



## **PUBLIC DISCLOSURE**

April 02, 2020

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

Westfield Bank, FSB  
Charter Number: 716697

Two Park Circle  
Westfield Center, OH 44251-5001

Office of the Comptroller of the Currency

200 Public Square Suite 1610  
Cleveland, OH 44144-2301

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 following table indicates the performance level of **Westfield Bank, FSB** (Westfield or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Westfield Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on an adequate level of lending in assessment areas (AAs), adequate lending activity, adequate geographic distribution of home mortgage and small loans to businesses, adequate distribution of home mortgage loans among borrowers of different incomes and small business loans among business of different sizes, and an adequate level of community development (CD) loans.
- The Investment Test rating is based on an overall good level of CD investments.
- The Service Test rating is based on the bank's retail services being reasonably accessible to geographies and individuals of different income levels and an adequate level of CD services.

### Lending in Assessment Area

An adequate percentage of the bank's loans are in its AA.

During the evaluation period, the bank originated and purchased 57.8 percent of its total home mortgage and small business loans by number and 59.2 percent by dollar amount inside the bank's AAs. This analysis is performed at the bank level, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria. This level of lending had a neutral impact on the bank's overall geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area 2016 - 2019										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,203	62.8	714	37.2	1,917	313,979	69.1	140,289	30.9	454,268
Small Business	497	48.5	527	51.5	1,024	138,387	44.7	171,380	55.3	309,767
Total	1,700	57.8	1,241	42.2	2,941	452,366	59.2	311,669	40.8	764,035

Source: Bank HMDA and Small Business Loan Data 2016 through 2019.

## Description of Institution

Westfield is a full-service intrastate bank headquartered in Westfield Center, Ohio. The bank is a federal savings bank and a wholly owned subsidiary of Westfield Bancorp, Incorporated, a one-bank holding company also headquartered in Westfield Center, Ohio. The bank is a wholly owned subsidiary of Ohio Farmers Insurance Agency. Westfield Bank owns Westfield Mortgage Company and COIN Financial. The Westfield Mortgage Company is a mortgage service company formed in March 2004. However, based on management statements, Westfield Mortgage has not serviced any mortgage loans or had any operations since the 2018 financial crisis. Thus, management considers this an inactive mortgage service company. COIN Financial was acquired by Westfield in July 2015, and is a non-banking indirect auto lending broker. Westfield Bancorp also owns Westfield Credit Corporation and Westfield Asset Management, which are non-banking entities.

According to the Report of Condition and Income, the bank's assets totaled \$1.48 billion, as of December 31, 2019. As of year-end 2018 and 2017, respectively, the bank's assets totaled \$1.428 billion and \$1.371 billion. The bank offers traditional loan products, which include home mortgage, commercial, commercial real estate, small business, direct and indirect auto, and consumer loans. The bank originates home and commercial loans that are referred through its insurance agency network and provides loans to its insurance agents located throughout the country. Westfield originated loans through manufactured housing dealers located in Pennsylvania, West Virginia, and Kentucky until the end of 2017. As of December 31, 2019, commercial and commercial real estate loans represent 58 percent of the bank's loan portfolio. The remainder of the loan portfolio includes 24 percent home mortgage loans, 15 percent consumer loans, and three percent in multifamily and other loans. Westfield also sells first lien residential loans to the secondary market, which are not part of the bank's loan portfolio.

Westfield's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and telephone banking, mobile banking, night depository, automated teller machine (ATM) services and e-statements. Business related products and services include checking, savings, business money market accounts, treasury management services, ACH, account transfers, bill pay, night depository, and telephone banking. The bank also offers agency banking, which includes deposit products and services offered through insurance agencies. The agency banking products and services are similar to the personal and business banking products offered by the bank.

As of our evaluation, Westfield had four AAs, which are contiguous. The bank's primary AA is identified as the Medina AA, which includes Medina County and six census tracts (CT) in Cuyahoga County. The Medina AA is part of the Cleveland-Elyria-Mentor, OH MSA. Westfield's other AAs include all of Summit County, Stark County, and Wayne County. Summit County, identified as the

Summit AA, is part of the Akron, OH MSA. Stark County, identified as the Stark AA, is part of the Canton-Massillon, OH MSA. Wayne County, which is identified as the Wayne AA, is not part of an MSA.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. Westfield received a rating of "Satisfactory" at the previous CRA examination dated January 3, 2017.

## **Scope of the Evaluation**

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

This performance evaluation covers the period from January 1, 2016 through December 31, 2019. In conducting the evaluation, we used Large Bank Community Reinvestment Act (CRA) examination procedures. This is the first evaluation where Westfield is being evaluated as a large bank.

We evaluated Westfield's lending performance based on its primary loan products, which include home mortgage loans and small loans to businesses. While the bank offers multifamily, home equity, consumer installment and farm loans, these products are not a primary focus for the bank. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful. However, we did consider multi-family loans that qualify as CD loans, as part of our CD lending assessment.

Prior to the examination, we tested the accuracy of the bank's reported Home Mortgage Disclosure Act and small business loan data. We determined the information to be accurate. During our evaluation, we evaluated the bank's CD loans, investments, and services.

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

We selected the bank's Medina, Summit and Stark AAs for full-scope reviews, as these areas have a majority of the bank's deposits and branch offices. We completed a limited scope review of the Wayne AA, as this represents the bank's smallest market based on loans originated or purchased and includes only one branch that holds and services 6.36 percent of total deposits. For additional details regarding the bank's AAs, see the Scope of Examination table under *Appendix A*.

### **Ratings**

The bank's overall rating is based on its lending and CD performance within the state of Ohio. The state rating is based on performance in the bank's AAs that received full-scope reviews. We gave more consideration to the bank's performance within the Medina AA when determining the overall state rating. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §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 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Ohio

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

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

**The Investment Test is rated:** Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- The overall geographic distribution of the bank's loans is adequate.
- The bank's overall distribution of home mortgage loans to individuals of different incomes and small business loans to businesses of different sizes is adequate.
- The bank originated or purchased an adequate level of CD loans.
- The bank originated an overall good level of CD investments.
- The bank's Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.
- The bank's level of CD services is adequate.

### Description of Institution's Operations in Ohio

As of our evaluation, the bank operated seven branch offices throughout its four AAs. Three branch offices are located in the Medina AA, which includes the office located within the vicinity of the holding company. The bank also has two branch locations within the Summit AA, and one each located in the Stark and Wayne AAs. In March 2017, Westfield closed one branch in the Medina AA and one in the Wayne AA. Both branches were in upper-income CTs. Also, in March 2017, the bank opened a branch in the Wayne AA, located in a middle-income CT. In October 2018, Westfield relocated two branches in the Summit AA, combining them into a new office. One of the relocated branch offices was in an upper-income CT, with the other in a moderate-income CT. The new office is in a middle-income CT.

All branch offices are open relatively the same hours and days. Each of the branch offices offer deposit taking ATM services onsite. Excluding the Westfield Center branch location in the Medina AA, night deposit services are offered at all remaining branch locations. Two of the bank's branch offices located in the Medina AA, one in the Stark AA, and one in the Akron AA offer drive-through services. The bank belongs to the Money Pass ATM network, which allows customers to access their funds fee free nationally. Westfield also reimburses customers up to \$12 per month for ATM fees when a customer uses an out of network ATM.

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<sup>1</sup> This rating reflects performance of the assessment areas combined. However, most weight was placed on the Medina assessment area.

