



## **PUBLIC DISCLOSURE**

May 8, 2023

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

First Federal Savings and Loan Association of Van Wert  
Charter Number 702969

679 Fox Road  
Van Wert, OH 45891

Office of the Comptroller of the Currency

Central Ohio – Indiana Office  
Metro Place V  
655 Metro Place South, Suite 625  
Dublin, OH 43017

**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 Lending Test rating is based on the state rating and the following overall conclusions:
  - The loan-to-deposit (LTD) ratio is reasonable.
  - A substantial majority of the bank's loans are inside the assessment area (AA).
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels.

### Loan-to-Deposit Ratio

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

First Federal Savings and Loan Association of Van Wert's (First Federal or bank) quarterly average LTD ratio since the previous evaluation period (December 31, 2018, through December 31, 2021) is 66.1 percent. The ratio improved from 62.5 percent as of December 31, 2018, to 66.9 percent as of December 31, 2021. The bank's quarterly average LTD ratio is reasonable when compared to financial institutions of similar size in Van Wert County, Ohio, or surrounding counties (Mercer, Auglaize, Putnam, and Paulding) with less than \$500 million in total assets. The peer group had an average LTD ratio of 73.2 percent, ranging from a low of 44.5 percent to a high of 89.5 percent. The bank does not sell loans on the secondary market.

### Lending in Assessment Area

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

The bank originated and purchased 83.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

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	50	83.3	10	16.7	60	4,885	80.7	1,165	19.3	6,050
Total	50	83.3	10	16.7	60	4,885	80.7	1,165	19.3	6,050

*Source: 2019, 2020, and 2021 Bank Data.  
Due to rounding, totals may not equal 100.0%.*

### Description of Institution

First Federal is a federally chartered stock savings association, organized since 1893 and headquartered in Van Wert, Ohio. The bank is owned by First Federal Van Wert Bancorp, Inc., a mutual holding

company with no stock issued to-date. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. First Federal is a single-state financial institution, with one AA (Van Wert County, Ohio) in a non-metropolitan area and one rating area (State of Ohio). Management operates one full-service office, with a drive-up facility and an automated teller machine (ATM), located in a middle-income census tract (CT). First Federal has not opened or closed any offices during the evaluation period.

First Federal primarily offers traditional financial products and services. In addition to traditional mortgage products, the bank participates in the Federal Home Loan Bank's Welcome Home Grant Program, which is designed to remove down payment and closing cost obstacles for low- or moderate-income (LMI) residents. First Federal also offers two in-house mortgage products that require down payments of less than 20 percent with no private mortgage insurance.

As of December 31, 2021, the bank had total assets of \$140.1 million and tier 1 capital of \$24.7 million. Total loans were \$75.8 million, representing 54.1 percent of total assets. First Federal's primary lending focus is home mortgage lending. The loan portfolio is comprised predominantly of residential home mortgages at 90.4 percent of total loans and leases as of December 31, 2021. Commercial, agriculture, and consumer loans represent 7.4 percent, 1.9 percent, and 0.3 percent of total loans, respectively. The bank's loan originations, based on the number of loans originated during the evaluation period, are 94.4 percent residential real estate (home mortgage) loans, with the remaining split between commercial and commercial real estate (business), agriculture, and consumer loans. Deposits totaled \$113 million spread across demand, saving, and time deposit products. The bank also offers online banking.

No legal, financial, or other factors impeding the bank's ability to help meet credit needs in the AA were noted. The bank was rated Satisfactory at the previous CRA evaluation dated January 25, 2019.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The evaluation period was January 1, 2019, to December 31, 2021.

The OCC evaluated the bank's lending performance based on their primary lending product, home mortgages. While the bank offers other lending products, these products were not a primary product during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. The bank's primary lending product is discussed under the "Description of Institution" section in this PE.

For the lending test, the OCC transaction tested 20 home mortgage loans per year for the Lending Test analysis since the bank was exempt from Home Mortgage Disclosure Act (HMDA) reporting during the evaluation period. The OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

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

First Federal has one AA in Van Wert County, Ohio, in a non-metropolitan statistical area (non-MSA). This AA is further described above under the “Description of Institution” section. The OCC completed a full-scope review of the Ohio non-MSA AA. A description of the AA is also provided in the “Description of Institution’s Operations in Ohio” section of this evaluation.

