

Rubric for BEE	A	B	C	D	F
LD Leadership Diversity	Institution's diversity of executive staff and governing board can measure 45% or more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of executive staff and governing board can measure 35% of more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of executive staff and governing board can measure 23% or more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of executive staff and governing board can measure 15% or less diversity in race, ethnicity, and gender for a significant amount of time but has begun to institutionalize initiatives and efforts to improve.	Institution's diversity of executive staff and governing board shows a complete lack of diversity (less than 10%) with no institutionalized initiatives or intention to improve.
CFD Client-Facing Diversity	Institution's diversity of client-facing staff can measure 45% or more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of client-facing staff can measure 35% of more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of client-facing staff can measure 23% or more diversity in race, ethnicity, and gender for a significant amount of time.	Institution's diversity of client-facing staff can measure 15% or less diversity in race, ethnicity, and gender for a significant amount of time but has begun to institutionalize initiatives and efforts to improve.	Institution's diversity of client-facing staff shows a complete lack of diversity (less than 10%) with no institutionalized initiatives or intention to improve.
EL Equitable Lending	Institutions lending data shows LMI origination and approval rates at least 80% of institution's average with loan volume and at least 30% of total business.	Institutions lending data shows LMI origination and approval rates at least 65% of institution's average with loan volume and at least 20% of total business.	Institutions lending data shows LMI origination and approval rates at least 40% of institution's average with loan volume and at least 10% of total business., and/or trending positively.	Institutions lending data shows LMI origination and approval rates at least 25% of institution's average with loan volume and at least 5% of total business., and/or trending positively.	Institution can point to HMDA data that shows approval rates in historically disadvantaged communities of less than 10% of institution's average and loan volume in the same communities of less than 5% of total business.
CPP Customized Products & Programs	Institution has evidence of success in implementing tailored products and employed economic programs that have results in increasing financial mobility in historically underresourced communities.	Institution has created tailored products and cultivated economic programs that support financial mobility in historically underresourced communities.	Institution has begun to plan around creating tailored products and economic programs that support financial mobility in historically underresourced communities.	Institution has implemented and continues to implement programs with little transformational results in historically underresourced communities.	Institution is committed to traditional financial vehicles and products.
CFE Community-Focused Empowerment	Institution has evidence of success for sustainable, institutionalized practices and significant, long-term financial investments in community programs within and outside of the institution.	Institution has evidence of sustainable, institutionalized practices and significant, long-term financial investments in community programs within and outside of the institution.	Institution has evidence of plans for sustainable, institutionalized practices and significant, long-term financial investments in community programs within and outside of the institution.	Institution has some evidence of either organization-wide practices or financial investments in community programs within or outside of the institution.	Institution has not incorporated institutionalized practices and significant, long-term financial investments in community programs historically and long-term plans do not reflect an intent to.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	91	89	CPP	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	The credit union has strong gender diversity (68% women) at the leadership level, but not as much racial diversity (14%).
CFD Client-Facing Diversity	A	The credit union has strong presence of women in the workforce (82%) and race (34%) for its staff that interact and engage with the community.
EL Equitable Lending	B	AllTru has 7 mortgage originations on 7 applications and 1 LMI origination on 1 application. AllTru deployed over \$67 million in CDFI loans representing over 50% of the credit unions total loan volume.
CPP Customized Products & Programs	A	Product & services include no-or-lost cost transaction services, access to credit builder loans for individuals with damaged credit histories, financial education, credit counseling & consumer protection services, & access to affordable loans.
CFE Community- Focused Empowerment	B	Team ranked AllTru in the Top 5 of all depositories in intentionally investing in equitable empowerment in St. Louis communities. Through the credit unions many community partnerships and tailored programs making a real impact in the region.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	90	85	CPP	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	There is strong diversity when it comes to gender (33%), but racial diversity could be stronger. Overall it is a healthy mix trending in a positive direction.
CFD Client-Facing Diversity	B	There is a strong positive trend over the years of increasing diversity of client -facing staff. In the St. Louis market, gender diversity is about 58% and 26% for racial diversity.
EL Equitable Lending	B	LMI Lending represented nearly 60% of business through their specialized mortgage program. Total LMI lending increased from 6% to 14% of total business.
CPP Customized Products & Programs	A	Ranked #1 out of all banks for customizable products and programs offered to support economic justice. The depth and breath of specialized programs offered and assistance dollars will make a difference in equitable lending in the future,
CFE Community-Focused Empowerment	B	BoA has and continues to make significant monetary investments in St. Louis and St. Louis institutions. \$1.5 million in local philanthropic efforts and the extension of partnerships throughout the region with small businesses.

