## INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

August 15, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings Bank of Twin Falls

**Charter Number: 702479** 

303 Shoshone Street North Twin Falls, ID 83301

Office of the Comptroller of the Currency

101 Stewart Street, Suite 1010 Seattle, WA 98101

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 Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on performance within the state of Idaho.
- The Community Development (CD) Test rating is based on performance within the state of Idaho.
- First Federal Savings Bank of Twin Falls (First Federal, or bank) had a more than reasonable loan-to-deposit (LTD) ratio for the evaluation period.
- A substantial majority of the bank's loans by both number and dollar amount were originated within the bank's assessment areas (AAs).
- The geographic distribution of home mortgage loans reflects an overall reasonable distribution of loans to low- and moderate-income (LMI) census tracts.
- The distribution of home mortgage loans by borrower income reflects an overall reasonable distribution of loans to LMI borrowers.
- The bank's CD activities demonstrated excellent responsiveness to community needs, most prominently through Paycheck Protection Program (PPP) loans providing vital job preservation and economic stability during the COVID-19 pandemic.

#### Loan-to-Deposit Ratio

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

The bank's average LTD ratio for the three years ended December 31, 2021, is 79.9 percent. This meets the standard for excellent performance given the demographics, lending opportunities, economic conditions, and credit needs of its AAs. We compared First Federal's average LTD ratio with five similarly situated banks, with asset sizes, branch networks, and footprints that were comparable to the bank's profile. These banks had an average LTD ratio of 67.6 percent for the same period. During the evaluation period, the highest quarterly ratio for First Federal was 96.5 percent, while the average high for the peer banks was 79.3 percent. The lowest quarterly ratio for First Federal was 62.4 percent, while the average low for the peer banks was 56.3 percent. All institutions in the peer group, as well as First Federal, experienced significant decreases in the LTD ratio of at least 25 percent during the review period due to unprecedented COVID-19 pandemic related deposit growth caused by rapidly changing market and economic conditions.

#### **Lending in Assessment Area**

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

The bank originated 94.7 percent of its total home mortgage loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Loan Category	N	lumber	of Loans			Dollar A	amount (	of Loans \$(	(000s)	
	Insi	Inside Outside		ide	Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
2019	1,210	95.4	59	4.6	1,269	229,630	93.6	15,662	6.4	245,291
2020	1,790	94.8	98	5.2	1,888	389,976	93.2	28,344	6.8	418,320
2021	1,999	94.3	120	5.7	2,119	484,355	91.9	42,628	8.1	526,983
Total	4,999	94.7	277	5.3	5,276	1,103,960	92.7	86,634	7.3	1,190,594

## **Description of Institution**

First Federal is a single state community bank located in Southern Idaho. The federally chartered institution is a mutual savings association with no holding company. As a mutual savings association, First Federal is owned by its depositors. The bank was founded in 1916 and has been headquartered in Twin Falls, Idaho since inception. In 1934, the bank reorganized into a mutual savings association. In 1989, the bank changed its name from First Federal Savings and Loan Association to First Federal Savings Bank. The bank has one subsidiary, FirstServ Corporation, which did not impact this evaluation. The bank also has one affiliate, the First Federal Foundation, which is a charitable organization that provides grants to other nonprofits in the Twin Falls region. The First Federal Foundation does not originate loans but does distribute donations to other organizations that benefit LMI individuals. We gave consideration to qualifying CD donations made by First Federal Foundation and aggregated them with the bank's CD activities.

First Federal's entire operations are across thirteen branches within Idaho, and consist of three AAs, the Twin Falls MSA AA, the Treasure Valley MSA AA, and the Magic Valley non-MSA AA. The Twin Falls AA has five branches in the city of Twin Falls, and also a branch each in the towns of Buhl, Jerome, and Kimberly. The Magic Valley AA consists of two branches in Burley and one in Rupert. Both Treasure Valley AA branches are located in Meridian. All branches offer ATMs and a variety of loan products to individuals and businesses. All branches except for the Eagle Road branch in Meridian offer drive-thru services. As of June 30, 2021, 68.2 percent of First Federal's deposits were in the Twin Falls AA, 23.6 percent in the Magic Valley AA, and 8.3 percent in the Treasure Valley AA.

