



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# **INTERMEDIATE SMALL BANK**

## **PUBLIC DISCLOSURE**

August 9, 2021

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

Connecticut Community Bank, National Association  
Charter Number: 23664

1111 Post Road East  
Westport, CT 06880

Office of the Comptroller of the Currency

340 Madison Avenue, 4th Floor  
New York, NY 10173

**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 .....	3
Discriminatory or Other Illegal Credit Practices Review .....	4
State Rating.....	5
State of Connecticut	
Community Development Test.....	8
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 Satisfactory.**

**The Lending Test is rated: Satisfactory**

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

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable and within the median of its competitors in the local market during the evaluation period.
- A significant portion of the bank's loans are made inside its assessment areas (AA).
- The distribution of loans to borrowers of different income levels is reasonable.
- The distribution of loans across geographies of different income levels is excellent.
- The bank exhibits an appropriate level of responsiveness to community development (CD) needs through CD loans, qualified investments, and CD services.
- The bank did not receive any Community Reinvestment Act (CRA)-related complaints during the review period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. Connecticut Community Bank's (CCB) quarterly LTD ratio since the previous CRA evaluation averaged 82.3 percent, with a quarterly high of 91.7 percent and a quarterly low of 77.5 percent. The OCC compared the bank's LTD ratio to three similarly situated banks in the AAs ranging in asset size from \$258 million to \$1.0 billion. The quarterly average LTD ratio for banks in this peer group was 94.7 percent, with a high of 108.9 percent for the quarterly average and a low of 57.6 percent.

### Lending in Assessment Area

A majority of CCB's loans were outside its AAs. This reflects adequate performance given the large number of commercial lenders offering small business loans in CCB's AAs.

Over the evaluation period, CCB originated 539 loans within its AAs, which represents 41.50 percent of loans originated. The total dollar amount of loans within the AAs was \$48.57 million, which represents 37.50 percent of total loans. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. During the assessment period, CCB actively met the needs of its immediate community by originating moderate volumes of the Small Business Association (SBA) Paycheck Protection Program (PPP) loans to existing and new potential customers. The SBA PPP loans bolstered the bank's ratio of loans made in its AAs in 2020, evidenced by the table below. The amount of loans

originated within the AAs increased to 410, which represents 49.28 percent of all loans, and the dollar amount increased to \$49.58 million, which represents 44.69 percent of all loans.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>												
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>		
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>	<b>Outside</b>					
	#	%	#	%		\$	%	\$	%			
<b>Small Business</b>												
2018	70	45.5	84	54.5	154	16,824	37.9	27,549	62.1	44,373		
2019	59	36.9	101	63.1	160	17,452	37.2	29,451	62.8	46,903		
2020	410	49.3	422	50.7	832	49,584	44.7	61360	55.3	110,944		
<b>Subtotal</b>	<b>539</b>	<b>47.0</b>	<b>607</b>	<b>53.0</b>	<b>1,146</b>	<b>83,860</b>	<b>44.7</b>	<b>118,360</b>	<b>58.5</b>	<b>202,220</b>		
<b>Total</b>	<b>539</b>	<b>47.0</b>	<b>607</b>	<b>53.0</b>	<b>1,146</b>	<b>83,860</b>	<b>41.5</b>	<b>118,360</b>	<b>58.5</b>	<b>202,220</b>		

*Source: Bank Data; Due to rounding, totals may not equal 100.0%*

## Description of Institution

CCB is an interstate community bank headquartered in Westport, Connecticut. In 2021, CCB applied for and received approval from the OCC to relocate its headquarters to Norwalk, Connecticut. The bank is wholly owned by Associated Community Bancorp, Inc. CCB's affiliate, InsurBanc, maintains its main office location in Farmington, Connecticut. There are currently no financial or legal impediments hindering the bank's ability to meet the credit needs of its AAs. InsurBanc, which operates in the Hartford AA, was included as part of the performance evaluation.

CCB's market area includes Fairfield and Hartford counties in Connecticut. CCB maintains eight branch locations with onsite ATMs across these two counties. CCB has two AAs located in Connecticut. The Fairfield County AA is in the Bridgeport-Stamford-Norwalk Metropolitan Statistical Area (MSA) #14860. The Hartford County AA is in the Hartford-East Hartford-Middletown MSA #25540. The bank maintains three branches in Greenwich, two branches in Westport, and one branch each in Darien, Norwalk, and Stamford. CCB's headquarters office has regular business hours Monday through Friday with limited hours on Saturday. All branches have regular business hours Monday through Friday with limited hours on Saturday except for the Putnam Avenue branch in Greenwich and the Stamford branch. These branches do not have Saturday hours. CCB had no branch openings or closings nor were there any mergers or acquisitions during the bank's evaluation period.