B	Point Total	Prior Year Rating	Leading Category	Trailing Category
	84	88	CFE	CFD

Category	Rating	Description of Findings
LD Leadership Diversity	A	Strong diversity of the governing board and the executive leadership team. About 41% of leadership identify as women and about 32% as people of color.
CFD Client-Facing Diversity	C	BMO's St. Louis market consists of about 100 employees with 61% identifying as women and about 21% identifying a people of color.
EL Equitable Lending	D	BMO has a moderate volume of mortgage originations with 20 (61% approval rate), but LMI lending represented 1 origination or 5% of total business with a low, 20% approval rate.
CPP Customized Products & Programs	B	BMO has a variety of products designed to help individuals realize their economic goals and better their financial situation. BMO boasts its talent development pipelines as well as the Zero Barriers to Inclusion initiative for long-term impact.
CFE Community-Focused Empowerment	A	BMO has and continues to make sustainable investments in the St. Louis area including nearly \$70k in direct donations. The bank has numerous thriving partnerships with local organizations such as the Hispanic Chamber in St. Louis and HBCU scholarships nationwide.

B	Point Total	Prior Year Rating	Leading Category	Trailing Category
	85	82	CFE	LD

Category	Rating	Description of Findings
LD Leadership Diversity	D	Busey stands at about 25% diversity in race and gender for its board of directors.
CFD Client-Facing Diversity	C	Racial diversity is low with 18% and gender diversity very strong standing at 59% women representation.
EL Equitable Lending	B	Busey does a significant volume of lending to small businesses. The institution has improved on lending in LMI areas now representing 19% of total business. Busey did approve 3 out of 4 applications.
CPP Customized Products & Programs	B	Busey offers flexible underwriting for mortgages, and offer programs to assist with qualifying for homes and building credit. A flagship program for LMI communities has been the My Community Home Loan.
CFE Community- Focused Empowerment	B	Busey has a bevy of local partnerships in the St. Louis community. Busey continues its local pledges to scholarship and education efforts as well as over \$14 million in community investments.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	90	86	CFD	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	Chase has seen increases in leadership diversity as it relates to gender and diversity at about 41% (+4%) and 14% (+4%) respectively.
CFD Client-Facing Diversity	A	Both racial diversity and gender diversity for the St. Louis Area is strong. Chase has between 50% and 57% racial diversity and over 42% for gender diversity.
EL Equitable Lending	B	Institution’s lending volume in areas of St. Louis that have seen historic disinvestment is 13% of total business with an approval rate of 86%.
CPP Customized Products & Programs	B	Institution is has committed \$30 billion to closing the racial wealth gap and increasing branches in LMI areas. Good products, but would like to see region-specific, population-advancing products as Chase deepens it’s knowledge of St. Louis.
CFE Community-Focused Empowerment	B	Chase is visibly deepening relationships with community organizations like WePower, Justine Peterson, InvestSTL and several strategic community investments.

B+	Point Total	Prior Year Rating	Leading Category	Trailing Category
	89	85	CFE	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	Commerce's board and executive leadership are at about 24% (-7%) for gender diversity and about 7% for racial diversity. Commerce measures about 35% for combined racial and gender diversity for upper-level management.
CFD Client-Facing Diversity	B	Diversity among management and client facing staff is solid. Over half (57%) are women and about 33% (+2) for diversity.
EL Equitable Lending	B	Commerce has impressive numbers for lending in the City of St. Louis. The bank ranks #2 in overall originations with 15% of business in LMI areas and a ranks #1 in LMI lending volume.
CPP Customized Products & Programs	B	Commerce is strong BankOn activator in the St. Louis region. Commerce offers borrowing for residents at a credit score of 580 and \$10,000 in borrowing capacity for non-traditional borrowers.
CFE Community- Focused Empowerment	A	Commerce has strong partnerships throughout the region. The bank has committed capital to supporting entrepreneurship and small business growth in the region. Commerce has ben and continues to be a consistent community partner and leader.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	90	84	EL	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	At the top levels of leadership, the bank’s gender diversity stands close to 28% and its racial diversity is about 16%.
CFD Client-Facing Diversity	B	At the associate level, women make up a healthy percentage of the workforce at 67% (+1%) and underrepresented minority population is at 37% (+1%).
EL Equitable Lending	A	The bank’s LMI volume represents 27% of their business, consisting of 6 originations. Enterprise Bank & Trust’s overall approval rate is about 80% and was 100% for its LMI mortgages.
CPP Customized Products & Programs	C	EB&T has listed a few options for potential and current bankers. Most notably, their Opportunity Checking product. The bank also has a lending program for non-traditional borrowers.
CFE Community- Focused Empowerment	B	Enterprise has maintained its investments in the St. Louis community, deepening partnerships with InvestSTL, the Gateway Neighborhood Fund, Enterprise University, and their intentional building of pipelines to banking careers.

