



## **PUBLIC DISCLOSURE**

May 8, 2023

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

Citizens Federal Savings and Loan Association of Bellefontaine  
Charter Number: 700824

100 N. Main St  
Bellefontaine, OH 43311

Office of the Comptroller of the Currency

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

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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 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 a reasonable distribution of loans to individuals of different income levels.
  - The bank's geographic distribution of loans is overall reasonable.

## 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.

Citizens Federal Savings and Loan Association of Bellefontaine's (Citizens or bank) quarterly average LTD ratio over the 13 quarters in the evaluation period (December 31, 2018, to December 31, 2021) is 84.2 percent. The ratio ranged from a high of 89.4 percent as of December 31, 2020, to a low of 78.1 percent as of June 30, 2020. The bank's quarterly average LTD ratio is more than reasonable when compared to financial institutions of similar size headquartered in Logan, Auglaize, Hardin, and Champaign Counties in Ohio. There were four similarly situated financial institutions in the surrounding area with total assets between \$100 million and \$500 million. These four financial institutions had an average LTD ratio of 73.1 percent over the evaluation period, ranging from a low of 44.5 percent to a high of 99.6 percent.

Net loans and leases increased from \$95 million as of December 31, 2018, to \$127.5 million as of December 31, 2021. The most rapid period of growth occurred in 2020, when approximately \$25 million in new loans were added to the balance sheet. During the evaluation period, total deposits grew by approximately \$39 million from \$117 million as of December 31, 2018, to \$156 million as of December 31, 2021. Some of the deposit growth can be attributed to the stimulus received in 2020 and 2021 due to the COVID-19 pandemic.

## Lending in Assessment Area

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

The bank originated and purchased 95 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										
2019-2021	57	95.0	3	5.0	60	9,740	94.7	542	5.3	10,282
<b>Total</b>	<b>57</b>	<b>95.0</b>	<b>3</b>	<b>5.0</b>	<b>60</b>	<b>9,740</b>	<b>94.7</b>	<b>542</b>	<b>5.3</b>	<b>10,282</b>
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%.</i>										

## Description of Institution

Citizens is a federally chartered mutual savings and loan association with total assets of \$175.3 million as of December 31, 2021. The bank holds \$127.5 million in net loans and leases, \$155.9 million in total deposits, and \$18.3 million in tier 1 capital. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. There is no holding company or affiliates. The bank's headquarters are in Bellefontaine, Ohio, with one full-service office and one drive-thru office in an adjacent lot. Both offices are in the same middle-income census tract (CT). The bank did not open or close any branches during the evaluation period (2019 – 2021). However, on October 22, 2022, Citizens closed its office at 110 North Main Street in Bellefontaine, Ohio, and on October 24, 2022, opened their newly remodeled main office at 100 North Main Street in Bellefontaine, Ohio. The newly remodeled office is in the same middle-income CT. Presently there is an automated teller machine (ATM) at each office location. During the evaluation period, the ATM was located at the drive-thru facility only.

Citizens is a single-state financial institution with one AA (Logan County, Ohio) and one rating area (Ohio). The AA is not located in a metropolitan statistical area (MSA). The AA consists of three upper-income, six middle-income, and two moderate-income census tracts (CTs). The AA is contiguous and does not arbitrarily exclude any low- and moderate-income (LMI) areas. Refer to the "Description of Institution's Operations in Ohio" section in this report for additional details regarding the AA.

As of the December 31, 2021, Consolidated Reports of Condition and Income (call report) and Uniform Bank Performance Report, Citizens' total loans were \$127.8 million, representing 72.9 percent of total assets. Citizens offers conventional fixed- and adjustable-rate first and second mortgages for the purchase, refinance, and home improvement of single-family residences. The bank offers home equity loans and a variety of deposit products. The bank also offers online and mobile banking.

The bank primarily focuses on home mortgage lending. Citizens sells a portion of loans to the Federal Home Loan Bank, with \$26.4 million in loans sold during the evaluation period. The bank's loan portfolio as of the December 31, 2021, Call Report, is comprised of 87.8 percent home mortgage loans, 11.1 percent commercial real estate (business) loans, 1.1 percent agriculture loans, and less than

one percent in consumer loans. The bank's loan originations, based on the number of loans originated during the evaluation period, are 85.1 percent home mortgage, 3.4 percent business, 0.3 percent agriculture, and 11.2 percent consumer loans. The bank's loan originations, based on the dollar amount of loans originated during the evaluation period, are 90.7 percent home mortgage, 5.8 percent business, 1 percent agriculture, and 2.5 percent consumer loans.

