



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# **INTERMEDIATE SMALL BANK**

## **PUBLIC DISCLOSURE**

August 4, 2025

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

Pioneer Trust Bank, National Association  
Charter Number: 21060

109 Commercial Street NE,  
Salem, OR 97301

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:** Satisfactory.

The major factors that support this rating include:

The Lending Test rating is based on the state of Oregon, and the following factors:

- Pioneer Trust Bank, National Association (PTB, or bank) originated a majority of loans, by number and dollar amount, within the assessment area (AA) during the evaluation period.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable provided the bank's size, financial conditions, and the credit needs of its community.
- An overall reasonable geographic distribution of small business loans.
- An overall reasonable distribution of loans to businesses of different sizes.

The Community Development (CD) Test rating is based on the state of Oregon.

- The bank demonstrated adequate responsiveness to the community development lending and investment needs within its assessment area.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit ratio was more than reasonable. During the 12 quarters of the evaluation period, Pioneer Trust Bank's average quarterly LTD ratio was 80.7 percent. PTB also ranged from a low LTD ratio of 60.9 percent to a high LTD ratio of 94.8 percent in this span. We compared PTB to a sample of seven similarly situated institutions with asset sizes between \$278.7 million to \$798.5 million. For these institutions, the average LTD ratio over the period was 67.7 percent. These institutions also had LTD ratios ranging from 46.9 percent to 95.6 percent.

### Lending in Assessment Area

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

To perform this analysis, we evaluated a random sample of 20 loans. The bank originated and purchased approximately 65 percent of its business loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage also does not include extensions of credit by affiliates that may be considered under the other performance criteria. By dollar amount, the bank disbursed 78.1 percent of loan amounts within the AA.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024		
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Small Business	13	65.0	7	35.0	20	4,629	78.1	1,294	21.9	5,923		

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%.

## Description of Institution

Pioneer Trust Bank, N.A. is a federally chartered community bank headquartered in Salem, Oregon. The bank operates two branches in Salem, Oregon where both of the bank's deposit-taking ATMs are also located. The bank is a wholly owned subsidiary of PTB Corporation, a one bank holding company also based in Salem, Oregon.

Management and the board have designated a single AA consisting of 54 census tracts (CTs). The AA consists of 3 low-income CTs, 12 moderate-income CTs, 25 middle-income CTs, and 14 upper-income CTs. The tracts include the city of Salem, Oregon, and are located in Marion and Polk counties. Salem is the second largest city in the state after Portland, and this AA represents a portion of the Salem Metropolitan Statistical Area (MSA). PTB has two banking locations in Salem within Marion County, one of which is close to the Polk County line, which enables the bank to serve customers in some Polk County CTs.

The bank reported \$700.4 million in total assets and \$99.1 million in tier 1 capital as of December 31, 2024. The bank's primary assets are loans, and net loans and leases comprise 74.7 percent of total assets. The bank's primary product is business lending. About 64.5 percent of the loan portfolio is business loans, which include commercial real estate loans, commercial and industrial loans, and construction and land development loans. The bank's secondary lending type is consumer lending. Approximately 11.3 percent of the portfolio consists of residential and consumer loans, and the remainder is in agricultural and other loans.

The bank did not engage in any merger or acquisition activities during the evaluation period. PTB does not have any financial or legal impediments that prevent it from meeting the credit needs of the AA. PTB's prior Community Reinvestment Act (CRA) Performance Evaluation dated May 2, 2022, resulted in an "Outstanding" rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

PTB's performance was evaluated under the Intermediate Small Bank CRA examination procedures. These procedures consist of two components: a Lending Test and a CD Test. The Lending Test is an assessment of the bank's record of meeting the credit needs of its AA through its lending activities. The bank offers a variety of loan products but is primarily a commercial lender. As a result, small business loan products were selected as the primary product for this evaluation. The CD Test is an assessment of the bank's responsiveness to community development needs within the AA through engaging in qualified lending, investment, donation, and service activities. The evaluation period for both the lending and CD tests was January 1, 2022, through December 31, 2024.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of 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), if applicable, 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**

The bank’s overall rating is based solely on the State of Oregon as this is the bank’s only rating area. The State rating is based on performance in the bank’s sole designated AA.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank’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 Oregon

**CRA rating for the State of Oregon<sup>1</sup>:** Satisfactory.

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

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

The major factors that support this rating include:

- The overall geographic distribution of small business loans is reasonable.
- The distribution of loans to businesses of different sizes is reasonable.
- The bank's responsiveness to the needs of the communities through CD activities is reasonable.

