



Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

September 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank, A FSB
Charter Number 706432

1300 McFarland Boulevard, NE
Tuscaloosa, AL 35403

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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, nor should it 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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INSTITUTION'S CRA RATING: This institution is rated Satisfactory.
The Lending Test is rated: Satisfactory.

First Federal Bank, a FSB (FFB or Bank) has a **Satisfactory** record of meeting community credit needs. The major factors supporting this rating include:

- FFB's average loan-to-deposit ratio is more than reasonable given the Bank's size, financial condition, economic environment, and assessment area (AA) credit needs.
- FFB originated a majority of loans outside the AA, a result of the Bank having loan production offices throughout Alabama and Florida to support its mortgage lending operations.
- Loan analysis indicates that the distribution of loans reflects reasonable penetration among individuals of different income levels.
- Loan analysis indicates that the institution had a reasonable dispersion of home loans to low- and moderate-income census tracts in the AA.
- The Bank did not receive any consumer complaints regarding Community Reinvestment Act (CRA) performance during this evaluation period.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and re- financings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

DESCRIPTION OF INSTITUTION

FFB is a federal savings bank with total assets of \$124.5 million at December 31, 2018. The Bank is wholly owned by Southeastern Financial, Inc., a one-bank holding company located in Tuscaloosa, AL. FFB operates its main office in a middle-income census tract in Tuscaloosa, AL. FFB operates two additional branches in moderate- and upper-income census tracts in Tuscaloosa, AL. FFB also operates seven loan production offices (LPO), with one LPO located within the Tuscaloosa MSA AA. During the review period, FFB closed two LPOs and opened one LPO. The Bank has not opened or closed any branches since the 2015 Performance Evaluation. No legal or financial factors impede FFB's ability to meet the credit needs of the community it serves.

The Bank is primarily a single-family mortgage lender, with 1-4 family mortgage loans to residential borrowers for home construction, purchase, and refinance. FFB offers both fixed and adjustable rate conventional mortgage loans, construction mortgage loans, home equity lines of credit, other special purpose consumer loans, and "bridge financing," which provides borrowers interim financing to buy a new home before they sell an existing home. The Bank also participates in the Veteran's Affairs (VA) and Federal Housing Administration (FHA) loan programs. FFB offers various deposit products, including personal checking, savings, money market, certificates of deposit, IRA accounts, small business checking accounts, and commercial checking and money market accounts. FFB also offers online banking to its customers.

The chart below provides details regarding FFB's loan composition as of December 31, 2018.

Loan Portfolio Composition as of December 31, 2018		
Loan Type	Dollar Amount (000's)	Percent of Total Loans
Construction and Land Development	6,534	6.28%
Secured by Farmland	0	0.00%
One-to-Four Family Residential	94,840	91.20%
Commercial Real Estate	1,557	1.50%
Total Real Estate Loans	102,931	98.98%
Agricultural	0	0.00%
Commercial and Industrial	411	0.40%
Consumer	577	0.55%
Other	71	0.07%
Total Loans	103,990	100.00%

Source: December 31, 2018 Call Report

FFB has one AA, comprised of the 58 census tracts in Hale, Pickens, and Tuscaloosa counties that make up the Tuscaloosa Metropolitan Statistical Area (MSA). The AA has a population of 235,570 according to the 2015 ACS Census data. The MSA AA is comprised of one low-income, 21 moderate-income, 25 middle-income, 9 upper-income, and 2 unknown census tracts. The AA meets the requirements of the regulation and

does not arbitrarily exclude low- and moderate-income geographies. None of the 58 census tracts were identified as distressed or underserved.

Competition in the AA is strong given several large institutions in the area, including Regions Bank, Wells Fargo Bank, and PNC Bank. FFB holds 2.32 percent of the deposit share within the AA. Lending in the AA is adversely impacted by the elevated poverty rate.

The table below details FNB's branch and ATM locations by census tract (CT) income level.

