgages loans that meet the CRA-eligible loan requirements. Aggregate annual lending goals for Outstanding lending performance are set to meet 2.5% of assets in every year of the plan (measured by annual CRA-eligible lending divided by average total assets of FSB from the prior year Call Report Schedule RC-K Line 9). For reference, if benchmarked against 2023 assets of \$110B, a 2.5% target would require a total \$2.8B in CRA qualified loan production.

CRA-eligible loan: A Retail Mortgage or Auto Loan would be included in the \$ totals toward the goals if they meet one of the following LMI requirements:

- The borrower's income is less than 80% of the Median Family Income (MFI) estimates provided by the FFIEC available as of the date of qualifying loan origination, regardless of any subsequent changes in MFI, or,
- The borrower resided in a Low- or moderate-income census tract as defined by the most current FFIEC data available as of the date of qualifying loan origination, regardless of any subsequent changes in tract incomes.

Mortgage and Auto Lending Goal (% of Prior Year Average Total Assets)					
2025		2026		2027	
Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding
2.0%	2.5%	2.0%	2.5%	2.0%	2.5%

Any amount in excess of the designated annual goal in one calendar year may be applied toward the next calendar year's goal.

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The Bank may consider additional qualitative credit, where appropriate, for the innovative and responsive unique consumer loan options meeting the needs of our military community. FSB is committed to providing products that meet the credit needs of the military community constituting the membership base. FSB provides several unique consumer loan options that are innovative and responsive to the needs of our military community, including:

**Academy Loans:** these low interest rate loans are offered to members attending one of the five service academies or newly commissioned officers from the service academies.

**Pre-Commission Loans:** these low interest rate loans are offered to eligible students participating in an undergraduate Reserve Officers' Training Corps (ROTC) program or Platoon Leaders Course or pursuing an advanced degree.

**Government Shut Down Loans:** these no interest loans equal to the members net pay, up to \$6,000, offer flexibility to members who are employees of an impacted federal agency.

FSB continues to look for new opportunities to improve the ways that we meet the needs of the community. While not currently part of FSB's CRA strategy, new opportunities may include loans to organizations that have a primary purpose of community development. These loans may include, but are not limited to:

- Loans to financial intermediaries such as Community Development Financial Institutions (CDFIs).
- Loans to organizations engaged in affordable housing construction or rehabilitation, including multifamily rental housing.
- Loans to Small Business Investment Companies (SBICs) and community development venture capital funds that promote economic development by financing small businesses, specifically military veteran-owned businesses.
- Various other loan opportunities to organizations that have a primary purpose of community development.

## *Investment Test (25%)*

FSB has a history of providing an Outstanding level of community development investments and remains committed to achieving an excellent level of community development investments that meet the needs of the community. FSB provides charitable contributions through its non-profit organization partnerships that target the specific needs of the military including education, economic and financial support, and family and social services. FSB can leverage these partnerships to meet the needs of its community during times of declared disasters. FSB also invests in several instruments and products to meet the needs of the larger community where our members live and work, including tax credits, bonds, and mortgage-backed securities. FSB will continue to meet the needs of its community, as identified in the needs assessment, through community development investments in a variety of ways that may include, but are not limited to:

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- Charitable contributions to organizations that support its members including, but not limited to the following: financial literacy, emergency financial assistance to military members, disaster relief programs, family and social services, job training and employment opportunities.
  - New Market Tax Credits that support economic development in rural, severely stressed areas of the country.
  - Mortgage-backed securities that facilitate affordable housing throughout the country.
  - Qualified bonds for revitalization/stabilization of inner-city schools where the majority of students attending participate in the National School Lunch Program.
- Affordable Housing/Low-Income Tax Credits where the majority of residents qualify for Section 8 housing or meet other income requirements.

During the last FSB CRA Exam (2019-2021), the combined FSB and USAA affiliate investment dollar volume was approximately \$1.7 billion, which represented 32.54% of FSB's allocated Tier 1 Capital (T1C), or approximately 10.84% per year. These numbers are unprecedented due to the number of mortgage-backed securities invested in during the early onset of the COVID-19 Pandemic and other investments that received CRA credit under the expanded list of qualified activities provided by the regulatory agencies. With the expiration of the COVID-19 National Emergency Declaration, the expanded list of qualified CRA investment activity provided by the agencies is no longer applicable in the 2025-2027 exam cycle. Investment goals below are set based on receiving CRA credit for traditional CD investments.

