



**PUBLIC DISCLOSURE**

September 13, 2021

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First Federal Savings Bank  
Charter Number 702631  
633 LaSalle Street  
Ottawa, Illinois 61350

Office of the Comptroller of the Currency  
Peoria Field Office  
211 Fulton Street, Suite 604  
Peoria, Illinois 61602

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory**

**The community development test is rated: Outstanding**

The major factors that support this rating include:

- The Lending Test rating is based on the satisfactory performance for the state of Illinois.
- The Community Development (CD) Test rating is based on the outstanding performance for the state of Illinois.
- The loan-to-deposit (LTD) ratio is reasonable.
- The bank originates a majority of its loans within its assessment areas (AAs).

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

The quarterly average LTD ratio was 69.13 percent for the twelve-quarter period from July 1, 2018, to June 30, 2021, with a low LTD ratio of 62.45 percent and a high LTD ratio of 75.46 percent.

First Federal Savings Bank (FFSB or bank) ranked ninth of twelve similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions ranged in asset size from \$302 million to \$495 million and reported quarterly average LTD ratios from 55.14 percent to 111.49 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 73.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,329	73.3	484	26.7	1,813	236,241	68.4	109,021	31.6	345,262
<b>Total</b>	<b>1,329</b>	<b>73.3</b>	<b>484</b>	<b>26.7</b>	<b>1,813</b>	<b>236,241</b>	<b>68.4</b>	<b>109,021</b>	<b>31.6</b>	<b>345,262</b>

Source: HMDA loan originations and purchases January 1, 2018 to December 31, 2020  
Due to rounding, totals may not equal 100.0%

## Description of Institution

FFSB is a \$378 million mutual intrastate institution headquartered in Ottawa, Illinois, located in north central Illinois with twelve branch locations. There was no change in FFSB's corporate structure since the previous CRA evaluation. The bank owns First Fed Insurance Agency, which provides insurance services. FFSB's subsidiary does not negatively affect their ability to meet the credit needs of the community.

The CRA evaluation has two rating areas. The nonmetropolitan AA (NonMSA AA) is composed of all census tracts (CTs) of Bureau, LaSalle, Lee, Livingston, Putnam, and Whiteside counties, which are nonmetropolitan areas. The Chicagoland AA (Chicago MSA AA) is composed of all CTs of Grundy, Kane, Kendall, and Will counties, which are all metropolitan areas.

The NonMSA AA includes nine branches with ATM services and banking services available on Saturdays, though only eight of the branches offers drive-thru services. The Chicago MSA AA includes three branches with drive-thru and ATM services, as well as banking services available on Saturdays. Customers also have banking access through online and mobile platforms. FFSB did not open or close any facilities since the previous CRA evaluation.

The bank sources a majority of its deposits, 69.1 percent, from the NonMSA AA, as of June 30, 2021.

FFSB's strategy is to provide superior products and services to build relationships with its communities, customers, and employees. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in the bank's assessment areas. The bank's previous Intermediate Small Bank CRA rating was "Satisfactory" as detailed in the August 13, 2018, Performance Evaluation.

FFSB held 54 percent of net loans and leases to total assets and had a Tier One Leverage Capital ratio of 11 percent at June 30, 2021. The bank is primarily a home mortgage lender and offers a full range of deposit and loan products and services. Residential lending represented the largest loan portfolio at \$157 million, followed by commercial lending at \$46 million, and consumer lending at \$3 million at June 30, 2021. FFSB also originates home mortgage loans for sale into the secondary market.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period covers the period from the date of the previous CRA PE of August 13, 2018, to September 13, 2021. We evaluated FFSB under the Intermediate Small Bank evaluation procedures, which includes a Lending Test and a CD Test.

The Lending Test evaluated loans originated or purchased between January 1, 2018, and December 31, 2020, and were compared to the 2015 American Community Survey Census Data.

The CD Test evaluated eligible community development loans, investments, and services from January 1, 2018, to December 31, 2020.