**Medina AA**

Table A - Demographic Information of the Assessment Area						
Assessment Area: Medina AA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	0.0	45.2	54.8	0.0
Population by Geography	197,305	0.0	0.0	39.5	60.5	0.0
Housing Units by Geography	77,701	0.0	0.0	41.2	58.8	0.0
Owner-Occupied Units by Geography	60,162	0.0	0.0	38.5	61.5	0.0
Occupied Rental Units by Geography	13,189	0.0	0.0	53.7	46.3	0.0
Vacant Units by Geography	4,350	0.0	0.0	40.2	59.8	0.0
Businesses by Geography	12,204	0.0	0.0	34.4	65.6	0.0
Farms by Geography	526	0.0	0.0	44.3	55.7	0.0
Family Distribution by Income Level	54,836	11.6	13.7	21.7	53.1	0.0
Household Distribution by Income Level	73,351	13.5	12.0	16.2	58.3	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$62,627	Median Housing Value			\$197,058
			Median Gross Rent			\$799
			Families Below Poverty Level			4.3%
Source: 2010 U.S. and 2016 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

Table B - Demographic Information of the Assessment Area						
Assessment Area: Medina AA 2017 - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	2.4	40.5	57.1	0.0
Population by Geography	199,467	0.0	1.5	36.9	61.7	0.0
Housing Units by Geography	80,452	0.0	1.6	37.3	61.0	0.0
Owner-Occupied Units by Geography	60,078	0.0	1.2	34.6	64.2	0.0
Occupied Rental Units by Geography	15,616	0.0	3.0	45.5	51.5	0.0
Vacant Units by Geography	4,758	0.0	1.9	45.3	52.8	0.0
Businesses by Geography	14,257	0.0	1.3	32.0	66.7	0.0
Farms by Geography	613	0.0	0.7	36.4	63.0	0.0
Family Distribution by Income Level	54,397	12.2	13.9	21.3	52.6	0.0
Household Distribution by Income Level	75,694	14.0	12.4	16.7	57.0	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$192,912
			Median Gross Rent			\$861
			Families Below Poverty Level			4.9%
Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

The Medina AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies. The AA is comprised of Medina County and six CTs contiguously



located in Cuyahoga County. The AA is part of the Cleveland-Elyria-Mentor OH, MSA, and offers a combination of urban and suburban neighborhoods, as well as rural areas. As of 2016, the AA had no low- or moderate-income CTs. However, as a result of the change to 2015 American Community Survey (ACS) Census Data, the AA gained one moderate-income CT on January 1, 2017.

Based on 2010 United States (US) Census Data, the AAs demographics indicate that 4.3 percent of low-income families live below the poverty level. 2010 U.S. Census Data reflects 77,701 housing units in the AA. Of these housing units, 77 percent were owner-occupied, 17 percent were rental units, and six percent were vacant. Based on 2015 ACS Census Data, the percentage of low-income families living below poverty increased to 4.9 percent. The data also reflects an increase in housing units to 80,452. Out of the total housing units, approximately 75 percent are owner occupied, 19 percent are rentals, and six percent are vacant.

A majority of businesses in the AA are small as measured by the number of employees and gross revenues. According to 2018 Dun & Bradstreet (D&B) data, 83 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 68 percent of businesses have fewer than five employees. Only two percent of businesses are headquartered in the AA, and 89 percent operate from a single location. The five largest employers within the AA include Westfield Insurance, Cleveland Clinic, Medina County, MTD Products, and public schools.

The economic conditions in the Medina AA have generally fared better than other AAs and the state of Ohio during the period of review. Unemployment levels in 2016 for the Medina AA totaled 4.3 percent, decreasing each year to 3.9 percent as of year-end 2019. In comparison, the state of Ohio unemployment rates ranged from 5.2 percent in 2016 to 4.1 percent in 2019.

Competition within the Medina AA is high. According to the June 30, 2019 FDIC Deposit Market Share report, there are 31 financial institutions with 436 offices serving both Medina and Cuyahoga Counties, which does not include credit unions or other financial organizations. In addition, according to 2018 peer aggregate mortgage data, there were 265 institutions that originated or purchase home mortgage loans within the AA. The top five home mortgage lenders include four large banks and a mortgage company that has a national presence. The five entities combined hold approximately 42 percent of market share. Based on 2018 peer small business data, there were 112 institutions that reported originating or purchasing small business loans within the AA. The top five small business lenders were all large institutions, which held 62.51 percent market share.

We conducted one community contact within the Medina AA. The purpose of the contact was to determine the credit and CD needs of the Medina AA. There is a high level of competition in the AA from larger banks, such as PNC and Huntington, to participate, lend, or invest in CD activities. However, based on community contact information, there are various opportunities to make CD investments and conduct CD services within the AA. The contact indicated the highest needs include serving as a Board member and making donations to support operations. Other needs include volunteering for fundraising events and sponsorship of Federal Home Loan Bank grants. The contact indicated that Westfield Bank has been involved with fundraising, and employees have participated with various committees and were members of the Board.

See Tables A and B above for additional demographic information on the Medina AA.

## Summit AA

Table A - Demographic Information of the Assessment Area						
Assessment Area: Westfield - Summit AA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	17.0	23.7	31.9	27.4	0.0
Population by Geography	541,781	10.7	22.1	33.3	33.9	0.0
Housing Units by Geography	244,314	11.4	23.9	34.4	30.3	0.0
Owner-Occupied Units by Geography	155,046	5.8	20.4	36.1	37.6	0.0
Occupied Rental Units by Geography	68,076	20.6	30.1	31.9	17.4	0.0
Vacant Units by Geography	21,192	22.5	29.4	29.8	18.3	0.0
Businesses by Geography	34,036	9.2	17.1	29.9	43.7	0.0
Farms by Geography	815	2.7	13.6	37.7	46.0	0.0
Family Distribution by Income Level	142,556	21.3	17.7	21.9	39.1	0.0
Household Distribution by Income Level	223,122	24.5	16.1	18.2	41.3	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$62,882	Median Housing Value			\$143,155
			Median Gross Rent			\$717
			Families Below Poverty Level			10.0%
Source: 2010 U.S. and 2016 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

Table B - Demographic Information of the Assessment Area						
Assessment Area: Summit AA 2017 - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	21.5	20.7	32.6	25.2	0.0
Population by Geography	541,847	13.7	21.4	33.8	31.0	0.0
Housing Units by Geography	245,237	14.4	22.5	34.9	28.2	0.0
Owner-Occupied Units by Geography	146,424	7.4	19.1	37.2	36.3	0.0
Occupied Rental Units by Geography	74,478	24.9	27.4	31.5	16.3	0.0
Vacant Units by Geography	24,335	24.9	27.6	31.8	15.7	0.0
Businesses by Geography	39,356	12.4	15.4	30.9	41.4	0.0
Farms by Geography	942	6.4	11.9	39.2	42.6	0.0
Family Distribution by Income Level	138,178	21.9	16.7	20.7	40.6	0.0
Household Distribution by Income Level	220,902	25.4	15.7	17.5	41.5	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$134,563
			Median Gross Rent			\$765
			Families Below Poverty Level			10.6%
Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

The Summit AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies. The AA is comprised of Summit County, which is part of the Akron OH, MSA. The AA offers a combination of urban and suburban neighborhoods, as well as rural areas. The city of Akron is the largest city within the AA, and contains a majority of the low- to moderate-income CTs. As of 2016, the AA had 23 low- and 32 moderate-income CTs. However, as a result of the change to 2015 ACS Census Data, the number of low-income CTs increased to 29 and the number of moderate-income CTs decreased to 28 on January 1, 2017.

The economic conditions in the Summit AA have somewhat deteriorated from 2016 through 2019 due to the fledgling recovery in manufacturing within the area. Unemployment levels in 2016 for the Summit AA totaled 5.1 percent, decreasing to 4.6 percent by 2019. In comparison, the state of Ohio unemployment rates ranged from 5.2 percent in 2016 to 4.1 percent in 2019. The economic conditions of the AA are also evident in poverty and housing demographics. Based on 2010 U.S. Census Data, the AAs demographics indicate that 10.0 percent of the low-income families live below poverty level. The 2010 U.S. Census Data indicates there were 244,314 housing units in the AA. Of these housing units, 64 percent were owner-occupied, 28 percent were rental units, and eight percent were vacant. Based on 2015 ACS Census Data, the percentage of low-income families living below poverty increased to 10.6 percent. The data also reflected a slight increase in housing units to 245,237. However, the percentage of owner-occupied housing units decreased to approximately 60 percent, whereas rentals and vacant housing units increased to 30 percent and 10 percent, respectively.