B	Point Total	Prior Year Rating	Leading Category	Trailing Category
	86	76	EL	LD

Category	Rating	Description of Findings
LD Leadership Diversity	D	Midland has about 18% gender diversity on their board and 18% racial diversity. However, not enough information was provided to determine the disaggregation of race and gender for upper-level leadership.
CFD Client-Facing Diversity	C	Midland’s client-facing staff is made up of about 70% women. Racial diversity stands at about 20% identifying as people of color.
EL Equitable Lending	A	Midland Bank originated 14 home loans on 15 applications for an impressive 93% approval rate. LMI originations represented almost 30% of total originations with an LMI approval rate of 100%.
CPP Customized Products & Programs	B	Midland offers a variety of programs including the Believable Banking Home Mortgage and Home Improvement programs (\$19 million in business). Midland has an affordable checking product that encourages direct deposit by reducing fees. Midland is working on obtaining BankOn2.0 certification.
CFE Community-Focused Empowerment	B	Midland States Bank Foundation awarded \$152k in grants, \$43.5K in CRA qualified donations, sponsorships, contributions and gifts for youth, community development and housing organization in St. Louis.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	91	85	CFE	

Category	Rating	Description of Findings
LD Leadership Diversity	B	Solid diversity of the governing board and the executive leadership team. Lots of noticed growth over last several years and led by a black CEO.
CFD Client-Facing Diversity	B	Positive growing number of diverse client-facing staff. Midwest touts a diversity percentage at 57% and gender diversity at 69%.
EL Equitable Lending	B	Midwest has solid numbers when it comes to LMI lending. Though the volume isn't very high, approval percentages overall are 94% and 65% for LMI areas.
CPP Customized Products & Programs	B	Institution offers many products geared toward the LMI community, and has renewed its commitment to BankOn 2.0. Midwest offers one of the strongest payday lending alternatives among all banks.
CFE Community- Focused Empowerment	A	Midwest has thrived in the community space, doubling down on its efforts to be community centered. Midwest's recent investment is Dellwood Innovation Center. Midwest's donations and strategic community partnership continue to deepen.

B-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	80	75	LD	CPP

Category	Rating	Description of Findings
LD Leadership Diversity	B	Paramount has strong racial diversity in leadership at 44% and low gender diversity at 22%, but trending positively.
CFD Client-Facing Diversity	C	Paramount has 24% (+10%) racial diversity among all employees and 45% gender diversity. The bank made a significant increase in the racial diversity of all employees.
EL Equitable Lending	B	Institutions lending volume in areas of St. Louis that have seen historic disinvestment is about 12% (+1%) of it's total business. Lending overall in St. Louis is low, but bank has strong approval rates.
CPP Customized Products & Programs	D	Institution is still in the early stages of building and piloting sustainable products and offering those products to the St. Louis community.
CFE Community- Focused Empowerment	C	Paramount has a few programs and partnerships focused on the St. Louis region. The bank currently has no locations in the city.

B	Point Total	Prior Year Rating	Leading Category	Trailing Category
	86	85	CFD	EL

Category	Rating	Description of Findings
LD Leadership Diversity	C	PNC's leadership diversity stands at 23% racial diversity and 30% gender diversity.
CFD Client-Facing Diversity	B	PNC has a diverse workforce with about 28% (+5%) for racial diversity and about 63% (+3%) for gender diversity.
EL Equitable Lending	C	PNC has significant lending activity in the city. The bank saw 26 mortgage originations (53% approval rate) with LMI lending representing 8% of total lending and a 40% approval rate.
CPP Customized Products & Programs	B	PNC has provides a Foundations Checking product which meets BankOn certification standards. PNC also provides special programs for low-credit borrowers, 1st-time homebuyers, minority entrepreneurs.
CFE Community- Focused Empowerment	B	PNC did over \$40 million in community development and revitalization financing in the St. Louis region. Additionally, PNC contributed \$7.5 million in small-business loans in the city.