FSB will assess level of performance by measuring the dollar volume of its total community development investments and loans (if applicable) against the FSB's T1C from the prior year. FSB will consider current period investments and investments from the prior period that maintain a book value at the end of the exam cycle. Further, any investments in excess of the one-year interim goal in a given calendar year can be applied to the next calendar year's interim goal. Consistent with prior exams investment performance will consider FSB and USAA affiliate investment activity in assessing performance to goal. The investment goals are indicated below:

Investments (% of Tier 1 Capital)							
2025		2026		2027		Total	
Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding
4.00%	5.00%	4.00%	5.00%	4.00%	5.00%	12.00%	15.00%

## Service Test (25%)

The Service Test consists of two goals, described in detail below:

1. Community Development Services
2. Retail Banking Services

### Community Development Services:

FSB provides a substantial amount of qualified service hours through service awareness and training and by providing employees with service opportunities that align with the goals of the CRA. This includes USAA

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employees significantly contributing to community development efforts through nonprofits and other initiatives that directly benefit the military community. FSB's community development service strategy is focused on meeting the needs of the military community and expands throughout the country based on its nationwide footprint and the location of its employees. Given the geographical location of most FSB employees, most community development service hours are delivered in the San Antonio area. Additional services are delivered throughout the country consistent with the geographical distribution of USAA employees. FSB has an established network of non-profit partnerships that facilitate the opportunity for employees to provide services directly to our military community. Further, the bank can leverage these partnerships to meet the needs of our community during times of declared disasters, such as pandemic and natural disaster relief. Additionally, employees are encouraged to provide services to organizations and causes that are personally meaningful to them and have a primary purpose of community development. Employees are given paid time off to participate in these community activities. FSB will continue to meet the needs of community through community development services in a variety of ways including, but not limited to:

- Providing financial literacy which may include credit counseling, homebuyer and home-maintenance counseling, financial planning, or other financial services education to promote community development and affordable housing.
- Partnering with national organizations to provide mentoring, career advancement skills, and assist with job placement opportunities for transitioning military members and their families.
- Skills-based volunteering that includes pro bono small business impact days and mentorship projects.
- Numerous employees serving as board members for organizations that support military families, LMI families, affordable housing, and economic development.
- Various other services provided by FSB associates that meet one of the four community development purposes: affordable housing, community services, economic development, or revitalization/stabilization.

FSB has a history of providing an Outstanding level of community development services and remains committed to achieving an excellent level of community development services that meet the needs of the community. During the last FSB CRA Exam (2019-2021), FSB and its USAA affiliates provided approximately 69,000 hours of community services, or approximately 23,000 hours per year. The number of volunteer hours during the last exam is unprecedented due to the expansion of qualified volunteer hours through the COVID-19 pandemic. With the expiration of the COVID-19 National Emergency Declaration, the expanded list of qualified CRA service activity provided by the agencies is no longer applicable in the 2025-2027 exam cycle. Therefore, FSB is committed to performing an average of 7,000 service hours per year over the three-year Strategic Plan period. Further, any services in excess of the one-year interim goal in a given calendar year can be applied to the next calendar year's interim goal. Consistent with prior exams, community development service performance will consider FSB and USAA affiliate service activity in assessing performance to goal.

Service Hours							
2025		2026		2027		Total	
Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding
6,000	7,000	6,000	7,000	6,000	7,000	18,000	21,000

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## Retail Banking Services:

Current Large Bank Exam guidelines primarily focus on the location of financial centers relative to low- or moderate-income areas and products and services offered in those centers, while the Bank primarily leverages alternative delivery systems, including digital banking and ATM's.

The Bank's ATM channel is critical in meeting the needs of the military community. Therefore, FSB has set its retail service goals to assess the distribution of financial centers and ATMs as a combined goal to include LMI locations and locations benefiting military members.

A financial center or ATM is considered "CRA qualified" if it meets either (or both) of the following criteria:

- The financial center or ATM is located in a low- or moderate- income census tract as defined by the current FFIEC data available, or,
- The financial center or ATM is located in proximity ( $\leq 5$  miles) of a military academy or base/installation.