A majority of businesses in the AA are small as measured by the number of employees and gross revenues. According to the 2018 D&B data, 81 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 66 percent of businesses have fewer than five employees. Approximately three percent of businesses are headquartered in the AA, and 87 percent operate from a single location. The five largest employers within the AA include Summa Health System, Cleveland Clinic, Akron's Children's Hospital, Minute Men HR Management Services, and FirstEnergy Corp.

Competition within the Summit AA is high. According to the June 30, 2019 FDIC Deposit Market Share report, there are 24 financial institutions with 152 offices serving Summit County, which does not include credit unions or other financial organizations. In addition, according to 2018 peer mortgage data, there were 330 institutions that originated or purchased home mortgage loans within the AA. The top five home mortgage loan lenders were larger institutions, and on a combined basis had 36.7 percent of market share. Based on 2018 peer small business data, there were 102 institutions that reported originating or purchasing small business loans within the AA. The top five small business lenders were all large institutions, which held 61.9 percent of market share.

We utilized information from an existing community contact servicing the Summit AA that was conducted mid-year 2019. The focus of the organization is financial education. The purpose of the contact was to determine the credit and CD needs in this AA. Based on our community contact information, competition for involvement in CD activities is high, as a large number of financial institutions operate within the AA. However, there have been opportunities to conduct CD services within the AA. Specifically, the contact indicated there is a need for low- or no-balance minimum checking accounts, non-custodial youth accounts, and opening online checking accounts.

**Stark AA**

Table A - Demographic Information of the Assessment Area						
Assessment Area: Westfield - Stark AA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	9.3	14.0	53.5	23.3	0.0
Population by Geography	375,586	5.1	12.3	54.8	27.8	0.0
Housing Units by Geography	164,824	6.2	13.7	54.2	26.0	0.0
Owner-Occupied Units by Geography	107,165	3.4	9.6	57.9	29.2	0.0
Occupied Rental Units by Geography	43,756	10.9	19.0	49.8	20.3	0.0
Vacant Units by Geography	13,903	13.5	28.1	39.3	19.0	0.0
Businesses by Geography	19,824	7.2	9.5	49.5	33.8	0.0
Farms by Geography	751	1.7	2.9	65.9	29.4	0.0
Family Distribution by Income Level	100,974	19.4	18.7	21.5	40.4	0.0
Household Distribution by Income Level	150,921	23.0	17.0	18.4	41.6	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$55,645	Median Housing Value			\$125,746
			Median Gross Rent			\$610
			Families Below Poverty Level			9.5%
Source: 2010 U.S. and 2016 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

Table B - Demographic Information of the Assessment Area						
Assessment Area: Stark AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	10.5	12.8	60.5	15.1	1.2
Population by Geography	374,979	6.8	11.5	63.1	18.3	0.3
Housing Units by Geography	165,462	7.4	12.3	62.9	16.8	0.5
Owner-Occupied Units by Geography	103,621	3.7	8.9	67.3	20.1	0.0
Occupied Rental Units by Geography	46,764	12.9	18.2	55.6	12.0	1.3
Vacant Units by Geography	15,077	15.8	17.9	55.6	9.1	1.6
Businesses by Geography	21,982	5.4	7.4	64.0	20.7	2.5
Farms by Geography	795	1.9	2.9	76.6	18.4	0.3
Family Distribution by Income Level	98,810	19.5	18.7	21.8	40.0	0.0
Household Distribution by Income Level	150,385	23.8	16.4	18.3	41.5	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$117,788
			Median Gross Rent			\$663
			Families Below Poverty Level			10.8%
Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.						

The Stark AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies. The AA is comprised of Stark County, which is part of the Canton -

Massillon OH, MSA. The AA offers a combination of urban and suburban neighborhoods and rural areas. The city of Canton is the largest city within the AA, which also contains a majority of low- to moderate-income CTs. As of 2016, the AA had eight low- and 12 moderate-income CTs. However, as a result of the change to 2015 ACS Census Data, the number of low-income CTs increased to nine and the number of moderate-income CTs decreased to 11 on January 1, 2017.

The economic conditions in the Stark AA somewhat deteriorated from 2016 through 2019 due to less manufacturing and a decline in population. Unemployment levels in 2016 for the Stark AA totaled 5.6 percent, decreasing to 4.6 percent by 2019. In comparison, the state of Ohio unemployment rates ranged from 5.2 percent in 2016 to 4.1 percent in 2019. Economic conditions of the AA are also evident in the poverty and housing demographics. Based on 2010 U.S. Census Data, the AAs demographics indicate that 9.5 percent of the low-income families live below the poverty level. The 2010 U.S. Census Data further reflected there were 164,824 housing units in the AA. Of these housing units, 65 percent were owner-occupied, 27 percent were rental units, and eight percent were vacant. Based on 2015 ACS Census Data, the percentage of low-income families living below poverty increased to 10.8 percent. The data also reflects a slight increase in housing units to 165,462. However, the percentage of owner-occupied housing units decreased to approximately 63 percent, whereas rentals and vacant housing units increased to 28 percent and nine percent, respectively.

A majority of businesses in the AA are small as measured by the number of employees and gross revenues. According to the 2018 D&B data, 81 percent of businesses located in the AA have less than \$1 million in gross annual revenues, and 64 percent of businesses have fewer than five employees. Approximately three percent of businesses are headquartered in the AA, and 87 percent operate from a single location. The five largest employers within the AA include Aultman Hospital, The Timken Co., Mercy Medical Center, Diebold, and Freshmark Inc.

Competition within Stark AA is high. According to the June 30, 2019 FDIC Deposit Market Share report, there are 16 financial institutions with 108 offices serving the county, which does not include credit unions or other financial organizations. In addition, according to 2018 peer mortgage data, there were 314 institutions lending within the AA. The top five home mortgage loan lenders were four larger institutions and a mortgage company that lends throughout the United States. The top five lenders on a combined basis had 38.6 percent of market share. Based on 2018 peer small business data, there were 80 institutions that reported originating or purchasing small business loans within the AA. The top five small business lenders were all large institutions, with market share of 59.65 percent.

We conducted one community contact within the Stark AA. The organization we contacted focuses on economic development. The purpose of the contact was to determine the credit and CD needs within the Stark AA. The community contact indicated there is low competition for CD involvement and there are various opportunities to make qualifying CD investments and conduct CD services within the AA. The contact indicated there is significant need for donations to support current operations. Additionally, there is a need for serving as a Board member and participating in financial literacy courses and fundraisers.

## **Scope of Evaluation in Ohio**

We evaluated Westfield's performance in the state of Ohio by analyzing the bank's lending performance and its CD lending, investment, and service performance for the years 2016 through 2019. We also considered activities of bank affiliates in relation to CD.

We selected the bank's Medina, Summit and Stark AAs for full-scope reviews as these areas have a majority of the bank's deposits and branch offices. For the *Distribution of Loans by Income Level of the Borrower*, we gave more consideration to the bank's performance within the Medina AA when determining the overall state rating, as this is the bank's primary AA and where the bank is headquartered. However, we did not evaluate the bank's geographic performance in the Medina AA, as this area had no low- or moderate-income CTs in 2016 and only one moderate-income CT from 2017 through 2018. As such, we evaluated the bank's geographic lending performance based on its lending throughout the Summit and Stark AAs. We completed a limited scope review of the Wayne AA, as this represents the bank's smallest AA based on number of branch offices and total deposits.

The procedures used to assess Westfield's lending performance focused on the bank's primary lending products. Based on the bank's strategic plan, reports of lending activities over the review period, Reports of Condition and Income, and discussions with senior management, we determined the bank's primary areas of lending focus are home mortgage and business loans. The bank's lending focus does not include home equity lines of credit (HELOC), home improvement, consumer, or farm loans. Therefore, we did not consider these loan products as part of the evaluation, as an analysis of these products would not be meaningful.

2019 aggregate home mortgage and small business data was not available during this evaluation. Therefore, we compared the bank's lending performance in 2017 through 2019 to 2018 aggregate home mortgage and small business data. However, due to Westfield's transition to a large bank during the evaluation period, the first small business loan data reported by the bank was 2019. Therefore, Westfield is not included as part of the 2018 small business aggregate data.

