



**PUBLIC DISCLOSURE**

August 19, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First Federal SB of Twin Falls  
Charter Number 702479  
383 Shoshone St N  
Twin Falls, ID 83301-6152

Office of the Comptroller of the Currency  
Denver Field Office  
1225 17th Street, Suite 450  
Denver, CO 80202

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	4
Scope of the Evaluation.....	5
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	7
State of Idaho.....	7
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- First Federal Savings Bank's (FFSB or bank) loan-to-deposit (LTD) ratio is more than reasonable.
- FFSB originated a substantial majority of loans within its designated assessment areas (AAs).
- The geographic distribution of loans within low- and moderate-income census tracts exhibits a reasonable dispersion throughout the bank's AAs.
- The distribution of loans to borrowers of different income levels is reasonable.
- FFSB's community development (CD) activities demonstrate adequate responsiveness to CD needs in the AAs.

### Loan-to-Deposit Ratio

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

The average quarterly LTD ratio during the evaluation period was 87 percent, ranging from a quarterly low of 81 percent to a quarterly high of 95 percent. FFSB's average LTD compares favorably to similarly situated institutions. The quarterly average of similarly situated banks ranges from 55 percent to 98 percent, with an average of 79 percent. Similarly situated banks are those banks of comparable asset size with similar business lines operating in the same geographies. The LTD ratios is calculated on a bank-wise basis.

### Lending in Assessment Area

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

The bank originated and purchased 87 percent of its total loans inside the bank's AAs during the evaluation period. By dollar volume, the bank originated and purchased 82 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	2,473	86.9%	373	13.1%	2,846	\$360,218	82.4%	\$76,969	17.6%	\$437,187
Total	2,473	86.9%	373	13.1%	2,846	\$360,218	82.4%	\$76,969	17.6%	\$437,187

## Description of Institution

FFSB is a \$670 million mutual savings bank headquartered in Twin Falls, ID. FFSB is a single state institution and does not have any affiliates or subsidiaries. The bank operates 11 retail branches in the Magic Valley region of the central southern portion of the state of Idaho and one retail branch in the Treasure Valley region, which converted from a loan production office to a full-service branch in January 2019. The bank operates 12 automated teller machines, one at each branch location. The bank has designated three AAs - the Twin Falls MSA, the Boise City MSA, and the Rural Idaho Non-MSA. The AAs meet the requirements of the Community Reinvestment Act (CRA) and do not arbitrarily exclude low or moderate-income census tracts (CT).

As of June 30, 2019, the bank reported net loans of \$552 million, which represents 80 percent of total assets. The majority of the loan portfolio consists of real estate loans totaling \$477 million, or 86 percent of loans, centered in 1-4 family mortgages. Commercial and consumer loans make up a much smaller portion of the loan portfolio at \$41 million (7 percent) and \$37 million (7 percent), respectively. Tier 1 capital levels are strong at \$79 million.

FFSB has not opened or closed any branches in low- or moderate-income tracts since the previous performance evaluation. The bank offers a wide variety of credit products, but its primary business focus is home mortgage lending. Retail services for consumers include checking, savings, investment, health and medical savings accounts, as well as overdraft protection services. Merchant services are also available for business customers.

FFSB received a “Satisfactory” rating at the last CRA examination dated August 8, 2016. There are no legal, financial, or other factors that would impede the bank’s ability to help meet the credit needs in its AAs during the evaluation period.

## **Scope of the Evaluation**

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

We evaluated FFSB under the Intermediate Small Bank examination procedures with an evaluation period from January 1, 2016, through December 31, 2018. The Intermediate Small Bank procedures include a lending test, which evaluates the bank's record of meeting credit needs of its AAs through its lending activities. To determine the bank's primary loan products, we analyzed both the number and dollar volume of loans originated and purchased in 2016 through 2018. We determined the primary product for the bank is home mortgages. To test lending performance, we evaluated performance using the 2010 U.S. Census data for loans originated in 2016 and the American Community Survey (ACS) U.S. Census data for loans originated in 2017-2018. The bank's lending during this review period is representative of the bank's lending strategy since the last CRA examination. Additionally, we evaluated FFSB's CD activities including CD lending, qualified investments, and services occurring from January 1, 2016, through December 31, 2018. We also contacted a community representative in the Twin Falls MSA to gather information on the local economy and general banking needs.

