



## **PUBLIC DISCLOSURE**

April 20, 2015

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Access National Bank  
Charter Number 23880

1800 Robert Fulton Drive  
Reston, VA 20191

Office of the Comptroller of the Currency  
Washington DC Field Office  
400 7th Street S.W.  
Washington, DC 20291

**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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## General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal supervisory agency to evaluate a financial institution’s record of meeting the credit needs of its entire community, including low- and moderate-income geographies, consistent with the safe and sound operation of the institution. Upon conclusion of such an evaluation, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Access National Bank (ANB or Bank) issued by the Office of the Comptroller of the Currency (OCC), the institution’s supervisory agency, for the evaluation period ending April 20, 2015. The OCC rates the CRA performance of an institution consistent with the provisions set forth in appendix A to 12 CFR Part 25.

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

The following table indicates the performance level of **Access National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Access National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- ANB’s lending activity reflects good responsiveness to assessment area credit needs.
- A small percentage of the Bank’s loans were made in its assessment area.
- The geographic distribution of ANB’s loans reflects good penetration throughout the assessment area.
- The distribution of ANB’s loans reflects good penetration among retail customers of different income levels.
- ANB originated a relatively high level of community development loans. The Bank’s community development lending had a positive impact on the Bank’s CRA performance.

- ANB makes a significant level of qualified community development investments that are responsive to community needs.
- ANB's branch network is reasonably accessible to the Bank's geographies and individuals of different income levels.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the Bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.



## Description of Institution

ANB is a full-service intrastate bank headquartered in Reston, VA. The Bank is a wholly-owned subsidiary of publicly traded Access National Corporation, a one-bank holding company headquartered in Reston, VA. Access National Mortgage (ANM), a division of ANB, originates residential mortgages and home equity loans for sale on the secondary market. ANM was a subsidiary of the Bank until July 2011. ANB has two active subsidiaries: (i) Capital Fiduciary Advisors LLC (CFA), a registered investment advisor, and (ii) Access Investment Services LLC (AIS), which provides traditional brokerage and insurance products.

The Bank operates five branch locations within Virginia: Reston, Vienna, Chantilly, Leesburg, and Manassas. Two branches, Manassas and Chantilly, are located in moderate-income geographies. The other three branches are located in upper income geographies. Branch locations do not offer extended hours or ATM services; however, each branch has a night depository box. ANB relocated two branches during the review period. The Vienna branch remained in an upper-income geography, and the Chantilly branch moved from a middle-income geography to a moderate-income geography.

ANB operates primarily as a business bank, with a primary customer base of small and medium sized businesses and affiliated consumers located in the assessment area. ANB offers a full range of deposit and loan products and services. Deposit products include personal and business checking accounts, savings accounts, money market accounts, certificates of deposit, and independent retirement accounts. Personal loan products offered include mortgages and home equity lines of credit. The Bank offers treasury management services and lines of credit for business customers. Business lending includes loans for small businesses, commercial, industrial, government contractors, commercial real estate, and equipment financing. The Bank's services also include online banking, online bill pay, and debit cards.

As of December 31, 2014, ANB reported total assets of \$1.1 billion and tier one capital of \$92.6 million. Total loans, net of unearned income, equaled \$808 million, or 77 percent of total assets. Small business and commercial loans comprised the largest segments of ANB's loan portfolio as of December 31, 2014. The primary composition of the loan portfolio includes 39 percent commercial real estate, 29 percent 1-4 family residential, 25 percent commercial and industrial, and 5 percent construction and development loans. There are no legal or financial constraints that impede ANB's ability to help meet the credit needs of its assessment area.

ANB's prior CRA evaluation was conducted as of October 11, 2011 using the Intermediate Small Bank CRA procedures, and the Bank received an overall rating of Satisfactory.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the Bank's performance under the Lending, Investment and Service Tests. To evaluate the Bank's lending performance, the OCC reviewed home mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses subject to filing under the CRA, and community development loans. Given the minimal number of multifamily and farm loans, the OCC did not include an analysis of the Bank's performance relative to these two loan types, as it would not be meaningful. The Investment Test included a review of investments, grants, and donations made in the Bank's assessment area that met the definition of a community development investment. The Service Test included a review of retail and community development services provided in the Bank's assessment area.