First Federal operates as a full-service bank, providing a variety of financial services to individuals and businesses. Each branch offers similar products and services, including retail and commercial deposit and loan products. The bank's primary lending product is home mortgage loans, including certain home construction loans required to be reported under the Home Mortgage Disclosure Act (HMDA). Commercial real estate and commercial and industrial loans are the most significant secondary lending products. Lending products offered to individuals include fixed and variable rate home mortgage loans; construction, lot, and land loans; personal loans; home equity loans and home equity lines of credit; individual tax identification number loans; reverse mortgages; automobile and recreational vehicle loans; credit cards; and overdraft protection. Business loan types include commercial real estate, multifamily, commercial and industrial, and construction and land development loans. During 2020 and 2021, First Federal participated in the Small Business Administration (SBA) PPP to help stabilize small

businesses and local communities during the COVID-19 pandemic. The PPP ceased new origination activity during 2021. The bank's suite of deposit products includes checking accounts, savings accounts, money market accounts, certificates of deposit, health/medical savings accounts, remote deposit capture, and individual retirement accounts.

As of December 31, 2021, First Federal had \$1.3 billion in total assets with net loans of \$730.7 million, or 58.3 percent of total assets. The bank's tier 1 capital totaled \$104.1 million. Because First Federal sells home mortgage loans on the secondary market, total lending activity is greater than indicated by the current balance sheet data or the LTD ratio. The following table summarizes loan origination volumes for the review period:

Lending Product	\$(000s)	% of Total \$
Home	1,618,425	80.0
Business	343,844	17.0
Consumer	53,318	2.6
Other	7,013	0.3
Farm	1,075	0.1
Source: Bank Data Due to rounding, totals may not equal 100.0%		

Other banking products and services include automated teller machines (ATMs), night depositories, bill pay, and drive-thru banking. While there are variances by branch, the hours of operation are typically 9:00 a.m. to 5:00 p.m. with extended morning or late afternoon hours via drive-thru banking, and a 6:00 p.m. closing time on Fridays. Most branches offer drive-thru banking from 10:00 a.m. to 2:00 p.m. on Saturdays. Branch services and operations remained available in-person throughout the pandemic with customers utilizing drive-thru services or branch appointments due to operating restrictions. Additional services are offered via the TellerPhone automated customer support phone system, and online banking. Most branches feature one deposit-taking ATM that is available 24 hours.

The Office of the Comptroller of the Currency (OCC) last evaluated First Federal's CRA performance on August 19, 2019, using the Intermediate Small Bank CRA evaluation procedures. The bank received an overall rating of "Satisfactory" for this evaluation. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs.

## **Scope of the Evaluation**

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

The OCC performed a full-scope review of the bank's CRA performance using examination procedures for intermediate-small banks. The period covered by this review includes the calendar years of 2019, 2020, and 2021. The lending test analysis focused on home mortgage lending, which was First Federal's primary lending product during the evaluation period. We also evaluated qualifying CD loans, investments, and services.

#### **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. 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**

The bank's overall rating is based solely on the Idaho state rating, as it is the only rating area for the bank.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each State Rating for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 25.28(c), in determining a federal savings association's 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 Idaho

**CRA rating for the State of Idaho:** Satisfactory **The Lending Test is rated:** Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of home mortgage loans reflects a reasonable distribution of loans to LMI census tracts.
- The distribution of home mortgage loans by borrower income level reflects a reasonable distribution of loans to LMI borrowers.
- The bank's CD activities demonstrated excellent responsiveness to community needs, most prominently through PPP participation during the COVID-19 pandemic.