### **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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Given the bank only operates within the state of Idaho and the primary product is home mortgages, all our conclusions were derived from the Idaho assessment results.

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

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

The OCC has not identified that this institution has engaged in any 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: Satisfactory**

The major factors that support this rating include:

- The bank's loan to deposit ratio is more than reasonable with a quarterly average of 87 percent during the evaluation period.
- A majority of the bank's loans are inside the AAs. During the evaluation period, 87 percent of the loans originated or purchased were within the AAs.
- The bank's geographic distribution of loans is reasonable.
- The bank's distribution of loans to borrowers of different income levels is reasonable.
- FFSB's community development (CD) activities demonstrate adequate responsiveness to CD needs in the AAs.

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

FFSB's operations in the State of Idaho are focused primarily in mortgage lending in the Magic Valley region, which is comprised of two AAs – the Twin Falls MSA AA (TFAA) and the Rural Idaho Non-MSA AA (RIAA). The TFAA includes Twin Falls and Jerome counties and the RIAA includes the contiguous counties of Cassia, Gooding, Lincoln, and Minidoka. We performed full-scope reviews of both the TFAA and the RIAA. While the bank operates a full-service branch in the Boise MSA, this AA was not included in this performance evaluation as the branch did not open until January 2019.

FFSB faces significant competition in its AAs. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report as of June 30, 2018, there were 12 institutions accepting retail deposits in the TFAA and nine in the RIAA. FFSB ranks first and second, respectively, in deposit market share for the TFAA and the RIAA.

The bank's designated AAs comply with the CRA and do not arbitrarily exclude low- or moderate-income CTs from the AAs. Refer to Tables A1 and A2 below for information on the demographics of the two AAs.

We contacted one community development organization that is based in the Magic Valley area. The organization is a non-profit that runs several programs designed to meet a variety of needs of low-income families. The non-profit is mostly funded by government and state agencies. The community contact indicated that there are housing needs within the Magic Valley. The contact also indicated that the financial institutions in the area are willing to help and do in most cases. The local non-profit

organizations have a good working relationship with the local financial institutions, and they provide money, services, and/or support for various local projects.

**Twin Falls Idaho MSA AA and Rural Idaho AA - 2016**

<b>Table A1 – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Combined AA - 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	33	0.0	12.1	84.8	3.0	0.0
Population by Geography	163,297	0.0	11.2	86.0	2.8	0.0
Housing Units by Geography	62,419	0.0	11.3	85.9	2.8	0.0
Owner-Occupied Units by Geography	39,169	0.0	9.2	87.6	3.2	0.0
Occupied Rental Units by Geography	17,313	0.0	15.8	81.8	2.5	0.0
Vacant Units by Geography	5,937	0.0	12.3	86.4	1.2	0.0
Businesses by Geography	9,277	0.0	14.2	81.1	4.7	0.0
Farms by Geography	1,428	0.0	2.1	96.9	1.0	0.0
Family Distribution by Income Level	40,354	18.0	21.0	24.6	36.3	0.0
Household Distribution by Income Level	56,482	21.0	18.5	21.3	39.2	0.0
Median Family Income Non-MSAs - GA	\$49,523	Median Housing Value				\$135,329
		Median Gross Rent				\$612
		Families Below Poverty Level				11.0%

*Source: 2010 U.S. Census and 2016 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.*