The evaluation period for the Lending Test, except for community development loans, covered January 1, 2012 through December 31, 2014. For the Investment Test, the Service Test, and community development loans, the evaluation period covered October 1, 2011, the date of the last CRA evaluation, through April 20, 2015. The OCC based the conclusions for community development loans and qualified investments on the number and dollar amounts made during the evaluation period. The OCC considered investments originated during prior periods with balances outstanding as of April 20, 2015. However, greater weight was placed on those investments made in the current review period. The OCC also considered the level of innovation, complexity, and responsiveness to community credit needs.

### Data Integrity

The OCC conducted a separate data integrity review prior to this evaluation. Examiners found the HMDA and CRA data reported in 2012, 2013, and 2014 to be accurate and reliable for this CRA evaluation.

The OCC also reviewed support for community development activities provided by ANB management and determined that these activities met the definition of community development.

### Selection of Areas for Full-Scope Review

The OCC performed a full scope review of the Bank's one assessment area. The assessment area consists of contiguous whole political subdivisions within the Washington-Arlington-Alexandria DC-VA-MD-WV Metropolitan Division (MD #47894). The designated assessment area includes geographies where ANB has its main office and branch offices, consists of whole census tracts, and does not arbitrarily exclude any low- or moderate-income geographies. The assessment area includes the counties of Arlington, Fairfax, Loudoun, and Prince William and the cities of Fairfax, Falls Church, Manassas, and Manassas Park. Refer to the demographic table in Appendix A for more information on the assessment area.

## **Ratings**

The Bank's overall rating is based on a full-scope review of ANB's single assessment area. The Lending Test was rated more heavily than the Investment or Service Test in arriving at the overall rating. In evaluating ANB's lending performance, business lending was rated more heavily than 1-4 family residential mortgage lending because business lending represented a larger portion of the Bank's assessment area lending activity.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR § 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the Bank, or in any assessment area by an affiliate whose loans have been considered as part of the Bank's CRA performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

The Bank's performance under the Lending Test is rated "High Satisfactory." Based on a full-scope review, the Bank's performance in the assessment area is good.

#### **Lending Activity**

ANB's lending activity in the assessment area is good, and its lending levels reflect good responsiveness to the assessment area credit needs.

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

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

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

##### **Home Purchase Lending**

ANB's record of originating home purchase loans among assessment area geographies of different income levels is excellent. The percentage of home purchase loans originated within low-income geographies exceeds the percentage of owner-occupied housing units located within the low-income geographies. ANB's market share of home purchase loans originated in low-income assessment area geographies exceeds its overall home purchase assessment area market share.

The percentage of home purchase loans originated within moderate-income geographies exceeds the percentage of owner-occupied housing units located within the moderate-income geographies. ANB's market share of home purchase loans originated in moderate-income geographies exceeds its overall home purchase assessment area market share.

##### **Home Mortgage Refinance Lending**

ANB's record of originating home mortgage refinance loans among assessment area borrowers of different income levels is adequate. The percentage of home mortgage refinance loans originated in low-income assessment area geographies is lower than the percentage of owner-occupied housing units located within the low-income assessment area geographies. ANB's market share of home mortgage refinance loans originated in low-income assessment area geographies is lower than its overall home mortgage refinance assessment area market share. The percentage of ANB's home mortgage refinance loans originated in moderate-income assessment area geographies is less than the percentage of owner-occupied housing units located within the moderate-income assessment area geographies. ANB's market share

of home mortgage refinance loans originated in moderate-income assessment area geographies is less than its overall home mortgage refinance assessment area market share. In this analysis, the OCC took into consideration the strong competition ANB faces in their assessment area.

### **Small Loans to Businesses**

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the Bank's origination/purchase of small loans to businesses.

ANB's origination of small loans to businesses within low- and moderate-income geographies in the assessment area is adequate. The percentage of small loans to businesses originated within low-income assessment area geographies exceeds the percentage of assessment area businesses located in those low-income geographies. ANB's market share for originating small loans to businesses in low-income geographies is near to its overall market share for originating small loans to assessment area businesses.