## **Ratings**

The bank’s overall rating is a blend of the state ratings. First Federal has one office in Van Wert, Ohio. Since the bank’s only office is in Ohio, the bank’s rating is based on performance solely in Ohio.

The rating is only based on performance in the Ohio non-MSA AA. Home mortgage loans are the only primary product and was the only product to receive consideration in the rating.

## **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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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 Ohio

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

**The Lending Test is rated: Satisfactory.**

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

### Description of Institution's Operations in Ohio

First Federal designated one AA in Ohio, Van Wert County (non-MSA AA). The bank selected the AA based on their targeted lending area and office location. The AA is contiguous, meets the requirements of the regulation, and does not reflect illegal discrimination, nor does it arbitrarily exclude any LMI areas.

The following information regarding demographic data, job market, affordable housing cost, competition, and credit needs provides additional performance context for First Federal's operations in Ohio.

#### Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	28,576	0.0	0.0	84.3	15.7	0.0
Housing Units by Geography	12,672	0.0	0.0	85.3	14.7	0.0
Owner-Occupied Units by Geography	8,594	0.0	0.0	82.2	17.8	0.0
Occupied Rental Units by Geography	2,761	0.0	0.0	92.4	7.6	0.0
Vacant Units by Geography	1,317	0.0	0.0	90.8	9.2	0.0
Businesses by Geography	1,588	0.0	0.0	84.7	15.3	0.0
Farms by Geography	232	0.0	0.0	78.0	22.0	0.0
Family Distribution by Income Level	7,851	16.5	18.1	23.9	41.5	0.0

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

Household Distribution by Income Level	11,355	19.1	18.0	18.8	44.0	0.0
Median Family Income MSA - Non-MSAs - Ohio		\$55,785	Median Housing Value			\$97,464
			Median Gross Rent			\$642
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2021 D&amp;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.</i>						

The non-MSA AA includes Van Wert County in its entirety. The only office is in Van Wert in CT 208, which is a middle-income CT. Van Wert is the largest city and county seat of Van Wert County.

According to the 2015 ACS U.S. Census Data, the population of the AA is 28,576, with 84.3 percent living in middle-income CTs and 15.7 percent in upper-income CTs. There are no LMI CTs in the AA. There were no CTs designated as distressed or underserved in 2019 and 2020. For 2021, the bank had one CT (201) in Van Wert County that was designated as an underserved CT (banking desert).

According to the 2015 ACS U.S. Census data, the median housing value in the AA was \$97,464. Based on the weighted average of Census MSA Median Family Income of \$55,785 in the table above, low-income families make less than \$27,893 and moderate-income families make at least \$27,893 but less than \$44,628 annually. Median housing values are close to 3.5 times the annual income of low-income families and 2.2 times the annual income of moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 12,672 total housing units in the AA, of which 67.8 percent are owner-occupied, 21.8 percent are rental occupied units, and 10.4 percent are vacant units. The median age of housing stock is approximately 64 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a potential barrier to home mortgage lending. Additionally, 9.1 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

As stated above, First Federal's primary business focus is home mortgage lending. The bank is not a HMDA reporter and is therefore not listed on the 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. However, based on internal bank reports, First Federal would rank as the top lender for the AA with 199 residential mortgages in 2021. For reference, the HMDA reporter with the largest market share by origination volume is Superior Credit Union, Inc. with 103 originations in 2021. There are no other institutions with more than 100 home mortgage loan originations in 2021.

Competition in the AA is moderate with other national banks, federal savings banks, and state banks. First Financial Bank has two offices in the AA, and no other institution has more than one office. As of the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, First Federal held \$106.1 million in deposits, which is 16.4 percent of the total deposits in this market area (Van Wert County, Ohio). As of the June 30, 2021, FDIC Market Share Report, the bank ranked third out of eight deposit market competitors. The bank slightly trailed The Citizens National Bank of Bluffton and First Financial Bank, which held 21.4 percent and 17.9 percent, respectively, of total deposits in the market area.

The economic conditions in the AA have improved since the start of the COVID-19 pandemic and are overall stable. The “not seasonally adjusted” unemployment rate as of December 2021 was 2.6 percent in Van Wert County and is overall reasonable when compared with the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent (Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Statistics, December 2021). Primary industries include manufacturing, healthcare, and insurance. Per the Van Wert Economic Development website, the primary employers are Danfoss, Cooper Farms, Tenneco, and Van Wert Health.

