



## **PUBLIC DISCLOSURE**

May 8, 2023

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

Fairfield FS & LA  
700311

111 East Main Street  
Lancaster, OH 43130-3713

Office of the Comptroller of the Currency

Central Ohio – Indiana Office  
Metro Place V  
655 Metro Place South, Suite 625  
Dublin, Ohio 43017

**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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	3
State Rating.....	5
State of Ohio.....	5
Lending Test.....	8
Community Development Test .....	9
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

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

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions:
  - The loan-to-deposit (LTD) ratio is more than reasonable.
  - A substantial majority of the bank's loans are inside the assessment area (AA).
  - The bank exhibits excellent geographic distribution of loans in its AA.
  - The bank exhibits an excellent distribution of loans to individuals of different income levels.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

Over the eight quarters since the previous Community Reinvestment Act (CRA) evaluation (January 2020 – December 2021), Fairfield Federal Savings and Loan Association's (Fairfield or bank) quarterly average LTD ratio was 94.7 percent. The ratio ranged from a high of 102.2 percent as of March 31, 2020, to a low of 89.4 percent as of December 31, 2021.

Fairfield's average LTD ratio is the highest among similarly situated banks in the metropolitan statistical area (MSA). In comparison, the quarterly average LTD ratio of similarly situated banks is 79.7 percent. This custom peer group consists of three other community banks with total assets less than \$375 million and headquartered in Franklin, Licking, or Perry County.

### Lending in Assessment Area

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

The bank originated and purchased 82.9 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	397	82.9	82	17.1	479	79,338	82.2	17,147	17.8	96,485
Total	397	82.9	82	17.1	479	79,338	82.2	17,147	17.8	96,485

*Source: 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Data.  
Due to rounding, totals may not equal 100.0%.*

## Description of Institution

Fairfield is a federally chartered, mutual savings association headquartered in Lancaster, Ohio. Fairfield does not have a holding company or any subsidiaries and did not conduct any merger/acquisition activity during the evaluation period. Fairfield serves the communities in the single-county area where its main office and two branches are located. Fairfield's primary business is making loans for the purchase, construction, and refinance of homes, but a variety of personal and business banking products and services are available. Loans on residential rental properties, commercial real estate, and vacant land are also offered. Other financial products and services include credit cards, deposit accounts (checking, savings, money market, certificates of deposit, and individual retirement accounts), safe deposit boxes, wire transfers, and e-banking (telephone, online, and mobile banking).

As of December 31, 2021, Fairfield had total assets of \$287.6 million and tier 1 capital of \$31.8 million. Total deposits equaled \$253.4 million or 88.1 percent of total assets, while gross loans and leases of \$227.2 million represented 79 percent of total assets. The loan portfolio composition and lending activity reflects Fairfield's continued focus on residential real estate lending. The outstanding balance of mortgage loans secured by a single-family dwelling represented \$220.1 million or 96.9 percent of gross loans and leases. The remainder mostly consisted of loans secured by a multi-family dwelling (0.8 percent), commercial real estate (1.9 percent), or credit cards and other loans (0.4 percent). By number, 99.5 percent of the loans originated or purchased in 2020 and 2021 were secured by residential real estate.

Fairfield is a single-state financial institution with one rating area (Ohio) and one AA (Fairfield County, Ohio). Fairfield has three offices in Fairfield County. Each office has a drive-up facility and a cash-dispensing automated teller machine (ATM). In addition, Fairfield operates 11 stand-alone ATMs in the county. No offices have been opened or closed since the prior CRA evaluation. Refer to the "Description of Institution's Operations in Ohio" section for more details on the branches and AA.

Fairfield's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AA. Fairfield received an Outstanding rating for its CRA performance during the prior evaluation period. This rating was reported in OCC's CRA Evaluation dated March 30, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This evaluation considers Fairfield's CRA performance from January 1, 2020, to December 31, 2021, with respect to its primary loan product, home mortgage loans. Therefore, the loan data used in this evaluation includes all HMDA-reportable mortgage loans originated or purchased in 2020 and 2021. There is no affiliate activity included.