The percentage of small loans to assessment area businesses originated within moderate-income geographies is somewhat lower than the percentage of assessment area businesses located within moderate-income assessment area geographies. ANB's market share for originating small loans to businesses located within moderate-income assessment area geographies is lower than its overall market share for originating small loans to assessment area businesses. ANB's record of originating small loans to businesses located within moderate-income assessment area geographies is good considering competition emanating from larger, nationwide business lenders. ANB faces strong market competition for small loans originated to small assessment area businesses. ANB ranks 21<sup>st</sup> among area business lenders. Five lenders account for 68 percent of the business lending market share, including American Express, FIA Card Services, Wells Fargo Bank, Capital One Bank, and Chase Bank.

### **Lending Gap Analysis**

A review and analysis of the geographic distribution of ANB's originations of home mortgage and small loans to businesses among assessment area geographies did not detect any conspicuous or unexplained gaps in ANB's lending patterns.

### **Inside/Outside Ratio**

The OCC performed an inside/outside ratio analysis on originated home mortgage loans and small loans to businesses within ANB's assessment area. Throughout the evaluation period, ANB originated a very small percentage of of home mortgage loans within its assessment area. Of total home mortgage loans originated by ANB, 12 percent of the number and 20 percent of the dollar volume, respectively, were within the assessment area. The low number and dollar volume of home mortgage loans in the assessment area is indicative of the strategy to act primarily as a business bank serving the local community, while the mortgage division originates loans for sale on the secondary market nationwide.

Consistent with ANB's strategy, the Bank originated a substantial majority of small loans to businesses within the assessment area throughout the evaluation period. Of total small loans to businesses, 73 percent of the number and 71 percent of the dollar volume were made within the assessment area. ANB's record of originating small loans to businesses within the assessment area positively impacted the overall analysis of the geographic distribution of lending by income level of geography.

<b>Access NB Assessment Area</b>										
Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
<b>HMDA</b>	1,153	11.97%	8,481	88.03%	9,634	447,035	20.14%	1,773,063	79.86%	2,220,098
<b>Small Business</b>	559	73.36%	203	26.64%	762	251,643	71.40%	100,797	28.60%	352,440
<b>Totals</b>	<b>1,712</b>	<b>16.47%</b>	<b>8,684</b>	<b>83.53%</b>	<b>10,396</b>	<b>698,677</b>	<b>27.16%</b>	<b>1,873,860</b>	<b>72.84%</b>	<b>2,572,538</b>

## Distribution of Loans by Income Level of the Borrower

ANB's record of distributing originations of home mortgage loans among assessment area borrowers of different income levels is good. ANB's record of distributing originations of small loans among assessment area businesses of different sizes is adequate.

### Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations.

### Home Purchase Lending

ANB's record of originating home purchase loans among assessment area borrowers of different income levels is good. The percentage home purchase loans originated to low-income assessment area borrowers is somewhat lower than the percentage of assessment area families classified as low-income. ANB's market share of home purchase loans originated to low-income assessment area borrowers is near to its overall home purchase assessment area market share.

The percentage of ANB's home purchase loans originated to moderate-income assessment area borrowers exceeds the percentage of assessment area families classified as moderate-income. ANB's market share of home purchase loans originated to moderate-income assessment area borrowers is near to its overall home purchase assessment area market share.

## **Home Mortgage Refinance Lending**

ANB's record of originating home mortgage refinance loans among assessment area borrowers of different income levels is adequate. The percentage home mortgage refinance loans originated to low-income assessment area borrowers is lower than the percentage of assessment area families classified as low-income. ANB's market share of home mortgage refinance loans originated to low-income assessment area borrowers is lower than its overall home mortgage refinance assessment area market share.

The percentage of ANB's home mortgage refinance loans originated to moderate-income assessment area borrowers is near to the percentage of assessment area families classified as moderate-income. ANB's market share of home mortgage refinance loans originated to moderate-income assessment area borrowers is near to its overall home mortgage refinance assessment area market share.

