



Office of the
Comptroller of the Currency
Washington, DC 20219

LIMITED PURPOSE BANK

PUBLIC DISCLOSURE

June 2, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Express National Bank
Charter Number: 25151

115 West Towne Ridge Parkway
Sandy, UT 84070

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street SW
Washington, DC 20219

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, nor should it 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 Outstanding.

The major factors that support this rating include:

- The institution demonstrates extensive use of innovative and/or complex qualified investments.
- The institution demonstrates a high level of community development (CD) loans, CD services, and qualified investment activity, particularly some investments that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and CD needs in its assessment area (AA).

Description of Institution

American Express National Bank (AENB, “institution,” or “bank”) is headquartered in Sandy, Utah. The bank is a wholly owned subsidiary of American Express Travel Related Services Company, Inc. (TRS). TRS is a wholly owned subsidiary of American Express Company (AXP). TRS and AXP are headquartered in New York, New York.

AENB maintained a single corporate office in Sandy, Utah, and did not operate any retail branches. AENB operated as a nationwide credit and charge card lender, issuing and servicing credit and charge cards to consumers and small and mid-sized enterprises, including co-branded cards. AENB offered business loans to small and mid-sized enterprises and unsecured installment loans to consumers. The bank offered limited savings, checking and loan products via its online platform for existing card members. The bank’s assessment area (AA) is Salt Lake City-Murray, Utah, Metropolitan Statistical Area (MSA), which consists of Salt Lake and Tooele Counties.

The bank was designated as a limited purpose institution for CRA purposes due to its narrow product lines offered to regional and broader markets. Based on this limited purpose designation, AENB strived to meet the credit needs of its local communities through its CD lending, qualified investments, and CD services. AENB’s total assets were \$193.1 billion as of December 31, 2024.

There were no known legal, financial, or other constraints that impeded the bank’s ability to help meet the credit and CD needs of its AA during the evaluation period. AENB’s prior CRA evaluation dated June 20, 2022, resulted in an Outstanding rating.

Table 1: Financial Information (000s)

	Year-end 2022	Year-end 2023	Year-end 2024	Average for Evaluation Period
Tier 1 Capital	\$14,819,924	\$17,038,009	\$18,748,497	\$16,868,810
Total Income	\$35,807,579	\$44,366,522	\$50,017,399	\$43,397,167
Net Operating Income	\$8,529,289	\$7,743,193	\$9,146,619	\$8,473,034
Total Assets	\$155,378,079	\$180,420,931	\$193,062,339	\$176,287,116

Source: Consolidated Report of Condition and Income and actual bank reported data. The Average for Evaluation Period is the average of the numbers in the three columns.

Scope of the Examination

Evaluation Period/Products Evaluated

In evaluating the bank’s performance under the CRA, examiners reviewed CD activities from January 1, 2022, through December 31, 2024. Examiners reviewed the level and nature of qualified investments, CD lending, and CD services. At the bank’s request, examiners also considered grants and CD services provided by its affiliates.

For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable, were combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state were combined and evaluated as a single area.

Examiners considered all qualified activity in the AA and the broader statewide or regional area that included the bank's AA. The bank adequately addressed the needs of its AA, therefore, CD activities outside of the bank's AA were considered in evaluating its performance.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 assessment area 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 found evidence of a violation of Unfair or Deceptive Acts or Practices (UDAP). The violation involved the delinking of related credit card accounts, causing a subset of consumer and small business credit cards to become inactive in rewards programs. The bank made full restitution to affected customers and enhanced procedures and controls to ensure future compliance.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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 Utah

CRA Rating for Utah: Outstanding

The major factors that support this rating include:

- The institution demonstrated extensive use of innovative and/or complex qualified investments, in the state of Utah including broader statewide regional areas.
- The institution demonstrated a high level of CD loans, qualified investment activity and CD services, particularly some investments that are not routinely provided by private investors, in the state of Utah.
- The institution exhibited excellent responsiveness to credit and CD needs in its AA.

Description of Assessment Area

AENB’s delineated AA consisted of the Salt Lake City-Murray, UT MSA, which was comprised of Salt Lake and Tooele Counties. Salt Lake County is adjacent to and east of Tooele County. Tooele County is in northern Utah and is primarily rural. Salt Lake City is the largest city in the MSA and the capital of Utah. The AA met the requirements of the regulation and did not arbitrarily exclude low- and moderate-income geographies. Table 2 below provides a summary of demographics for the Salt Lake City MSA.