ATM/Financial Center (FC) Distribution (% in LMI Geographies and/or Proximity to Military)					
2025		2026		2027	
Satisfactory	Outstanding	Satisfactory	Outstanding	Satisfactory	Outstanding
40.00%	50.00%	40.00%	50.00%	40.00%	50.00%

The Bank's metric for ATM/financial center distribution will be calculated annually as of December 31st by dividing the combined number of "CRA qualified" financial centers and ATMs by the total number of financial centers and ATMs. Annual ATM/financial center distribution goals for Outstanding performance are set to 50% in every year of the plan. Establishing this goal for the majority of USAA ATM/financial centers to be "CRA qualified" throughout the evaluation period demonstrates the Bank's commitment to meeting the needs of the communities it serves, including both LMI geographies and the military community.

## *Performance Ratings System*

Evaluation of the Bank's performance under this Strategic Plan will be based upon the rating system set forth below. The rating system is intended to address scenarios where USAA achieves mixed outcomes relative to goals in different categories. Additionally, the rating system serves as a tool for USAA to self-assess its CRA performance. This conclusion methodology is generally consistent with the rating system used by federal regulators to evaluate large banks, except that no points are assigned if USAA does not substantially meet a Plan goal for a Satisfactory rating.

Based on the Bank's performance relative to the goals described above, a Component Test Rating and associated points are assigned, with 24 points being available. The Component Tests are weighted as follows: Lending (50%), Investment (25%), and Service (25%). The weight of Service Test is divided evenly (12.5% each) between the two Plan goals (CD Services and Retail Banking Services).

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## Component Rating and Points

Component Rating	Lending	Investment	Service	
			CD Services	Retail Banking Services
Outstanding	12 points	6 points	3 points	3 points
Satisfactory	9 points	4 points	2 points	2 points
Plan Goal for Satisfactory Not Substantially Met	0 points	0 points	0 points	0 points

Based on the sum of the resulting point values, the Composite Rating (institution-level CRA Rating) is assigned using the Scoring Range as follows:

## Composite Rating and Scoring Ranges

Composite Rating	Scoring Range
Outstanding	20+
Satisfactory	11-19
Needs to Improve	5-10
Substantial Noncompliance	0-4

## Alternative Evaluation Method

USAA is committed, at the very minimum, to meeting this Strategic Plan's measurable goals for a "Satisfactory" rating. However, as provided in 12 CFR 25.27(f)(4), if USAA does not "meet substantially its plan goals for a satisfactory rating," the Bank may elect to be evaluated under the Lending, Investment, and Service tests for large banks.



# USAA CRA Strategic Plan



## Appendix A – Notice of Proposed Strategic Plan

### Notice Regarding Public Inspection of Proposed CRA Strategic Plan

#### USAA Federal Savings Bank

#### Community Reinvestment Act Strategic Plan (“CRA Strategic Plan”)

The Community Reinvestment Act requires a bank that has developed a CRA Strategic Plan to publish notice of the CRA Strategic Plan and solicit formal written public comment for at least a 30-day period. Pursuant to this requirement, USAA Federal Savings Bank hereby provides notice to the public of its plan to submit a CRA Strategic Plan to the Office of the Comptroller of the Currency (OCC).

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## COLLEGE FOOTBALL

# Texas' lofty offensive goal: nation's most explosive team



**KIRK BOHLS**  
COMMENTARY

While I got ya, here are nine things and one crazy prediction:

**1. Ready, set, donate.** A day before the Longhorns were to begin their first workouts at 2:45 Wednesday afternoon, Kyle Flood put it plain and simple. The Texas offensive coordinator and offensive line coach, who met the press Tuesday along with defensive coordinator Pete Kwiatkowski and special teams coordinator Jeff Banks in their only visit with the media all year, said the Longhorns have one clear-cut goal. "We want to be the most explosive offense in the country." Who's to say they can't? All but one member of the starting offensive line returns, and right tackle Cam Williams, who can blot out the sun, should be a great replacement for the departed Christian Jones. Quarterback Quinn Ewers is back for a third season and has already topped 5,500 yards passing. Flood said he doesn't know if sophomore returnees Jaydon Blue from Klein Cain or C.J. Baxter from Orlando, Fla., will be the feature back because "both are proven commodities, and I expect both of them to play and play quite a bit. And I think Tre Wisner has had a great offseason." But fourth-year UT coach Steve Sarkisian has had a 1,000-yard rusher in his last 11 full seasons as a coach, excluding his two years with the Atlanta Falcons and partial year at USC. ... Asked if the team might lean more heavily on the run game, especially early in the season