## **Small Loans to Businesses**

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the Bank's origination/purchase of small loans to businesses.

ANB's record of origination of small loans to assessment area businesses of different sizes is good considering the competition emanating from larger, nationwide business lenders. The percentage of small loans originated to small assessment area businesses is somewhat lower than the percentage of assessment area businesses defined as small. Small businesses are defined as businesses reporting annual revenues of \$1 million or less. ANB's market share of small loans to assessment area small businesses exceeds its overall market share for small loans originated to assessment area businesses of all sizes.

Lenders garnering a larger market share of small loans to small businesses include large national lenders with greater resources. Five lenders account for 68 percent of the area's business lending market share, including American Express, FIA Card Services, Wells Fargo Bank, Capital One Bank, and Chase Bank.

Additionally, of ANB's small loans originated to assessment area businesses, approximately 27 percent are originated to businesses for amounts of \$100 thousand or less. ANB's record of originating smaller dollar loans to assessment area businesses demonstrates ANB's willingness to originate loans in amounts needed by smaller businesses.

## **Community Development Lending**

The Bank has made a relatively high level of community development loans. Throughout the evaluation period, ANB originated four qualified Small Business Administration (SBA) 504 loans totaling \$8.9 million in its assessment area. In addition to these loans, ANB originated two qualified SBA 504 loans totaling \$2.9 million that benefit the greater Washington-Arlington-Alexandria DC-VA-MD-WV MSA (MSA #47900), and one loan totaling \$1.1 million benefitting the greater statewide area. The SBA 504 program is a financing tool for small businesses that promotes economic development and permanent job creation. The program accomplishes this

by providing small businesses with long-term, fixed-rate financing for the acquisition of major fixed assets for expansion and modernization. ANB's community development lending activity within the SBA 504 program reflects good responsiveness to community credit needs.

<b>SBA 504 Loans</b>		
	<b>#</b>	<b>Amount</b>
Inside assessment area	4	\$8,879,000
Bank's MSA	2	\$2,880,000
Greater Regional MSA	1	\$1,135,000
<b>Total</b>	<b>7</b>	<b>\$12, 894,00</b>

ANB made two additional community development loans benefiting the greater statewide area totaling \$7.4 million. These loans funded affordable housing for low-income families, seniors, and individuals with special needs and were originated through the FHLB of Atlanta's Affordable Housing Program. ANB's community development lending activity, overall, reflects good responsiveness to community credit needs.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the Lending Test conclusion. ANB uses various innovative and flexible lending programs to serve assessment area credit needs.

ANB participates in the SBA loan programs, specifically the SBA 7(a) and 504 loan programs. The SBA 7(a) program assists small businesses in gaining access to credit for business purposes. The Bank originated approximately \$24.5 million in SBA 7(a) loans throughout the review period.

The Virginia Small Business Financing Authority (VSBFA) is the state's economic development and business financing division. The VSBFA helps banks make loans to businesses that demonstrate the ability to repay, but may need additional collateral support or a more robust secondary repayment source. The program provides this additional support by providing cash collateral, subordinate companion loans, guaranties, and loan loss reserves to reduce the risk to the lender and successfully gain credit for the business. Loan proceeds are used to help the small business start, enhance, or expand operations and create new jobs for Virginia citizens. VSBFA has recognized ANB for their participation in the cash collateral program throughout the northern Virginia region.

Throughout the review period, the Bank made two loans to a housing and redevelopment authority that provides zero-interest deferred payment loans to bring single and multifamily homes into compliance with building codes and provide affordable housing to low- and moderate-income individuals and families.

ANB extends home mortgage loans through the FHLB First Time Homebuyer Product (FHP), which provides up to \$5,000 in matching funds for the down payments and closing costs for first-time homebuyers. Similarly, ANB works with the Federal Housing Administration (FHA), providing FHA insured loans, which have lower down payment requirements and are designed to assist low- to moderate-income borrowers obtain home loans. ANB also extends loans



through the U.S. Department of Agriculture (USDA) rural development loan program. This program encourages growth in rural parts of the country where other flexible loan programs may not be as active, and allows for minimal down payments and competitive interest rates. In addition to affordable home purchase loan programs, ANB participates with affordable home loan refinance programs, including (i) the FHA streamline refinance program, which is designed to lower the monthly payments on current FHA-insured mortgages; and (ii) the Home Affordable Refinance Program (HARP) through the Federal Housing Finance Agency to assist underwater and near-underwater homeowners refinance their mortgages.