### Description of Institution's Operations in Oregon

Pioneer Trust Bank, National Association traces its history to the Ladd and Bush Trust Company, which was incorporated in 1924. In 1940 the trust company's name was changed to Pioneer Trust Company following the sale of affiliate Ladd and Bush Bank. In 1968, the Pioneer Trust Company became a full service bank and began offering loan and deposit products. In 1985, the current name of Pioneer Trust Bank, N.A. was adopted as PTB became a national bank. PTB's market presence has always been focused on the Salem, Oregon market with trust services; for the past half century the bank has offered a variety of traditional loan and deposit services to individuals and businesses.

Both of the bank's branches are located centrally in Salem, about one mile apart, and each provides an automated teller machine (ATM) that accepts deposits. The branch network did not change during the review period. While both bank locations are in the same upper-income tract, the tract borders a few moderate-income tracts. PTB offers mobile banking, mobile remote deposit, telephone banking, and online banking, including bill pay services. The bank also offers night drop facilities, safe deposit boxes, money orders, cashier's checks, notary services, wire transfers, and foreign currency drafts. In addition, PTB partners with MoneyPass to provide customers with surcharge-free ATM access nationwide.

Deposit products offered to consumers include savings accounts, checking accounts, certificates of deposit, and individual retirement accounts. PTB also offers credit and debit cards. A similar suite of deposit products is available for business customers, including sole proprietorships. Lending products include commercial real estate loans, business lines of credit, construction loans, and land development loans. Consumers are offered home equity lines of credit, auto, and personal loans. Loan services are primarily offered at the main office location; however, the products offered at both branch locations are comparable.

Competition from other financial institutions is significant. According to the FDIC Insured Institutions Deposit Market Share Report (as of June 30, 2024), 13 financial institutions have a presence in the AA, with 60 offices throughout Marion and Polk counties. FDIC market share data as of June 30, 2024, indicates PTB ranks fifth in deposit market share. PTB's deposits in Marion and Polk counties total \$569.8 million, which equates to 8 percent market share. PTB does not hold deposits in offices outside

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

the AA. Primary competitors for deposit market share in PTB's AA include Umpqua Bank with 20.5 percent market share; U.S. Bank, N.A. with 20.3 percent market share; JPMorgan Chase Bank, N.A. with 15.4 percent market share; and Wells Fargo Bank, N.A. with 14.2 percent market share.

Moody's Analytics (Moody's) indicates that primary economic drivers in Salem are high performing sectors in the healthcare and state government, as well as in professional and business services. The local agriculture industry faces increasing uncertainty due to commodity price volatility and evolving trade conditions, which impacts input costs such as fertilizer and equipment. Salem has benefitted from a population growth of 0.7 percent in 2024 per the U.S. Census Bureau due to its proximity to a large metropolitan area in Portland. Oregon's unemployment rate has also been trending upwards during the second half of 2024; however, Salem has maintained its stability as hiring kept pace with above-average labor force growth. Salem's economy is expected to slow down in coming months which aligns with statewide and national projections considering the macroeconomic trends evident nationally. Salem historically has benefitted from the public sector's stability, with revenues exceeding expectations over the past few years contributing to healthy reserves. Risk remains in potential reductions to federal funding which support about one-third of the Oregon's overall state budget.

The following table provides a summary of the demographic information for PTB's assessment area.