Tom Fox/Tribune News Service

**With a veteran quarterback in Quinn Ewers, Texas expects its offense to pile up the points in a hurry.**

receiver room, I was looking at it this morning. We've got, I think, nine receivers who are ultimately going to take reps with the ones and the twos, and we haven't been anywhere near that in the three previous years."

**2. Elephants in the room.** Kwiatkowski didn't dodge what may be the most critical issue facing the 2024 Texas defense and possibly the team. Just how does he replace the shutdown tandem of T'Vondre Sweat and Byron Murphy, the two early-round NFL draft picks who terrorized offensive lines last season? "We've got guys," the defensive boss said, "but it's tough to replace those two dudes." Hell, it may be impossible, considering the damage they did on defense. Kwiatkowski is high on veterans Alfred Collins and Vernon Broughton from Cypress Ridge in the interior line. Neither of those has been remotely close to being a star. But then neither was Sweat nor Murphy before last fall. "So how do you do it? You coach your tail off. You know those two guys coming back have played a lot of football and they've gotten better."

**3. Special players.** Banks got on his pedestal and bragged on his best two special-teams players, safety Michael Taaffe and linebacker Ma Blockwell. "These

phenomenal. They're as good a guys as we've had. Brendan Schooler and Keilan Robinson were core guys who have made their mark in the NFL, and these two guys are right in that mold."

**4. A Royal dis.** Maybe you saw ESPN's rankings of the top 25 stadiums in college football and noticed that Royal-Memorial Stadium was included — barely — at 25th. That's preposterous for a stadium celebrating its 100th anniversary this season. It has to be in the top 10. With all its history, Bevo and a long-time haven for bats — God, I can still remember the smell — DKR rates much higher. I counted that I have covered games in 13 of the 25 ranked venues and have to say I am completely geeked about checking the Big House in Ann Arbor off my list. Also, I have not been to any of the venues in the former East Division of the SEC and can't wait to attend games at Tennessee and Georgia. Here's my top 10 favorite stadiums in order. The Rose Bowl has to top the list, followed by the stadiums at LSU, Texas, Ohio State, Michigan, Tennessee, Georgia, Nebraska because of the most hospitable fans in the nation (Penn State has the second-friendliest), Texas A&M and Auburn.

**5. Dream big.** Loved getting to know Luther Burden Jr. This

then. He put it out there. That's right up there with the late great Cedric Benson, who once told me he'd rather win the Heisman than beat Oklahoma. I applauded Cedric's candor.

**6. Will the real UT stand up?** So we're a month out from the season opener, and we've yet to decide which is the real UT in the SEC. Sure, Tennessee thought it had bragging rights because, yeah, it was one of the founding members way back in 1932 and seemed to get the league office's unofficial blessing when Volunteer players named to the preseason All-SEC team were listed as playing for UT while Longhorns so honored were listed as Texas players. I'd suggest just letting the play on the field decide, although unless they meet in the SEC Championship Game or the College Football Playoff, that collision won't come until 2026.

**7. Man's best friend.** Did you catch the heart-warming video on X celebrating Layla, who gathered her last bat at home plate and returned it to the dugout of the Clearwater Beach Dogs to end her 13-year stint? If that doesn't soothe your heart, I can't help you.

**8. Scattershooting.** Wondering whatever happened to swimming great Mark Spitz, who won seven gold medals in Munich in 1972. Can he really be 74? Casey Hampton, last week's subject, was a five-time Pro Bowl nose tackle and two-time Super Bowl champion who was just inducted into the Steelers Hall of Honor.

**9. At the box office:** Was rough keeping up with all the inside jokes of "Deadpool & Wolverine." They were coming so fast and furious. Almost needed captions. Ryan Reynolds was clearly made for this role as Robert Downey Jr. was for "Iron Man." This

## Legal Notices

### Legals/Public Notices

#### LEGAL NOTICE

Medical records for patients of Crest Side Medical Clinic or Crest Side Med., LLC will be made available for pickup with appropriate identification Monday – Friday 9:30am – 3:30pm at the property management office located at 4330 Medical Dr., Suite 175, San Antonio, TX 78229 until August 11, 2024.