## **INVESTMENT TEST**

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

ANB's performance under the investment test is rated "High Satisfactory". Based on a full-scope review of ANB's assessment area, the Bank's performance is good. Refer to Table 14 in appendix C for the facts and data used to evaluate the Bank's level of qualified investments.

Throughout the evaluation period, ANB made \$2.9 million qualified community development investments throughout the review period within the assessment area. Qualified community development investments included \$2.9 million in Small Business Investment Corporation (SBIC) investments benefiting the assessment area and one \$33 thousand investment to provide affordable housing in the assessment area. The \$33 thousand investment has an additional commitment of \$2.9 million from the Bank.

ANB also funded 11 qualifying donations totaling \$162 thousand to community development organizations that provide the assessment area with economic development and other community services that benefit low- and moderate-income individuals and families. Total community development investments and grants/donations represented 3.39 percent of tier one capital. The 11 community development donations benefited five different organizations. The community development organizations that benefited include:

- Two organizations that promote self-sufficiency for low- and moderate-income individuals and families by providing services such as food, shelter, affordable housing, and quality childcare
- A scholarship fund for low- and moderate- income students
- An organization that provides support to find affordable housing for low- and moderate-income individuals
- An organization providing assistance for families in Fairfax County suffering from poverty

During the prior CRA evaluation period, ANB funded qualified community development investments that continue to directly benefit the assessment area. One prior period investment funded an SBIC limited partnership that promotes economic development by financing businesses in the broader statewide regional area, including the assessment area. The SBIC has invested in two businesses within the assessment area, one of which was in 2012. The second investment was to a community investment fund that invests primarily in debt securities

supporting affordable housing for low- and moderate-income individuals and communities in the assessment area.

Additionally, ANB provided an \$850 thousand subsidy in conjunction with two loans made through the FHLB Atlanta's Affordable Housing Program, which benefited the greater statewide area. The loans receiving the subsidy were used to purchase and rehabilitate 75 multifamily residential units into affordable housing for low- and moderate-income families.

## **SERVICE TEST**

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

ANB's performance under the Service Test is rated "High Satisfactory". Based on a full-scope review of ANB's assessment area, the Bank's performance is good.

### **Retail Banking Services**

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the Bank's branch delivery system and branch openings and closings.

ANB's delivery systems are reasonably accessible to individuals and business owners within the assessment area. ANB operates five branches within the Washington-Arlington-Alexandria DC-VA-MD-WV Metropolitan Division (MD #47894).

The distribution of ANB's branches in low-income geographies is less than the percentage of the population residing in low-income geographies. No branches were located in low-income geographies where 4 percent of the population resides. The distribution of branches in moderate-income geographies exceeds the percentage of the population residing in moderate-income geographies. Forty percent of the Bank's branches were in moderate-income geographies where 15 percent of the population resides. The remaining 60 percent of branches were located in upper-income geographies. Although a majority of the branches are located in upper-income geographies, these branches allow delivery systems to be accessible to essentially all portions of the assessment area due to proximity to low- and moderate-income geographies.

Throughout the evaluation period, ANB relocated two branches. One branch moved within the same upper-income geography, and the second moved from a middle-income geography to a moderate-income geography. The branch relocation to a moderate-income geography has improved the accessibility of the Bank's delivery system in low- and moderate-income geographies and to low- and moderate-income individuals.

The services offered by ANB do not vary in a way that would inconvenience low- and moderate-income individuals. A full line of traditional banking products and services are offered at all five branches. The Bank does not offer extended weekday or any weekend hours at any of the branches. However, all five of the branches offer night depository boxes. While ANB does not operate any ATMs, the Bank refunds a total of five monthly ATM surcharge fees

to all consumer (i.e. non-business) customers. ANB offers effective alternate delivery systems such as internet and mobile banking.

