

# **PUBLIC DISCLOSURE**

December 5, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

County Savings Bank Charter Number 703136

410 Wanamaker Ave Essington, PA 19029-1322

Office of the Comptroller of the Currency

1150 Northbrook Drive Suite 303 Trevose, PA 19503

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

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# **Overall CRA Rating**

### Institution's CRA Rating: This institution is rated Satisfactory

### The lending test is rated: Satisfactory

The major factors that support this rating include:

- The quarterly loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs;
- A majority of the bank's lending activity is within the AA by number of loans originated and dollar amount;
- The geographic distribution of loans to low and moderate-income borrowers is reasonably dispersed within the census tracts;
- The overall borrower distribution of loans by income level of the borrower reflects reasonable distribution to borrowers of different income levels;
- The bank did not have any CRA related complains during the assessment period.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-todeposit ratio is reasonable. The bank's quarterly average loan-to-deposit ratio over the 12 quarters captured in our evaluation period was 50 percent. During this period, the ratio ranged from a quarterly low of 48.29 percent to a quarterly high of 51.08 percent. We compared the bank's loan-to-deposit ratio to seven similarly situated banks located in Chester and Delaware Counties, ranging in asset sizes from \$200 to \$600 million. The quarterly average loan-to-deposit ratio for these institutions over the same 12 quarters captured in our evaluation period was 86.07 percent. The comparison bank ratios range from a quarterly low of 72.42 percent to a quarterly high of 100.28 percent. While the bank's quarterly average net loan-to-deposit ratio is lower than comparable institutions, it is reasonable when taking into consideration the bank's asset size, lending market share, and competition for loans within the AA.

### Lending in Assessment Area

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

The bank originated and purchased 73.6 percent of its total loans, by number of loans, inside the bank's AAs during the evaluation period. The bank originated 60.6 percent of its total loans, by dollar amount, inside the AA. 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.

	I	Number o	of Loans		Total	Dollar A				
Loan Category	Insi	de	Outs	side		Insic	le	Outs	Total	
	#	%	#	%	#	\$ %		\$ %		\$(000s)
Home Mortgage				-		-				
2019	31	75.6	10	24.4	41	3,658	59.0	2,543	41.0	6,201
2020	16	66.7	8	33.3	24	4,330	62.1	2,641	37.9	6,970
2021	20	76.9	6	23.1	26	3,591	60.6	2,338	39.4	5,929
Subtotal	67	73.6	24	26.4	91	11,578	60.6	7,522	39.4	19,100
Total	67	73.6	24	26.4	91	11,578	60.6	7,522	39.4	19,100

## **Description of Institution**

County Savings Bank (CSB) is a two-branch community mutual thrift located in Delaware County, Pennsylvania. Total assets were \$100 million as of December 31, 2021. The bank's two locations are in Tinicum Township (headquarters) and Ridley Township PA. Tinicum Township is included in the Philadelphia, PA MSA. The bank has one assessment area (AA) located in Delaware County, Pennsylvania. CSB's primary line of business consists of traditional banking products including checking accounts, savings programs, money market accounts, certificates of deposit, residential mortgages, and consumer loans.

As of December 31, 2021, CSB reported net loans and leases of \$45.6 million or 47 percent of average assets. Loan products are heavily concentrated in loans backed by residential real estate. The table below details the composition of the loan portfolio.

31-Dec-21											
Loan Category	<pre>\$ Amount (thousands)</pre>	% Of Outstanding Loans									
Residential Real Estate	40,489	88.14%									
Non-Farm/Non-Residential	5,393	11.74%									
Consumer Loans	57	0.12%									
TOTAL	45,939	100.00%									

CSB's last Public Evaluation (PE) was dated December 3, 2018, and the institution received a satisfactory rating. Since the previous PE, there have been no changes to the strategic initiatives at the bank. CSB has not closed or opened any branches since the prior CRA exam. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

# **Scope of the Evaluation**

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

We completed a full scope evaluation of CSB using the Small Bank CRA Examination procedures, which only includes a Lending Test and Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period covers the bank's performance from January 1, 2019, through December 31, 2021. The evaluation under the lending test considered home mortgage loans, as these are the bank's primary product.

