# **PUBLIC DISCLOSURE**

July 24, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Iron Bank Charter Number 1214

195 Main Street Salisbury, CT 06068

Office of the Comptroller of the Currency

91 Fieldcrest Avenue Suite A-30 Edison, NJ 08837

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 Needs to Improve.

#### The lending test is rated: Needs to Improve

The major factors that support this rating include:

- The distribution of loans to individuals of different income levels is very poor.
- A substantial majority of the bank's loans are inside of its assessment area (AA).
- The bank's quarterly loan-to deposit is reasonable.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the loan-to-deposit ratio is reasonable. The bank's average loan-to-deposit ratio over the twelve quarters from March 31, 2019 through December 31, 2021 was 79.52 percent. During this period, the bank's ratio performance ranged from a low of 72.55 percent on September 30, 2019 to a high of 86.17 percent on December 31, 2020. The bank's average loan-to-deposit ratio is comparable to seven peer institutions of similar size, location, and product offerings. The bank ranks third among these seven similarly situated banks. The loan-to-deposit ratios for the seven peer institutions averaged 73.93 percent, ranging from a low of 52.74 percent to a high of 100.65 percent.

#### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated 80.6 percent of its total loans inside its AA during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Conclusions on the bank's lending inside the AA are factored into the overall geographic distribution analysis.

	]	Number o	f Loans			Dollar A	Total				
Loan Category	Inside Ou			ide	Total #	Inside		e	Outsic		
	# %		#	# %		\$	%	\$	%	\$(000s)	
Home Mortgage											
2019	11	91.7	1	8.3	12	6,602	91.5	616	8.5	7,218	
2020	21	77.8	6	22.2	27	20,028	74.4	6,874	25.6	26,902	
2021	18	78.3	5	21.7	23	17,634	78.7	4,770	21.3	22,404	
Total	50	80.6	12	19.4	62	44,264	78.3	12,260	21.7	56,524	

### **Description of Institution**

The National Iron Bank was first established in 1847 in Salisbury, Connecticut and has operated under a national banking charter since 1865. The bank is wholly owned by Iron Bancshares, Inc., a one-bank holding company.

The bank operates four retail branches and two loan production offices within Litchfield County in northwestern Connecticut. All branches and loan offices are located in middle-income census tracts. All branches offer a full line of banking services for both consumer and commercial customers. Branches offer traditional banking hours Monday through Friday with two branches offering Saturday hours as well.

The bank had total assets of \$257.1 million as of December 31, 2021. Total loans amounted to \$192.1 million while deposits totaled \$237.8 million. The bank's primary lending product is 1-4 family residential loans. The loan portfolio consists of \$178.7 million in real estate loans, \$11.4 million in commercial and industrial loans, \$2 million in individual loans, and \$21 thousand in other loans. The bank operates as a traditional community bank offering a variety of loan products for individuals and businesses.

The bank operates in a competitive financial services market in the northwestern Connecticut area with multiple national, regional, and local institutions. There are no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating on its prior CRA Performance Evaluation dated September 17, 2018.

## Scope of the Evaluation

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

The Office of the Comptroller of the Currency (OCC) evaluated the bank using small bank performance criteria, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The evaluation period for the lending test is January 1, 2019 through December 31, 2021. Based on a review of the number and dollar amount of loans originated, the OCC determined that home mortgage loans were the bank's primary loan product during the evaluation period. Home mortgages represented 74.4 percent of total loans, as of December 31, 2021. OCC examiners analyzed a random sample of 62 home mortgage loans originated during the evaluation period to assess the bank's CRA performance.

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

We completed a full-scope review for the bank's one AA, consisting of eleven contiguous census tracts that include portions of the towns of Salisbury, Canaan, North Canaan, Sharon, Cornwall, Warren, Washington, and Goshen in Litchfield County. Litchfield County is not located in a Metropolitan Statistical Area (MSA). National Iron's AA remains unchanged from its previous CRA evaluation. The AA complies with the CRA guidelines and does not arbitrarily exclude low- or moderate- income (LMI) geographies. Home mortgage loan information is considered in context because the analysis for non-HMDA reporting banks is based on a sample of loans, rather than on total bank originations and purchases over the evaluation period. Refer to appendix A for more information on the bank's AA.