The Federal Financial Institutions Examination Council's (FFIEC) initiated changes, which utilized ACS Census data for the FFIEC published census data beginning January 1, 2017. The change to ACS Census data resulted in updated demographic information for population and housing. The ACS Census data also resulted in changes to the income designations of some CTs. As such, we performed a separate analysis of the 2016 lending data from the 2017 through 2019 lending data. In addition, the Office of Management and Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2018. None of the bank's AAs were impacted by the OMB changes, allowing 2017 through 2019 data to be combined for analysis. As a result, the 2017 through 2019 analysis period will receive more weight than the 2016 analysis period, as this period represents a larger portion of lending and CD activities.

We used other supporting information in this evaluation, including 2010 U.S. Census data, 2015 ACS data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of Westfield's AAs. We also considered information from community contacts to help assess the needs of the bank's AA, and the opportunities for financial institutions to lend and provide services within those areas.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Medina, Summit, and Stark AAs is adequate.

### Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Medina AA	496	219	1	3	719	42.0	74.9
Summit AA	341	177	0	3	521	30.5	8.6
Stark AA	328	73	0	1	402	23.5	10.2
Wayne AA	38	28	0	0	66	3.9	6.3
CD Loans – Regional or Statewide	0	0	0	2	2	.1	0.0
<b>TOTAL</b>	<b>1,203</b>	<b>497</b>	<b>1</b>	<b>9</b>	<b>1,710</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Medina AA	141,861	52,684	198	7,140	202,063	43.5	74.9
Summit AA	82,517	53,152	0	2,360	138,029	29.7	8.6
Stark AA	82,030	22,391	0	700	105,121	22.6	10.2
Wayne AA	7,571	10,160	0	0	17,731	3.8	6.3
CD Loans – Regional or Statewide	0	0	0	1,616	1,616	.4	0.0
<b>TOTAL</b>	<b>313,979</b>	<b>138,567</b>	<b>198</b>	<b>11,816</b>	<b>464,560</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas from 2016 through 2019. The narrative below addresses performance in full-scope areas only.

Westfield's volume of lending activity is adequate in Ohio. In drawing our overall conclusion and our conclusions for each AA, we considered the bank's market presence, product delivery channels, and competition within each AA.

### Medina AA

Lending levels in the Medina AA reflect adequate responsiveness to AA credit needs. During the evaluation period, the bank originated 496 home loans totaling \$141.9 million and 219 small business loans totaling \$52.7 million. Based on the FDIC Market Share report from June 30, 2019, there were 31 deposit-taking institutions with one or more banking offices in the AA. Westfield ranked 12<sup>th</sup> with deposit market share of 1.49 percent.

Westfield's lending market share is adequate compared to its deposit market share in the Medina AA. Peer home mortgage data for 2018 indicates Westfield ranked 19<sup>th</sup> among 265 lenders that reported home mortgage loans with a market share of 1.37 percent. This is the equivalent to the top seven percent of lenders in the AA. As noted in the scope of evaluation above, Westfield's first reporting of small business loans originated or purchased was 2019 data, which is not available at this time. However, based on the number of small business loans originated or purchased by the bank in 2018

within the AA as compared to 2018 peer aggregate small business loan data, Westfield would have ranked 31<sup>st</sup> among 112 lenders that reported small business loans with a market share of 0.16 percent. This is the equivalent to the 28 percent of reporting lenders in the AA. Given the competition from other reporting lenders in the AA, the bank's lender rankings are adequate.

### **Summit AA**

Lending levels in the Summit AA reflect adequate responsiveness to AA credit needs. During the evaluation period, the bank originated 341 home mortgage loans totaling \$82.5 million and 177 small business loans totaling \$53.1 million. Based on the FDIC Market Share report from June 30, 2019, there were 24 deposit-taking institutions with one or more banking offices in the AA. Westfield ranked 12<sup>th</sup> with a deposit market share of 0.82 percent.

Westfield's lending market share is adequate compared to its deposit market share in the Summit AA. Peer home mortgage data for 2018 indicates Westfield ranked 39<sup>th</sup> among 330 lenders that reported home mortgage loans with a market share of 0.43 percent. This is the equivalent to the top 12 percent of lenders in the AA. Based on the number of small business loans originated or purchased by the bank within the AA in 2018 compared to 2018 peer aggregate small business loan data, Westfield would have ranked 22<sup>nd</sup> among 102 lenders that reported small business loans with a market share of 0.39 percent. This is the equivalent to the 22 percent of reporting lenders in the AA. Given the competition from other reporting lenders in the AA, the bank's lender rankings are adequate.

### **Stark AA**

Lending levels in the Stark AA reflect adequate responsiveness to AA credit needs. During the evaluation period, the bank originated 328 home mortgage loans totaling \$82.0 million and 73 small business loans totaling \$22.3 million. Based on the FDIC Market Share report from June 30, 2019, there were 16 deposit-taking institutions with one or more banking offices in the AA. Westfield ranked 10<sup>th</sup> with a deposit market share of 1.72 percent.

Westfield's lending market share is adequate compared to its deposit market share in the Stark AA. Peer home mortgage data for 2018 indicates Westfield ranked 39<sup>th</sup> among 314 lenders that reported home mortgage loans with a market share of 0.52 percent. This is the equivalent to the top 12 percent of lenders in the AA. Based on the number of small business loans originated or purchased by the bank within the AA in 2018 compared to 2018 peer aggregate small business loan data, Westfield would have ranked 27<sup>th</sup> among 80 lenders that reported small business loans with a market share of 0.30 percent. This is the equivalent to the 34 percent of reporting lenders in the AA. Given the competition from other reporting lenders in the AA and the bank's limited presence, Westfield's lender rankings are adequate.

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

The bank exhibits an adequate geographic distribution of loans in its AAs. We did not consider the Medina AA in our evaluation of the bank's distribution of loans by income level of the geography, as the area had no low- or moderate-income CTs in 2016 and only one moderate-income CTs from 2017 through 2019. For drawing conclusions in the Summit and Stark AAs, we weighed each AA equally. We also considered the amount of competition and bank's presence within each AA.



## ***Home Mortgage Loans***

The overall geographic distribution of the bank's home mortgage loans is adequate.

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.

### **Medina AA**

The Medina AA had no low- or moderate-income CTs during 2016, and only one moderate-income CT from 2017 through 2019. Therefore, we did not perform a geographic distribution analysis of home mortgage loans for this AA, as an analysis would have not been meaningful.

### **Summit AA**

The overall geographic distribution of the bank's home mortgage loans in the Summit AA was good.

The distribution of the bank's home mortgage lending in 2016 was adequate. The percentage of the bank's home mortgage loans at 2.3 percent was below the percentage of owner-occupied housing units at 5.8 percent and matched the aggregate percentage of 2.3 percent in low-income CTs. However, the proportion of the bank's home mortgage lending at 6.9 percent in moderate-income CTs was significantly below the percentage of owner-occupied housing units and aggregate lending at 20.4 and 15.1 percent, respectively.

As of 2017 through 2019, the bank's home mortgage lending percentage in low- and moderate-income CTs was good. The proportion of the bank's home mortgage loans in low-income tracts at 4.7 percent was below the percentage of owner-occupied housing units of 7.4 percent and slightly above the aggregate home mortgage lending percentage of 4.0 percent. Additionally, the proportion of the bank's home mortgage lending in moderate-income CTs at 16.1 percent was near the owner-occupied housing unit percentage of 19.1 percent and above the aggregate home mortgage lending percentage of 15.4 percent.

### **Stark AA**

The overall geographic distribution of the bank's home mortgage loans in the Stark AA was adequate.

The distribution of the bank's home mortgage lending in 2016 was good. The percentage of the bank's home mortgage loans at 1.6 percent in low-income CTs was near the percentage of owner-occupied housing units at 3.4 percent and slightly above the aggregate percentage of 1.2 percent. However, the proportion of the bank's home mortgage lending at 3.2 percent in moderate-income CTs was significantly below the percentage of owner-occupied housing units at 9.6 percent and near the aggregate lending at 5.6 percent.