### Salem-Keizer AA

**Table 2 – Demographic Information of the Assessment Area  
Assessment Area - Salem-Keizer AA 2024**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	2022 - 2024
<b>Geographies (Census Tracts)</b>	54	5.56	22.22	46.30	25.93	0.00	
<b>Population by Geography</b>	282,309	4.70	20.41	49.54	25.35	0.00	
<b>Housing Units by Geography</b>	105,451	4.80	19.91	49.71	25.57	0.00	
<b>Owner-Occupied Housing by Geography</b>	58,258	1.93	13.75	53.18	31.15	0.00	
<b>Occupied Rental Units by Geography</b>	41,736	9.01	27.71	44.70	18.59	0.00	
<b>Vacant Units by Geography</b>	5,457	3.34	26.08	51.11	19.48	0.00	
<b>Businesses by Geography</b>	11,815	1.74	22.12	47.01	29.12	0.00	
<b>Farms by Geography</b>	657	2.13	13.85	44.29	39.73	0.00	
<b>Family Distribution by Income Level</b>	65,953	21.22	17.82	20.15	40.82	0.00	
<b>Household Distribution by Income Level</b>	99,994	22.64	17.18	19.67	40.51	0.00	
<b>Unemployment rate (%)</b>	5.68	15.01	7.16	4.32	5.39	0.00	
<b>Households Below Poverty Level (%)</b>	11.90	34.11	19.60	9.33	6.83	0.00	
<b>Median Family Income (41420 - Salem, OR MSA)</b>	\$73,679			<b>Median Housing Value</b>	\$260,600		
<b>Median Family Income (41420 - Salem, OR MSA) 2024</b>	\$91,300			<b>Median Gross Rent</b>	\$1,051		
				<b>Families Below Poverty Level</b>	9.37		
FFIEC File - 2024 Census							
2024 Dun & Bradstreet SBSF Demographics							
Due to rounding, totals may not equal 100.0%							
(*) The NA category consists of geographies that have not been assigned an income classification							

## Community Contacts

To help identify community credit needs and banking opportunities to meet those needs, we spoke with two community contacts as part of our performance evaluation. Both contacts indicated that state and federal government assistance and grant funding have been reduced, which has hindered the capability of community organizations to offer services. Additionally, the high cost of living and cuts to social safety programs (i.e. tax credits for childcare not being renewed, the absence of government stimulus checks, and reductions to SNAP benefits) have increased the local need and use of social services such as food banks and shelters. One community contact shared that food banks have been directly impacted by cuts to federal programs like Medicaid and U.S.D.A. that provide food banks with a significant portion of their food donations. Consequently, food supplies have been reduced and adversely impacted the elderly and disabled in the local community. Both contacts also emphasized the shortfall of affordable housing and need for shorter-term transitional housing developments in Salem. These circumstances have created opportunities for financial institutions to get involved by offering their services, and providing grants as suggested by one contact. PTB was recognized for providing borrowing lines and checking accounts to help sustain one organization's operations during a difficult period.

## Scope of Evaluation in Oregon

Pioneer Trust Bank operates only in the state of Oregon. The OCC performed a full-scope evaluation of the bank's only AA. There were no limited-scope areas to review. Refer to appendix A.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

### LENDING TEST

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

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

Based on a full-scope review, the bank's lending performance in the state of Oregon was reasonable. Due to the minimal number of home mortgages, small farm, and consumer loans originated during the assessment period, an analysis of those loan types is not meaningful. Therefore, the full-scope review was an analysis of small business loans originated.

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

The bank exhibited reasonable geographic distribution of loans in the state.

#### *Small Loans to Businesses*

Refer to Table 9 in the state of Oregon 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. During the assessment period, based on a sample of 31 loans in the bank's AA, PTB had 3.2 percent of business loans go to businesses located in low-income census tracts. This compares favorably to peer lenders,

who, in aggregate, had 2.3 percent of loans located in low-income census tracts. Within the AA, 1.7 percent of total businesses reside in low-income census tracts.

PTB's demographic distribution in the moderate-income census tracts is in line with peer lenders. The bank made 22.6 percent of its business loans to businesses located in the moderate-income census tracts. This is slightly below peer lenders who, in aggregate, made 23.0 percent of business loans in moderate-income tracts, relative to the 22.1 percent of total businesses located in these census tracts within the AA.

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

The bank exhibited a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

#### ***Small Loans to Businesses***

Refer to Table 10 in the state of Oregon 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.

During the assessment period, based on a sample of 31 loans within the AA, loans to businesses with annual revenues of less than \$1 million represented 55 percent of the bank's loans by count. This is in line with peer lenders' performance, who in aggregate had 56.4 percent of loans go to business with revenues below \$1 million. Within the AA, 83.3 percent of businesses had revenues below \$1 million.