#### Ratings

The bank's overall rating is based on the full-scope review of its single AA.

## **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 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 Connecticut**

#### CRA rating for the State of Connecticut <sup>1</sup>: Needs to Improve

The Lending Test is rated: Needs to Improve

The major factors that support this rating include:

• The bank exhibits very poor distribution to borrowers of different income levels, given the product lines offered by the bank.

### **Description of Institution's Operations in Connecticut**

The AA consists of eleven contiguous census tracts that include portions of the towns of Salisbury, Canaan, North Canaan, Sharon, Cornwall, Warren, Washington, and Goshen in Litchfield County. Litchfield County is not located in an MSA. The bank's main branch in located in Salisbury, Connecticut. The AA consisted of nine middle-income, two upper-income, and no low-income or moderate-income census tracts.

The 2015 American Community Service (ACS) survey data reports a total population of 29,951, comprising 12,498 households and 8,333 families. Approximately 17.4 percent of the families are categorized as low-income, 16.9 percent as moderate-income, 21.7 percent as middle-income, and 44.1 percent as upper-income. Approximately 4.7 percent of households are below the poverty level. The FFIEC 2021 estimated median family income (MFI) for Litchfield County Non MSA was \$89,735. Of the AA's total population, 75.7 percent of individuals reside in middle-income tracts, 24.3 percent reside in upper-income tracts, and there are no low-income or moderate-income tracts in the AA. The median housing value in the bank's AA is \$369,747. Please refer to Table A for more information.

The FDIC's June 30, 2021 deposit market share report indicates the bank had a deposit market share in Litchfield County of 3.39 percent, which ranked 11th out of 14 financial institutions gathering deposits in the county. Webster Bank, Thomaston Savings Bank, and Union Savings Bank held the top three market shares, of 15.83 percent, 12.64 percent, and 12.03 percent respectively, which together constituted nearly 40 percent of the deposit market in the county. The bank continues to face strong competition in the AA, with the market dominated by large national and regional financial institutions and national mortgage companies.

The bank continues to face a high level of competition from other financial institutions in the AA. Based on 2021 Peer Mortgage Data, 130 lenders originated or purchased loans in the bank's AA. The top five mortgage lenders in this AA have a combined total market share of 30.3 percent and include Rocket Mortgage, Salisbury Bank and Trust Company, Torrington Savings Bank, Webster

<sup>&</sup>lt;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.

Bank, and Northwest Community Bank, with 7.17 percent, 6.8 percent, 5.6 percent, 5.38 percent, and 5.3 percent, respectively.

According to the 2021 Business Demographic Data, there were a total of 5,006 businesses in the AA. Approximately 75.5 percent of all businesses were located in middle-income geographies, while 24.5 percent were in upper-income geographies, and there are no low-income or moderate-income geographies in the AA. The largest industries in Connecticut are Education and Health Services, Government, and Professional and Business Services, which account for 48.2 percent of the total industries in the state, according to Moody's Analytics, as of September 2021. The three largest industries in the nearby Hartford Metro Area are all the same as the statewide industries, and represent 47.3 percent of total industries in the metro area.

Based on Moody's Analytics, the largest employers in the State of Connecticut are concentrated in the education and healthcare sectors and include the Yale New Haven Health System, Hartford HealthCare, United Technology Corp., Yale University, General Dynamics/Electric Boat, and the University of Connecticut. The Hartford Metro Area does not include Litchfield County but is the closest metro area to the AA. The Hartford Metro Area includes the counties of Hartford, Tolland, and Middlesex, and the largest employers in the metro area are Hartford HealthCare, Pratt & Whitney/United Technologies, the University of Connecticut, The Travelers Cos. Inc., Hartford Financial Services Group, and Trinity Health - New England.