FFSB's primary loan products are home mortgage loans as reported in HMDA. Home mortgage lending represented 74.5 percent by number and 87.8 percent by dollar of all originations and purchases between January 1, 2018, and December 31, 2020. Home mortgage loans are also the strategic focus of the bank.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The NonMSA rating area received a greater weighting as a majority of the bank's branches and deposit activity is within the NonMSA AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Illinois

**CRA rating for the State of Illinois<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The borrower distribution of loans reflects excellent performance.
- The geographic distribution of loans reflects reasonable performance.
- The CD lending and CD services reflects excellent responsiveness while CD investments reflect adequate responsiveness.

### Description of Institution's Operations in Illinois

FFSB's lending strategy in Illinois is focused on owner-occupied home mortgage lending. FFSB serves its customers with twelve branches and twelve ATMs. Each branch location provides banking services on Saturdays, and eleven branches offer drive-thru service. Four branches and four ATMs are located in moderate-income geographies. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Major employment sectors include health care, manufacturing, and retail services.

The annual unemployment rate in the State of Illinois was declining in 2018 and 2019 until 2020 due to the Covid-19 pandemic. The annualized unemployment rates were 4.4 percent in 2018, 4.0 percent in 2019, and 9.5 percent in 2020. Most of the counties were comparable to the State of Illinois in 2018 and 2019 while Bureau, LaSalle, and Putnam Counties compared unfavorably. Unemployment rates in the AA were high during 2020 due to the Covid-19 pandemic, with Kane, LaSalle, and Will Counties experiencing the highest in the AA with 9.1, 9.4, and 9.5 percent, respectively, for 2020.

Competition for loans and deposits is high among financial institutions in the AA due to the number and variety of financial institutions within and accessible to the AA. Competing institutions include national banks, state banks, federal thrifts, farm credit institutions, credit unions, and other nonbank lenders.

FFSB held the twelfth highest deposit market share position in the NonMSA AA at 2.5 percent among 48 FDIC insured financial institutions, at June 30, 2021. The top five institutions held a deposit market share of 36.6 percent in the NonMSA AA.

FFSB held the thirty-seventh highest deposit market share position in the Chicago MSA AA at .3 percent among 57 FDIC insured financial institutions, at June 30, 2021.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Housing costs are generally affordable in the NonMSA AA for moderate-income families when considering the median housing value but may present challenges for some low-income families when also considering property tax rates in Illinois. The higher cost of living and housing would present additional challenges for low- and moderate-income families in the Chicago MSA AA. The level of families below poverty increased from 2017 to 2020 in the Chicago MSA AA, which may reduce opportunities for lending, particularly to lower income families.

Community contacts from both AAs stated loans to small businesses and affordable and multifamily housing are the greatest credit needs of the communities for both AAs. The community contact from the NonMSA AA noted FFSB is responsive in meeting the credit needs of its communities.

## NonMSA AA

<b>Table A - Demographic Information of the Assessment Area</b>						
<b>Assessment Area: NonMSA AA, 2015 ACS Census</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	77	0.0	11.7	72.7	15.6	0.0
Population by Geography	282,757	0.0	9.3	74.4	16.3	0.0
Housing Units by Geography	125,332	0.0	10.1	74.4	15.5	0.0
Owner-Occupied Units by Geography	83,202	0.0	8.4	74.5	17.1	0.0
Occupied Rental Units by Geography	29,045	0.0	14.0	75.3	10.7	0.0
Vacant Units by Geography	13,085	0.0	11.8	72.2	16.1	0.0
Businesses by Geography	14,809	0.0	12.9	72.8	14.3	0.0
Farms by Geography	1,622	0.0	2.9	81.4	15.7	0.0
Family Distribution by Income Level	73,827	17.3	17.5	21.5	43.8	0.0
Household Distribution by Income Level	112,247	21.1	15.5	17.3	46.0	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$115,752
			Median Gross Rent			\$666
			Families Below Poverty Level			8.9%
<i>Source: 2015 ACS and 2019 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Chicago MSA AA