A-	Point Total	Prior Year Rating	Leading Category	Trailing Category
	90	84	CFE	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	About 30% gender diversity in executive leadership and racial diversity at about 15%.
CFD Client-Facing Diversity	A	Regions has strong client-facing diversity with gender diversity around 62%. More than 20% of staff are racially diverse and 10% in managerial roles.
EL Equitable Lending	B	Regions has a healthy level of lending in the City of St. Louis. LMI lending represents about 17% of total business and are being approved at a 56% rate.
CPP Customized Products & Programs	B	Regions has a bevy of local and national programs for economic empowerment. Regions has a financial education center, offers a secured credit card, closing cost assistance, and specific programs for MBEs/WBEs.
CFE Community-Focused Empowerment	A	Regions ranks #1 here and continues to strengthen partnerships with the Urban League Small Business Center and greater St. Louis community. Regions is very visible on the local front with 60+ local partnerships.

B+	Point Total	Prior Year Rating	Leading Category	Trailing Category
	89	88	CFE	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	Simmons has about 23% of their top leadership identifying as women with about 15% racial diversity. Simmons has also designed leadership pipeline programs.
CFD Client-Facing Diversity	B	Diversity among client-facing staff is high especially with initiatives in the community and retail banking. Simmons has 66% of its client-facing staff identify as women and 27% racial diversity.
EL Equitable Lending	C	Simmons had 14 mortgage originations on 19 applications. In LMI census tracts, Simmons had 2 originations on 6 applications (33% approv.) with LMI lending constituting 16% of total business.
CPP Customized Products & Programs	A	Simmons is a BankOn2.0 certified and offers several customized programs including the 100% Affordable Advantage Home Mortgage, Credit Builder Loan, and the Simmons Bank Foundation Credit Card.
CFE Community-Focused Empowerment	A	Simmons has significant investments in the St. Louis community including retail banking onsite at the Urban League headquarters. Simmons has developed and deepened its Community Board which gives direct recommendations to Simmons leadership.

C+	Point Total	Prior Year Rating	Leading Category	Trailing Category
	79	88	EL	LD

Category	Rating	Description of Findings
LD Leadership Diversity	C	UMB's diversity of the governing board and the executive leadership team stands at about 29% for gender diversity and about 14% for racial diversity.
CFD Client-Facing Diversity	B	Client facing diversity see's women at about 53% of the workforce and overall workforce diversity at 25%.
EL Equitable Lending	D	UMB had low lending volume in the city (12 loan originations) and only 1 in LMI areas.
CPP Customized Products & Programs	B	UMB is underway with BankOn 2.0 which offers fee-free and affordable products to the St. Louis community. UMB continues its dedication and investment in small businesses and entrepreneurship, especially WBEs/MBEs.
CFE Community- Focused Empowerment	B	UMB has made significant investments in the St. Louis community to the tune of \$3.5 million spanning housing support services, economic development, revitalization.

B+	Point Total	Prior Year Rating	Leading Category	Trailing Category
	89	86	CPP	EL

Category	Rating	Description of Findings
LD Leadership Diversity	B	US Bank has strong diversity at the leadership level with racial diversity at 31% and gender diversity at 38%.
CFD Client-Facing Diversity	A	Diversity among client-facing staff is very strong at about 57% for gender and 35% for racial diversity.
EL Equitable Lending	C	US Bank is #1 in volume, but LMI lending represents only 6% of total business. Approval rate overall is 57% and 39% for LMI areas.
CPP Customized Products & Programs	A	US Bank's ongoing commitment to products that build economic capacity is strong. It's apparent through the commitment to BankOn 2.0 as well as the quality depth and breadth of its products and programs.
CFE Community- Focused Empowerment	B	US Bank has made significant investments in the St. Louis community, establishing key partnerships (Urban League, Prosperity Connections, Justine Peterson) to promote the regions economic well-being.

	Grade	LD	CFD	EL	CPP	CFE
<i>AVERAGES</i>	<i>B</i>	<i>C</i>	<i>B</i>	<i>B</i>	<i>B</i>	<i>B</i>
	TOTALS					
A	6	1	4	2	4	5
B	8	3	7	8	9	9
C	1	9	4	3	1	1
D	0	2	0	2	1	0
F	0	0	0	0	0	0