ANHD believes that reinvestment benefiting low- and moderate-income New Yorkers should be substantial and in proportion to each bank's locally-held deposit base.

THE OVERALL REINVESTMENT VOLUME INDEX measures each bank's volume of reinvestment to its locally held deposits, including:

1. Community Development Reinvestment: Community Development loans, CRA-qualified investments, and CRA-eligible grants
2. Core Consumer & Commercial Lending: 1-4 family loans to low- and moderate-income (LMI) borrowers, Multifamily community development loans; & Small business loans in LMI tracts

THE OVERALL REINVESTMENT QUALITY SCORE measures how well the bank's lending, investments, and services reach LMI residents and neighborhoods. The quality score is an average of three scores, based on each bank's performance relative to its peers.

2. Community Development: % of lending and investments to nonprofits, to CDC's, and for affordable housing, % of grants to neighborhood-based organizations, % of deposits to grants, and responsiveness / innovation for retail banks.