Table 2: Utah Assessment Area Description

Assessment Area - Salt Lake City MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	268	2.24	23.13	45.90	26.87	1.87
Population by Geography	1,257,936	2.03	22.95	46.97	27.45	0.60
Housing Units by Geography	427,135	1.90	25.04	46.40	26.60	0.06
Owner-Occupied Housing by Geography	275,979	0.78	18.91	47.93	32.38	0.00
Occupied Rental Units by Geography	128,492	4.08	37.13	44.30	14.30	0.19
Vacant Units by Geography	22,664	3.16	31.12	39.77	25.94	0.00
Businesses by Geography	68,513	2.13	17.33	45.52	33.91	1.11
Farms by Geography	1,615	1.55	16.97	48.36	32.57	0.56
Family Distribution by Income Level	282,565	17.83	19.45	23.43	39.30	0.00
Household Distribution by Income Level	404,471	20.98	17.36	20.55	41.11	0.00
Unemployment rate (%)	3.20	4.75	3.42	2.88	1.75	2.16

Households Below Poverty Level (%)	8.32	20.41	13.66	7.12	4.56	43.08
Median Family Income (41620 - Salt Lake City-Murray, UT MSA) for 2020	\$90,360	Median Housing Value				\$313,250
Median Family Income (41620 - Salt Lake City-Murray, UT MSA) for 2024	\$115,400	Median Gross Rent				\$1,190
		Families Below Poverty Level				5.53
FFIEC File - 2024 Census. 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100% (*) The NA category consists of geographies that have not been assigned an income classification						

The U.S. Census Bureau (Census) estimated the population in the AA to be 1.3 million in 2024, a 3.6 percent increase since the 2020 Census. According to the November 2024 Moody's Analytics, the population growth was attributed to a high rate of natural population increase rather than migration. Despite in-flows from high-cost metro areas, out-migration from the area outpaced in-migration to the area for the previous three years.

The Census reported total housing units in the AA as 64.6 percent owner-occupied, 30.1 percent rental-occupied, and 5.3 percent vacant. Owner-occupied housing in low- and moderate-income geographies in the AA represented 19.7 percent of the total owner-occupied housing units. Rental units accounted for 4.1 percent of the housing units in low-income geographies, and 37.1 percent of the housing units in moderate-income geographies. The low ownership and high rental rates in low- and moderate-income geographies indicated a lack of affordable home purchase options.

The distribution of families by income level was 17.8 percent low-, 19.5 percent moderate-, 23.4 percent middle-, and 39.3 percent upper-income. According to the Census, 25.4 percent of the AA's census tracts were low- and moderate-income, and 8.3 percent of households in the AA were living below the poverty level. In low- and moderate-income geographies, 20.4 and 13.7 percent of households were below the poverty level, respectively.

The Salt Lake City MSA business environment remained highly competitive for CRA investments. According to the FDIC's June 30, 2024, Deposit Market Share Report, there were 51 FDIC-insured financial institutions operating 204 offices, with \$943 billion in deposits. The top five institutions in the AA were Morgan Stanley Bank, NA, Ally Bank, American Express National Bank, Goldman Sachs Bank USA, and UBS Bank USA. These institutions controlled approximately 75.4 percent of the deposit market share, with a combined \$710.9 billion in deposits. AENB ranked third in the AA, with \$148.7 billion in deposits, or 15.8 percent of the market share. Since the bank has no branches and exclusively offers deposit products via the internet, a portion of the allocated deposits were sourced at the national level and reported to the Salt Lake City MSA.

During the evaluation period, the Salt Lake City MSA maintained a low unemployment rate. Per the Bureau of Labor Statistics, the average annual non-seasonally adjusted unemployment rate increased from 2.4 percent in 2022 to 3.2 percent in 2024. This mirrored the state annual averages of 2.4 percent and 3.2 percent for the same period. Additionally, the MSA's average annual unemployment rates were lower than the national annual average unemployment rates of 3.4 percent for 2022, and 3.9 percent in 2024.

According to Moody's Analytics, the area was in the mid-expansion phase of its business cycle during 2024. Despite recent slowing, the local economy remained healthy. Job creation was comparable with the state and nation. The MSA benefited from a high concentration of high-wage jobs in technology and knowledge-based industries; low-costs for businesses relocating from Silicon Valley; stable employment; and research spillovers from nearby universities. The construction sector led the way for job creation. After peaking in early 2022, the finance industry declined due to high interest rates and reduced credit demand. The largest industries in the Salt Lake City metro area were professional and business services; government; education and health services; retail trade; and leisure and hospitality services. The top five employers in the area were the University of Utah, Intermountain Health Care Inc., Walmart Inc., Amazon Fulfillment Services Inc, and Delta Airlines.