As of December 31, 2020, the bank had total assets of \$565.4 million, net loans of \$420.4 million, and total deposits of \$511.2 million. The bank's tier 1 capital totaled \$51.3 million. Net loans comprised 74 percent of total assets. Commercial and industrial (C&I) loans made up the majority of CCB's loans, totaling \$231 million or 55 percent of the loan portfolio at June 30, 2021. Commercial real estate (CRE) loans totaled \$167.3 million or 40 percent of the loan portfolio, 1-4 family residential loans totaled \$18.1 million or 4 percent, and multifamily loans totaled \$8.3 million or 2 percent.

The bank offers a variety of traditional products and services, including personal and business deposit accounts. CCB also offers direct deposit, wire transfer services, Visa debit cards, and online and mobile banking services. CCB's lending focuses on C&I and CRE, serving small- and medium-sized

businesses. The bank's website offers limited internet-banking services and provides information on branch hours and bank products. Additional information on products and services can be found in the bank's Public File, which is available by request at any branch location. The previous CRA evaluation, as of May 22, 2018, assigned an overall "Satisfactory" rating.

The OCC contacted two community members from the bank's AAs as part of this examination. One contact's organization works to facilitate economic development in Fairfield County. The contact stated that there are affordable housing and small business lending opportunities for local financial institutions. The other community member was an official from a nonprofit organization focusing on community development in Hartford County. This contact noted the opportunity for financial institutions to provide credit and low-cost deposit products to small businesses and nonprofits. The contact also noted the opportunity for financial education and affordable home loan options to customers through down payment assistance programs.

## **Scope of the Evaluation**

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

To evaluate CCB's performance under the CRA, the OCC used the Intermediate Small Bank Examination Procedures, which include a lending test and a CD test.

The lending test evaluated the bank's record of meeting the credit needs of their AAs. The evaluation period for the lending test was January 1, 2018 through December 31, 2020. The bank offered both residential and commercial loan products but is primarily a commercial lender, evidenced by business loan volumes during the evaluation period. As a result, the OCC primarily considered business loan products during this evaluation.

The CD test assessed the bank's record of meeting the credit needs of their assessment areas through CD lending, qualified investments, and CD services. The OCC reviewed CD activities from May 23, 2018 through December 31, 2020.

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

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA.

Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

CCB's overall rating is based solely on the State of Connecticut rating as this is the only rating area. Due to the nature of the bank's lending activities, preference was given to commercial and small businesses loans given the much larger volume of these types of loans originated during the examination period.

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

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

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

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

## State Rating

### State of Connecticut

**CRA rating for the State of Connecticut:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- CCB's LTD is reasonable, reflecting responsiveness to credit needs in its market area and immediate community.
- The bank originated a moderate volume of loans both by number and dollar amount inside its AAs.
- The bank exhibits an excellent distribution of loans across geographies of different income levels in the State of Connecticut. There were no gaps identified within the bank's lending to low- and moderate-income (LMI) census tracts (CT).
- The bank exhibits a reasonable distribution of loans to businesses of different sizes in the State of Connecticut.
- The bank did not receive any type of CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Connecticut

During the evaluation period, CCB primarily focused on commercial lending to its Fairfield and Hartford AAs. The bank owned eight branches within the Fairfield AA, which operate as Stamford Bank & Trust, Norwalk Bank & Trust, Darien Bank & Trust, Westport National Bank (which included two branches), and Greenwich Bank & Trust (which included three branches). Collectively, these branches made up CCB's Fairfield Division. In April 2013, the bank acquired InsurBanc, which is a non-retail, specialized banking division and is the only CCB facility operating in the Hartford AA. The InsurBanc Division specializes in providing lending and electronic depository services to insurance agencies and state associations throughout the United States and does not operate as a traditional retail branch.

Personal products offered during the evaluation period included checking, savings, certificates of deposits (CD), individual retirement accounts, home equity loans and lines of credit, consumer loans, residential mortgages, and credit cards (issued and serviced by TCM Bank, N.A.). Business products included checking, savings, CDs, term loans, lines and letters of credit, mortgage loans, construction loans, SBA loans, credit cards (issued and serviced by TCM Bank, N.A.), and insurance agency acquisition & perpetuation loans. Additionally, CCB offered a variety of other services to both personal and business customers such as debit cards, official checks and money orders, direct deposit, online banking services, mobile banking (including mobile remote deposit capture), wire transfers, and a fraud-prevention system for check users. CCB also offered remote deposit capture and ACH originations to its business customers.