### **Community Development Services**

ANB's level of community development services is good. Throughout the evaluation period ANB supported nine organizations in the assessment area that qualified under the definition of community development services by serving as board and committee members and in these capacities demonstrated the provision of financial services. These services included providing technical assistance to organizations that serve low- and moderate- income individuals and families by providing affordable housing, providing individual financial counseling services, and promoting economic development. Examples of community development services provided include:

- An ANB employee was a member of the loan committee of a nonprofit community development group that provides SBA 504 loans in the greater Washington DC area.
- An ANB employee served on the board and provided financial budgeting seminars for an organization that provides services and specialized support to prevent inappropriate institutionalization and homelessness.
- An ANB employee was a board member and provides financial technical assistance to an organization that provides college scholarships to low- and moderate-income students.
- An ANB employee serves as vice chairman of the board and loan committee for a tax-exempt community development corporation that facilitates affordable housing construction, rehabilitation, or development in Virginia.
- An ANB employee serves as a Board member and provides financial expertise for an organization that provides financial support for housing related expenses and provides services to the homeless.

## Appendix A: Scope of Examination

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 metropolitan and nonmetropolitan areas 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>	Lending Test (excludes community development Loans): (01/01/12 to 12/31/14) Investment and Service Tests and community development Loans: (10/01/11 to 04/20/15)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Access National Bank (ANB) Reston, VA	Residential Mortgage Loans Small Loans to Businesses Community Development Loans Community Development Investments Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment areas and Type of Examination</b>		
<b>Assessment area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA #47894	Full-Scope	Part of the greater Washington-Arlington-Alexandria, DC-VA-MD-WV MSA #47900 assessment area includes the following counties: Arlington, Fairfax, Loudoun, and Prince William; and cities: Fairfax, Falls Church, Manassas, and Manassas Park.

## Appendix B: Market Profiles for Full-Scope Areas

### Access NB assessment area

Demographic Information for Full Scope Area: Access NB Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	482	3.53	14.11	35.27	45.64	1.45
Population by Geography	2,090,657	3.87	15.02	35.39	45.72	0.00
Owner-Occupied Housing by Geography	508,160	1.81	10.65	35.24	52.30	0.00
Business by Geography	208,941	2.08	11.60	35.31	50.77	0.23
Farms by Geography	2,965	2.12	10.83	32.98	54.00	0.07
Family Distribution by Income Level	495,580	15.52	14.86	20.60	49.03	0.00
Distribution of Low and Moderate Income Families throughout assessment area Geographies	150,525	7.77	25.68	40.52	26.02	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		100,890 105,900 5%	Median Housing Value Unemployment Rate (2010 US Census)		477,887 2.34%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2013 HUD-adjusted MFI

ANB has one assessment area, which includes Arlington, Fairfax, Loudon, and Prince William Counties and includes the cities of Fairfax, Falls Church, Manassas, and Manassas Park. These cities and counties lie in northern Virginia and are located within the Washington-Arlington-Alexandria DC-VA-MD-WV Metropolitan Division (MD #47894), which is a part of the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA (MSA #47900).

ANB’s strategy is to act primarily as a business bank serving small and medium sized businesses and associated consumers within the assessment area. In addition to the business banking strategy, the Bank operates a mortgage division, previously a subsidiary of the Bank, which originates home mortgages and home equity loans nationwide for sale on the secondary market. Loans originated through the mortgage division are primarily funded with non-core deposits and short-term borrowings as needed.

ANB’s assessment area includes a total of 482 census tracts. The assessment area includes 17 low-income geographies, 65 moderate-income geographies, 171 middle-income geographies, 222 upper-income geographies, and seven geographies for which no income level is assigned. The Bank has a total of five branches within the assessment area, two in moderate-income geographies and three in upper-income geographies.