Soaring housing prices have caused deterioration of the area's cost-of-living advantage and have made other Utah metro areas more appealing. Per Moody's Analytics, housing prices briefly declined from late 2022 to early 2023, then quickly rose again, remaining the highest in Utah. Lower interest rates will boost finance, and the public sector will provide stable job opportunities.

The OCC conducted a review of information from four existing community contacts in the AA completed during the evaluation period. The organizations included a local coalition and a CD financial institution that support affordable housing; a county government agency that provides economic development services; and a technical assistance provider that offers statewide support for small businesses and entrepreneurs. Challenges in the area included: a shortage of affordable housing stock for low- and moderate-income individuals; lack of access to capital and education for small businesses; and limited availability of affordable childcare. Opportunities noted for financial institutions included: participating in Low-Income Housing Tax Credit (LIHTC) and affordable multifamily projects; providing financial literacy courses; offering small dollar loans; conducting outreach and education on financing options for small businesses, including in rural areas; and providing grants to fund childcare centers.

The OCC met with six CD organizations that maintained relationships with AENB during the evaluation period. These entities included a provider of medical housing for homeless individuals; a community center that assists those in sobriety; an organization offering refurbished bicycles and educational programs to low- and moderate-income individuals; a small business incubator program that provides technical assistance and training for culinary entrepreneurs; a mixed-use affordable housing redevelopment; and supportive housing that provides wrap-around services for homeless individuals and those recovering from substance abuse. Additionally, the OCC participated in a CD tour of the bank's LIHTC investments on tribal lands. Each of the organizations' representatives and tribal leadership highlighted the positive impact of the bank's contributions, which helped them meet the needs of low- and moderate-income individuals and geographies.

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median home to the expected incomes for low- and moderate-income households within the Salt Lake City MSA. Based on the information in the 2024 table above, the median housing value for the Salt Lake City MSA was \$313,250. In this MSA, low-income families earned less than \$57,700 and moderate-income families earned less than \$92,320. 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 \$1,443 for low-income borrowers and \$2,308 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent fixed 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 median housing value would have been \$1,682. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing in the MSA.

Conclusions About Performance

Summary

During the three-year performance evaluation, AENB and its affiliates provided an excellent level of qualified CD investments, grants, CD loans, and services within the AA and the broader state-wide and regional area that includes the AA. Consideration was given to the bank's capacity and the CD opportunities within the highly competitive AA. AENB and its affiliates made a total of \$522.1 million in qualified CD investments and grants. AENB originated or renewed \$120 million in CD loans during the evaluation period that benefitted the AA or the broader statewide or regional area that includes the AA. AENB and its affiliates also completed CD activities that benefitted areas outside its AA. Overall, AENB and its affiliates' CD lending and investment activity for the current evaluation period totaled 13.2 percent of average tier 1 capital.

The bank made extensive use of qualified investments that have complex structures and investments that are innovative in nature.

The bank used LIHTC equity funds, Preservation Funds, Equity Equivalent (EQ2) investments, and affordable housing private equity investments to meet CRA needs. An EQ2 investment is a long-term, fully subordinated debt to CDFIs with features that make it function like equity. These CDFIs supported low-income communities in the bank's AA as well as outside the AA through access to financial products and services. Investments considered innovative were located throughout the United States including two in Native Land areas. For example, AENB invested in a fund that provides capital to Minority Depository Institutions (MDIs) that primarily lend in low- and moderate-income areas with the goal of promoting community development and generating job growth. As another example, AENB established a New Market Tax Credit (NMTC) fund focused on supporting NMTC projects on tribal land. AENB is also a participant on the MDIs subcommittee of the OCC's Roundtable for Economic Access and Change (Project REACH).

AENB exhibited excellent responsiveness to the CD needs of its AA, especially toward affordable housing and economic development needs. AENB reported that its CRA activities created 10,705 affordable housing units. AENB funded 4,368 units using LIHTC equity funds during the

evaluation period. The bank invested in 37 percent or 15 of the 41 LIHTC projects available in the state of Utah during the evaluation period, even though opportunities are limited.