#### **Responses to Complaints**

There were no consumer complaints related to the bank's Community Reinvestment Act performance during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD Test in the state of Oregon is rated Satisfactory.

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

Based on a full-scope review, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

#### **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.

**Table 3: Community Development Loans**

Assessment Area	Total			
	#	% of Total #	\$ (000's)	% of Total \$
Salem-Keizer	11	100	6,985	100

The bank's CD lending exhibits adequate responsiveness to the CD credit needs of the bank's AA. During the evaluation period, PTB originated eleven qualifying CD loans in its AA totaling approximately \$7.0 million. These eleven loans benefited eight different organizations/entities that provide housing services, community services, or that promote economic development that primarily benefits low- and moderate-income (LMI) individuals. The following are examples of CD loans the bank originated or purchased in this AA:

- A \$2.7 million loan to fund the construction of a new training facility for an organization that supports LMI students, small businesses, and their employees. The new facility is located in a moderate-income tract and will create employment opportunities for LMI individuals.
- A \$307,500 loan to an organization to purchase a house. The organization provides various housing services, including homeless prevention and assistance to families in need.
- A \$700,000 loan to support an organization that provides essential services to LMI families, including but not limited to food, clothing, and housing support.

### Number and Amount of Qualified Investments

**Table 4: Qualified Investments**

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salem-Keizer	0	0	84	483	84	100	483	100	0	0

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

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

PTB's performance for providing qualified investments in the State of Oregon is adequate. Qualified investments consist entirely of donations. PTB donated \$483 thousand to 27 organizations in its AA during the evaluation period. These donations helped fund necessary organizations and services, including but not limited to health care foundations, community development organizations, and food banks.

The following are examples of qualified investments in the AA:

- A donation to an organization that provides various services that primarily benefit families that are at or below the poverty level. In addition, this organization provides families with access to a food pantry, clothing closet, and community referrals to resources and services that may assist them.
- A donation to an organization that provides shelter, transitional housing, and mentoring to youth in need.

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

- A donation to an entity that provides free healthcare to the Salem community, including those in need.

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

The bank's level of CD services demonstrates adequate responsiveness to the needs within its AA. Bank employees and senior management members have volunteered approximately 1449 hours of their time and expertise to twelve qualified organizations operating within its AA. These organizations primarily provide community services that benefit and have a direct positive impact to LMI individuals.

The following are examples of CD services provided by bank staff:

- Served as Board Treasurer of a foundation that provides grants to organizations providing legal aid that directly benefits LMI individuals.
- Served in the Finance Committee of a non-profit hospital that serves/assists LMI individuals.
- Served on a Planning Committee for an organization that provides homeless individuals with emergency services, including meals, shelter, showers, clothing, and personal care items.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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>	(01/01/2022 to 12/31/2024)	
<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>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Oregon:		
Salem-Keizer AA	Full-Scope	Marion and Polk Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Pioneer Trust Bank, N.A.	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Oregon	Satisfactory	Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

**Unfunded Commitments:** Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. 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 9. 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 AA.

**Table 10. 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 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Salem-Keizer AA	31	9,754	100	10,716	1.7	3.2	2.3	22.1	22.6	23.0	47.0	45.2	43.8	29.1	29.0	30.9	0	--	0
Total	<b>31</b>	<b>9,754</b>	<b>100</b>	<b>10,716</b>	<b>1.7</b>	<b>3.2</b>	<b>2.3</b>	<b>22.1</b>	<b>22.6</b>	<b>23.0</b>	<b>47.0</b>	<b>45.2</b>	<b>43.8</b>	<b>29.1</b>	<b>29.0</b>	<b>30.9</b>	<b>0</b>	<b>--</b>	<b>0</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn &amp; Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Salem-Keizer AA	31	9,754	100	10,716	83.3	55	56.4	8.0	45	8.7	0
Total	<b>31</b>	<b>9,754</b>	<b>100</b>	<b>10,716</b>	<b>83.3</b>	<b>55</b>	<b>56.4</b>	<b>8.0</b>	<b>45</b>	<b>8.7</b>	<b>0</b>

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn &amp; Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%