



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

May 9, 2022

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings and Loan Association of Greene County  
**Charter Number 702190**

25 East High Street  
Waynesburg, PA 15370

Office of the Comptroller of the Currency

Corporate One Office Park, Building 2  
4075 Monroeville Boulevard, Suite 430  
Monroeville, PA 15146

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The average loan-to-deposit ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment areas.
- A majority of the bank's home mortgage lending activity is originated within the bank's delineated assessment areas.
- The distribution of home mortgage loans represents reasonable distribution among borrowers of different income levels.
- The geographic distribution of home mortgage loans reflects excellent distribution among census tracts of different income levels.
- The bank demonstrates adequate responsiveness to community development needs in its assessment areas.
- There were no CRA-related complaints during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment areas (AAs), the bank's loan-to-deposit (LTD) ratio is reasonable.

First Federal Savings and Loan Association of Greene County's ("FFSLA" or "the bank") quarterly LTD ratio since the previous CRA evaluation averaged 75.7 percent, with a quarterly high of 79.2 percent and a quarterly low of 70.9 percent. The Office of the Comptroller of the Currency (OCC) compared the bank's LTD ratio to four similarly situated banks in the AAs ranging in asset size from \$563.6 million to \$1.6 billion. The quarterly average LTD for banks in the peer group was 68.3 percent, with a quarterly average high of 82.7 percent and quarterly average low of 46.9 percent.

### Lending in Assessment Area

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

The bank originated and purchased 77.7 percent of its total loans inside the AAs during the evaluation period between January 1, 2019 and December 31, 2021. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Lending in the AA had a positive impact on our

analysis of the geographic distribution of lending by income level. The table below illustrates the number and dollar volume of loans the bank originated inside and outside of its AAs.

<b>Table D - Lending Inside and Outside of the Assessment Areas</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2019	477	77.2	141	22.8	618	55,576	69.2	24,713	30.8	80,289
2020	620	76.8	187	23.2	807	89,755	72.3	34,390	27.7	124,144
2021	595	78.9	159	21.1	754	83,078	74.3	28,803	25.7	111,881
<b>Subtotal</b>	<b>1,692</b>	<b>77.7</b>	<b>487</b>	<b>22.3</b>	<b>2,179</b>	<b>228,409</b>	<b>72.2</b>	<b>87,906</b>	<b>27.8</b>	<b>316,315</b>
<b>Total</b>	<b>1,692</b>	<b>77.7</b>	<b>487</b>	<b>22.3</b>	<b>2,179</b>	<b>228,409</b>	<b>72.2</b>	<b>87,906</b>	<b>27.8</b>	<b>316,315</b>
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

FFSLA is an intrastate federal savings association located in Pennsylvania. The bank's main office and headquarters is located in Waynesburg, Pennsylvania. FFSLA maintains one subsidiary, First Greene Mortgage, which is located in Morgantown, West Virginia. First Greene Mortgage serves as a loan production office for FFSLA outside of the bank's AAs and was not considered as a part of the evaluation. There was no merger or acquisition activity during the evaluation period.

During the evaluation period, the bank primarily operated in Pennsylvania and will be evaluated as a single state institution. FFSLA identified two separate AAs, both in Pennsylvania: the Greene County (Co) PA Non-Metropolitan Statistical Area (Non-MSA) AA and the Pittsburgh PA Metropolitan Statistical Area (MSA) AA (#38300). The Greene Co PA non-MSA AA includes the entirety of Greene County. The Pittsburgh PA MSA AA includes the full counties of Fayette County and Washington County. FFSLA does not include the other counties in the Pittsburgh PA MSA in their AA as the bank does not operate any branches or deposit taking locations in these counties. The excluded counties in the Pittsburgh PA MSA consist of Allegheny, Armstrong, Beaver, Butler, and Westmoreland. The AAs do not arbitrarily exclude low- to moderate-income census tracts (CTs).