The Office of the Comptroller of the Currency (OCC) assessed Fairfield's CRA performance using the Interagency Small Bank examination procedures. These procedures comprise the Lending Test and include the following performance criteria:

- the LTD ratio,
- percentage of originated and purchased loans made inside the AA,

- lending to borrowers of different income levels and/or businesses of different sizes,
- lending in low- and moderate-income areas within the AA, and
- the bank's record of acting on written complaints regarding its performance in helping to meet the credit needs of the AA.

At management's request, the OCC also considered the bank's community development activities. Such activities are optional for a Small Bank examination, so the bank's performance may be used to enhance an overall rating of "Satisfactory" but cannot be used to lower a rating that otherwise would have been assigned.

For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census data. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same 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.

Fairfield has one AA, which is Fairfield County, Ohio (Columbus MSA AA). The OCC completed a full-scope review of the bank's only AA. A description of the AA is provided in the "Description of Institution's Operations in Ohio" section of this evaluation.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Fairfield operates in a single state, so its overall rating is determined by the rating for the State of Ohio. The State of Ohio rating is based on Fairfield's performance in the only AA, the Columbus MSA AA.

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

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

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

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans to individuals of different income levels.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

### Description of Institution's Operations in Ohio

Fairfield has three offices in Fairfield County, Ohio. Each office has a drive-up facility and a cash-dispensing ATM. The main office in Lancaster is in a low-income geography. The branch office in Lancaster is in a moderate-income geography and the branch in Pickerington is in a middle-income geography. In addition, Fairfield operates 11 stand-alone ATMs in the county. Four of these ATMs are in a low-income geography, one is in a moderate-income geography, and six are in a middle-income geography.

Fairfield's AA consists of all 28 census tracts in Fairfield County. Fairfield County is part of the Columbus, OH Metropolitan Statistical Area (MSA) 18140. This AA meets regulatory requirements and does not exclude any LMI areas.

#### Columbus MSA AA

The following information regarding demographic data, job market, housing cost, competition, and credit needs provides additional performance context for Fairfield's operations in Ohio.

---

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

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbus MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	28	7.1	14.3	53.6	25.0	0.0
Population by Geography	149,112	4.4	14.5	52.4	28.7	0.0
Housing Units by Geography	59,367	5.2	15.2	53.3	26.3	0.0
Owner-Occupied Units by Geography	38,803	2.5	12.6	49.7	35.2	0.0
Occupied Rental Units by Geography	16,229	10.8	21.1	60.8	7.3	0.0
Vacant Units by Geography	4,335	8.7	15.8	57.7	17.9	0.0
Businesses by Geography	9,010	10.3	8.4	49.9	31.5	0.0
Farms by Geography	477	3.4	15.9	53.2	27.5	0.0
Family Distribution by Income Level	39,967	19.7	17.3	21.1	41.9	0.0
Household Distribution by Income Level	55,032	22.3	15.2	17.1	45.4	0.0
Median Family Income MSA – 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$156,868
FFIEC Updated Median Family Income (2021)		\$83,900	Median Gross Rent			\$816
					Families Below Poverty Level	7.3%

*Source: 2015 ACS Census and 2021 Dun & Bradstreet (D&B) Data.  
Due to rounding, totals may not equal 100.0%.  
(\* The NA category consists of geographies that have not been assigned an income classification.*

### Job Market

Business demographic data from Dun & Bradstreet (2021) indicates the primary industries in the AA are services (41.1 percent) and retail trade (12.6 percent). The major employers in Fairfield County include Pickerington public schools, Fairfield County government, Fairfield Medical Center, and Anchor Hocking.