#### Notice of a Draft Environmental Assessment and Public Open House

Terminal Development Project (TDP) San Antonio International Airport (SAT) Draft Environmental Assessment

San Antonio, Texas



Pursuant to Title 40, Code of Federal Regulations 1506.6(b), notice is hereby given by the San Antonio Airport System (SAAS), the coordination with the Federal Aviation Administration (FAA), that a Draft Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of the proposed TDP at SAT. The SAAS intends to undertake a variety of improvements to provide facilities that will accommodate forecast increases in passengers and airport operations at an adequate level of service. Project improvements include, but are not limited to:

- Development of a new passenger terminal building.
- Demolition of structures to accommodate a new passenger terminal building.
- Improvements to terminal access roadways.
- Construction of a ground transportation center.
- Construction of support facilities and utilities.

The Draft EA evaluates the potential environmental effects of the Proposed Project described above and has been prepared pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA). The FAA is the lead federal agency to ensure compliance with NEPA for airport development actions. The Draft EA has been prepared in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. The Draft EA includes an analysis of reasonable alternatives, potential environmental impacts, and mitigation measures, as appropriate.

#### Public Review and Comment

The public is invited to review the Draft EA and submit comments. The Draft EA has been published and can be found at the SAAS website: <https://flysanantonio.com/business/about-saas/environmental-statement/>. A hard copy of the Draft EA can be viewed in person at SAAS offices during regular business hours. Please call Joshua Hesse, SAAS Noise Abatement & Sustainability Officer, at 210-207-5847 or email [ESD@flysanantonio.com](mailto:ESD@flysanantonio.com) to schedule an appointment to review the hard copy in person at Airport Center, 10100 Reunion Place, Suite 300, San Antonio, TX 78216.

Additionally, the following public libraries will have a hard copy of the Draft EA for review from July 8, 2024, through August 23, 2024. Please contact the local library to schedule viewing times.

1. Central Library, 600 Soledad, San Antonio, TX 78205 - (210) 207-2500
2. Thousand Oaks Branch Library, 4618 Thousand Oaks, San Antonio, TX 78233 - (210) 207-0940
3. Tobin Branch Library, 4134 Harry Wurzbach, San Antonio, TX 78209 - (210) 207-9400
4. Brookhollow Branch Library, 530 Heininger, San Antonio, TX 78232 - (210) 207-9400
5. Westfall Branch Library, 6111 Rosedale Court, San Antonio, TX 78201 - (210) 207-9220

Comments may be submitted in writing by email, through the U.S. mail, or during the public meeting.

#### Public Meeting

Following a scoping period in February 2024, a Public Meeting for the Draft EA will be held, in the format of an informal open house, at the following time and place:

Thursday, August 08, 2024, 6:00 PM – 7:30 PM Central Daylight Time (CDT) Airport Center, 10100 Reunion Place, Suite 350, San Antonio, TX 78216. Free Parking is available in the building's parking garage.

Emailled comments on the Draft EA may be sent to Jon Enron, RS&H Deputy Project Manager at [jon.enron@sandh.com](mailto:jon.enron@sandh.com).

Handwritten comments may also be submitted via U.S. mail at: Sandra Lauterbach

### Legals/Public Notices

#### Notice of Public Hearing

The City of San Antonio's Board of Adjustment will hold a Public Hearing at 1:00 PM, on 8/19/2024 at the Cliff Morton Development and Business Services Center, 1501 South Alamo Street, to consider the following items:

CASE NO. BOA-24-10300128  
Applicant: Guadalupe Ibarra  
Lot 5, Block 4, NCB 12758  
29181 Linn Road  
Zoned: "R-4 AHOD" Residential Single-Family Airport Hazard Overlay District  
A request for 1) a 7' variance from the minimum 10' front setback to allow a 3' front setback; 2) a 4' variance from the minimum 5' side setback to allow a 1' carport side setback; and 3) a 5' variance from the minimum 15' clear vision to allow a 10' driveway clear vision.