CCB operated in a highly competitive market during the evaluation period. Other local financial institutions competing in the Fairfield AA included several area community banks, as well as regional and large institutions, such as People's United Bank, Bank of America, JPMorgan Chase Bank, Citibank, Wells Fargo Bank, TD Bank, and Webster Bank, which held a combined 80.39 percent market share of insured deposits. Regional and large institutions competing in the Hartford AA included Bank of America, People's United Bank, Webster Bank, TD Bank, Berkshire Bank, Liberty Bank, and Santander Bank with a combined 89.29 percent market share of insured deposits. According to the FDIC's June 2020 Deposit Market Share Report, CCB's deposit market share in the Fairfield AA and Hartford AA was 0.81 percent and 0.53 percent, respectively.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Combined</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)	241	28.2	21.6	19.5	29.9	0.8
Population by Geography	957,269	23.8	24.3	21.0	30.5	0.3
Housing Units by Geography	388,582	24.2	25.1	22.6	28.0	0.0
Owner-Occupied Units by Geography	201,925	9.3	21.5	26.4	42.8	0.0
Occupied Rental Units by Geography	151,969	40.6	29.3	19.3	10.7	0.0
Vacant Units by Geography	34,688	39.3	27.4	15.1	18.2	0.0
Businesses by Geography	123,948	16.8	20.6	22.0	40.3	0.2
Farms by Geography	2,545	15.7	24.1	24.4	35.8	0.0
Family Distribution by Income Level	229,831	31.1	16.2	16.7	36.1	0.0
Household Distribution by Income Level	353,894	32.3	15.5	15.8	36.4	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA	\$105,628	Median Housing Value			\$385,807	
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA	\$88,016	Median Gross Rent			\$1,174	
		Families Below Poverty Level			11.1%	
Source: 2015 ACS and 2020 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.						

## Scope of Evaluation in Connecticut

The rating for Connecticut is based on full-scope reviews of the Fairfield and the Hartford Non-MSA AAs. CCB's branches and ATMs are located within the AAs, and a significant portion of the bank's lending and CD activities are centered there.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

### LENDING TEST

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

Based on a full scope review of the bank's lending products and channels, the bank's lending performance in the state of Connecticut is reasonable. The OCC's analysis only considered commercial lending products as the volume of home mortgage loans was minimal in both AAs.

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

The bank exhibits an excellent geographic distribution of loans in its AA.

##### *Small Loans to Businesses*

Refer to Table Q in the State section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

The bank's percentage of small loans to businesses in low-income CTs was slightly below the percentage of businesses in low-income CTs; however, the percentage exceeded the peer aggregate. The percentage of small loans to businesses in moderate-income CTs exceeded both the percentage of businesses in moderate-income CTs and the peer aggregate.

The bank's level of small loans to businesses in the Hartford AA was not sufficient to provide a meaningful analysis.

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

The bank exhibits a reasonable distribution of loans among businesses of different sizes.

##### *Small Loans to Businesses*

Refer to Table R in the "State" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes is reasonable.

The bank's percentage of loans to small businesses (businesses with revenues of \$1 million or less) was significantly below the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of small business loans was below peer. However, the bank was in the top 25 percent of small business lenders based on market share data as of December 31, 2020. The bank had a small business market share of 0.21 percent, which meets the standard for adequate performance given that CCB competed with several larger lenders to small businesses.

The bank's level of small loans to businesses in the Hartford AA was not sufficient to provide a meaningful analysis.

### **Responses to Complaints**

CCB received no CRA-related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

CCB's performance under the CD test is Satisfactory. CCB demonstrated adequate responsiveness to the community development needs of the Fairfield and Hartford AAs.

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

CCB provided an adequate level of CD lending within its Fairfield and Hartford AAs. CCB originated 16 loans totaling \$17.2 million during the evaluation period that met the regulatory definition of CD. Examples of some of the larger CD loans included the following:

- CCB originated a line of credit each year of the evaluation period, totaling \$12.0 million, to provide transportation services to LMI census tracts in Fairfield County.
- CCB committed to a total of \$3.5 million in affordable housing related loans over the evaluation period.