#### 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 fullscope 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

CSB's overall rating is based primarily on the review of the bank's full-scope AA, the Delaware County AA. The vast majority of the bank's loans, deposits, branches are located in this AA during the evaluation period.

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

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# **State Rating**

## State of Pennsylvania

### CRA rating for the State of Pennsylvania: Satisfactory

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The quarterly loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs;
- A majority of the bank's lending activity is within the AA by number of loans originated and dollar amount;
- The geographic distribution of loans to low and moderate-income borrowers is reasonably dispersed within the census tracts;
- The overall borrower distribution of loans by income level of the borrower reflects reasonable distribution to borrowers of different income levels;
- The bank did not have any CRA related complains during the assessment period.

## Description of Institution's Operations in Pennsylvania

County Savings Bank (CSB) is an intra-state, mutual thrift located in Delaware County, Pennsylvania. Total assets were \$100 million as of December 31, 2021. The bank's two locations are in Tinicum Township (headquarters) and Ridley Township PA. Tinicum Township is included in the Philadelphia, PA MSA. The bank's primary line of business consists of traditional banking products, with first lien 1-4 family loans being their primary loan product. The bank has one assessment area (AA) located in Delaware County, Pennsylvania. The AA is comprised of 144 census tracts. The census tracts are primarily comprised of upper-income tracts (93 tracts). The AA is located in a competitive market, with 504 different lenders competing for market share as of 2020.

As of December 31, 2021, the bank reported net loans of \$45.88 million, and had a net loans and leases to total assets ratio of 46 percent.

## **Delaware County AA**

Table A – Dem Asse	<b>.</b>		of the Assess e County AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	144	2.1	16.0	16.0	65.3	0.2
Population by Geography	561,683	1.2	13.7	15.0	70.1	0.0
Housing Units by Geography	222,249	1.5	14.3	15.1	69.2	0.0
Owner-Occupied Units by Geography	142,548	0.5	7.7	13.2	78.5	0.0
Occupied Rental Units by Geography	61,269	3.1	24.2	18.8	53.9	0.0
Vacant Units by Geography	18,432	3.3	31.9	17.4	47.4	0.0
Businesses by Geography	56,944	0.6	10.7	12.2	76.4	0.1
Farms by Geography	986	0.3	3.8	9.1	86.8	0.0
Family Distribution by Income Level	136,633	12.8	11.7	15.6	59.8	0.0
Household Distribution by Income Level	203,817	15.4	11.4	14.3	58.9	0.0
Median Family Income MSA - 37964 Philadelphia, PA		\$56,411	Median Hous	ing Value		\$242,730
			Median Gros	s Rent		\$1,057
			Families Belo	ow Poverty L	evel	7.5%

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

The local economy is relatively stable. Per Moody's Analytics review of the Philadelphia Metropolitan area, the economy is the process of recovering from the COVID-19 recession. The major employment sectors in the Philadelphia Metro area continue to be healthcare, professional and business services, and government. The major employers within the area are University of Pennsylvania Health System, Thomas Jefferson University and TJU Health Systems inc., Children's Hospital of Philadelphia, Comcast, and Drexel University. Unemployment rates continue to improve, with above-average job growth anticipated in the coming years. The healthcare industry is expected to generate the most job growth, while white-collar careers may lag in growth. According to the U.S Bureau of Labor Statistics, the unemployment rate in Delaware County, PA in December 2021 was 4.3 percent, which was below the statewide unemployment rate of 5.5 percent. U.S. unemployment during this period was 6.7 percent.

Competition in the AA is high and includes local community banks and larger regional and national banks. Per the 2020 Peer Mortgage Data, there are 504 lenders within CSB's AA. CSB's largest competitors are Wells Fargo Bank, NA which originated 2,625 loans or 10.09 percent of the market share, Quicken Loans, LLC which originated 1,427 loans or 5.48 percent of the market share, and Citizens Bank, NA. which originated 1,013 loans or 3.89 percent of the market share.