FFSLA operates eight full-service branches in Pennsylvania. The bank maintains two branches each in Waynesburg and Uniontown, and one branch each in Carmichaels, Mount Morris, Washington, and Taylorstown. The branches are split evenly between the Pittsburgh PA MSA AA and the Greene Co PA non-MSA AA, with each AA having four branches. Of the eight branches one is in a moderate-income CT, five are in middle income CTs, and two are in upper-income CTs. There were no branches in low-income CTs. FFSLA had no branch openings or closings during the evaluation period.

FFSLA's branches operate with standard lobby hours from 8:30 a.m. to 4:00 p.m., Monday through Thursday, and extended hours on Friday until 6:00 p.m. at all locations, except for the Downtown Uniontown and Main Waynesburg branches, which close at 5:00 p.m. Drive-thru hours during the week are from 8:30 a.m. to as late as 6:00 p.m. The bank offers drive-thru only services on Saturdays from 8:30 a.m. to 12:00 p.m. at the Waynesburg and Uniontown drive-thrus, and the Mount Morris,

Washington, and Taylorstown branches. The stand-alone drive-thru location in Waynesburg is the only branch that does not offer other traditional banking activities outside of deposit taking. FFSLA operates nine automated teller machines (ATMs), which includes one stand-alone ATM on Waynesburg University's campus. All ATMs can accept deposits, except for the stand-alone ATM on Waynesburg University's campus and the ATM located at the main branch in Waynesburg.

According to the Reports of Condition and Income, as of December 31, 2021, the bank reported total assets of \$1.0 billion, total loans of \$635.0 million, and total deposits of \$893.4 million. Total loans comprised 61.0 percent of total assets. The vast majority of the bank's loans are one-to-four family first lien residential mortgages, which comprised 94.6 percent of total loans as of December 31, 2021. Overall, real estate loans make up 99.4 percent of the bank's total loans. As of December 31, 2021, tier 1 capital was \$140.0 million or 13.44 percent of total assets.

The bank's strategic plan continues to focus on originating one-to-four family residential mortgages within their AAs. In addition, the bank maintains small portfolios of consumer loans and commercial loans to local churches, fire departments, and nonprofit organizations. The bank's website, changed in 2022 to [www.ffgc.bank](http://www.ffgc.bank), provides a listing and description of its loan and deposit services. The bank offers a variety of traditional products including personal checking and savings accounts, money markets, and certificates of deposit. Services include direct deposit, wire transfers, telephone banking, and safe deposit boxes. The bank also offers online banking services, which includes remote check deposit services.

There are currently no financial or legal impediments hindering the bank's ability to meet the credit needs of its AAs. The bank received a Satisfactory rating using Intermediate Small Bank (ISB) procedures as of the last CRA performance evaluation dated March 4, 2019.

## **Scope of the Evaluation**

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

This performance evaluation is an assessment of FFSLA's ability to meet the credit needs in its AAs. We evaluated the bank using ISB evaluation procedures, which includes a Lending Test and Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs in its AAs through lending activities. The Community Development Test evaluates the bank's responsiveness to community development (CD) needs in its AAs through qualified lending, investments and donations, and services.

To evaluate performance under the Lending Test, we reviewed home mortgage loan originations between January 1, 2019 and December 31, 2021. The bank's primary loan product over the evaluation period was home mortgage loans.

To evaluate performance under the Community Development Test, we evaluated the bank's loans, investments and donations, and services that satisfied the definition of CD made between January 1, 2019 and December 31, 2021. The analysis took into consideration the economic, financial, and environmental factors that impact the bank's CRA performance.