The economic conditions in the Fairfield County have improved since the start of the COVID-19 pandemic and are overall stable. The annual unemployment rate in Fairfield County compares favorably to the statewide and nationwide rates during the evaluation period. The impact of the COVID-19 pandemic can be seen in the substantial increase in the annual unemployment rate in 2020; however, the spike in unemployment was followed by a gradual recovery through the end of 2021. According to the U.S. Bureau of Labor Statistics as of December 2021, the “not seasonally adjusted” unemployment rate was 3 percent in Fairfield County, which is reasonable when compared with the State of Ohio and the national unemployment rates.

<b>Average Annual Unemployment Rates</b>				
	<b>*Average 2019</b>	<b>Average 2020</b>	<b>Average 2021</b>	<b>December 2021</b>
Fairfield County	3.8	6.7	4.4	3.0
State of Ohio	4.2	8.2	5.1	3.5
United States	3.7	8.1	5.4	3.7

*Source: U.S. Bureau of Labor Statistics  
\*2019 is not in the evaluation period, this data was included for reference only.*



### Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$156,868. Based on the Federal Financial Institutions Examination Council (FFIEC) Updated Median Family Income of \$83,900 in the table above, moderate-income families make less than \$67,120 and low-income families make less than less than \$41,950. Median housing values are 2.3 times the annual income of moderate-income families and 3.7 times the annual income of low-income families. The housing cost relative to income may have a limiting effect on mortgage demand for some LMI families when also considering the down payment requirement, homeowner costs such as taxes and insurance, and other debt payments. Additionally, 7.3 percent of families live below poverty, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Competition

Competition for deposits is strong given the number and size of financial institutions with offices in the AA. Competition is comprised of a mix of state and national chartered local community banks, credit unions, and branches of larger financial institutions. According to the June 30, 2021, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), 17 institutions with 38 offices operated in Fairfield County. Fairfield's deposits of \$246.8 million represented a market share of 8.1 percent. This market share ranks Fairfield sixth among the 17 FDIC-insured institutions. The bank's primary competitors include financial institutions with significant deposit activity in the AA such as Park National Bank, JPMorgan Chase Bank, National Association (N.A.), Huntington National Bank, Vinton County National Bank, and Fifth Third National Bank, N.A. These top five hold 64 percent of the total market share of deposits in the AA.

Strong competition for home mortgage loans also exists in the AA. Aggregate HMDA data for 2021 shows a total of 328 lenders originated or purchased 10,556 home mortgage loans in the AA. The top five mortgage lenders in the AA include Huntington National Bank, Rocket Mortgage, Union Savings Bank, Park National Bank, and Union Home Mortgage. These five lenders had a combined market share of 24.2 percent. In comparison, Fairfield originated 189 loans and ranked 16<sup>th</sup> with a market share of 1.8 percent.

### Community Contact

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization. The contact identified affordable housing as a credit need in the community. The contact also identified low-cost construction financing, rehab loans, second chance checking accounts, and no/low-cost checking accounts as needs in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

## **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of Fairfield's only AA, the Columbus MSA AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2020 and 2021 for the home mortgage loan analysis. Since there is one primary product and one AA, weighting is not applicable. Refer to the table in Appendix A: Scope of Examination for additional information.

## **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Columbus MSA AA is excellent.

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

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

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

Fairfield's percentage of home mortgage loans originated or purchased in both low- and moderate-income areas exceeds the percentage of owner-occupied housing units (OOHUs) and the aggregate percentage for all reporting lenders. Bank performance in low-income census tracts exceeds the percentage of OOHUs by 5.6 percent and aggregate percentage by 5.5 percent. Bank performance in the moderate-income census tracts exceeds the percentage of OOHUs by 5.0 percent and aggregate percentage by 6.6 percent.

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.

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

Overall, the OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of the bank's reports and maps.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank. The OCC considered lending opportunities to LMI borrowers were somewhat limited by housing cost, poverty level, market competition, and the COVID-19 pandemic.

## ***Home Mortgage Loans***

Fairfield's percentage of home mortgage loans originated or purchased to low-income borrowers is 8.1 percent below the percentage of low-income families in the AA but exceeds the aggregate percentage for all reporting lenders by 3.7 percent. Fairfield's percentage of home mortgage loans to moderate-income borrowers approximates the percentage of moderate-income families and is slightly below the aggregate percentage of all reporting lenders by 1.9 percent.