There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AA. Citizens' previous CRA rating was "satisfactory" as of the Performance Evaluation (PE) dated January 23, 2019.

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The evaluation period was from January 1, 2019, to December 31, 2021.

The OCC evaluated Citizens' lending performance based on its primary lending product, home mortgage lending. While the bank offers other lending products, these products were not a primary product during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. Citizens' lending products are discussed under the "Description of Institution" section of this report. For the Lending Test, the OCC evaluated home mortgage loans originated in 2019, 2020, and 2021 (20 loans per year).

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. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of 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 the purposes of this evaluation, bank delineated AAs located within the same MSA, multistate MSA (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.

Citizens has one AA, which is Logan County, Ohio (Logan County AA). The AA is not in an MSA. The OCC completed a full-scope review of the Logan County AA. A more detailed description of the AA is 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. Citizens operates in a single state. All the bank's offices are in Bellefontaine, Ohio. Since the bank's only offices are in Ohio, the rating is based on the performance solely in Ohio. The state rating is based on performance in the bank's only AA, Logan County, Ohio. Refer to the "Scope" section under the state 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 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: Satisfactory.**

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

The major factors that support this rating include:

- Citizens exhibits a reasonable distribution of loans to individuals of different income levels.
- Geographic distribution of loans is overall reasonable.
- The bank has not received any complaints about its CRA performance in helping to meet the AA’s credit needs during the evaluation period.

### Description of Institution’s Operations in Ohio

Citizens designated one AA in Ohio, Logan County, which is not in an MSA. The bank selected the AA based on their targeted lending area and office location. The AA is contiguous, meets the requirements of the regulation, and does not reflect illegal discrimination, nor does it arbitrarily exclude any LMI areas.

#### Logan County AA

Demographic Information of the Assessment Area						
Assessment Area: Logan County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	54.5	27.3	0.0
Population by Geography	45,484	0.0	13.9	57.1	29.0	0.0
Housing Units by Geography	23,163	0.0	17.1	59.2	23.6	0.0
Owner-Occupied Units by Geography	13,725	0.0	10.5	57.1	32.4	0.0
Occupied Rental Units by Geography	4,915	0.0	28.1	56.4	15.5	0.0
Vacant Units by Geography	4,523	0.0	25.2	68.8	6.0	0.0
Businesses by Geography	2,236	0.0	16.3	58.2	25.4	0.0
Farms by Geography	207	0.0	4.3	51.2	44.4	0.0
Family Distribution by Income Level	12,733	19.6	14.6	23.1	42.7	0.0
Household Distribution by Income Level	18,640	20.6	15.2	18.3	45.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$117,767
			Median Gross Rent			\$686
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS and 2021 D&amp;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.</i>						

The Logan County AA includes two moderate-income CTs, six middle-income CTs, and three upper-income CTs in Logan County, Ohio. None of the AA is part of an MSA. The bank's only office is in Bellefontaine, Ohio, in a middle-income CT. There is a drive-up facility in an adjacent lot as well as an ATM.

According to the 2015 ACS U.S. Census Data, the population of the AA is 45,484 with 13.9 percent living in moderate-income CTs, 57.1 percent living in middle-income CTs, and 29 percent living in upper-income CTs. There are no low-income CTs in the AA. The AA includes 12,733 families and 18,640 households. There were no CT classification changes and no designated distressed or underserved CTs in the AA during the evaluation period.

According to the 2015 ACS U.S. Census data, the median housing value in the AA was \$117,767. Based on the weighted average of Census MSA Median Family Income of \$55,785 in the table above, low-income families make less than \$27,893 and moderate-income families less than \$44,628 annually. Median housing values are approximately 4.2 times the annual income of low-income families and about 2.6 times the annual income of moderate-income families. The housing costs relative to income may have a limiting effect on mortgage demand among some LMI families. As of the 2015 ACS U.S. Census, there are 23,163 total housing units in the AA, of which 59.3 percent are owner-occupied, 21.2 percent are rental occupied units, and 19.5 percent are vacant units. The median age of housing stock is approximately 53 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a barrier to home mortgage lending. Additionally, 10.8 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

As stated above, Citizens' primary business focus includes home mortgage lending. Competition for home mortgage loans is strong. Top mortgage lenders in the AA include Huntington National Bank, Honda Federal Credit Union, Rocket Mortgage, Home Point Federal Mortgage Corporation, and Union Home Mortgage with a combined market share of 32.45 percent, as of the 2021 Peer Mortgage Data report. As of the 2021 Peer Mortgage Data report, there were 188 lenders originating 2,015 home mortgage loans. Citizens is exempt from filing HMDA data; therefore, the bank was not included 2021 Peer Mortgage Data report.