Distribution of Bank Offices and ATMs by Census Tract						
Census Tract Income Level	Tracts		Full-Service Branches		Automated Teller Machines	
	#	%	#	%	#	%
Low	1	1.72%	0	0.00%	0	0.00%
Moderate	21	36.21%	1	33.33%	1	33.33%
Middle	25	43.10%	1	33.33%	1	33.33%
Upper	9	15.52%	1	33.34%	1	33.34%
Unknown	2	3.45%	0	0.00%	0	0.00%
TOTAL	58	100.00%	3	100.00%	3	100.00%

Local employment in the area is heavily dependent upon the University of Alabama, which employs over 13,000. The student population has increased to a total 38,563. The nearby Mercedes-Benz plant in Tuscaloosa County, AL is noted as the second largest employer in the area. The plant directly employs approximately 4,000 people; this does not include employees of on-site suppliers.

Community Contacts revealed that local banks are serving customers in the AA. Most financial literacy training is provided through non-profit groups in the area. The two community contacts noted that there is also a need for small business loans, mortgage loans including first time homebuyers, and home improvement loans.

SCOPE OF EVALUATION

Evaluation Period/Products Evaluated

FFB was evaluated under the Small Bank examination procedures, comprised of a Lending Test, to assess its performance under the Community Reinvestment Act (CRA). The Lending Test evaluates the Bank's record of meeting the credit needs of its assessment area (AA) through its lending activities. The Bank's previous CRA rating, dated May 4, 2015, was "Satisfactory." This performance evaluation starts from the date of the Bank's previous CRA examination, covering the period from April 1, 2015 through December 31, 2018.

The Bank's primary loan product is 1-4 family residential real estate loans, representing 91.4 percent of total loans at December 31, 2018. The Bank also originates 1-4 family residential real estate loans to sell in the secondary market. Because 1-4 family residential loans represent a significant portion of the Bank's lending strategy during the review period, we based conclusions solely on an analysis of this loan product. The Bank is a Home Mortgage Disclosure Act (HMDA) reporter and our analysis used HMDA data from 2016, 2017, and 2018 to form conclusions.

Data Integrity

A data integrity exam performed in August 2019 validated the accuracy of the HMDA data.

Selection of Areas for Full-Scope Review

The one AA of Tuscaloosa, Hale, and Pickens counties, known as the Tuscaloosa MSA, received a full-scope review.

Ratings

The Bank's overall rating is based on its mortgage lending performance in the one AA of Tuscaloosa, Hale, and Pickens counties.

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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

FFB's CRA performance is satisfactory based on the results of the lending test.

Loan-to-Deposit Ratio

FFB's average loan-to-deposit (LTD) ratio is more than reasonable given the Bank's size, financial condition, and assessment area credit needs, and meets the standards for outstanding performance. The LTD ratio averaged 102.45 percent over the 16 quarters since the previous CRA examination, with a quarterly low of 89.41 percent and a quarterly high of 121.46 percent. The LTD ratio is more than reasonable when compared to three similarly situated institutions, which had average LTD ratio of 45.64 percent over the review period. The Bank exceeds the standards for satisfactory performance.

Institution	Assets as of 4Q18 (in thousands)	Average LTD Ratio
Bank of Moundville	88,311	28.09%
Citizens Bank, The	99,991	52.90%
First Federal Bank, a FSB	\$133,847	102.45%
Peoples Bank of Greensboro	90,748	55.94%

Source: UBPR and Call Report Data

Lending in Assessment Area

Table D - 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												
2016	736	35.7	1,326	64.3	2,062	116,163	38.3	187,185	61.7	303,348		
2017	668	35.3	1,225	64.7	1,893	108,293	36.4	188,929	63.6	297,222		
2018	637	36.7	1,101	63.3	1,738	113,235	38.7	179,286	61.3	292,521		
Subtotal	2,041	35.9	3,652	64.1	5,693	337,691	37.8	555,400	62.2	893,091		

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

FFB originated a substantial majority of HMDA-reportable loans outside its AA. Our review indicated that approximately 64 percent of the number of loans and 62 percent of the dollar volume of loans originated from January 1, 2016, through December 31, 2018 were to borrowers located outside the bank's AA. The Bank's primary source of income is the origination and sale of mortgages to the secondary market. In order to support this strategy, the Bank has seven LPOs to generate enough loan volume to make this a

profitable line of business. Only one of the LPOs is located the Bank's AA, so most of the Bank's HMDA reportable loans are originated outside the AA.