The OCC reviewed one community contact that was conducted with a community service organization that serves Van Wert and surrounding counties. The contact noted there is an opportunity in the area for banks to partner with affordable housing developers to build homes in rural areas. The contact was not aware of any creative financing or discriminatory practices by local institutions and felt that local banks are willing, knowledgeable and do a good job of being involved with their local communities.

### **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the non-MSA AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage loans are the bank’s primary lending product and was evaluated under the Lending Test. As discussed above, the OCC evaluated home mortgage lending using a sample of 20 loans per year for 2019, 2020, and 2021.

The rating is based on performance in the bank’s only AA, the non-MSA AA. As discussed above, the OCC placed full weight on the primary product, home mortgage loans. Refer to the “Scope of Evaluation” section for more details.

### **LENDING TEST**

The bank’s performance under the Lending Test in Ohio is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

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

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

The OCC did not perform an analysis of the geographic distribution of loans as part of this review. The bank’s AA is comprised entirely of middle- and upper-income geographies. Since the AA does not include any LMI CTs, a review of the geographic distribution would not be meaningful. However, the OCC considered that one CT is designated as underserved for 2021 in the evaluation.

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

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

The bank’s AA is comprised entirely of middle- and upper-income geographies. Since the AA does not include any LMI CTs, a review of the geographic distribution would not be meaningful.



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

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution. The OCC reviewed internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

### **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.

In evaluating the borrower distribution of home mortgage loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA, especially during the COVID-19 pandemic. The OCC also considered the percentage of families that live below the poverty level, and the barriers this creates for these families to qualify for home mortgage financing.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by First Federal to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level, placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

The bank's distribution of home mortgage loans by borrower income level in the AA reflects a reasonable distribution. First Federal's percentage of home mortgage loans to low-income borrowers exceeds aggregate data but is below the percentage of low-income families in the AA. First Federal's percentage of home mortgage loans to moderate-income borrowers is below aggregate data but near to the percentage of moderate-income families in the AA.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. As stated above, overall median housing values are 2.2 to 3.5 times the weighted average of the median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Approximately 9.1 percent of the families live below the poverty level. Additionally, there is strong competition for loans in Van Wert County, Ohio. As stated above, First Federal is not a HMDA reporter and is therefore not included in the 2021 Peer Mortgage Data report. However, based on internal bank reports, First Federal originated more home mortgage loans in 2021 in Van Wert County, Ohio, than the top mortgage originator.

## **Responses to Complaints**

First Federal has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

<b>Time Period Reviewed:</b>	1/1/19 to 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Non-MSA AA	Full-Scope	The AA includes all CTs in Van Wert County, Ohio.

## Appendix B: Summary of State Ratings

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RATINGS: First Federal Savings and Loan Association of Van Wert	
Overall Bank:	Lending Test Rating
First Federal Savings and Loan Association of Van Wert	Satisfactory
State:	
Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Non-MSA AA	60	\$5,689	100.0	799	0.0	0.0	0.0	0.0	0.0	0.0	82.2	85.0	83.1	17.8	15.0	16.9	0.0	0.0	0.0	
<b>Total</b>	<b>60</b>	<b>\$5,689</b>	<b>100.0</b>	<b>799</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>82.2</b>	<b>85.0</b>	<b>83.1</b>	<b>17.8</b>	<b>15.0</b>	<b>16.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA AA	60	\$5,689	100.0	799	16.5	10.0	9.5	18.1	16.7	26.0	23.9	30.0	22.8	41.5	43.3	27.2	0.0	0.0	14.5	
<b>Total</b>	<b>60</b>	<b>\$5,689</b>	<b>100.0</b>	<b>799</b>	<b>16.5</b>	<b>10.0</b>	<b>9.5</b>	<b>18.1</b>	<b>16.7</b>	<b>26.0</b>	<b>23.9</b>	<b>30.0</b>	<b>22.8</b>	<b>41.5</b>	<b>43.3</b>	<b>27.2</b>	<b>0.0</b>	<b>0.0</b>	<b>14.5</b>	

*Source: 2015 ACS; 01/01/2019 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.