#### **Description of Institution's Operations in Idaho**

First Federal currently operates thirteen branches spread across three AAs in the Twin Falls/Magic Valley and Boise areas of Idaho. The bank has three designated AAs, including the Twin Falls Metropolitan Statistical Area (MSA) AA, the Treasure Valley MSA AA, and the Magic Valley non-MSA AA. There are eight branches in the Twin Falls AA, three branches in the Magic Valley AA, and two branches in the Treasure Valley AA. The Twin Falls AA consists of the entire MSA, which is delineated as Twin Falls and Jerome Counties. Five of the eight branches are located in the city of Twin Falls, with one additional branch each in the towns of Buhl, Jerome, and Kimberly. The Magic Valley AA consists of Cassia, Minidoka, Gooding, and Lincoln counties, with two branches in Burley and one in Rupert. Both Treasure Valley AA branches are located in Meridian. This AA consists of the two counties within the Boise MSA that the bank can reasonably serve, Ada and Canyon Counties. Both branches in the Treasure Valley market opened during the review period. The Eagle Road branch converted from a loan production office to a branch on January 7, 2019, while the Fox Run branch opened on February 25, 2021. There were no other changes to branch locations, nor any mergers or acquisitions during the evaluation period. The Twin Falls AA is the bank's largest market with a 63.7 percent share of deposits in 2021.

## Twin Falls MSA and Magic Valley Non-MSA

Due to the Twin Falls MSA and Magic Valley non-MSA AAs being in close proximity, many of the economic, employment, and housing factors are similar, and are therefore combined in this section.

#### Economy and Employment

Based on economic data from Moody's Analytics, the Twin Falls local economy is exhibiting solid growth, with a quick recovery from the impacts of the COVID-19 pandemic and expansion of the metro area. Nearly all industries have eclipsed pre-pandemic employment levels. U.S. Bureau of Labor Statistics (BLS) data shows overall labor force participation increasing from 53 thousand in January 2019 to 54 thousand in December 2021. BLS data also shows the unemployment rate trending downwards since the pandemic, with a rate of 2.6 in December 2021 compared to a low of 2.4 percent in

September 2019. The primary industry in the region continues to be food manufacturing, which makes up nearly 10 percent of jobs. Moody's Analytics identifies the long-term strength for the region as its strong population growth relative to the surrounding region, which will benefit retail, healthcare, and other consumer service industries. The top employers include St. Luke's Hospital, College of Southern Idaho, Personnel Plus, ConAgra Foods, and Chobani.

Based on the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) market share report, First Federal has the largest deposit market share amongst twelve banks operating in Twin Falls and Jerome Counties. First Federal has 27.3 percent of the market, compared to the closest competitor which has 17.3 percent. In the counties of Cassia, Gooding, and Minidoka, First Federal places second amongst nine institutions, controlling 16.9 percent of deposits, compared to the lead bank at 32.7 percent.

#### **Housing**

Based on 2015 American Census Survey (ACS) data, affordable housing may be difficult to obtain for LMI families. Within the Twin Falls MSA AA the ratio of median house value to median family income was 2.9:1. For prospective LMI borrowers, this rises to at least 5.7:1 for low-income individuals and at least 3.6:1 for moderate income individuals. In the Magic Valley non-MSA AA, housing is slightly more affordable, with median housing values being at least 4.7:1 for low-income borrowers and 2.9:1 for moderate-income borrowers. According to Moody's Analytics, home values in the region have appreciated in line with the overall U.S. rate over the past few years, which has negatively impacted housing affordability. Housing values were impacted by migration to the region which peaked in 2020, creating increased competition for existing housing stock. Between 2019 and 2021, the population grew by 3.2 thousand or 2.9 percent, with net migration of 2.9 thousand people. Over that period, there were 2,956 single family and multifamily housing permits approved. Moody's Analytics found roughly 40 percent of house prices being overvalued in 2021.

#### **Community Contact**

To identify community credit and development needs and understand the performance of local financial institutions, we spoke to a community contact who works for a regional development organization that operates in both the Twin Falls MSA AA and Magic Valley non-MSA AA. The contact stated that while the COVID-19 pandemic negatively impacted the region, it recovered quickly and is growing, especially in terms of diversifying the economy beyond the food industry sector. The contact felt the local financial institutions were providing support to the community and could not identify opportunities where the institutions were not already active. They cited First Federal as an example of a bank that provides support to the community.