CASE NO. BOA-24-10300137  
Applicant: Avani Bhansali  
Lot 24, Block 11, NCB 1434  
2639 East Commerce Street Unit 201  
Zoned: "AE-2 EP-1 ML-OD-3 ML-R-2 AHOD" Arts and Entertainment Facility Parking/Traffic Control/Martindale Army Airfield Military Lighting Overlay Military Lighting Region 2 Airport Hazard Overlay District  
A request for a Special Exception to allow one (1) additional 2' Short Term Rental permit on the block face.

CASE NO. BOA-24-10300139  
Applicant: Randy Cumfitt  
Lot 2, Block 22, NCB 385  
1420 North Main Street  
Zoned: "C-3 UC-5 AHOD" General Commercial Main Ave./McCullough Ave. Urban Corridor Airport Hazard Overlay District  
A request for a 14' variance from the 15' setback to allow a structure to be 1' from the Urban Corridor district front setback.

CASE NO. BOA-24-10300041  
Applicant: Ernest Romero  
East 48.85 feet of Lot 9, Block B, NCB 639  
621 Iowa Street  
Zoned: "R-4 AHOD" Residential Mixed Airport Hazard Overlay District

A request for an 1,838 square foot variance from the minimum lot size requirement of 4,000 square feet to allow development on 2,162 square feet lot.

CASE NO. BOA-24-10300043  
Applicant: Juan Delalicia  
East 16 feet of north 89.35 feet of Lot 1 and west 14.03 feet of north 89.35 feet of Lot 2, Block 4, NCB 1035  
1204 Delaware Street  
Zoned: "R-4 AHOD" Residential Mixed Airport Hazard Overlay District

A request for 1) a 1,330 square foot variance from the minimum lot size requirement of 4,000 square feet to allow development on 2,670 square feet lot, 2) a 4' variance from the minimum 5' side setback requirement to allow a structure to have 1' side setbacks and 3) a 6' variance from the minimum 10' rear setback requirement to allow a structure to have a 4' rear setback.

CASE NO. BOA-24-10300046  
Applicant: Yolanda Alvarado  
Lot 120 excluding southwest irregular 125 feet, NCB 8563 and the north 37.5 feet of west 150 feet of Lot 12, NCB 8563  
159 Wallace Street and 595 South San Joaquin Avenue  
Zoned: "R-4 ML-OD-2 ML-R-1 AHOD" Residential Single-Family Lockland Military Lighting Overlay Military Lighting Region 1 Airport Hazard Overlay District  
A request for a 12' variance from the minimum 25' clear vision to allow a corner with a 6' clear vision.

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USAA Federal Savings Bank

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#### TABE Notices



# USAA CRA Strategic Plan



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August 1 2024  
LAZS0133144

**Public Notices**

The Arizona Department of Corrections, Rehabilitation and Reentry is soliciting for BPM006281 Pest Control for ASPC Lewis. The solicitation will be available in the Arizona Procurement Portal (APP) at [app.az.gov](http://app.az.gov) on or before 08/12/2024. Vendors must be registered in APP to participate.  
Pub: Aug 1, 2024

**Destruction of Records for Deer Valley Unified School District**  
Five (5) years after a student has withdrawn or graduated from the district, or when information is no longer needed to provide special education services, the district will destroy personally identifiable information on that student. It should be noted that information contained in these records may be needed by the Parents or Students for other purposes such as Social Security Benefits. You may obtain these records from Student Support Services prior to the destruction date of August 30, 2024. If you have questions or information relating to any of the above information please contact Student Support Services in the Deer Valley Unified School District.  
Phone 602-445-4982  
Pub: July 31, Aug 1, 2024

**CITY OF TEMPE**  
**REQUEST FOR STATEMENT OF QUALIFICATIONS**  
Construction Manager at Risk  
Clubhouse Project-Ken McDonald Golf Course  
Project No. 6410781  
The City of Tempe is inviting your firm to submit a Statement of Qualifications or providing Construction Manager at Risk services for Clubhouse Project-Ken McDonald Golf Course. The complete RFQ is available on-line at <http://www.tempe.gov/eng/projects/biddi> for firms wanting additional information on the project. Please direct any questions no later than August 8, 2024, by 4:00 p.m., Arizona time, to the City of Tempe - Engineering Division, at [contractor\\_support@tempe.gov](mailto:contractor_support@tempe.gov)  
PUBLISH: July 25, 2024, July 26, 2024 and August 1, 2024, August 2, 2024.