Qualified Investments

Current Investments

During the evaluation period, the bank originated 23 qualified investments totaling \$513.4 million in the AA and in the broader statewide or regional area that includes the AA. Since the bank adequately addressed the needs of its AA, the OCC considered an additional 47 qualified investments totaling \$691.1 million outside of its AA. AENB and its affiliates’ qualifying current investments totaled \$1.2 billion.

The investment portfolio includes investments that were responsive to the identified community needs. The majority of the bank’s current investments were for affordable housing, totaling \$970.2 million. The bank had a large volume of LIHTCs, totaling \$800.2 million and investments in Preservation Funds totaling \$140.5 million.

AENB also addressed the assessment area and the broader regional area’s need for economic development opportunities with investments totaling \$234.3 million through the bank’s NMTCs, EQ2 investments, Certificates of Deposits, and other types of qualifying investments. The majority of the economic development investments, or \$158.6 million, were NMTCs while \$30 million were EQ2s.

Grants

AENB and its affiliates provided 247 qualified grants totaling \$8.6 million to non-profit CD organizations and programs that benefitted the AA. AENB provided 83 additional grants totaling \$21.9 million outside of the bank’s AA. The majority of the bank’s grants, \$16.5 million, were related to economic development. The rest of the grants, \$12.6 million, were related to community services, and \$1.5 million were related to affordable housing.

Prior Period Investments

AENB held 129 investments totaling \$863 million from prior evaluation periods that remained outstanding as of December 31, 2024. These investments included LIHTCs, housing bonds, mortgage-backed securities, and SBA-related investment pools.

The following table summarizes the bank’s investments, grants, prior period investments that remained outstanding as of December 31, 2024, and unfunded commitments inside and outside the AA:

Table 3: Qualified Investment Activity (000s)

	Benefits AA**	Outside AA	Totals
Originated Investments	\$513,425	\$691,075	\$1,204,500
Originated Grants	\$8,642	\$21,883	\$30,525
Prior-Period Investments that Remain Outstanding	\$711,563	\$151,472	\$863,035

Total Qualified Investments	\$1,233,630	\$864,431	\$2,098,061
Unfunded Commitments*	\$322,133	\$457,112	\$779,246

* “Unfunded Commitments” means legally binding investment commitments that are tracked and recorded by the bank’s financial reporting system. ** Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

As of December 31, 2024, the bank had 7.3 percent of the average tier 1 capital in qualified investments and grants that benefitted the bank’s AA and 5.1 percent outside the bank’s AA. The following table measures the total level of qualified investment activity in terms of average tier 1 capital and average total income over the evaluation period.

Table 4: Qualified Investment Percentages

	Benefits AA (%) *	Outside AA (%)	Totals
Total Investments/Average Tier 1 Capital	7.3%	5.1%	12.4%
Total Investments/Average Total Income	2.8%	2.0%	4.8%

* Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

Examples of significant CD investments and grants include:

- AENB took a leadership role in addressing affordable housing on Native Tribal Lands. AENB established an NMTC fund in partnership with another large financial institution that directed \$24.3 million in equity to projects on Native Tribal Lands and projects affiliated with Native Tribes. AENB’s creation of the fund was in line with the Department of Treasury CDFI Fund’s strategic plan that called for creating broad on-ramps for new CDFIs and CD Entities and the announcement of their NMTC Native Initiative which focused on increasing NMTC investments in Native Areas.
- AENB established an NMTC fund in partnership with another large financial institution that directed \$44.3 million in equity to projects that support home ownership by providing capital to small businesses and organizations with the goal to revitalize low-income areas and create jobs for low- and moderate-income communities.
- AENB invested \$11.6 million into a proprietary LIHTC fund investment that supported the development of affordable housing. The project supported the rehabilitation of an historic building in Salt Lake City, Utah, that resulted in a 46-studio unit building restricted to tenants earning 30 percent or less of the area median income (AMI). Each of the 46 units had a set aside for tenants that were facing homelessness with five of the units specifically set aside for tenants with substance abuse disorders. The project provided each tenant with supportive services including substance use and addiction recovery services, mental illness support, and employment and benefit support. To ensure access to wrap around services, the bank also provided \$218,500 in grants during the evaluation period to the developer of the project, a non-profit organization, to support their comprehensive medical care program.