Despite low lending activity within the AA, performance is adequate and meets the standards for satisfactory performance. The presence of several active, large bank and peer competitors within the Tuscaloosa MSA, the Bank's limited deposit market share of 2.32 percent within the AA, and community contact data indicating that AA credit needs are being met, are mitigating factors to the results of the bank's Inside/Outside ratio and loan performance within the AA.

Lending to Borrowers of Different Incomes

FFB's lending to borrowers of different income levels is more than reasonable and exceeds the standards for satisfactory performance. Refer to Table P in Appendix C for the facts and data we used to evaluate the borrower distribution of the Bank's home mortgage loans. Low-income families represent 4.1 percent and 5.0 percent of the AA for 2016 and 2017-2018, respectively. Although the Bank achieved a lower penetration of home mortgage loans to low-income borrowers, at 3.4 percent and 3.1 percent, respectively, 15 percent of the AA population lives below the poverty level. This high rate of poverty impedes FFB's ability to originate home loans to qualified low-income borrowers. In addition, the one low-income census tract (#118) in the AA is located around the University of Alabama, where the 39 thousand student-base does not typically need home loans. Considering these factors, the Bank achieved reasonable penetration for home loans to low-income borrowers.

Moderate-income families represent 15.5 percent and 16.0 percent of the AA in 2016 and 2017-2018, respectively. The distribution of mortgage home loans reflects a more than reasonable penetration, at 26.1 percent and 21.8 percent, respectively.

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout the AA and meets the standards for satisfactory performance. Refer to Table O in Appendix C for the facts and data we used to evaluate the geographic distribution of the Bank's home mortgage loans. Owner-occupied housing in the low-income census tracts represents only 6.0 percent and 0.9 percent of the AA, during 2016 and 2017-2018, respectively. These low percentages illustrate the high usage of rental properties, and therefore reduced need for home loans. FFB's originations of 1.2 percent and 0.0 percent in home mortgage loans for 2016 and 2017-2018, respectively for the low-income census tracts, which is lower than the demographic comparator and reflects poor dispersion in 2016; but reasonable in 2017-2018. For 2017-2018, only one census tract in the AA is designated as low-income.

Owner-occupied housing in the moderate-income census tracts represent 21.7 percent and 20.9 percent of AA housing in 2016 and 2017/2018, respectively. FFB originated 8.3 percent and 12.6 percent of home mortgage loans in moderate-income census tracts in 2016 and 2017/2018, respectively. This reflects reasonable dispersion. The 2016 dispersion is lower than the demographic comparator for 2016 and reflects poor

dispersion. The 2017-2018 reflects reasonable dispersion. Taking into consideration, the AA's high poverty rate of 15 percent and the low level of owner-occupied units in the low and moderate-income census tracts. A total 21.8 percent of owner-occupied units are located in the low (0.9%) and moderate-income census tracts (20.9). Given these circumstances, the bank meets the standards for satisfactory geographic distribution of credit to low- and moderate-income borrowers.

Responses to Complaints

FFB did not receive any CRA-related complaints during the review period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities we reviewed, and loan products considered in the examination. The table also reflects the metropolitan and nonmetropolitan areas 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	Lending Test (excludes CD loans): 01/01/16 to 12/31/18	
Financial Institution	Products Reviewed	
First Federal Bank, A FSB	Home Mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Tuscaloosa, AL MSA	Full-Scope	See Appendix B

