PUBLIC DISCLOSURE

March 23, 2020

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Northern Interstate Bank, National Association
Charter Number 6863

501 W. US 2,
Norway, MI 49870

Office of the Comptroller of the Currency
1200 N Mayfair Rd, Suite 200
Wauwatosa, WI 53226

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 major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).

- A substantial majority of loan originations are made within the bank's AA.

- The borrower distribution of home mortgage loans reflects reasonable distribution among borrowers of different income levels.

- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies.

Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 65.60 percent over the 17 quarters from December 31, 2015 to December 31, 2019. The bank ranks third in a peer group that includes three other similarly situated banks with peer bank average LTD ratios ranging from 61.74 percent to 77.64 percent in the specified period. The other banks in this peer group have total assets ranging from $136 million to $371 million.

Lending in Assessment Area

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

The bank originated and purchased 94.52 percent of its total loans by number and 92.97 percent of its total loans by dollar amount inside the bank's AA during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the chart below for additional detail.

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										
2017-2019	69	94.52	4	5.48	73	7,618	92.97	576	7.03	8,194
Total	69	94.52	4	5.48	73	7,618	92.97	576	7.03	8,194

Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data
Due to rounding, totals may not equal 100.0

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Northern Interstate Bank, National Association's (NIB's) performance under the Small Bank Lending Test. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities. We reviewed data for the bank's primary loan product, home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, November 16, 2015, through March 23, 2020. The Lending Test evaluated loans originated between January 1, 2017 and December 31, 2019.

To provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of 10, beginning with the Census Bureau's 2015 American Community Survey (ACS). NIB's AA was not impacted by this change; therefore, we combined our assessment for 2017, 2018, and 2019. Data is discussed in the applicable narrative sections of the evaluation.

To evaluate lending, we used data from bank reports and a random sample of home mortgage loans originated in the bank's AA. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

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 Michigan

CRA rating for the State of Michigan[1]: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of its AA.

- A substantial majority of loan originations are made within the institution's AA.

- The borrower distribution of home mortgage loans reflects reasonable distribution among borrowers of different income levels.

- The borrower distribution of home mortgage loans reflects reasonable distribution among geographies.

Description of Institution's Operations in Michigan

NIB is a $154 million federally chartered bank headquartered in Norway, Michigan. NIB is a subsidiary of Northern Interstate Financial, Inc., and was formed through the merger of The First National Bank of Norway and First National Bank of Crystal Falls in April 2017. Since then, there have been no other mergers or acquisitions. The bank has eight branches, and 12 automated teller machines (ATMs) located in Dickinson, Eastern Iron, Southwestern Marquette, and Menominee counties in the state of Michigan.

NIB is a full-service financial institution, offering traditional banking products and services. As of December 31, 2019, the loan portfolio totaled $88.1 million and represented 57.3 percent of total assets. The loan portfolio based on dollar volume outstanding is comprised of 49.92 percent residential real estate, 41.57 percent commercial, 6.97 percent consumer, and 2.54 percent agricultural loans. Tier 1 capital as of December 31, 2019 totaled $18.1 million.

NIB has one AA and one rating area. The AA is a non-MSA, covering 18 census tracts (CTs) located in Michigan. The AA does not lie within a metropolitan statistical area (MSA) and is contiguous. There are no CTs listed as distressed or underserved. Our assessment was based solely on lending within the state of Michigan given the bank does not have any branches in any other states.

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

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of the AA. NIB's last CRA examination was dated November 16, 2015. Using small bank procedures, the bank received a Satisfactory rating.

Employment and Economic Factors
Major employers in the AA include industry focused in health, engineering, lodging services, manufacturing, and retail. Some of the major employers in the area are Verso Paper, Boss Snowplow, MJ Electric, Dickinson County Hospital, and the Veterans Administrative Hospital. Unemployment in the bank's AA is in line with statewide unemployment data. Overall, the local and state economies are characterized as stable.

While there have been no major fluctuations in the unemployment statistics for the counties within the bank's AA, these counties generally had slightly higher unemployment rates than the overall state of Michigan. Please refer to the chart below for the unemployment data for all counties included in the bank's AA, and the state of Michigan overall, for the years 2017, 2018, and 2019.

Michigan Unemployment Averages %			
County	2017	2018	2019
Dickinson	4.7	3.8	4.1
Iron	4.1	5.6	5.4
Marquette	5.5	4.9	4.8
Menominee	4.8	4.0	4.0
Statewide	4.6	4.2	4.1

Market competition is strong in the bank's AA. As of June 30, 2019, NIB had 7.99 percent of the deposit market share, placing the bank seventh out of 12 financial institutions in the AA. Competing financial institutions had deposit market shares ranging from 0.52 percent (Upper Peninsula State Bank) to 16.97 percent (Flagstar Bank, FSB) during the same period.