Based on 2014 business geodemographic data, there are a total of 208,941 non-farm businesses within the assessment area, representing 98.6 percent of all businesses in the assessment area. Approximately 71 percent of non-farm businesses have annual revenues less than or equal to \$1 million, 5 percent have revenues greater than \$1 million, and 24 percent did not report revenues. The majority of non-farm assessment area businesses are

located within middle- and upper-income geographies, with approximately 36 percent in middle-income geographies and 51 percent in upper-income geographies. Low- and moderate-income geographies contain approximately 2 percent and 12 percent, respectively, of assessment area non-farm businesses.

The economy of ANB's assessment area has continued to improve over the past three years. The greater MSA has a high per capita income, an educated workforce, and has experienced strong population growth relative to other northeastern metropolitan areas. Based on data obtained from the Bureau of Labor Statistics, the average unemployment rate for the greater MSA was 4.5 percent as of December 2014. This compares well to the national average unemployment rate of 5.6 percent as of December 31, 2014. The major industries in the area include (i) federal, state, and local government, (ii) computer systems design and related services, (iii) restaurants, and (iv) management, scientific, and technology consulting. Top employers in the area are the U.S. government, Northrup Grumman, SAIC Inc., Inova Health System, and Booz Allen Hamilton.

The 2010 U.S. Census data reported the total population of the assessment area to be approximately 2.1 million. Within the assessment area, there are 495,580 families. The 2010 U.S. Census median family income was \$100,890, and the 2013 HUD-adjusted median family income was \$105,900. Approximately 15.52 percent of families are low-income, 14.86 percent are moderate-income, 20.60 percent are middle-income, and 49.03 percent are upper-income. An estimated 5 percent of households are below the poverty level. According to the 2010 U.S. Census data, approximately 1.81 percent of owner-occupied housing is in low-income geographies, 10.65 percent is in moderate-income geographies, 35.24 percent is in middle-income geographies, and 52.30 percent is in upper-income geographies. The median housing value is \$477,887.

The greater metropolitan area is a highly competitive market for banking services, with 87 institutions operating 1,719 banking offices within the greater Washington-Arlington-Alexandria DC-VA-MD-WV MSA (MSA #47900), which includes Metropolitan Division #47894. In addition, a number of credit unions and non-depository financial service providers serve the MSA. Based on the June 30, 2014 FDIC Summary of Deposit Market Share report, ANB's deposit market share within the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA is 0.40 percent, with a total of five branch offices. ANB ranks 23<sup>rd</sup> out of 87 institutions within the MSA. ANB's primary competitors for deposits are E\*TRADE (2 offices, 16.80 percent market share), Wells Fargo (166 offices, 12.78 percent market share), Bank of America (165 offices, 12.42 percent market share), Capital One (186 offices, 11.33 percent market share), and SunTrust Bank (175 offices, 8.96 percent market share). ANB's mortgage lending market share within the MSA is 0.25 percent, ranking 64<sup>th</sup> out of 605 lenders in the MSA. ANB's primary mortgage lending competitors are Wells Fargo, JP Morgan Chase, US Bank, BB&T, and George Mason Mortgage LLC. The top five mortgage lenders captured 35 percent of the market and included three of the five largest institutions operating in the United States and one national mortgage company.

The OCC made contact with community nonprofit organizations involved in affordable housing and financial assistance for low- and moderate- income families. According to the community contacts, there are numerous opportunities for area financial institutions to assist in addressing community development and credit needs in the assessment area. The community contacts

identified the needs of the community to include basic banking services, affordable housing lending, funding for construction and renovation of affordable housing, funding support for non-profit community development entities, and funding to assist small businesses with seasonal cash flow needs.

## Appendix C: Tables of Performance Data

### Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the Bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this performance evaluation.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the Bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_\_ .12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies.



The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the Bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the Bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the Bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the Bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the Bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the Bank in each MA/assessment area. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the Bank's financial reporting system.
- A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the Bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the Bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/assessment area. The table also presents data on branch openings and closings in each MA/assessment area.

Table 1. Lending Volume

LENDING VOLUME												
Geography: ACCESS NB assessment area												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014												
Assessment area (2013):	% of Rated Area Loans (#) in MA/assessment area <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/assessment area <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Access NB assessment area	100.00	1,153	447,035	480	143,445	0	0	0	0	1,633	590,480	100.00

<sup>\*</sup> Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is from October 01, 2011 to April 20, 2015.

