

### 10 CRA for Community Bankers: The Impact of the 2005 Amendments

BY BONITA G. JONES AND THOMAS J. HEALY

Effective September 1, 2005, the federal banking agencies modified the CRA regulation's definition of "small bank," raising the asset threshold from \$250 million to \$1 billion. The new rule eliminated CRA data reporting requirements and offered a streamlined assessment process for banks with total assets of at least \$250 million and less than \$1 billion.

### 16 Fair Lending Exam Management: Constant Preparation is Key to a Successful Exam

BY CARL G. PRY, CRCM

Successful management of a fair lending exam depends not as much on what you can do to get ready, but on what you have done up to that point. This article discusses what you can and should do before the exam even begins.

### 24 When the IT 'Rubber' Meets the Compliance 'Road'

BY KATHLEEN M. CURTIS, CRCM

On the surface, the worlds of information technology (IT) and compliance may seem to be alien to one another. On a basic risk exposure and management basis, however, there is really not much that is so new or strange about an interface between compliance and IT.



### 30 How to Simplify Policy Approvals for Directors

BY TOM THOMAS

The fact that federal regulators have placed more compliance oversight responsibility on bank directors means that it might be a good idea for bank compliance officers to review how they interact with their board members. But that presents an opportunity: The compliance officer's job will be easier—and, importantly, the compliance officer will be seen by both management and directors as being more effective—when compliance becomes more palatable for your board.

### 34 Document Retention Essentials: Emerging Issues of E-Discovery and E-Admissibility

BY AGNES BUNDY SCANLAN

The court in *Zubulake* set out a "litigation hold" procedure that attorneys must follow when litigation is reasonably anticipated. In the aftermath of *Zubulake*, much attention has been given to crafting document retention policies to facilitate the "litigation hold" process and to ensure that pertinent information is not lost.

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