Table A – Den	· ·			nent Area						
Assessment Area: Twin Falls MSA										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	19	0.0	5.3	84.2	10.5	0.0				
Population by Geography	102,657	0.0	3.6	88.6	7.7	0.0				
Housing Units by Geography	39,773	0.0	3.9	88.3	7.8	0.0				
Owner-Occupied Units by Geography	24,071	0.0	2.1	87.8	10.1	0.0				
Occupied Rental Units by Geography	12,570	0.0	6.9	89.0	4.2	0.0				
Vacant Units by Geography	3,132	0.0	5.2	90.0	4.8	0.0				

Businesses by Geography	11,362	0.0	7.3	80.8	12.0	0.0
Farms by Geography	1,009	0.0	1.6	88.9	9.5	0.0
Family Distribution by Income Level	26,312	18.8	19.3	22.3	39.5	0.0
Household Distribution by Income Level	20.6	18.5	19.6	41.2	0.0	
Median Family Income MSA – 46300 Twin Falls, ID MSA	\$51,434	Median Hous	\$147,271			
	Median Gross	\$726				
	Families Belo	12.0%				

Source: 2015 ACS and 2021 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.

Table A – Dem	ographic I	nformation	of the Assessn	nent Area		
Asses	sment Area	: Magic Va	lley Non-MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	7.1	85.7	7.1	0.0
Population by Geography	64,141	0.0	6.5	88.5	5.0	0.0
Housing Units by Geography	24,190	0.0	6.4	88.9	4.7	0.0
Owner-Occupied Units by Geography	15,508	0.0	5.2	89.4	5.4	0.0
Occupied Rental Units by Geography	6,323	0.0	9.6	86.3	4.1	0.0
Vacant Units by Geography	2,359	0.0	5.5	92.2	2.4	0.0
Businesses by Geography	6,035	0.0	10.2	84.0	5.8	0.0
Farms by Geography	921	0.0	0.9	91.0	8.1	0.0
Family Distribution by Income Level	16,244	19.2	20.6	23.4	36.8	0.0
Household Distribution by Income Level	21,831	21.4	17.6	19.2	41.8	0.0
Median Family Income Non-MSAs - ID		\$52,867	Median Housi	\$123,203		
			Median Gross	Rent		\$635
			Families Belo	w Poverty Le	vel	12.1%

Source: 2015 ACS and 2021 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.

## Treasure Valley MSA

#### Economy and Employment

Based on economic data from Moody's Analytics, the Treasure Valley area economy is exhibiting strong growth, ranking third in the job gains compared to pre-pandemic levels across the top 100 metro areas. BLS data shows unemployment rates in 2021 trended downwards towards all-time lows, with unemployment rate at 2.5 percent in December 2021 compared to a low of 2.4 percent in September 2019. While the professional and business services, and health and education sectors continue to be significant portions of the Boise job market, the semiconductor industry is the unique strength for the region. Increased reliance on technology ensures a stable baseline demand for semiconductors, and if global supply chain disruptions ease manufacturing costs are expected to decrease. Additionally, the

recently passed Creating Helpful Incentives to Produce Semiconductors (CHIPS) bill will provide financial incentives to increase domestic semiconductor production. The top employers in the Treasure Valley area include St. Luke's Hospital, Micron Technology, St. Alphonsus Regional Medical Center, and Boise State University.

Based on the June 30, 2021, FDIC market share report, First Federal's level of total deposits ranks 19th out of 22 financial institutions operating in the counties of Ada and Canyon. First Federal holds 0.5 percent of deposits in the region, compared to the top competitor with 23.2 percent.

#### Housing

Based on 2015 ACS data, housing may be difficult to obtain for LMI families within the Treasure Valley AA as the median house value was 2.8 times the median family income. For prospective LMI borrowers, this ratio rises to at least 5.7:1 for low-income individuals, and 3.5:1 for moderate-income individuals. According to Moody's Analytics, house values in the region have appreciated more rapidly than the overall U.S. rate during the past few years, which has negatively impacted housing affordability. The Treasure Valley region population has experienced an increase of 37 thousand, or 4.9 percent growth between 2019 and 2021, driven by a large amount of migration to Idaho. Net migration over the time period was 48 thousand. During that same period, approved single-family and multifamily housing permits numbered 32,590. The increased competition for housing supply has led to an increase in housing prices in the region, with Moody's Analytics finding the roughly 60 percent of house prices being overvalued in 2021.