<b>Table A - Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago MSA AA, 2015 ACS Census</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	254	5.5	19.7	41.3	33.1	0.4
Population by Geography	1,379,194	3.5	17.8	38.1	40.7	0.0
Housing Units by Geography	483,795	3.6	16.8	40.5	39.1	0.0
Owner-Occupied Units by Geography	354,821	1.6	12.0	41.1	45.3	0.0



Occupied Rental Units by Geography	98,306	9.8	31.9	37.3	21.1	0.0
Vacant Units by Geography	30,668	6.2	24.4	44.4	25.0	0.0
Businesses by Geography	80,649	3.2	11.1	36.6	49.1	0.0
Farms by Geography	2,507	1.7	9.7	48.6	40.0	0.0
Family Distribution by Income Level	343,460	17.2	15.9	20.8	46.1	0.0
Household Distribution by Income Level	453,127	18.5	14.2	18.2	49.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$211,565
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,070
			Families Below Poverty Level			6.8%
<i>Source: 2015 ACS and 2019 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Illinois

Both the NonMSA and Chicago MSA AAs received a full-scope review. The NonMSA rating area received a greater weighting as a majority of the bank's branches and deposit activity is within the NonMSA AA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Illinois is reasonable.

### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

#### *Home Mortgage Loans*

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects reasonable distribution in the AAs.

The proportion of lending in the moderate-income geographies in the NonMSA AA was below the percentage of owner-occupied housing units and was just below the aggregate distribution. There were no low-income geographies during the evaluation period in the NonMSA AA. The lower lending levels

in moderate-income CTs is attributed to the location of branches in proximity to some of the moderate-income geographies in the NonMSA AA.

The proportion of lending in low- and moderate-income (LMI) geographies in the Chicago MSA AA was below the percentage of owner-occupied housing units but exceeded the aggregate distribution.

### ***Lending Gap Analysis***

We performed a lending gap analysis that included a review of density maps of originated home mortgage loans and compared to AA maps and location of branches. We did not identify any unexplained, conspicuous gaps in lending.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects excellent distribution in the AAs.

The proportion of lending to low-income families was below the percentage of low-income families but significantly exceeded the aggregate distribution for both AAs. The proportion of lending to moderate income-families exceeded both the percentage of moderate-income families and the aggregate distribution for the NonMSA AA. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families and is comparable to the aggregate distribution for the Chicago MSA AA.

### **Responses to Complaints**

FFSB did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Illinois is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

## **Number and Amount of Community Development Loans**

FFSB's CD lending performance represents excellent responsiveness in the full-scope areas, given the opportunities and needs.

FFSB's CD lending activity included five loans totaling \$1.4 million, representing 3.2 percent of tier one capital, to support affordable housing in LMI areas in the Chicago MSA AA.

FFSB made use of responsive flexible lending during the Covid-19 pandemic by originating loans to stabilize small businesses and communities through the SBA Paycheck Protection Program (PPP). The bank originated 44 PPP loans in the NonMSA AA totaling \$3.1 million and 64 PPP loans in the Chicago MSA AA totaling \$2.0 million. FFSB originated an additional 55 loans totaling \$1.2 million in the statewide area of Illinois. Total PPP loans of \$6.3 million receiving consideration reflect 14.3 percent of tier one capital. FFSB is not traditionally active in SBA lending. This activity received positive consideration as it provided stabilization of small businesses and communities.

## **Number and Amount of Qualified Investments**

FFSB's CD investment performance represents adequate responsiveness in the full-scope areas. The bank's investments consisted entirely of donations. FFSB made \$25 thousand in donations supporting organizations that provided services to LMI persons, including various health and human services, homeless shelters, and food banks. Total donations reflect .1 percent of tier one capital.

## **Extent to Which the Bank Provides Community Development Services**

FFSB's CD service performance represents excellent responsiveness in the full-scope areas. FFSB bank officers provided 1,250 service hours in leadership positions across both AAs.

FFSB's delivery systems are reasonably accessible to individuals of different incomes and businesses of different sizes via branches, ATMs, and online and mobile platforms. Additionally, four branches and four ATMs are located in moderate-income geographies.