For the period of 2017 through 2019, the bank's home mortgage lending percentage in low- and moderate-income CTs was adequate. The proportion of the bank's home mortgage loans in low-income CTs at 0.8 percent was below the percentage of owner-occupied housing units of 3.7 percent and near the aggregate home mortgage lending percentage of 1.2 percent. Additionally, the proportion of the bank's home mortgage lending at 2.3 percent in moderate-income CTs was significantly below the

owner-occupied housing unit percentage of 8.9 percent and near the aggregate home mortgage lending percentage of 5.4 percent.

### ***Small Loans to Businesses***

Overall, the bank's geographic distribution of small loans to businesses is adequate.

Refer to Table Q in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

### **Medina AA**

The Medina AA had no low- or moderate-income CTs during 2016, and only one moderate-income CT from 2017 through 2019. Therefore, we did not perform a geographic distribution analysis of small loans to businesses for this AA, as an analysis would have not been meaningful.

### **Summit AA**

The geographic distribution of the bank's originations and purchases of small loans to businesses in the Summit AA was excellent.

During 2016, the distribution of the bank's small loans to businesses in low- and moderate-income CTs was good. Westfield originated or purchased 11.7 percent of its small loans to businesses in low-income CTs, which was above the percentage of businesses at 9.2 percent. In addition, the bank's small business lending percentage exceeded aggregate's small business lending percentage of 7.1 percent. However, the bank's percentage of small business lending in moderate-income CTs at 13.3 percent was below the percentage of businesses at 17.1 percent and near the aggregate small business lending percentage of 15.1 percent.

During the 2017 through 2019 period, the bank's distribution of small loans to businesses in low- and moderate-income geographies was excellent. The bank's proportion of small business loans at 14.5 percent in low-income CTs was above both the percentage of businesses and percentage of aggregate small business lending at 12.4 percent and 10.9 percent, respectively. Additionally, the proportion of bank's small loans to businesses in moderate-income CTs at 40.2 percent significantly exceeded the percentage of businesses at 15.4 percent and aggregate's percentage of lending to small businesses at 14.5 percent.

### **Stark AA**

The geographic distribution of the bank's originations and purchases of small loans to businesses in the Summit AA was poor.

During 2016, the distribution of the bank's small loans to businesses in low- and moderate-income CTs was adequate. Westfield did not originate or purchase any small loans to businesses in low-income CTs. However, based on only 25 small business loans originated or purchased, the bank's percentage of small business lending in moderate-income CTs at 12.0 percent was above the percentage of businesses at 9.5 percent and significantly above the aggregate small business lending percentage of 6.6 percent.

During the 2017 through 2019 period, the bank's distribution of small loans to businesses in low- and moderate-income geographies was poor. Similar to 2016, Westfield did not originate or purchase any small loans to businesses in low-income CTs. In addition, the proportion of the bank's small business loans at 2.1 percent in moderate-income CTs was significantly below both the percentage of businesses at 7.4 percent and below the aggregate's percentage of small loans to businesses at 6.3 percent.

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

We reviewed summary reports and maps, and analyzed Westfield's home mortgage and small loans to businesses lending over the evaluation period to identify any gaps in the geographic distribution of loan activity. We did not identify any unexplained or conspicuous gaps.

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

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

In drawing our conclusion, we gave more weight to the bank's performance within the Medina AA, which is the bank's primary area. Additionally, when determining our overall conclusions, we considered the level of competition in each AA and economic conditions. We also considered the percentage of families that live below the poverty level, and barriers this creates for these families to qualify for home mortgage financing and have the financial capacity to own a home.

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

The bank's overall distribution of home mortgage loans to borrowers of different incomes was adequate.

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.

### **Medina AA**

Overall, the distribution of the bank's home mortgage loans to borrowers of different incomes within the Medina AA was adequate.

The distribution of the bank's home mortgage lending in 2016 was good. The proportion of home mortgage loans to low-income borrowers at 3.1 percent was significantly below the percentage of low-income families in the AA at 11.6 percent. However, the bank's percentage was near the aggregate lending percentage of 5.0 percent. The proportion of the bank's home mortgage loans to moderate-income borrowers at 14.7 percent was higher than the percentage of families in the AA at 13.7 percent. Additionally, the bank's percentage of lending to moderate-income borrowers were similar to the aggregate's lending percentage at 14.8 percent.

The distribution of the bank's home mortgage lending to low- and moderate-income borrowers from 2017 through 2019 was adequate. Westfield's proportion of home mortgage loans to low-income families at 3.8 percent was significantly below the percentage of low-income families at 12.2 percent. However, the bank's percentage of home mortgage loans to low-income borrowers was near the aggregate home mortgage lending percentage of 5.7 percent. The bank's home mortgage lending

percentage to moderate-income borrowers of 10.6 percent was near the percentage of moderate-income families at 13.9 percent and significantly below the aggregate lending percentage of 15.8 percent.

### **Summit AA**

Overall, the distribution of the bank's home mortgage loans to borrowers of different incomes within the Summit AA was adequate.

The distribution of the bank's home mortgage lending in 2016 was adequate. The proportion of home mortgage loans to low-income borrowers at 3.4 percent was significantly below the percentage of low-income families in the AA at 21.3 percent, as well as the aggregate lending percentage of 9.4 percent. However, the bank's percentage of lending to moderate-income borrowers at 14.9 percent was near both the percentage of moderate-income families and the aggregate percentage of lending at 17.7 percent and 18.7 percent, respectively.

The distribution of the bank's home mortgage lending to low- and moderate-income borrowers from 2017 through 2019 was also adequate. Westfield's proportion of home mortgage loans to low-income families at 8.3 percent was significantly below the percentage of low-income families at 21.9 percent. Additionally, the bank's percentage of home mortgage loans to low-income borrowers was below aggregate's home mortgage lending percentage of 12.2 percent. The bank's home mortgage lending percentage to moderate-income borrowers of 15.0 percent was near the percentage of moderate-income families at 16.7 percent and below the aggregate lending percentage of 20.7 percent.

### **Stark AA**

Overall, the distribution of the bank's home mortgage loans to borrowers of different incomes within the Stark AA was poor.

The distribution of the bank's home mortgage lending in 2016 was poor. The proportion of the bank's home mortgage loans to low-income borrowers at 1.6 percent was significantly below the percentage of low-income families in the AA at 19.4 percent, as well as the aggregate lending percentage of 8.1 percent. In addition, the bank's percentage of home mortgage lending to moderate-income borrowers at 11.1 percent was significantly below both the percentage of moderate-income families and the aggregate home mortgage lending percentage at 18.7 and 18.6, respectively.

The distribution of the bank's home mortgage lending to low- and moderate-income borrowers from 2017 through 2019 was also poor. Westfield's proportion of home mortgage loans to low-income families at 6.0 percent was significantly below the percentage of low-income families at 19.5 percent. Additionally, the bank's percentage of home mortgage loans to low-income borrowers was below the aggregate home mortgage lending percentage of 9.9 percent. The bank's home mortgage lending percentage to moderate-income borrowers of 14.0 percent was below the percentage of moderate-income families at 18.7 percent and significantly below the aggregate lending percentage of 21.6 percent.

### ***Small Loans to Businesses***

Refer to Table R in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Overall, the bank's borrower distribution of small loans to businesses was poor.

### **Medina AA**

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor in the Medina AA.

During the 2016, Westfield only originated or purchased 12.2 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is significantly below both the percentage of businesses of revenues \$1 million or less at 82.4 percent, as well as the aggregate lending percentage of 45.3 percent. Westfield's performance from 2017 through 2019 was consistent with its 2016 performance. The bank's percentage of small loans to businesses with revenues of \$1 million or less was 26.9 percent. However, the percentage of businesses with revenues \$1 million or less within the AA equated to 84.1 percent, and the aggregate percentage of small loans to businesses with revenues of \$1 million or less was 47.6 percent.