<sup>\*\*\*</sup> Deposit Data as of April 23, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ACCESS NB assessment area								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment area (2013):	% of Rated Area Loans (#) in MA/assessment area <sup>*</sup>	Total Optional Loans <sup>**</sup>		Small Business Real Estate Secured <sup>**</sup>		Home Equity <sup>**</sup>		Motor Vehicle <sup>**</sup>		Credit Card <sup>**</sup>		Other Secured Consumer <sup>**</sup>		% of Rated Area Deposits in assessment area <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Access NB assessment area	100.00	51	51,579	51	51,579	0	0	0	0	0	0	0	0	100.00

<sup>\*</sup> Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2014.

<sup>\*\*\*</sup> Deposit Data as of April 23, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ACCESS NB assessment area					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography <sup>*</sup>				
Assessment area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Access NB assessment area	370	100.00	1.81	2.97	10.65	13.24	35.24	30.00	52.30	53.78	0.25	0.46	0.28	0.22	0.25	

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/assessment area as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ACCESS NB assessment area						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	4	100.00	1.81	0.00	10.65	25.00	35.24	0.00	52.30	75.00	0.05	0.00	0.00	0.00	0.09

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/assessment area as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ACCESS NB assessment area				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Access NB assessment area	779	100.00	1.81	0.51	10.65	5.91	35.24	26.44	52.30	67.14	0.26	0.24	0.17	0.21	0.31	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/assessment area as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ACCESS NB assessment area				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography <sup>*</sup>				
Assessment area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans					
<b>Full Review:</b>															
Access NB assessment area	0	0.00	9.21	0.00	23.69	0.00	41.18	0.00	25.92	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Multi-family loans originated and purchased in the MA/assessment area as a percentage of all multi-family loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.



Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ACCESS NB assessment area						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	478	100.00	2.08	2.30	11.60	9.21	35.31	44.35	50.77	44.14	0.44	0.40	0.32	0.50	0.43

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/assessment area as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2014).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ACCESS NB assessment area						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	0	0.00	2.12	0.00	10.83	0.00	32.98	0.00	54.00	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/assessment area as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2014).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															
Geography: ACCESS NB assessment area							Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014								
Assessment area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>1</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	370	100.00	15.52	10.36	14.86	17.16	20.60	21.89	49.03	50.59	0.25	0.24	0.23	0.21	0.30

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/assessment area as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 8.6% of loans originated and purchased by bank.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ACCESS NB assessment area						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	4	100.00	15.52	0.00	14.86	0.00	20.60	0.00	49.03	100.00	0.03	0.00	0.00	0.00	0.06

<sup>1</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/assessment area as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 75.0% of loans originated and purchased by bank.

<sup>2</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ACCESS NB assessment area						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>3</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Access NB assessment area	779	100.00	15.52	3.41	14.86	12.23	20.60	24.47	49.03	59.89	0.30	0.14	0.29	0.28	0.33

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/assessment area as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 9.8% of loans originated and purchased by bank.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ACCESS NB assessment area			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
Assessment area:	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Access NB assessment area	480	100.00	71.44	50.63	26.67	27.71	45.63	0.44	0.48

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/assessment area as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ACCESS NB assessment area			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Access NB assessment area	0	0.00	94.13	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ACCESS NB assessment area					Evaluation Period: OCTOBER 1, 2011 TO APRIL 20, 2015				
Assessment area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Access NB assessment area	2	2,700	4	2,979	6	5,679	52.46	3	4,021

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.



Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

Distribution of Branch and ATM Delivery System				Geography: ACCESS NB assessment area				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
MA/Assessment area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Access NB assessment area	100.00	5	100.00	0	40	0	60	0	0.00	0	0	0	0	3.87	15.02	35.39	45.72

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: ACCESS NB assessment area				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
MA/Assessment area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Access NB assessment area	100.00	5	100.00	0	40	0	60	0	0.00	0	0	0	0	3.87	15.02	35.39	45.72