Competition in the AA is strong with state and national banks, branches of larger financial institutions, and credit unions. As of the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, Citizens held \$147.7 million in deposits, which is 16.6 percent of the total deposits in this market area (Logan County, Ohio). As of the June 30, 2021, FDIC Deposit Market Share Report, Citizens ranked 2<sup>nd</sup> out of 13 deposit market competitors. The top five financial institutions with significant deposit activity in Logan County include Huntington National Bank, Citizens Federal Savings and Loan Association of Bellefontaine, Liberty National Bank, PNC Bank, National Association (N.A.), and Civista Bank, with a combined deposit market share of 67.1 percent.

The economic conditions in Logan County, Ohio are stable. The "not seasonally adjusted" unemployment rate for Logan County, Ohio, as of December 2021, was 2.9 percent which is overall reasonable when compared with the Ohio unemployment rate of 3.4 percent and national rate of 3.7 percent (Ohio Department of Job and Family Services/Office of Workforce



Development – Bureau of Labor Market Statistics, December 2021). Primary industries include manufacturing and logistics. Large employers in Logan County include two Honda motor plants as well as Midwest Express, a logistics company specializing in refrigerated transport.

The OCC reviewed one community contact that was conducted with a community service organization that serves Logan County, Ohio, as well as the surrounding counties. The contact was with an affordable housing non-profit organization. The contact did not mention any concerns with the credit needs being met in the AA. Needs and opportunities in the community include short-term small dollar loans, homeownership counseling and financial education, and home repair funds. Overall, local financial institutions are adequately meeting the credit and community development (CD) needs of the community.

### **Scope of Evaluation in Ohio**

The OCC performed a full-scope review of the Logan County AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage loans are the bank's primary lending product and were evaluated under the Lending Test. As discussed above, the OCC evaluated home mortgage lending using internal bank data and transaction tested 20 loans per year in the evaluation period.

The rating is based on performance in the bank's only AA, Logan County, Ohio. Refer to the "Scope of the Evaluation" section for more details.

### **Lending Test**

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

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

Based on a full-scope review, the bank's performance in the Logan County AA is adequate.

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

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

The OCC performed a geographical analysis of home mortgage loans in the AA. As of the 2015 ACS U.S. Census, there are no low-income tracts in the AA but there are two moderate-income tracts (CT 42 and CT 44) in the AA. Of the 60 loans the OCC transaction tested, three were secured by residential real estate in moderate-income CTs. The OCC also reviewed internal bank data showing reasonable lending in moderate-income CTs.

One of the two moderate-income CTs (CT 44) is near the bank's office in Bellefontaine. As of the June 30, 2021, FDIC Deposit Market Share report, there are 13 financial institutions in Logan County with 20 offices. Two of the 13 financial institutions have an office in CT 42, and one has an office in CT 44. All three are larger financial institutions and provide strong competition for home mortgage loans in the moderate-income CTs.

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger financial institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

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

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

Citizens originated approximately 798 home mortgage loans during the evaluation period. The OCC transaction tested 60 loans, 20 per year of the evaluation period, and evaluated the number of loans made in LMI CTs. During the evaluation period, the percentage of home mortgage loans originated by the bank in moderate-income CTs was below both the demographic comparator and aggregate lending data of other HMDA reporters. The OCC considered that only 13.9 percent of the population in the AA live in moderate-income tracts.

The OCC considered other factors contributing to limited lending opportunities within moderate-income CTs, which includes strong competition from three other financial institutions with offices located in the moderate-income CTs. Based on 2021 figures, there is a relatively low volume of housing units within the moderate-income tracts (3,962), as well as a moderate poverty rate (based on families below poverty) of 10.8 percent overall and modest vacancy rate in the AA (19.5 percent). Approximately 21.2 percent of the housing units are rental occupied. The median age of housing stock within the AA is 53 years. This may present an additional barrier to lending, given the cost of homeownership in older housing is typically higher than newer housing. Competition for loans is strong due to the volume of financial institutions in the AA. The top five financial institutions in home mortgage lending account for 32.45 percent of the home mortgage market share as of the 2021 Peer Mortgage Data report. Additionally, Citizens does not participate in Federal Housing Administration (FHA) or United States Department of Agriculture (USDA) lending programs which would allow for less stringent underwriting (lower down payment and closing costs) for LMI borrowers. These performance context factors provide further support for the bank's lending in LMI tracts.