### **Summit AA**

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor in the Summit AA.

During the 2016, Westfield only originated or purchased 26.7 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is significantly below both the percentage of businesses of revenues \$1 million or less at 81.0 percent, as well as the aggregate lending percentage of 41.5 percent. Westfield's performance from 2017 through 2019 was consistent with its 2016 performance. The bank's percentage of small loans to businesses with revenues of \$1 million or less was 26.5 percent. However, the percentage of businesses with revenues \$1 million or less within the AA equated to 82.5 percent, and the aggregate percentage of small loans to businesses with revenues of \$1 million or less was 43.6 percent.

### **Stark AA**

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor in the Stark AA.

During the 2016, Westfield only originated or purchased 44.0 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's percentage is significantly below the percentage of businesses of revenues \$1 million or less at 80.9 percent. However, the bank's percentage was near the aggregate lending percentage of 45.5 percent. Westfield's performance from 2017 through 2019 was consistent with its 2016 performance. The bank's percentage of small loans to businesses with revenues of \$1 million or less was 35.4 percent. However, the percentage of businesses with revenues \$1 million or less within the AA equated to 82.0 percent, and the aggregate percentage of small loans to businesses with revenues of \$1 million or less was 44.4 percent.

### **Community Development Lending**

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, Westfield originated nine qualifying CD loans totaling \$11.81 million. Below are the details regarding each loan and the AAs that benefitted. When drawing our conclusions for each AA, we considered the CD loans originated or purchased on a regional or statewide basis. We also considered the level of competition in each AA for CD loans.

### **Medina AA**

The bank has originated or purchased an adequate level of CD loans within the Medina AA. Westfield originated or purchased two CD loans totaling approximately \$4.99 million, and committed to one CD loan totaling \$2.15 million dollars during the review period. The two originated or purchased loans and one loan commitment were to an entity that provides affordable housing. This is in addition to the CD loans originated or purchased on a regional or statewide basis.

### **Summit AA**

The bank originated or purchased an adequate level of CD loans within the Stark AA. During the review period, Westfield originated or purchased one CD loan totaling \$110,000 to an entity that provides affordable housing. The bank also originated or purchased one loan each totaling \$2.25 million to entities that provide social services to low- or moderate-income individuals. Specifically, one of the entities used the funds to renovate and expand its facilities for the purpose of providing food to low- or moderate-income persons. The other entity provides services such as job placement and vocational training for low- and moderate-income individuals with disabilities, child advocacy and foster care visitation for low- and moderate-income children, and operates a senior housing facility. This is in addition to the CD loans originated or purchased on a regional or statewide basis.

### **Stark AA**

The bank has originated or purchased an adequate level of CD loans within the Stark AA. The bank originated or purchased one CD loan totaling \$700,000 to an entity that provides affordable housing. This is in addition to the CD loans originated or purchased on a regional or statewide basis.

### **Regional or Statewide Area**

Westfield originated two qualifying CD loans outside of the bank's AAs totaling approximately \$1.62 million. The two CD loans were provided to organizations whose primary purpose is affordable housing, which benefitted each of the bank's AAs.

### **Product Innovation and Flexibility**

The institution makes limited use of innovative or flexible lending practices in order to serve AA credit needs.

Westfield's offers Fannie Mae's HomeReady Mortgage product. The HomeReady mortgages are similar to conventional home loans offered by Fannie Mae, which are meant to help low- and moderate-income borrowers buy or refinance their homes. Specifically, HomeReady loans reduce the typical

down payment, mortgage insurance, and sources of down payment requirements for qualifying borrowers. During the review period, the bank originated 28 HomeReady loans totaling \$3.5 million. Out of the 28 HomeReady loans, five were in the Medina AA, 13 in the Summit AA, eight in the Stark AA, and two in the Wayne AA.

Westfield participates in a Fix-It lending program designed to provide low-cost home improvement loans. The loans are not limited to low- or moderate-income people or areas. However, the program offers a discounted interest rate and the value of the home is based on county tax records as opposed to the expense of an appraisal. The loans range between \$5,000 to \$50,000 with a term up to five years. The bank introduced the program in the Medina AA in 2015. In 2018, Westfield expanded the program with Mustard Seed, a community development organization, in Akron, Ohio, and in the Stark AA in 2019. As of the review period, the bank originated 38 Fix-It loans for a total of approximately \$502,000 to borrowers of different income levels.

The bank is not an approved Federal Housing Administration (FHA) or Veterans Administration (VA) lender. Therefore, Westfield has partnered with a mortgage company to refer borrowers seeking FHA and VA financing. FHA and VA loans offer benefits, such as lower down payments and less restrictive underwriting guidelines, which assists individuals that don't qualify for traditional financing to obtain a home mortgage loan. As of the review period, Westfield's referrals resulted in the origination of 16 government backed home mortgage loans totaling \$2.4 million.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Wayne AA is weaker than the bank's overall performance under the Lending Test in the full-scope area(s). In 2016, the bank did not originate or purchase a sufficient amount of home mortgage or small loans to businesses to be evaluated. Though Westfield's geographic and borrower lending percentages from 2017 through 2019 were comparable, the ratios are skewed due to the limited number of loans originated or purchased in the AA. Specifically, Westfield only originated or purchased a total 28 home mortgage loans and 26 small loans to businesses over the three year period, averaging only ten home mortgage loans and nine small loans to businesses each year. Additionally, excluding the two CD loans originated or purchased on a regional or statewide basis, Westfield did not originate or purchase any CD loans within the Wayne AA.

Refer to Tables O through V in the state of Ohio section of *Appendix D* for additional details.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Ohio is rated Satisfactory.

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

Based on full-scope reviews, the bank's overall performances in the Medina, Summit and Stark AAs are good.

Overall, the institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely uses innovative or complex investments to support CD initiatives.

<b>Qualified Investments</b>										
<b>Assessment Area</b>	<b>Prior Period*</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments**</b>	
	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$(000's)</b>
Medina AA	0	0	27	261	27	41.54	261	1.92	0	0
Summit AA	1	117	9	1,904	10	15.38	2,021	14.86	0	0
Stark AA	1	622	14	1,394	15	23.08	2,015	14.82	0	0
Wayne AA	0	0	2	204	2	3.08	204	1.50	0	0
Regional	3	8,068	8	1,035	11	16.92	9,103	66.97	1	4,000
<b>Total</b>	<b>5</b>	<b>8,807</b>	<b>52</b>	<b>4,798</b>	<b>57</b>	<b>100.0</b>	<b>13,605</b>	<b>100.0</b>	<b>1</b>	<b>4,000</b>

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

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

### Medina AA

The bank's responsiveness to CD needs in the AA is adequate when giving consideration for statewide or regional CD investments. During the evaluation period, Westfield made qualified CD investments totaling approximately \$261,000, which is low considering this is the bank's primary AA and holds 74.9 percent of bank deposits. Qualified investments included five investments to organizations primarily focused on senior crime prevention targeted in low-and moderate-income AAs. Additionally, the bank provided 22 donations totaling \$21,465 to five different organizations. These entities primarily focused on social services, including food pantries, clothing, child advocacy, and affordable housing targeted to low- and moderate-income individuals. None of the investments demonstrated innovation or complexity.

### Summit AA

The bank's responsiveness to CD needs in the Summit AA is good. During the evaluation period, Westfield made qualified CD investments in the Summit AA totaling approximately \$2.02 million. The bank made four investments in securities backed 100 percent by home mortgage loans to low- and moderate-income borrowers. The bank also provided six donations totaling \$14,650 to organizations focused on affordable housing, and financial literacy courses at schools with a majority of students that are financially disadvantaged. None of the investments demonstrated innovation or complexity.

### Stark AA

The bank's responsiveness to CD needs in the AA is good. During the evaluation period, Westfield made qualified CD investments in the Stark AA totaling \$2.02 million. The qualified investments included two securities backed 100 percent by home mortgage loans to low- and moderate-income borrowers. Westfield also provided 12 separate donations to organizations focused in affordable housing, home improvement, financial literacy courses, and mental health services to low- and moderate-income individuals. None of the investments demonstrated innovation or complexity.