#### **Community Contact**

To identify community credit and development needs and identify opportunities for local financial institutions, we utilized three interviews of community contacts. Two of the contacts worked with regional economic development organizations, and one worked for a housing organization. In general, contacts indicated the region felt limited impact from the COVID-19 pandemic and has been growing as people move in from other states. Contacts identified housing affordability as a primary concern due to insufficient supply to match demand and deteriorating affordability. While all contacts had a positive perception of financial institution participation in the area, two identified micro-lending and outreach to smaller businesses as opportunities, and the other identified funding for housing projects as an ongoing need.

Table A – Dem	ographic Ir	formation	of the Assessn	nent Area		
Asse	ssment Are	a: Treasure	Valley MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	88	6.8	28.4	37.5	27.3	0.0
Population by Geography	616,422	3.6	26.4	44.8	25.2	0.0
Housing Units by Geography	235,712	4.2	26.7	43.8	25.3	0.0
Owner-Occupied Units by Geography	151,060	1.5	22.2	46.4	29.9	0.0
Occupied Rental Units by Geography	72,033	8.9	35.5	39.4	16.1	0.0
Vacant Units by Geography	12,619	9.5	29.8	37.6	23.2	0.0
Businesses by Geography	94,597	8.2	21.5	39.5	30.8	0.0
Farms by Geography	3,261	4.1	21.7	46.9	27.2	0.0
Family Distribution by Income Level	152,134	18.9	18.6	21.8	40.7	0.0

Household Distribution by Income Level	223,093	22.5	16.6	18.9	42.0	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Med	\$174,922		
			Median Gross	Rent		\$843
			Families Belo	w Poverty Le	vel	10.0%
Source: 2015 ACS and 2021 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 Idaho**

Ratings in the state of Idaho are based on the performance across all three full-scope AAs: the Twin Falls MSA AA, the Magic Valley non-MSA AA, and the Treasure Valley MSA AA. We selected the Twin Falls and Magic Valley AAs for full-scope reviews due to the bank having a significant presence in each area. We conducted a full-scope review for the Treasure Valley AA as it's a new market for First Federal, and by dollar amount the Treasure Valley AA represented the second highest amount of home mortgage activity for the bank. In our conclusions, we gave the Twin Falls AA the greatest weight as it represented the substantial majority of activity. Refer to Appendix A of this evaluation for a list of all AAs under review.

During the evaluation period, in comparison to overall lending activity, First Federal originated a minimal number of loans to small businesses, small farms, and consumers, making an analysis of these loan types not meaningful. We omitted those products from the lending test section for this performance evaluation.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IDAHO

#### LENDING TEST

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

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews in all three AAs, the bank's lending performance in the state of Idaho is reasonable.

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

The bank exhibits an overall reasonable geographic distribution of loans in the state. This is based on reasonable performance in the Twin Falls MSA and Magic Valley non-MSA AAs, which account for the substantial majority of the bank's lending activity.

#### Home Mortgage Loans

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

#### Twin Falls MSA

The geographic distribution of home mortgage loans in the Twin Falls MSA AA is reasonable. As there are no low-income tracts in the AA, our analysis focused on lending to borrowers in moderate-income tracts. First Federal originated 2.5 percent of its home mortgage loans, by number, within moderate-income tracts. This is slightly better than peer institutions, which in aggregate originated 2.2 percent of their loans within moderate-income tracts. It is also above the proportion of owner-occupied housing units within the AA that reside in moderate-income tracts, at 2.1 percent.

#### Magic Valley Non-MSA

The geographic distribution of home mortgage loans in the Magic Valley non-MSA AA is reasonable. As there are no low-income tracts in the AA, our analysis focused on lending to borrowers in moderate-income tracts. First Federal originated 3.8 percent of its home mortgage loans, by number, within moderate-income tracts. This is similar to aggregate peer performance of 4.8 percent. It is also only slightly below the proportion of owner-occupied housing units within the AA that reside in moderate-income tracts, at 5.2 percent.

#### Treasure Valley MSA

The geographic distribution of home mortgage loans in the Treasure Valley MSA AA trails performance in the other AAs. First Federal originated 2.0 percent of its loans, by number, within low-income tracts. This compares favorably to aggregate peer performance, at 1.5 percent, and is also above the proportion of owner-occupied housing units that reside in low-income tracts, at 1.5 percent. Performance in the moderate-income tracts, where First Federal originated 14.0 percent of its loans, lagged aggregate peer performance, at 19.0 percent. This is also below the proportion of owner-occupied housing units that reside in moderate-income tracts, at 22.2 percent.