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

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

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

FSLA’s overall rating is based solely on the state of Pennsylvania rating as this is the only rating area. The bank’s performance in the Pittsburgh PA MSA AA carried the greatest weight as this AA received a full-scope review and represented the majority of home mortgages lending activity by both dollar amount and volume during the evaluation period. The Greene Co PA non-MSA AA was subject to a limited-scope review. Additionally, there are no low- to moderate-income (LMI) CTs in the Greene Co PA Non-MSA AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Pennsylvania

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

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's geographic distribution of home mortgage loans is excellent.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank demonstrated adequate responsiveness to the CD lending, investment, and service needs of the AAs.

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



## Description of Institution's Operations in Pennsylvania

FFSLA only maintains branches within the state of Pennsylvania within its two AAs; therefore, there is no difference in the description of the institution's operating at the overall and state level. Please refer to the overall description of the institution's operations for additional information. The bank's performance in the Pittsburgh PA MSA AA carried the greatest weight as the AA received a full-scope review while the Greene County PA Non-MSA AA was subject to a limited-scope review. More weight was also given to the Pittsburgh PA MSA AA as it represented the majority of home mortgage lending activity by both dollar amount and volume of loans during the evaluation period.

### Pittsburgh PA MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh PA MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	5.3	36.8	45.3	12.6	0.0
Population by Geography	343,077	3.6	33.3	46.1	17.0	0.0
Housing Units by Geography	156,521	3.8	34.4	46.9	14.9	0.0
Owner-Occupied Units by Geography	102,192	1.8	30.3	49.1	18.8	0.0
Occupied Rental Units by Geography	35,544	8.5	43.6	40.2	7.7	0.0
Vacant Units by Geography	18,785	6.1	39.4	47.6	6.9	0.0
Businesses by Geography	28,631	5.4	25.5	39.3	29.8	0.0
Farms by Geography	1,065	1.6	18.7	57.9	21.8	0.0
Family Distribution by Income Level	89,821	24.5	18.4	21.4	35.7	0.0
Household Distribution by Income Level	137,736	27.3	16.1	17.1	39.5	0.0
Median Family Income MSA - 38300 Pittsburgh, PAMSA		\$69,624	Median Housing Value			\$126,247
			Median Gross Rent			\$640
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FFSLA's Pittsburgh PA MSA AA is comprised of Washington and Fayette County, PA. The AA consists of 95 geographies (census tracts), of which there are five low-income CTs, 35 moderate-income CTs, 43 middle-income CTs, and 12 upper-income CTs. There are no unknown CTs. The bank has not made any changes to the AA since the previous evaluation. According to the 2015 U.S. Census, the total population for the AA was 343,077 and the distribution of families by income level was 3.6 percent low-income, 33.3 percent moderate-income, 46.1 percent middle-income, and 17.0 percent upper-income.

FFSLA operates four full-service branches that offer traditional deposit and loan products and services in the AA. Drive-up windows and ATM services are available at all locations in the AA, except for the Downtown Uniontown branch, which has a drive-thru located less than two miles away. The Uniontown Drive-Thru also offers traditional banking services. Of the branches in the AA, one branch is located in

a moderate-income CT, one branch is located in a middle-income CT, and the remaining two branches are located in upper-income CTs. There are no branches in low-income CTs.

According to the June 30, 2021 FDIC Summary of Deposit Market Share Report, FFSLA was ranked ninth out of the 37 institutions operating within the AA, with 4.2 percent of total deposits. FFSLA's total deposits within the AA were \$396.0 million, or 45.6 percent of the bank's total deposits. The top five institutions in the AA were PNC Bank, Washington Financial Bank, Citizens Bank, First National Bank of Pennsylvania, and KeyBank, which combined held 59.9 percent of the deposit market share as of June 30, 2021. FFSLA originated 1,138 loans totaling \$159.1 million in the AA during the evaluation period. Loans originated in the AA represented 52.2 percent of total loans by count and 50.3 percent of total loans by dollar volume originated by the bank during the evaluation period. Competition for mortgage loans in the AA is strong and includes local commercial and savings banks, branches of larger regional and nationwide banks, and national mortgage lenders. Based off the most recent 2020 Peer Mortgage Data, there were 325 lending institutions within the AA competing for mortgage applications. FFSLA ranked seventh, with a market share of 3.2 percent by count and a 2.5 percent by total dollar volume. The top five lenders, with combined market share of 26.9 percent by count and 25.5 percent by total dollar amount, were PNC Bank, Wells Fargo Bank, Quicken Loans, Citizens Bank, and Victorian Finance.