## Statewide and Regional AA

The bank has committed to \$9.1 million of investments into statewide securities. This includes \$5.12 million in prior investments in a Small Business Investment Company Fund, which the bank renewed in 2019 for \$1.0 million with an additional \$4.0 million committed. The bank previously funded two investments in Low-Income Housing Tax Credits (LIHTC) that benefitted the AAs, holding a current balance of \$2.87 million. The investments in the LIHTC helped create and preserve approximately 3,200 affordable housing units benefiting low- and moderate-income geographies or individuals. Additionally, the bank's investment into the Senior Housing Crime Prevention Program generated \$20,000 in dividends from qualified CD statewide investments that benefitted senior housing facilities with a majority of low- to moderate-income residents. None of the investments demonstrated innovation or complexity.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Wayne AA is weaker than the bank's overall performance under the Investment Test in full-scope areas.

Westfield's responsiveness to CD needs in the Wayne AA is adequate. During the evaluation period, Westfield made qualified CD investments in the Wayne AA totaling \$204,111. The qualified investments include two separate securities, focused on affordable housing and senior crime prevention. None of the investments demonstrated innovation or complexity.

## SERVICE TEST

The bank's performance under the Service Test in Ohio is rated Low Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Medina AA, Stark AA, and Summit AA is adequate. Based on a limited-scope review, the bank's performance in the Wayne AA is adequate.

## Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Medina AA	15.01	3	42.86	0.00	0.00	0.00	100.0	0.00	1.66	42.04	56.29
Stark AA	1.85	1	14.29	0.00	0.00	100.0	0.00	6.78	11.47	63.14	18.32
Summit AA	1.72	2	28.56	0.00	50.00	0.00	50.00	13.73	21.41	33.81	31.03
Wayne AA	3.61	1	14.29	0.00	0.00	100.0	0.00	0.00	11.01	62.79	25.27

## Medina AA

Westfield's branches are reasonably accessible within the geographies and to individuals of different income levels in the Medina AA, considering the bank's limited branch network in the area. Branch hours and services available do not vary in ways that inconvenience individuals of differing income levels. Overall, systems for delivering retail banking services are adequate. The bank operates three offices in the area. All branches in the AA are located in upper-income CTs. The AA had no low or moderate-income CTs in 2016. A change to the 2015 ACS Data resulted in the addition of one moderate-income CT in 2017 through 2019. Westfield did not open any new branches during the review period, and current branches were established prior to the designation of the moderate-income CT.

Each branch has a deposit taking ATM located onsite. In addition, the bank offers other alternative delivery systems, such as online banking, mobile banking, and internet banking.

## Summit AA

Westfield's branches are reasonably accessible within the geographies and to individuals of different income levels in the Summit AA. Branch hours and services available do not vary in ways that inconvenience individuals of differing income levels. Overall, systems for delivering retail banking services are adequate. The bank operates two offices in the area, one in a moderate-income CT and one in an upper income CT, which on a combined basis contain 55.2 percent of the population.

The branches have deposit taking ATMs located onsite. The bank also offers other alternative delivery systems, such as online banking, mobile banking, and internet banking.

## Stark AA

Westfield's branches are reasonably accessible within the geographies and to individuals of different income levels in the Stark AA, considering the bank's limited branch network in the area. Branch hours and services available do not vary in ways that inconvenience individuals of differing income levels. Overall, systems for delivering retail banking services are adequate. The bank operates one office in the area in a middle-income CT, which contains 63.1 percent of the population. Additionally, the bank offers other alternative delivery systems, such as online banking, mobile banking, internet banking, and an onsite deposit taking ATM. The bank did not open or close any branches in the Stark AA during the evaluation period.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Medina AA	0	1	0	0	0	-1
Stark AA	0	0	0	0	0	0
Summit AA	1	2	0	0	0	-1
Wayne AA	1	1	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

During the examination period, the bank closed two branches and opened two new branches. These did not have an adverse impact on the accessibility of low- and moderate-income geographies. One branch acquired in the 2012 Western Reserve acquisition was closed in the Medina AA due to lack of customer volume. The bank closed one branch in an upper-income CT and relocated it to a middle-income CT of Wayne AA. Two branches in the Summit AA, one located in an upper-income CT and the other in a moderate-income CT, were relocated and consolidated into one branch in a more central location, located within a moderate-income CT. There were no openings or closures in the Stark AA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly for low- and moderate-income geographies and individuals. All seven branch locations operate at reasonable hours and each has a deposit-taking ATM. Four of the locations also operate drive-thru services with extended operating hours. The bank offers typical banking products, and alternative delivery systems include telephone banking, online banking, mobile banking, and mobile remote capture. Operations are consistent across all branches and there are minimal differences in operating hours. Customers have various methods to access banking operations.

## **Community Development Services**

The institution provides an adequate level of CD services.

### **Medina AA**

Westfield provides an adequate level of CD services to the Medina AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, social services for low- and moderate-income individuals, and economic development. The bank's officers and staff participated in four organizations within the AA. During the evaluation period, the employees on a combined basis provided a total of 397 hours of qualifying services. Primary examples of these service activities are detailed below.

- Bank employees are active members of committees and boards of organizations that provide financial assistance and resources to support low- and moderate-income households. One employee serves as President at an organization specifically focused on low- and moderate-income individuals undergoing breast cancer treatments. Patients must qualify as low- or moderate-income through the organization's income assessment. One employee works with an organization that promotes economic development through tax abatements and small business lending. The organization funds SBA 504 loans to small businesses within the AA.
- One employee participates on a fundraising committee for a local organization providing subsidized housing, social services, and employment for low-to-moderate income individuals with disabilities. The committee focuses on one fundraiser that financially supports organizational operations and programs.

## **Stark AA**

Westfield provides an adequate level of CD services to the Stark AA. Bank personnel provide financial and technical expertise to organizations involved in affordable housing, financial literacy programs, social services for low- and moderate-income individuals, and economic development. The bank's officers and staff participated in seven organizations within the AA. During the evaluation period, the employees on a combined basis provided a total of 381 hours of qualifying services. Primary examples of these service activities are detailed below.

- Employees serve on various boards, committees, and fundraisers that provide affordable housing to low- and moderate-income households. This includes underwriting for housing loans and providing financial expertise on the board of Habitat for Humanity. Employees serve on the board of an organization, which focuses on home improvements to qualifying low- and moderate-income households.
- Westfield focuses on providing education for financial literacy. Bank staff teach Junior Achievement courses and interview skills at two schools that have a majority of students that are financially disadvantaged. Additionally, one employee conducts financial coaching specifically to low-to-moderate income individuals.
- Bank employees are active members on boards of organizations supporting economic development. This includes organizations providing tax abatements and 504(a) small business loans or services.

## **Summit AA**

Westfield provided an adequate level of CD services to the Summit AA. The bank's officers and staff members participated with ten organizations to provide financial and technical expertise to organizations involved in financial literacy and social services. During the evaluation period, the employees on a combined basis provided 239 hours of services. Primary examples of these service activities are detailed below.

- Bank officers and staff focus a majority of community service on initiatives related to financial literacy. Staff teaches Junior Achievement financial courses and hosts finance days at various Akron schools, all with a majority of students that are considered financially disadvantaged.
- Bank employees serve on various boards and committees providing social services including housing, food drives, financial education, counseling, and employment resources to low- and moderate-income individuals. Additionally, an employee serves on the board of an organization providing free meals on weekends to students participating in the free/reduced-price lunch program.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Wayne AA is weaker than the bank's overall performance under the Service Test in full-scope areas. Westfield provided a low level of CD services to the Wayne AA. The bank's Chief Lending Officer (CLO) participated with one organization to provide financial and technical expertise involved in economic

development. The CLO served on the Board of Directors and presented annual updates to the lending team, totaling 10 hours per year.