The OCC also reviewed internal bank reports showing a yearly breakdown of accepted, withdrawn, and denied loans by geography. The internal data shows approximately 10 to 11 percent of all home mortgages were originated for property located in the moderate CTs over the evaluation period. This is commensurate with the aggregate data in Table O and further supports the bank's overall reasonable level of lending in LMI tracts.

## **Lending Gap Analysis**

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

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

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

In evaluating the borrower income distribution of home mortgage loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions and demographic data in the AA. The OCC also considered internal bank reports and Citizens' affordable housing program.

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

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.

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

The bank exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels within the AA. For loans originated during the evaluation period, Citizens' percentage of home mortgage loans to low-income borrowers is below both aggregate and demographic data. Citizens' percentage of home mortgage loans to moderate-income borrowers is below both aggregate and demographic data as well. The OCC considered factors that may explain the lower level of lending including the number of families living below the poverty level (10.8 percent) and the percentage of rental occupied units (21.2 percent).

Citizens does not participate in the FHA or USDA lending programs which allow for less stringent underwriting for LMI individuals. However, Citizens implemented an affordable housing program in the late 1990s. Management recognized a credit need in the community for homeownership among Logan County's LMI families. In 1997, the program was expanded to include rehabilitation and improvement first mortgage loans to LMI families, in addition to home purchase loans. Some of the terms include a fixed interest rate that is  $\frac{1}{4}$  percent lower than the conventional fixed rate, lower down payment requirements, and no points. During the evaluation period, Citizens originated two loans totaling \$111,805 in 2019, two loans totaling \$206,800 in 2020, and two loans totaling \$35,000 in 2021. None of these loans were included in the OCC's transaction testing analysis. From the inception of the program to December 31, 2021, the bank has originated approximately 185 loans totaling \$9.6 million.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. As stated above, overall median housing values are 2.6 to 4.2 times the weighted average of median family income of LMI families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to LMI families. Competition remains strong with the top five financial institutions for home mortgage lending accounting for 32.45 of the lending market share, as discussed above.

The OCC also considered internal bank data. Internal bank reports show the closed, withdrawn, and denied loan applications by borrower income for each year in the evaluation period. When referencing this data, it shows that Citizens originated approximately 12 to 14 percent of all home mortgages to individuals qualifying as LMI. When internal data is considered, Citizens' lending to LMI borrowers is overall reasonable.

### **Responses to Complaints**

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

**Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	1/1/19 – 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<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>		
Logan County, Ohio AA	Full-Scope	The AA includes all CTs in Logan County, Ohio.

## Appendix B: Summary of State Ratings

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RATINGS: Citizens Federal Savings and Loan Association of Bellefontaine	
Overall Bank:	Lending Test Rating
Citizens Federal Savings and Loan Association of Bellefontaine	Satisfactory
State:	
Ohio	Satisfactory

## 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 (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

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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 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

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.

not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% 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	
Logan County AA	60	10,018	100.0	2,015	0.0	0.0	0.0	10.5	5.0	11.0	57.1	68.3	60.2	32.4	26.7	28.7	0.0	0.0	0.0	
<b>Total</b>	<b>60</b>	<b>10,018</b>	<b>100.0</b>	<b>2,015</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.5</b>	<b>5.0</b>	<b>11.0</b>	<b>57.1</b>	<b>68.3</b>	<b>60.2</b>	<b>32.4</b>	<b>26.7</b>	<b>28.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 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>2019-21</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	
Logan County AA	60	10,018	100.0	2,015	19.6	3.3	4.3	14.6	6.7	17.9	23.1	21.7	21.5	42.7	68.3	37.3	0.0	0.0	19.0	
<b>Total</b>	<b>60</b>	<b>10,018</b>	<b>100.0</b>	<b>2,015</b>	<b>19.6</b>	<b>3.3</b>	<b>4.3</b>	<b>14.6</b>	<b>6.7</b>	<b>17.9</b>	<b>23.1</b>	<b>21.7</b>	<b>21.5</b>	<b>42.7</b>	<b>68.3</b>	<b>37.3</b>	<b>0.0</b>	<b>0.0</b>	<b>19.0</b>	

*Source: 2015 ACS; 01/01/2019 - 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.

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.