According to 2021 Peer Deposit Data, CBS's deposit market share within this AA is 0.46 percent which ranks CSB 23rd out of 32 institutions in AA. CBS's primary competitors are TD Bank, N.A. (13 offices, 16.47 percent market share), Wells Fargo Bank, N.A. (19 offices, 16.45 percent market share), Citizens Bank, N.A. (18 offices, 12.09 percent market share), PNC Bank, N.A. (nine offices, 9.18 percent market share), and Franklin Mint Federal Credit Union (one office, 7.15 percent market share).

## **Community Contact**

We reviewed the OCC Community Contact Database during this examination to determine the local credit needs of the community. We reviewed two reports of local economic development groups conducted in 2022. Contacts indicated the county has an aging population, comprised of mostly blue-collar workers of moderate- to middle-income. Contacts noted that high housing costs and low inventory have negatively impacted the Delaware County housing market.

## Scope of Evaluation in Pennsylvania

We completed full-scope reviews of the bank's AAs which comprises the whole of Delaware County, PA. The county consists of 144 contiguous tracts. This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

Please refer to appendix A for a list of all AAs under review.

# LENDING TEST

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

## **Conclusions for Area Receiving Full-scope Review**

Based on full-scope review of the bank's performance in the state of Pennsylvania is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the State.

#### Home Mortgage Loans

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

The bank exhibits reasonable geographic distribution of loans within the state. The bank did not originate a loan within a low-income census tract. Opportunities to lend within low-income tracts within the AA are limited, as there are only 3 low-income tracts with the AA. The percentage of home mortgages made to borrowers within moderate-income tracts exceeded the peer aggregate. This meets the standard for satisfactory performance.

## Distribution of Loans by Income Level of the Borrower

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

#### 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 bank exhibits reasonable distribution of loans to individuals of different income levels. The percentage of home mortgage loans made to low-income borrowers was slightly below the aggregate while the percentage of home mortgage loans made to moderate-income borrowers exceeded the aggregate in the assessment area. This meets the standard for satisfactory performance.

#### **Responses to Complaints**

The bank did not receive any CRA related complains during the assessment period.

# **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	01/01/2019-12/31/2021	
Bank Products Reviewed:	Home Mortgage Loans	
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
County Savings Bank AA	Full-Scope	Whole of Delaware County- total of 144 census tracts

# **Appendix B: Summary of MMSA and State Ratings**

RA	TINGS	County Savings Bank
Overall Bank:		Lending Test Rating
County Savings Bank		Satisfactory
MMSA or State		
Pennsylvania		Satisfactory

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# **Content of Standardized Tables**

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

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

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

	Т	otal Home	Mortgag	e Loans	Low-Income Tracts			Low-Income Tracts Moderate-Income Tracts Middle-Income Tracts					Upper	Income	e Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Delaware County AA	67	11,578	100.0	26,018	0.5	0.0	0.1	7.7	4.5	3.4	13.2	34.3	9.5	78.5	61.2	87.1	0.0	0.0	0.0
Total	67	11,578	100.0	26.018	0.5	0.0	0.1	7.7	4.5	3.4	13.2	34.3	9.5	78.5	61.2	87.1	0.0	0.0	0.0

	Т	Total Home Mortgage Loans Low-Income Borrowers			orrowers	Moderate-Income Middle-Income Borrowers					Upper-I	ncome ]	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
Delaware County AA	67	11,578	100.0	26,018	12.9	1.5	2.2	11.7	10.7	9.0	15.6	22.4	16.4	59.8	47.8	56.6	0.0	17.9	15.8
Fotal	67	11,578	100.0	26,018	12.9	1.5	2.2	11.7	10.7	9.0	15.6	22.4	16.4	59.8	47.8	56.6	0.0	17.9	15.8