## 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>	01/01/2016 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Westfield Bancorp, Inc	Holding Company	Home Mortgage (excluding HELOCs) and small business loans.
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas (AA)</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Medina AA (Cleveland-Elyria MSA 17460)	Full-scope	Medina County, six contiguous census tracts in Cuyahoga County
Summit AA (Akron, OH MSA 10420)	Full-scope	Summit County
Stark AA (Canton-Massillon, OH MSA 15940)	Full-scope	Stark County
Wayne AA (Wayne County, OH)	Limited-scope	Wayne County (non-MSA)

## Appendix B: Summary of State Rating

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<b>RATINGS - Westfield Bank, FSB</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State Rating</b>
	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
<b>State:</b>				
Ohio	Low Satisfactory	Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## 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 §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 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.

**MMSA (state):** 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.

**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 loans are treated the same 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.
- 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. 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.

**2016**

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Medina AA	129	33,625	44.6	7,765	0.0	0.0	0.0	0.0	0.0	0.0	38.5	41.9	38.0	61.5	58.1	62.0	0.0	0.0	0.0
Stark AA	63	14,593	21.8	10,435	3.4	1.6	1.2	9.6	3.2	5.6	57.9	28.6	58.2	29.2	66.7	35.1	0.0	0.0	0.0
Summit AA	87	21,711	30.1	15,973	5.8	2.3	2.3	20.4	6.9	15.1	36.1	37.9	36.8	37.6	52.9	45.8	0.0	0.0	0.0
Wayne AA	10	2,003	3.5	2,454	0.1	0.0	0.2	5.5	10.0	5.2	64.4	50.0	64.7	30.0	40.0	30.0	0.0	0.0	0.0
Total	289	71,932	100.0	36,627	3.6	1.0	1.4	12.3	3.1	8.5	45.7	38.1	45.0	38.4	57.8	45.1	0.0	0.0	0.0
Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
	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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Medina AA	129	33,625	44.6	7,765	11.6	3.1	5.0	13.7	14.7	14.8	21.7	18.6	20.6	53.1	58.1	46.6	0.0	5.4	13.0
Stark AA	63	14,593	21.8	10,435	19.4	1.6	8.1	18.7	11.1	18.6	21.5	15.9	21.6	40.4	63.5	31.4	0.0	7.9	20.2
Summit AA	87	21,711	30.1	15,973	21.3	3.4	9.4	17.7	14.9	18.7	21.9	13.8	20.0	39.1	57.5	34.9	0.0	10.3	17.0
Wayne AA	10	2,003	3.5	2,454	14.9	0.0	4.9	15.9	20.0	19.1	22.4	30.0	23.5	46.7	50.0	37.3	0.0	0.0	15.3
Total	289	71,932	100.0	36,627	18.5	2.8	7.8	17.2	14.2	17.9	21.8	17.0	20.8	42.5	58.8	36.5	0.0	7.3	17.0
Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2016		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Medina AA	74	20,791	46.0	3,918	0.0	0.0	7.6	0.0	0.0	13.0	34.4	58.1	32.6	65.6	41.9	45.9	0.0	0.0	0.9
Stark AA	25	8,874	15.5	5,006	7.2	0.0	5.5	9.5	12.0	6.6	49.5	60.0	48.1	33.8	28.0	38.7	0.0	0.0	1.1
Summit AA	60	17,475	37.3	9,206	9.2	11.7	7.1	17.1	13.3	15.1	29.9	33.3	30.3	43.7	41.7	46.5	0.0	0.0	0.9
Wayne AA	2	950	1.2	1,654	0.1	0.0	0.1	9.3	0.0	8.8	58.6	0.0	62.7	32.0	100.0	27.8	0.0	0.0	0.7
Total	161	48,090	100.0	19,784	6.3	4.3	7.0	11.5	6.8	12.5	38.5	48.4	35.0	43.7	40.4	44.5	0.0	0.0	0.9
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2016	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Medina AA	74	20,791	46.0	3,918	82.4	12.2	45.3	6.7	86.5	11.0	1.4
Stark AA	25	8,874	15.5	5,006	80.9	44.0	45.5	6.9	56.0	12.2	0.0
Summit AA	60	17,475	37.3	9,206	81.0	26.7	41.5	7.6	71.7	11.4	1.7
Wayne AA	2	950	1.2	1,654	81.1	0.0	50.1	6.8	50.0	12.1	50.0
Total	161	48,090	100.0	19,784	81.2	22.4	44.7	7.2	75.8	11.6	1.9
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.											

**2017 – 2019**

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2017-19		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% 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	
Medina AA	367	108,236	40.2	8,829	0.0	0.0	0.0	1.2	0.8	0.8	34.6	24.0	35.2	64.2	75.2	64.0	0.0	0.0	0.0	
Stark AA	265	67,437	29.0	11,293	3.7	0.8	1.2	8.9	2.3	5.4	67.3	48.7	68.9	20.1	48.3	24.5	0.0	0.0	0.0	
Summit AA	254	60,806	27.8	18,241	7.4	4.7	4.0	19.1	16.1	15.4	37.2	33.1	39.1	36.3	46.1	41.5	0.0	0.0	0.0	
Wayne AA	28	5,568	3.1	3,114	0.0	0.0	0.0	7.7	10.7	7.9	63.6	53.6	63.6	28.6	35.7	28.4	0.1	0.0	0.1	
Total	914	242,047	100.0	41,477	4.3	1.5	2.1	11.8	5.8	9.0	48.3	34.6	48.2	35.6	58.1	40.7	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-19		
	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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Medina AA	367	108,236	40.2	8,829	12.2	3.8	5.7	13.9	10.6	15.8	21.3	14.4	21.9	52.6	67.0	45.4	0.0	4.1	11.2
Stark AA	265	67,437	29.0	11,293	19.5	6.0	9.9	18.7	14.0	21.6	21.8	14.7	23.1	40.0	60.0	33.4	0.0	5.3	12.1
Summit AA	254	60,806	27.8	18,241	21.9	8.3	12.2	16.7	15.0	20.7	20.7	16.1	21.0	40.6	50.0	33.6	0.0	10.6	12.5
Wayne AA	28	5,568	8.0	3,114	16.0	3.6	5.9	18.5	17.9	22.7	21.9	14.3	22.9	43.6	64.3	36.4	0.0	0.0	12.1
Total	914	242,047	100.0	41,477	19.0	5.7	9.7	17.0	13.0	20.1	21.3	15.0	21.9	42.8	60.2	36.3	0.0	6.1	12.1
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																			



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-19		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Medina AA	145	31,893	43.2	4,254	0.0	0.0	8.9	1.3	0.7	17.1	32.0	57.2	27.9	66.7	42.1	44.4	0.0	0.0	1.6	
Stark AA	48	13,517	14.3	5,570	5.4	0.0	4.6	7.4	2.1	6.3	64.0	70.8	61.7	20.7	27.1	24.8	2.5	0.0	2.6	
Summit AA	117	35,677	34.8	10,083	12.4	14.5	10.9	15.4	40.2	14.5	30.9	16.2	30.0	41.4	29.1	43.4	0.0	0.0	1.1	
Wayne AA	26	9,210	7.7	1,878	0.0	0.0	0.0	11.2	15.4	10.5	64.0	84.6	63.7	24.7	0.0	24.7	0.1	0.0	1.1	
Total	336	90,297	100.0	21,785	7.4	5.1	8.5	10.4	15.8	15.0	42.7	47.0	33.9	38.9	32.1	41.0	0.7	0.0	1.6	
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "-" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2017-19	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Medina AA	145	31,893	43.2	4,254	84.1	26.9	47.6	6.0	72.4	9.9	0.7
Stark AA	48	13,517	14.3	5,570	82.0	35.4	44.4	6.4	54.2	11.7	10.4
Summit AA	117	35,677	34.8	10,083	82.5	26.5	43.6	6.8	70.9	10.7	2.6
Wayne AA	26	9,210	7.7	1,878	82.0	7.7	51.3	6.5	92.3	11.5	0.0
Total	336	90,297	100.0	21,785	82.6	26.5	46.5	6.5	70.8	10.9	2.7
Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent. Westfield Bank FSB (716697) excluded from Aggregate.											