As of December 2021, the U.S. Bureau of Labor Statistics (BLS) reported the unemployment rate for Litchfield County was 3.9 percent. BLS also reported a state-wide unemployment rate for Connecticut of 5.1 percent, and a national unemployment rate of 3.9 percent, as of December 2021.

To determine local economic conditions and community needs, the OCC reviewed information from two community contacts serving the bank's AA. The community contacts identified the need for small business lending to provide credit needs to local businesses who are challenged by large chain retailers in the area. Additionally, the community contacts noted that there is a particular need for services targeted to low- and moderate- income individuals, such as affordable bank accounts, financial assistance, financial education, assistance with credit repair, and credit programs.

#### Litchfield County Non-MSA Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	0.0	81.8	18.2	0.
Population by Geography	29,951	0.0	0.0	75.7	24.3	0.
Housing Units by Geography	17,456	0.0	0.0	75.8	24.2	0.
Owner-Occupied Units by Geography	10,003	0.0	0.0	77.4	22.6	0.
Occupied Rental Units by Geography	2,495	0.0	0.0	69.5	30.5	0.
Vacant Units by Geography	4,958	0.0	0.0	75.9	24.1	0.
Businesses by Geography	5,006	0.0	0.0	75.5	24.5	0.
Farms by Geography	421	0.0	0.0	84.3	15.7	0.
Family Distribution by Income Level	8,333	17.4	16.9	21.7	44.1	0.
Household Distribution by Income Level	12,498	21.5	15.0	17.7	45.8	0.
Median Family Income Non-MSAs - CT		\$89,735	Median Housi	\$369,74		
			Median Gross	Rent		\$1,01
			Families Belov	w Poverty Lev	el	4.7%

### **Scope of Evaluation in Connecticut**

The OCC completed a full-scope review for the single AA, consisting of eleven contiguous census tracts that include portions of the towns of Salisbury, Canaan, North Canaan, Sharon, Cornwall, Warren, Washington, and Goshen in Litchfield County, Connecticut.

## LENDING TEST

The bank's performance under the Lending Test in the State of Connecticut is rated needs to improve.

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

Based on a full-scope review, the bank's performance in the Litchfield County AA is poor.

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

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

#### Home Mortgage Loans

The borrower distribution of home mortgage loans is very poor. The proportion of loans to low-income borrowers is well below both the percentage of low-income families and aggregate lending. Demographics show that 17.4 percent of families are low-income and 4.7 percent of families are below the poverty level in the AA. With median family income of \$89,735, low-income borrowers earn less than \$44,868 a year. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,122 for low-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the \$369,747 median housing value would be \$1,985. These costs are challenging and may limit lending opportunities for low-income families, which is also reflected by lower aggregate lending compared to demographics. The proportion of loans to moderate-income borrowers is well below both the percentage of moderate-income families and aggregate lending.

Refer to Table P in the state of Connecticut 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.

#### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the 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:	01/01/19 to 12/31/21	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Typ		
<b>Rating and Assessment Areas</b>	Type of Exam	Other Information
Connecticut		
Litchfield County AA	Full-Scope	Litchfield County (Eleven contiguous census tracts that include portions of the towns of Salisbury, Canaan, North Canaan, Sharon, Cornwall, Warren, Washington, and Goshen)

# Appendix B: Summary of MMSA and State Ratings

	RATINGS	The National Iron Bank
Overall Bank:		Lending Test Rating
National Iron		Needs to Improve
MMSA or State:		
Connecticut		Needs to Improve

## **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

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

	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market		% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Litchfield County	50	44,264	100.0	1,339	18.6	0.0	6.9	16.5	6.0	16.5	22.3	10.0	20.7	42.6	84.0	46.5	0.0	0.0	9.4
Total	50	44,264	100.0	1,339	18.6	0.0	6.9	16.5	6.0	16.5	22.3	10.0	20.7	42.6	84.0	46.5	0.0	0.0	9.4