A majority of the bank's CD lending benefitted the Fairfield AA. CCB originated 11 loans, totaling \$15.0 million, in the Fairfield AA that met the regulatory definition of CD. The bank originated four loans totaling \$1.7 million in the Hartford AA that met the regulatory definition of CD. Additionally, the bank originated one loan totaling \$500 thousand that benefitted both the Fairfield and Hartford AAs. The loans were primarily to support affordable housing and community services, such as transportation services, and build housing in LMI census tracts.

CCB also participated as a PPP lender in 2020. The bank originated 15 loans over \$1 million totaling \$27.4 million. Of the 15 loans, five loans totaling \$11.8 million were originated within the bank's AA, and 10 loans totaling \$15.7 million outside of the bank's AA.

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

CCB made an adequate level of CD investments in the Fairfield and Hartford AAs. The bank made two qualified investments totaling \$1.6 million, or 3.12 percent of tier 1 capital. Both investments supported affordable housing for LMI individuals benefitting the Fairfield County and Hartford County census tracts.

CCB made several investments in minority-owned depository financial institutions outside of the bank's AA to promote economic development. The bank has five CDs in minority-owned depository financial institutions, totaling \$1.3 million.

CCB made 179 charitable contributions, totaling \$99.1 thousand, during the evaluation period. Of these, 150 charitable contributions, totaling \$87.3 thousand, benefitted the Fairfield County AA, and 26 charitable contributions, totaling \$10.2 thousand, benefitted the Hartford County AA. Additionally, three

charitable contributions, totaling \$1.7 thousand, benefitted both the Fairfield and Hartford County areas. The charitable contributions supported community services, such as providing care to disabled individuals, the elderly, and veterans, and providing shelter and food resources for the homeless.

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

CCB provided an adequate level of CD services in both the Fairfield and Hartford AAs. CCB employees provided services to various programs that met the regulatory definition of CD. During the evaluation period, six employees provided 91.5 hours of qualified CD services. Two bank employees provided financial literacy education in conjunction with an organization that works with LMI individuals experiencing homelessness. Two bank employees provided financial services, with one serving as an advisory board member, to an organization that provides housing and employment services to homeless veterans. The bank provided no-fee accounts to clients of an organization that provides disabled individuals and their families with high quality care and life service programs including job training, competitive employment, and residential options.

### **Responsiveness to Community Development Needs**

CCB employees exhibited an adequate responsiveness to the credit needs and development needs of the community. The bank participated in fewer CD activities in the Hartford County AA than the Fairfield County census tract, which is reasonable due to the fact that CCB has just one branch located in Hartford County.

## 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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

<b>Time Period Reviewed:</b>	January 1, 2018 – December 31, 2020	
<b>Bank Products Reviewed:</b>	Small business loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
InsurBanc	Subsidiary	Small Business loans
<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>
Connecticut		
Fairfield AA	Full Scope	Fairfield County
Hartford AA	Full Scope	Hartford County

## Appendix B: Summary of MMSA and State Ratings

---

RATINGS		Connecticut Community Bank, N.A.	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
CCB	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Connecticut	Satisfactory	Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

---

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

## 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 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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2018-2020			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CCB Fairfield AA	173	46,905	96.1	19,547	13.7	12.7	12.3	20.5	24.9	18.9	20.0	22.5	21.8	45.7	39.9	47.1	0.0	0.0	0.0
CCB Hartford AA	7	1,668	3.9	10,239	23.1	0.0	19.4	20.8	0.0	22.3	25.9	57.1	26.1	29.7	42.9	31.6	0.5	0.0	0.5
<b>Total</b>	<b>180</b>	<b>48,573</b>	<b>100.0</b>	<b>29,786</b>	<b>16.8</b>	<b>12.2</b>	<b>14.7</b>	<b>20.6</b>	<b>23.9</b>	<b>20.1</b>	<b>22.0</b>	<b>23.9</b>	<b>23.3</b>	<b>40.3</b>	<b>40.0</b>	<b>41.8</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2018-2020			
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
CCB Fairfield AA	173	46,905	96.1	19,547	90.4	34.7	45.7	4.2	65.3	5.4	0.0		
CCB Hartford AA	7	1,668	3.9	10,239	87.1	71.4	42.7	4.8	28.6	8.2	0.0		
<b>Total</b>	<b>180</b>	<b>48,573</b>	<b>100.0</b>	<b>29,786</b>	<b>89.3</b>	<b>36.1</b>	<b>44.7</b>	<b>4.4</b>	<b>63.9</b>	<b>6.3</b>	<b>0.0</b>		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%