Below is a subsection of Table O presenting data for the low-income and moderate-income tracts:

2019-2021	T	Total Home Mortgage Loans				v-Income Trac	ets	Moderate-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	
Twin Falls MSA	3,083	627,152	61.7	6,180	0.0	0.0	0.0	2.1	2.5	2.2	
Magic Valley Non- MSA	1,224	231,300	24.5	2,548	0.0	0.0	0.0	5.2	3.8	4.8	
Treasure Valley MSA	692	245,508	13.8	67,643	1.5	2.0	1.5	22.2	14.0	19.0	
Total	4,999	1,103,960	100.0	76,371	1.2	0.3	1.4	18.2	4.4	17.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

First Federal Savings Bank excluded from Aggregate

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

The bank exhibits a reasonable distribution of home mortgage loans to individuals of different income levels within the state. This is based on reasonable performance in the Twin Falls MSA and Magic Valley non-MSA AAs, which account for the substantial majority of lending activity.

#### Home Mortgage Loans

Refer to Table P in the state of Idaho section of appendix D for the entire set of facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Twin Falls MSA

The distribution of home mortgage loans to borrowers of different income levels within the Twin Falls MSA AA is reasonable. During the evaluation period, First Federal originated a similar percentage of loans to low-income borrowers as peer institutions, at 4.3 and 4.9 percent respectively. Both First Federal and peer institutions fall significantly below the percentage of AA families that are considered low-income, at 18.8 percent. This could be attributed to the housing costs being significantly prohibitive for low-income borrowers, as displayed in Table A in section D. Housing affordability challenges limit opportunities for financial institutions to originate home mortgage loans to low-income borrowers. In comparison, First Federal and peer institutions demonstrated better distribution to moderate-income borrowers, at 16.0 and 19.3 percent of loans respectively, compared to the 19.3 percent of AA families that are considered moderate-income.

#### Magic Valley Non-MSA

The distribution of home mortgage loans to borrowers of different income levels within the Magic Valley non-MSA AA is reasonable. During the evaluation period, First Federal originated a similar percentage of loans to low-income borrowers as peer institutions, at 4.6 and 4.9 percent respectively. Similar to the Twin Falls MSA, both the bank and peer institutions fall significantly below the percentage of AA families that are considered low-income, at 19.2 percent. This could be due to the market lacking sufficient affordable housing. Both First Federal and peer institutions perform better in lending to moderate-income families, with the bank originating 18.5 percent of its loans to moderate-income borrowers, compared to aggregate peer performance at 18.4 percent, and the 20.6 percent of AA families that are considered moderate-income.

#### Treasure Valley MSA

The distribution of home mortgage loans to borrowers of different income levels within the Treasure Valley AA is weaker than performance in other AAs, primarily due to performance compared to peer institutions. Over the evaluation period, First Federal had a lower percentage of loans by number to low-income borrowers compared to peer institutions, at 1.7 and 5.0 percent respectively. While housing in the Treasure Valley AA is similarly unaffordable for low-income borrowers, First Federal lags the performance of peer institutions subject to the same affordability challenges. The trend is similar for moderate-income borrowers, to whom First Federal made 11.0 percent of its loans, which is below both the peer aggregate of 15 percent, and demographic of 18.6 percent of families.

Below is a subsection of Table P presenting data for the low-income and moderate-income borrowers:

2019-2021	T	Total Home Mortgage Loans				ncome Borrov	vers	Moderate-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Twin Falls MSA	3,083	627,152	61.7	6,180	18.8	4.3	4.9	19.3	16.0	19.3	
Magic Valley Non- MSA	1,224	231,300	24.5	2,548	19.2	4.6	4.9	20.6	18.5	18.4	
Treasure Valley MSA	692	245,508	13.8	67,643	18.9	1.7	5.0	18.6	11.0	15.0	
Total	4,999	1,103,960	100.0	76,371	18.9	4.0	5.0	18.9	15.9	15.5	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

First Federal Savings Bank excluded from Aggregate

#### **Responses to Complaints**

There have been no consumer complaints related to the bank's CRA performance during the evaluation period.

#### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Idaho is rated Outstanding.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state of Idaho through CD loans, investments, and services, as appropriate, considering the bank's capacity and the needs and availability of such opportunities for CD in the bank's AAs. This was primarily due to PPP lending where the bank's participation in the program was excellent. The bank's other CD-qualifying activity varied significantly between AAs but was sufficient to support the outstanding rating in aggregate. Due to excellent performance across AAs, we also considered CD activity across the state of Idaho.

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

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

In Idaho, First Federal originated a total of 1,063 CD-qualifying loans totaling \$90.7 million. This is bolstered by the large number of PPP loans made during the evaluation cycle. The bank originated 1,033 PPP loans within its AAs, totaling \$80.3 million. In addition, the bank also originated an extra 18 PPP loans totaling \$5.1 million outside its AAs, which given the adequacy of CD overall, provides additional support for the CD rating for the institution. The bank's PPP loan program was designed to provide support to its local communities during the COVID-19 pandemic. The bank originated a significant

volume of loans to assist the communities it serves, as well as neighboring communities during the pandemic. Some examples of projects First Federal supported by funding CD loans includes constructing housing units in an LMI census tract, and a loan to help open a small business in a low-income census tract.

	Commun	ity Development Lo	ans	
			Total	
Assessment Area	#	% of Total #	\$(000's)	% of Total \$
Twin Falls MSA	10	0.9	4,248,631	4.7
PPP	679	63.9	43,209,677	47.6
Twin Falls MSA Total	689	64.8	47,458,308	52.3
Magic Valley Non-MSA	-	-	-	-
PPP	246	23.1	19,764,703	21.8
Magic Valley Total	246	23.1	19,764,703	21.8
Treasure Valley MSA	2	0.2	962,400	1.1
PPP	108	10.2	17,398,822	19.2
Treasure Valley MSA Total	110	10.4	18,361,222	20.2
State of Idaho, Outside AAs	-	-	-	-
PPP	18	1.7	5,144,043	5.7
State of Idaho, Outside AAs Total	18	1.7	5,144,043	5.7
Total Loans	1,063	100.0	90,728,276	100.0

We noted that there is a comparatively low level of non-PPP loans originated in the Treasure Valley MSA AA. This is predominately because the bank is currently attempting to expand into the Treasure Valley area and is experiencing significant levels of competition for qualifying lending opportunities in the area. Given the level of PPP loans that the bank has made in the area, we found that the bank has demonstrated a willingness and ability to provide area loans when feasible. The lack of non-PPP lending activity in the Magic Valley non-MSA AA is mitigated by the high volume of CD investments, which is discussed in the following section.

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

Qualified Investme	ents									
	Prio	r Period*	Curr	Current Period		7	Unfunded Commitments**			
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Twin Falls MSA	1	213,486	15	414,821	16	48.5	628,307	9.1	0	-
Magic Valley Non-MSA	5	818,122	5	3,691,270	10	30.3	4,509,392	65.2	0	-
Treasure Valley MSA	1	410,058	1	8,209	2	6.1	418,267	6.1	0	-
Within AAs Total	7	1,441,666	21	4,114,300	28	84.8	5,555,966	80.4	0	-
Out of AAs	5	1,355,435	0	-	5	15.2	1,355,435	19.6	0	-
Total	12	2,797,100	21	4,114,300	33	100.0	6,911,400	100.0	0	-
Source: Bank Data Due to rounding, totals ma	ay not equa	al 100.0%		<u>'</u>					•	ı

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

First Federal has nine outstanding CD-qualifying bonds, of which seven were originated during the prior evaluation period, and two were originated during the current evaluation period. These bonds total \$5.5 million and were intended to provide funding to local municipalities, including those located in LMI tracts within the Magic Valley Non-MSA AA.

In addition, the bank operates a close affiliate foundation called the First Federal Foundation. This foundation provided an additional 19 qualifying investments during the evaluation period, totaling \$70 thousand. The foundation's operations are primarily centered around the Twin Falls MSA and Magic Valley Non-MSA AAs. The bank also has an additional five bonds which benefited areas outside of the bank's AA issued during prior periods. These bonds total \$1.4 million. Combined with the bank's other investment activities, these bonds provide additional support for the bank's overall CRA rating.