- AENB committed an additional \$1.2 million to an LIHTC development located on the Tohono O’odham Reservation in Tucson, Arizona. This was the third development invested in by AENB on the Tohono O’odham Reservation. All 30 units were designated for families with low- and moderate-incomes, earning less than 60 percent of AMI. These units were designated for eventual tenant ownership following the completion of the 15-year LIHTC compliance period through a purchase option.
- AENB provided \$300,000 in grants to a CDFI that supported various services including housing loans, grants, HUD-approved homebuyer education, downpayment assistance, workforce development programs, and home improvement services.
- AENB provided \$1.8 million to a CDFI that supported services including technical assistance to small businesses, financial counseling and first-time home ownership education, and grants to business development organizations to strengthen organizational development and core functions.

CD Lending

AENB originated three CD loans totaling \$120 million that benefited the broader statewide area that includes the AA during the evaluation period. Consideration was also given to an additional \$5 million loan made outside the bank’s AA because AENB adequately addressed the identified needs in the AA. As of December 31, 2024, the bank reported \$22.9 million of unfunded CD lending commitments.

The following tables measures the level of total CD loan activity in terms of average tier 1 capital and average total income during the evaluation period.

Table 5: CD Lending Percentages

	Benefits AA (%) *	Outside AA (%)	Total (%)
Total CD Lending/Average Tier 1 Capital	0.71	0.03	0.74
Total CD Lending/Average Total Income	0.28	0.01	0.29

* CD loans included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following are highlights of AENB’s CD lending activities:

AENB continued to provide a lending commitment that renewed annually, to a Community Reinvestment Corporation. The bank’s renewal was for a \$40 million commitment in a loan pool that was funded by a consortium of 39 financial institutions. The loan pool provided the organization with access to the capital needed to provide affordable housing developers long-term financing for affordable housing projects in Salt Lake City County and the Rocky Mountain region.

AENB provided a \$5 million loan to a CDFI that provided capital for affordable multifamily housing development. The CDFI provided a wide range of products supporting affordable housing,

such as pre-development financing for affordable housing developers, support for single family acquisition rehab projects that provided home ownership opportunities to low- and moderate-income families and permanent housing for seniors, and rural housing.

CD Services

AENB employees and its affiliates provided 11,668 hours of service to 84 CD organizations and programs that benefited low- and moderate-income individuals, small businesses and CDFI’s. This included 254 AENB employees providing 3,531 hours of CD services to 51 organizations and programs. In addition, over 656 employees of AENB’s affiliates provided 8,137 hours of CD services to 33 organizations and programs that benefited low- and moderate-income programs and services. The services provided by AENB employees and its affiliate were highly responsive to CD needs.

AENB employee activities included serving in leadership roles on boards of directors and/or committees of affordable housing and community service organizations, delivering financial literacy seminars and credit counseling for low- and moderate-income individuals. Community service organizations included technical job training, homelessness prevention, and employment training and counseling. The services were provided in conjunction with grants and/or CD loans that supported community needs.

Table 6: CD Service Activities

CD Service	Benefits AA*	Outside AA
Community Services	1,836	9,236
Economic Development	10	103
Affordable Housing	253	230
Total Community Development Service Hours	2,099	9,569

** CD services included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.*

The following are highlights of AENB’s CD service activities:

- During the evaluation period, three AENB employees provided 149 hours of service serving on the Board or as a Loan Committee Member for a Community Reinvestment Corporation. The organization provided access to capital needed to support affordable housing developers long-term financing for affordable housing projects in Salt Lake County and the Rocky Mountain region. AENB continues to provide an annual renewed lending commitment to this organization, as well.
- AENB and affiliate employees collaborated with a nonprofit and provided a total of 228 service hours through a leadership development program. Through the program, employees

were connected with two local nonprofit organizations that needed financial education resources. Employees worked closely with each organization to create financial literacy materials. Both organizations provided food and job training to primarily low- and moderate-income individuals in the AA.

- AENB employees provided 171 service hours to low- and moderate-income elementary students through financial literacy education. Programs also fostered work-readiness and entrepreneurship to students in kindergarten through fifth grade.

Appendix A: Summary of State Rating

RATINGS	
Overall Bank:	Overall Bank Rating
American Express National Bank	Outstanding
State Name	State Rating
Utah	Outstanding

Appendix B: Definitions and Common Abbreviations

The following terms and abbreviations may be 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 AA.

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 low- and moderate-income 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 CD loans and qualified investments, branch distribution, and CD services).

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the AA.

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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

Rating Area: A rated area is a state or multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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.