**Community Announce**  
lost, found, happy ads, novena...

**Community Announce**  
lost, found, happy ads, novena...

**Community Announce**  
lost, found, happy ads, novena...

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# USAA CRA Strategic Plan



## Appendix B – Glossary

**Area Median Income:** the median family income for the metropolitan statistical area (MSA) or metropolitan division (MD) if a person or geography is located in an MSA or MD, or the statewide nonmetropolitan median family income if a person or geography is located outside an MSA or MD.

**Assessment Area:** One or more geographic area(s) delineated by an institution and used by a regulatory agency in evaluating the institution's record of helping to meet the credit needs of its community. An assessment area generally consists of one or more MSAs or MDs or one or more contiguous political subdivisions such as counties, cities, or towns; it includes the geographies in which the bank has its main office, its branches, and its deposit-taking ATMs, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans.

**ATM:** Automated teller machine is an automated, unstaffed banking facility owned or operated by the bank at which deposits are received, cash dispersed, or money lent.

**Census tract:** a small, relatively permanent statistical subdivision of a county in a metropolitan area or a selected nonmetropolitan county designed to be a relatively homogenous unit with respect to population characteristics, economic status, and living conditions.

**Community Development:** lending, investing, and servicing activities that support affordable housing for LMI individuals; community services and organizations that target the needs of LMI individuals; economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs, or have gross annual revenues of \$1 million or less; or revitalize or stabilize LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle income geographies designated by the Federal Reserve, FDIC, and the OCC.

**Community Development Financial Institutions (CDFI):** specialized organizations that provide financial services in low-income communities and to people who lack access to financing. CDFIs include regulated institutions such as community development banks and credit unions, and non-regulated institutions like loan and venture capital funds.

### Income level:

- **Low-income:** an individual income that is less than 50% of the area median income, or a median family income that is less than 50% of the geography.
- **Moderate-income:** an individual income that is at least 50% and less than 80% of the area median family income, or median family income that is at least 50% and less than 80% of the geography.
- **Middle-income:** an individual income that is at least 80% and less than 120% of the area median family income, or median family income that is at least 80% and less than 120% of the geography.
- **Upper-income:** an individual income that is 120% or more of the area median family income, or median family income that is 120% or more of the geography.

# USAA CRA Strategic Plan



**Low Income Housing Tax Credits (LIHTC):** a tax incentive for housing developers to construct, purchase, or renovate housing for low-income individuals and families. The Low-Income Housing Tax Credit was written into the Tax Reform Act of 1986.

**MSA/MD:** a metropolitan statistical area or metropolitan division as defined by the Director of the Office of Management and Budget.

**New Market Tax Credits (NMTC):** The New Markets Tax Credit Program is a federal financial program in the United States. It aims to stimulate business and real estate investment in low-income communities in the United States via a federal tax credit.

**Qualified Investment:** a lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Strategic Plan:** Banks may elect to have their performance under the CRA evaluated based on a pre-approved strategic plan that addresses their CRA responsibilities. The CRA regulations require that the strategic plan be developed in consultation with members of the public, be published for public comment, and contain measurable annual goals. The required contents of a strategic plan and the OCC's criteria for evaluating a strategic plan are specified in the CRA regulations. The CRA strategic plan evaluation option provides a bank with the opportunity to tailor its CRA objectives to the needs of its community and to its own capacities, business strategies, and expertise.

# USAA CRA Strategic Plan



## Appendix C – References

Peachman, Rachel Rabkin, “Meet The World’s Best Banks 2024,” Forbes, April 16, 2024, <https://www.forbes.com/sites/rachelpeachman/2024/04/16/meet-the-worlds-best-banks-2024/?sh=10e062361074> (accessed April 2024).

Lanning, Jonathan, “The Importance of Cars and Car Loans for People with Low and Moderate Incomes,” Federal Reserve Bank of Chicago, July 15, 2022, <https://www.chicagofed.org/publications/blogs/cdps/2022/importance-cars-and-car-loans> (accessed July 2024).