In response to the Covid-19 pandemic, FFSB assisted home mortgage borrowers by providing forbearance assistance to impacted borrowers. FFSB provided forbearance assistance to 141 home mortgage borrowers, representing \$25 million, experiencing difficulties during the Covid-19 pandemic. These efforts received positive consideration as they promoted housing stability.

FFSB participates in lending programs to help meet the credit needs of LMI borrowers:

- FFSB participates in two Freddie Mac programs that help LMI borrowers obtain home ownership. These programs offer higher maximum LTV limits and reduced mortgage insurance costs. 131 borrowers, representing \$17.3 million in funding, received assistance through this program. This program is available in both AAs.
- FFSB participates in the USDA Rural Housing Loan program that helps LMI borrowers purchase homes in rural areas. FFSB helped 11 borrowers, representing \$1.0 million, receive assistance through this program. This program is available in both AAs.
- FFSB participates in the FHLB's down payment assistance program where LMI borrowers can receive forgivable grants that can be applied to closing costs and down payments. FFSB helped

32 borrowers receive down payment assistance of \$192 thousand through this program. This program is available in both AAs.

- FFSB also participates in the IHDA First Home loan program where LMI borrowers obtain home ownership. The program offers low down payments, below-market fixed rates, and low down payment requirements. FFSB helped 14 borrowers, representing \$2.2 million, receive assistance through this program. The IHDA loans also have a supplementary grant program where LMI borrowers can use the funds for down payments and/or closing costs. These 14 borrowers also received \$83 thousand in assistance through the grant program.
- FFSB helped four local food pantries and homeless shelters by obtaining \$20 thousand in Covid-19 relief funds through the FHLB's Targeting Impact grant program.
- FFSB participates in additional local grant programs in addition to offering FHA and VA loans, which not all financial institutions offer.

FFSB is often the only lender in its communities offering these types of loan programs, particularly in its NonMSA AA communities. The bank is therefore providing needed CD services by offering these products throughout its AAs.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/18 to 12/31/20	
<b>Bank Products Reviewed:</b>	Home mortgage loans, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Illinois</b>		
NonMSA AA	Full-scope	All CTs in Bureau, LaSalle, Lee, Livingston, Putnam & Whiteside Counties
Chicago MSA AA	Full-scope	All CTs in Grundy, Kane, Kendall & Will Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS (BANK NAME)			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
	Satisfactory	Outstanding	Satisfactory
MMSA or State:			
Illinois	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.



**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Chicago MSA AA	760	159,624	57.2	94,251	1.6	1.3	0.6	12.0	8.3	6.7	41.1	48.2	37.2	45.3	42.2	55.4	0.0	0.0	0.0	
NonMSA AA	569	76,617	42.8	8,301	0.0	0.0	0.0	8.4	4.0	5.0	74.5	68.5	71.2	17.1	27.4	23.8	0.0	0.0	0.0	
<b>Total</b>	<b>1,329</b>	<b>236,241</b>	<b>100.0</b>	<b>102,552</b>	<b>1.3</b>	<b>0.8</b>	<b>0.6</b>	<b>11.3</b>	<b>6.5</b>	<b>6.6</b>	<b>47.4</b>	<b>56.9</b>	<b>40.0</b>	<b>39.9</b>	<b>35.9</b>	<b>52.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Chicago MSA AA	760	159,624	57.2	94,251	17.2	9.2	5.1	15.9	16.4	16.5	20.8	23.9	22.1	46.1	46.4	38.6	0.0	3.9	17.7	
NonMSA AA	569	76,617	42.8	8,301	17.3	6.9	5.6	17.5	18.3	17.0	21.5	26.0	22.7	43.8	45.5	40.6	0.0	3.3	14.1	
<b>Total</b>	<b>1,329</b>	<b>236,241</b>	<b>100.0</b>	<b>102,552</b>	<b>17.2</b>	<b>8.2</b>	<b>5.1</b>	<b>16.1</b>	<b>17.2</b>	<b>16.5</b>	<b>20.9</b>	<b>24.8</b>	<b>22.2</b>	<b>45.7</b>	<b>46.1</b>	<b>38.8</b>	<b>0.0</b>	<b>3.7</b>	<b>17.4</b>	

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*