Community Contact
We spoke with a community contact from the Dickinson Area Community Foundation that serves the area. The contact noted that the local economy had been doing historically well as of the review period and that there are quite a few new small businesses starting-up in the area in the following sectors: retail, housing, new office space, and land development. They did note that the Iron County area continues to struggle some, but that they have always faced challenges given its rural location and population. It was also noted that the bank allows for meetings and gatherings for the Dickinson Area Community Foundation to be held at local bank branches as a convenience to the community and that the bank has employees on the foundation's board. Overall, the needs of the community are being met by the local financial institutions.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NIB Non-MSA AA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	11.1	77.8	11.1	0.0
Population by Geography	59,100	0.0	10.8	78.0	11.2	0.0
Housing Units by Geography	36,203	0.0	10.0	79.5	10.5	0.0
Owner-Occupied Units by Geography	20,929	0.0	10.4	76.9	12.6	0.0
Occupied Rental Units by Geography	5,062	0.0	15.3	75.8	9.0	0.0
Vacant Units by Geography	10,212	0.0	6.6	86.5	6.9	0.0
Businesses by Geography	3,251	0.0	8.5	84.1	7.4	0.0
Farms by Geography	133	0.0	5.3	83.5	11.3	0.0
Family Distribution by Income Level	16,339	19.1	19.2	24.2	37.6	0.0
Household Distribution by Income Level	25,991	25.6	17.6	18.0	38.8	0.0
Median Family Income Non-MSAs- MI		$53,628	Median Housing Value			$94,712
			Median Gross Rent			$587
			Families Below Poverty Level			9.8%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

According to 2015 ACS Census Data, the bank's AA is comprised of 18 CTs, of which zero are low-income, two (11.1 percent) are moderate-income, 14 (77.8 percent) are middle-income, and two (11.1 percent) are upper-income. The total population of the AA is 59,100, which is comprised of 16,339 families. The percentage of families at each income level is: 19.1 percent low-income, 19.2 percent moderate-income, 24.2 percent middle-income, and 37.6 percent upper-income. The average median family income is $53,628. The percentage of families below the poverty level is 9.8 percent. Owner-occupied units comprise 57.81 percent of total housing units.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Michigan non-MSA AA is good.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017-2019 Conclusions
The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. From our random sample of 69 loans, the bank originated loans in middle-income CTs only. Consideration is given to the fact that there are only 2 moderate-income CTs in the AA, both of which are not in reasonably close proximity to the bank's branch locations.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable 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 appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

2017-2019 Conclusions
The geographic distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 10.1 percent of its home mortgages to low-income families, which is below the demographics that show 19.1 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which show 8.6 percent of peer lending within the AA was to low-income families. The bank originated 20.3 percent of home mortgages to moderate-income families, which exceeds the demographics that show 19.2 percent of families in the AA are moderate-income. The bank's lending also exceeds the aggregate peer lending data, which show 18.8 percent of peer lending within the AA was to moderate-income families.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practice within this evaluation period.

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 MSAs and non-MSAs 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".

Time Period Reviewed:	January 1, 2017 through December 31, 2019	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
Northern Interstate Financial, Inc.	Holding Company	None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Michigan Non-MSA	Full-scope	Full counties of Dickinson and Menominee and the eastern portion of Iron County and the southwestern portion of Marquette County.

Appendix B: Summary of MMSA and State Ratings

RATINGS	Northern Interstate Bank, National Association
Overall Bank:	Lending Test Rating:
Satisfactory	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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 30th 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-<u>income</u> 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.

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were 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) in those geographies. Because arrogate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S.   **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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 aggregate peer data for the years the data is available. Because aggregate 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 T.   **Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to $500 thousand) originated and purchased by the bank to farms with revenues of $1 million or less to: 1) the percentage distribution of farms with revenues of greater than $1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table U.   **Assessment Area Distribution of Consumer 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 households in those geographies.

Table V.   **Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2017-2019

	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$ (000s)	% of Total	% 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
NIB Non-MSA AA	69	7,618	100	0.0	0.0	0.0	10.4	0.0	13.8	76.9	100.0	70.8	12.6	0.0	15.4	0.0	0.0	0.0
Total	69	7,618	100	0.0	0.0	0.0	10.4	0.0	13.8	76.9	100.0	70.8	12.6	0.0	15.4	0.0	0.0	0.0

Source: 2015 U.S Census; 01/01/2017 - 12/31/2019 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017-2019

	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$ (000s)	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
NIB Non-MSA AA	69	7,618	100	19.1	10.1	8.6	19.2	20.3	18.8	24.2	33.3	22.0	37.6	36.2	34.2	0.0	0.0	0.0
Total	69	7,618	100	19.1	10.1	8.6	19.2	20.3	18.8	24.2	33.3	22.0	37.6	36.2	34.2	0.0	0.0	0.0

Source: 2015 U.S Census; 01/01/2017 - 01/01/2019 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0