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

Bank employees and directors provided at least 206 qualifying CD service hours during the evaluation period, and the majority of these services demonstrated leadership roles in the provision of services as well as providing financial education to the community. Bank employees focused the majority of their activity in the Twin Falls MSA AA, which had 122 qualifying service hours. The Magic Valley non-MSA AA had a total of 46 service hours, while the Treasure Valley MSA AA totaled 38 hours. The majority of these service hours were dedicated to assisting local schools, housing organizations for LMI members of the population, as well as organizations focusing on supporting local economic growth. Examples of these activities were organizing financial education seminars for LMI refugees in assistance with the local university and overseeing financials for local healthcare charities.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

## **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".

Time Period Reviewed:	01/01/2019 to 12/31/2021								
Bank Products Reviewed:	Home mortgage loans CD loans, investments, and services								
Affiliate(s)	Affiliate Relationship	Products Reviewed							
First Federal Foundation	Non-profit charitable organization that receives its entire funding from First Federal	Grants to non-profit organizations that qualified as CD-eligible investments							
List of Assessment Areas and Type of	of Examination								
Rating and Assessment Areas	Type of Examination	Other Information							
Idaho									
Twin Falls MSA	Full-scope	Entire counties of Twin Falls and Jerome							
Magic Valley Non-MSA	Full-scope	Entire counties of Cassia, Gooding, Minidoka, and Lincoln							
Treasure Valley MSA	Full-scope	Entire counties of Ada and Canyon							

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

RATING	First Federa	First Federal Savings Bank of Twin Falls									
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating								
First Federal Savings Bank of Twin Falls	Satisfactory	Outstanding	Satisfactory								
State:											
Idaho	Satisfactory	Outstanding	Satisfactory								

<sup>(\*)</sup> 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 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 arrogate 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 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.

Table O: As	Cable O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography         2019-21																			
	Tota	al Home Moi	rtgage l	Loans	Low-Income Tracts			Moderate-Income Tracts			Middle	-Incom	e Tracts	Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	( )ccunied	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	
Twin Falls MSA	3,083	627,152	61.7	6,180	0.0	0.0	0.0	2.1	2.5	2.2	87.8	87.8	89.0	10.1	9.7	8.7	0.0	0.0	0.0	
Magic Valley Non- MSA	1,224	231,300	24.5	2,548	0.0	0.0	0.0	5.2	3.8	4.8	89.4	88.9	90.4	5.4	7.4	4.8	0.0	0.0	0.0	
Treasure Valley MSA	692	245,508	13.8	67,643	1.5	2.0	1.5	22.2	14.0	19.0	46.4	48.6	48.1	29.9	35.4	31.3	0.0	0.0	0.0	
Total	4,999	1,103,960	100.0	76,371	1.2	0.3	1.4	18.2	4.4	17.2	55.1	82.7	52.8	25.4	12.7	28.6	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

First Federal Savings Bank (10000582971) excluded from Aggregate

Table P: Assess	Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower         2019-21															2019-21			
	Tot	al Home Mo	rtgage L	Loans	Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Twin Falls MSA	3,083	627,152	61.7	6,180	18.8	4.3	4.9	19.3	16.0	19.3	22.3	24.5	24.2	39.5	49.8	37.4	0.0	5.4	14.2
Magic Valley Non-MSA	1,224	231,300	24.5	2,548	19.2	4.6	4.9	20.6	18.5	18.4	23.4	26.1	25.2	36.8	47.4	38.1	0.0	3.4	13.5
Treasure Valley MSA	692	245,508	13.8	67,643	18.9	1.7	5.0	18.6	11.0	15.0	21.8	19.8	23.6	40.7	62.0	44.6	0.0	5.5	11.8
Total	4,999	1,103,960	100.0	76,371	18.9	4.0	5.0	18.9	15.9	15.5	22.0	24.2	23.7	40.2	50.9	43.8	0.0	4.9	12.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

First Federal Savings Bank (10000582971) excluded from Aggregate