### *Employment and Economic Factors*

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for Washington County was 4.7 percent as of December 2021 and decreased from a high of 16.5 percent in April 2020. Washington County's unemployment rate is below the state unemployment rate for Pennsylvania of 5.5 percent but remains above the national unemployment rate of 3.9 percent as of December 2021. The non-seasonally adjusted unemployment rate for Fayette County was 6.6 percent. Fayette County's unemployment rate is both above the state unemployment rate for Pennsylvania of 5.5 percent and the national unemployment rate of 3.9 percent as of December 2021 and decreased from a high of 19.7 percent in April 2020. The high unemployment in both Washington and Fayette Counties in 2020 was associated with the COVID-19 pandemic.

According to a January 2022 Moody's Analytics Report, the Pittsburgh PA MSA will face challenges as new geographic flexibility for high-tech and office workers may lead to relocation away from the MSA. Additionally, inefficiently addressed state fiscal problems may hurt growth. Moody's noted that overall, the Pittsburgh PA MSA's recovery will maintain a below-average pace in the near term. Longer term, sub-par demographic trends will leave the MSA economic trajectory lagging compared to the rest of the nation. However, Moody's is expecting the residential real estate market will see an end to the pandemic-fueled acceleration in home prices quicker than the rest of the nation.

### *Housing*

There are limited opportunities for residential mortgage lending in low-income CTs within the AA, with more opportunities in moderate-income CTs. Of the 95 total CTs in the AA, there are five low-income CTs and 35 moderate-income CTs. The majority of the CTs, or 57.9 percent, are middle- and upper-income geographies.

Additionally, there is a lower number of housing units within LMI geographies compared to middle- and upper-income geographies. Of the total 156,521 housing units in the AA, housing units in low- and moderate-income CTs represent 3.8 percent and 34.4 percent of total housing units, respectively, while

middle- and upper-income geographies make up 61.8 percent. The majority of housing units in low-income CTs, or 50.5 percent, are rental units. Owner-occupied units represent another 30.4 percent of all housing units in low-income CTs, while the remaining 19.1 percent are vacant. The majority of housing units in moderate-income CTs, or 57.5 percent, are owner-occupied.

Home ownership in LMI geographies may be difficult due to higher median housing prices compared to median family income and higher household poverty rates. According to the 2015 ACS US Census, the median house value was \$126,247, which is relatively high for LMI households. The median family income for the AA was \$69,624, which would result in a low-income family annual income below \$34,812, and a moderate-income family annual income between \$34,812 and \$55,699. These income levels could make it difficult to afford housing at the median housing value in this AA for LMI borrowers as the median housing value is approximately 3.6 times the low-income family income threshold. Poverty levels in LMI geographies within the AA remains high. Households below the poverty line make up 30.6 percent of households in low-income geographies and 20.5 percent of households in moderate-income geographies. Additional factors that may cause difficulties in LMI geographies include higher median age of housing within LMI geographies compared to middle- and upper- income geographies. Consequently, the above demographic and economic factors along with limited quality available housing within the bank's AA limits both the opportunity for and demand of residential mortgage loans.

### *Community Contact*

A community contact representing an economic development organization provided information regarding the Pittsburgh PA MSA as of the third quarter of 2019. The contact stated that employment growth in the area was slightly decreasing at the time of the conversation. Previously, the local economy had benefited from the boost by oil and gas growth in the area; however, the production had slowed down. Production may have seen an additional decrease due to slow downs associated with the coronavirus pandemic. The community contact also stated there is a need for startup funding for new businesses, however, financial institutions are facing obstacles due to either extremely poor credit or lack of collateral. The community contact did provide a positive perception of the degree of involvement of the local financial institutions in the area despite the economic issues noted.