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tuscaloosa MSA AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	1.7	32.8	43.1	19.0	3.4
Population by Geography	235,570	1.5	26.2	42.9	25.2	4.2
Housing Units by Geography	104,152	1.3	29.0	46.0	21.4	2.3
Owner-Occupied Units by Geography	54,112	0.9	20.9	46.2	31.5	0.4
Occupied Rental Units by Geography	28,587	2.1	38.4	46.0	10.9	2.6
Vacant Units by Geography	21,453	0.9	37.1	45.5	10.1	6.4
Businesses by Geography	11,732	1.4	31.3	41.3	23.4	2.6
Farms by Geography	448	0.4	31.9	40.2	27.0	0.4
Family Distribution by Income Level	54,760	24.2	15.9	17.9	42.0	0.0
Household Distribution by Income Level	82,699	26.5	14.7	16.1	42.8	0.0
Median Family Income MSA - 46220 Tuscaloosa, AL MSA	\$56,265	Median Housing Value			\$155,725	
		Median Gross Rent			\$743	
		Families Below Poverty Level			14.7%	
<p>Source: 2015 ACS Census and 2018 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.</p>						

The Bank has one AA, consisting of Tuscaloosa, Hale, and Pickens Counties, AL, which is also known as the Tuscaloosa MSA. The AA consists of one low-, twenty-one moderate-, twenty-five middle-, nine upper-income, and two unknown census tracts. The AA complies with regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies. FFB is ranked 11th in market share among the 25 depository institutions in Tuscaloosa County. Major banking competitors include branches of large regional institutions including: Regions Bank, Bryant Bank, and Synovus Bank, in addition to community banks: Smart Bank, and West Alabama Bank and Trust. At June 30, 2018, FFB's market share was 2.32 percent. In addition to the main branch office, FFB has two additional full-service branch location in Tuscaloosa County AL. Each of the three locations has a 24-hour accessible ATM that adjoins each location. Since the last Community Reinvestment Act (CRA) evaluation dated May 14, 2015, FFB has not opened or closed any branches. FFB's primary lending focus continues to be home mortgage loans. There are no legal or financial impediments to FFB's ability to meet AA credit needs. At August 31, 2019, the AA's unemployment

rates of 3.7 (Hale County), 3.3 percent (Pickens County) and 2.6 percent (Tuscaloosa County) is higher for Hale and Pickens counties than the state of Alabama unemployment rate of 3.1 percent. Unemployment for Hale County is higher than the U.S. employment rate of 3.5 percent. The major employer in the AA is the University of Alabama.

The two local community contacts noted home mortgage loans as the primary financial need in the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for 2016 and 2017/2018. For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category

of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category

of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Tuscaloosa MSA AA 2016	736	116,163	100.0	6,774	6.0	1.2	2.7	21.7	8.3	12.1	38.8	33.4	36.5	33.6	57.1	48.6	0.0	0.0	0.0
Total	736	116,163	100.0	6,774	6.0	1.2	2.7	21.7	8.3	12.1	38.8	33.4	36.5	33.6	57.1	48.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2017-18

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
Tuscaloosa MSA AA 2018	1,305	221,528	100.0	6,556	1.0	0.0	0.3	20.9	12.6	12.9	46.2	43.3	44.6	31.5	43.8	41.3	0.4	0.4	1.0
Total	1,305	221,528	100.0	6,556	1.0	0.0	0.3	20.9	12.6	12.9	46.2	43.3	44.6	31.5	43.8	41.3	0.4	0.4	1.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data; 2017 HMDA Aggregate Data; "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Tuscaloosa MS A AA 2016	736	116,163	100.0	6,774	22.7	3.4	4.1	16.7	26.1	15.5	19.6	28.9	17.9	41.1	40.8	34.0	0.0	0.8	28.6
Total	736	116,163	100.0	6,774	22.7	3.4	4.1	16.7	26.1	15.5	19.6	28.9	17.9	41.1	40.8	34.0	0.0	0.8	28.6

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Tuscaloosa MS A AA 2018	1,305	221,528	100.0	6,556	24.2	3.1	5.0	15.9	21.8	16.0	17.9	25.6	19.0	42.0	49.0	35.9	0.0	0.5	24.1
Total	1,305	221,528	100.0	6,556	24.2	3.1	5.0	15.9	21.8	16.0	17.9	25.6	19.0	42.0	49.0	35.9	0.0	0.5	24.1

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.**Due to rounding, totals may not equal 100.0*