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.

## **Responses to Complaints**

Fairfield has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

## **COMMUNITY DEVELOPMENT**

Fairfield exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a neutral impact on the bank's rating in the state.

### **Number and Amount of Community Development Loans**

The bank did not make any community development loans during the evaluation period.

### **Number and Amount of Qualified Investments**

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus MSA AA	0	\$ 0	42	\$ 91	42	100.0%	\$ 91	100.0%	0	\$ 0

\* 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.

Qualified investments consist of donations to various organizations having a mission consistent with a CD purpose. These donations supported homeless shelters, food pantries, medical service foundations, youth mentoring programs, or child advocacy groups. Some examples of these donations are:

- \$30,000 to an organization that provides support for education, health, and financial initiatives in LMI communities.

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

- \$8,470 to an organization that provides a youth mentoring program for children facing adversity.
- \$6,500 to an organization that serves people in need by addressing the societal issues of food, shelter, safety, and healing through food pantries, homeless shelters, domestic violence services, senior living and healthcare, and affordable housing.
- \$5,000 to an organization that builds affordable housing for LMI individuals or families.

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

During the evaluation period, nine officers and employees provided technical and financial expertise to 18 different community organizations with a CD purpose. Eight employees served in a leadership role as a board or committee member for these organizations. In addition, two officers spoke at a financial literacy seminar series for attendees seeking assistance through job and family services.

Bank employees also provide home finance counseling to customers and the bank offers a special loan program, “Neighbors Helping Neighbors.” This program allows borrowers to purchase and finance their primary residence with no down payment. Furthermore, the borrowers are not charged a higher interest rate or additional fees for the absence of a down payment. Nine loans totaling \$984,890 were originated under this program in 2020 and 2021.

## 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”.

<b>Time Period Reviewed:</b>	1/1/2020 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<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 of Ohio</b>		
Columbus MSA AA	Full Scope	Fairfield County

# Appendix B: Summary of State Ratings

---

RATINGS Fairfield Federal Savings and Loan Association	
Overall Bank:	Lending Test Rating
Fairfield Federal Savings and Loan Association	Outstanding
State:	
State of Ohio	Outstanding

## 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 (MD):** 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 (MSA):** 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

---

### 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 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- 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. The table also presents aggregate peer data for the years the data is available. 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

State of Ohio

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2020-21</b>		
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			
Columbus MSA AA	397	79,338	100.0	10,556	2.5	8.1	2.6	12.6	17.6	11.0	49.7	56.9	44.8	35.2	17.4	41.6	0.0	0.0	0.0			
<b>Total</b>	<b>397</b>	<b>79,338</b>	<b>100.0</b>	<b>10,556</b>	<b>2.5</b>	<b>8.1</b>	<b>2.6</b>	<b>12.6</b>	<b>17.6</b>	<b>11.0</b>	<b>49.7</b>	<b>56.9</b>	<b>44.8</b>	<b>35.2</b>	<b>17.4</b>	<b>41.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>			

*Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2020-21</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available Income Borrowers					
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Columbus MSA AA	397	79,338	100.0	10,556	19.7	11.6	7.9	17.3	17.6	19.5	21.1	18.6	22.9	41.9	37.0	31.6	0.0	15.1	18.1			
<b>Total</b>	<b>397</b>	<b>79,338</b>	<b>100.0</b>	<b>10,556</b>	<b>19.7</b>	<b>11.6</b>	<b>7.9</b>	<b>17.3</b>	<b>17.6</b>	<b>19.5</b>	<b>21.1</b>	<b>18.6</b>	<b>22.9</b>	<b>41.9</b>	<b>37.0</b>	<b>31.6</b>	<b>0.0</b>	<b>15.1</b>	<b>18.1</b>			

*Source: 2015 ACS; 01/01/2020 - 12/13/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.