## **Scope of Evaluation in Pennsylvania**

The bank's overall rating is based entirely on the state rating of Pennsylvania. The state rating is based on the performance in both of the bank's AAs, Pittsburgh PA MSA AA and Greene Co PA non-MSA AA, for both the Lending Test and the Community Development Test. We completed a full-scope review of the bank's Pittsburgh PA MSA AA as the majority of the bank's mortgage lending activity occurred in the Pittsburgh PA MSA AA. The Greene Co PA non-MSA AA received a limited scope review as the AA does not have any low- or moderate-income CTs and a meaningful assessment could not be conducted. Home mortgages are the bank's primary lending product and was the only product evaluated under the Lending Test. Equal weight was placed on the Lending Test and the Community Development Test.

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

### **LENDING TEST**

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

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

Based on full- and limited-scope reviews, the bank's lending performance in the state of Pennsylvania is reasonable.

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

The bank exhibits excellent geographic distribution of loans in the state.

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

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

The distribution of the bank's home mortgage loans in LMI geographies was excellent. The proportion of home mortgage loans originated in low-income areas exceeded both the percent of owner-occupied housing units and the peer aggregate percentage. Additionally, the proportion of home mortgage loans originated in moderate-income areas exceeded both the percent of owner-occupied housing units and the peer aggregate percentage.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels.

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

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

The distribution of the bank's loans reflects reasonable distribution among individuals of different income levels. The percentage of home mortgage loans to low-income borrowers was well below the distribution of low-income families and near to the percentage of loans by all lenders to low-income families. The percentage of home mortgages loans to moderate income borrowers both exceeded the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. When considering the bank's opportunities to lend to low-income borrowers, the distribution is reasonable.

#### **Responses to Complaints**

There were no CRA complaints received by the bank or any agency since the prior examination

regarding performance in meeting the credit needs of the bank's established AA.

### Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Greene Co PA non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Pennsylvania is rated Satisfactory.

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

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the Pittsburgh PA MSA AA.

The bank's CD loans and qualified investments for this period totaled \$3.4 million dollars, or 2.4 percent of tier 1 capital. Bank directors and employees also performed 342 hours of community services to eleven different organizations within the Greene County Non-MSA AA and the Pittsburgh, PA MSA AA.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending for both full- and limited-scope reviews. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Pittsburgh, PA MSA AA (Full-Scope)	1	100%	\$91	100%
Greene County Non-MSA AA (Limited-Scope)	0	0%	\$0	0%

FFSLA originated one CD loan in the Pittsburgh PA MSA AA during the evaluation period. The CD loan provided financing for a local community group that supports community services specifically targeted towards low- and moderate-income consumers. The Bank's commercial lending is limited to a small portfolio of investor-owned real estate loans and loans to local non-profit entities. As a result, the bank has limited opportunities to originate CD loans.

## Number and Amount of Qualified Investments

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% Of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh, PA MSA AA (Full-Scope)	9	\$1,250	13	\$2,783	22	42%	\$4,033	84.0%	0	\$0
Greene County Non-MSA AA (Limited-Scope)	13	\$143	17	\$628	30	58%	\$771	16.0%	0	\$0
<b>Total</b>	<b>22</b>	<b>\$1,393</b>	<b>30</b>	<b>\$3,410</b>	<b>52</b>	<b>100%</b>	<b>\$4,804</b>	<b>100%</b>	<b>0</b>	<b>\$0</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.

The bank's level of CD investments and donations during the evaluation period is adequate considering the institution's capacity, competitive and demographic characteristics of the market, and opportunities for CD investments. During the evaluation period, bank investments and donations totaled \$2.8 million in the Pittsburgh PA MSA AA. The highlights of the bank's CD investments and donations in the Pittsburgh PA MSA AA included investments totaling \$2.1 million to four local area school districts with over 50 percent free and reduced lunch students. Additionally, the bank supported affordable housing by paying all associated monthly private mortgage insurance (PMI) premiums for first-time home buyers that met LMI qualifications. The bank paid approximately \$299.8 thousand in PMI premiums on behalf of LMI borrowers during the evaluation period in both assessment areas.

### Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of CD services in the Pittsburgh PA MSA AA. During the evaluation period, three bank employees, officers, and directors provided approximately 37 hours of expertise, leadership services, or community services to different CD eligible organizations within the Pittsburgh PA MSA AA. The services met the regulatory definition of CD and included financial literacy programs and providing services and expertise for organizations in LMI geographies. The bank's CD services included a bank officer serving on the board for a nonprofit organization that constructs and renovates housing for LMO residents.

### Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Greene Co PA non-MSA AA is consistent with the bank's overall performance under the CD Test in the full-scope area. During the evaluation period, bank investments and donations totaled \$628 thousand in the Greene Co PA non-MSA AA which included a \$55 thousand donation to a local program that supports workforce development opportunities for LMI borrowers. During the evaluation period, bank employees, officers, and directors provided approximately 305 hours of expertise, leadership services, or community services to different CD eligible organizations within the Greene Co non-MSA AA.

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

# 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 MSA(s) and non-MSA(s) 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>	January 1, 2019 to December 31, 2021	
<b>Bank Products Reviewed:</b>	Home mortgage Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Pittsburgh PA MSA	Full-Scope	Fayette County and Washington County
Greene Co PA non-MSA	Limited-Scope	Greene County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS First Federal Savings and Loan Association of Greene County			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Federal Savings and Loan Association of Greene County	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Pennsylvania	Satisfactory	Satisfactory	Satisfactory

(\* ) The Lending Test and Community Development Test carry equal weight in the overall rating.



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2019-21**

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
Greene Co PA non-MSA AA 2021	554	69,335	32.7	493	0.0	0.0	0.0	0.0	0.0	0.0	94.8	89.2	88.8	5.2	10.8	11.2	0.0	0.0	0.0
Pittsburgh PA MSA 2021	1,138	159,074	67.3	12,325	1.8	2.2	1.2	30.3	44.3	18.9	49.1	40.9	42.8	18.8	12.7	37.2	0.0	0.0	0.0
<b>Total</b>	<b>1,692</b>	<b>228,409</b>	<b>100.0</b>	<b>12,818</b>	<b>1.6</b>	<b>1.5</b>	<b>1.1</b>	<b>27.5</b>	<b>29.8</b>	<b>18.2</b>	<b>53.3</b>	<b>56.7</b>	<b>44.5</b>	<b>17.6</b>	<b>12.1</b>	<b>36.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

First Federal Savings and Loan (10000702190) excluded from Aggregate

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Greene Co PA non-MSA AA 2021	554	69,335	32.7	493	19.2	5.1	6.5	18.9	11.2	16.4	19.9	23.5	18.5	42.1	58.8	41.8	0.0	1.4	16.8
Pittsburgh PA MSA 2021	1,138	159,074	67.3	12,325	24.5	9.7	8.3	18.4	18.6	17.4	21.4	26.7	21.0	35.7	43.2	37.6	0.0	1.8	15.7
<b>Total</b>	<b>1,692</b>	<b>228,409</b>	<b>100.0</b>	<b>12,818</b>	<b>24.0</b>	<b>8.2</b>	<b>8.2</b>	<b>18.4</b>	<b>16.2</b>	<b>17.4</b>	<b>21.3</b>	<b>25.7</b>	<b>20.9</b>	<b>36.3</b>	<b>48.3</b>	<b>37.7</b>	<b>0.0</b>	<b>1.7</b>	<b>15.7</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

First Federal Savings and Loan (10000702190) excluded from Aggregate