**Twin Falls Idaho MSA AA and Rural Idaho AA – 2017/2018**

<b>Table A2 – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Combined AA – 2017/2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	33	0.0	6.1	84.8	9.1	0.0
Population by Geography	166,798	0.0	4.7	88.6	6.7	0.0
Housing Units by Geography	63,963	0.0	4.8	88.5	6.7	0.0
Owner-Occupied Units by Geography	39,579	0.0	3.3	88.4	8.3	0.0
Occupied Rental Units by Geography	18,893	0.0	7.8	88.1	4.1	0.0
Vacant Units by Geography	5,491	0.0	5.3	90.9	3.7	0.0
Businesses by Geography	9,818	0.0	9.8	81.7	8.5	0.0
Farms by Geography	1,421	0.0	1.1	91.2	7.7	0.0
Family Distribution by Income Level	42,556	19.0	19.8	22.7	38.5	0.0
Household Distribution by Income Level	58,472	20.9	18.2	19.5	41.4	0.0
Median Family Income MSAs – 46300 Twin Falls, ID	\$51,434	Median Housing Value				\$138,169
Median Family Income Non-MSA - ID	\$52,759	Median Gross Rent				\$695
		Families Below Poverty Level				12.0%

*Source: 2015 U.S. Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0  
 (\*) The NA category consists of geographies that have not been assigned an income classification.*



## **Scope of Evaluation in Idaho**

The TFAA and the RIAA both received full-scope reviews for this evaluation. The primary product in these AAs was home mortgage loans. While FFSB operates a full-service branch in the Boise MSA AA, it did not open until January 2019; therefore, that AA is not considered in the scope of this evaluation.

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

### **LENDING TEST**

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

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

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

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

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

Refer to Tables O1 and O2 in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### **Twin Falls Idaho MSA AA**

Our review of home mortgages in the TFAA showed a reasonable geographic distribution. There are no low-income CTs in this assessment area. The bank's percentage of loans to moderate-income level CTs falls short of the local demographic as well as the demographic comparator in both 2016 and 2017/2018. For 2016, the bank's percentage of loans to moderate-income CTs was 8.7 percent, compared to the local CT demographic of 12.0 percent and the demographic comparator of 15.0 percent. For 2017/2018, the bank's percentage of loans to moderate-income CTs was 1.3 percent, compared to the CT demographic of 2.1 percent and the demographic comparator of 2.3 percent. We consider this to be reasonable performance.

#### **Rural Idaho Non-MSA AA**

Our review of home mortgages in the RIAA showed a reasonable geographic distribution. The bank's geographic distribution in this AA is in line with the local CT demographic and the demographic comparator. There are no low-income level CT in this assessment area. The bank's percentage of loans to moderate-income level CT falls just short of the local demographic, as well as the demographic comparator in 2016. However, it exceeds those metrics in 2017/2018. For 2016, the bank's percentage of loans to moderate income level CT was 4.1 percent, compared to the local census tract demographic of 4.9 percent and the demographic comparator of 4.7 percent. For 2017/2018, the bank's percentage of loans to moderate-income level CT was 5.7 percent, compared to the local CT demographic of 5.2 percent and the demographic comparator of 3.2 percent. We consider this to be reasonable performance.

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

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

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

Refer to Tables P1 and P2 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Twin Falls Idaho MSA AA

Our review of home mortgages in the TFAA showed a reasonable borrower distribution. The bank's percentage of loans to low-income borrowers was well below the local demographic but in line with the demographic comparator. The bank's percentage of loans to moderate-income borrowers was in line with both the local demographic and the demographic comparator. For 2016, the bank's percentage of loans to low-income borrowers was 5.5 percent, compared to the local demographic of 17.9 percent and the demographic comparator of 4.5 percent. The bank's percentage of loans to moderate-income borrowers was 16.7 percent, compared to the local demographic of 20.6 percent and the demographic comparator of 18.7 percent. For 2017/2018, the bank's percentage of loans to low-income borrowers was 5.5 percent, compared to the local demographic of 18.8 percent and the demographic comparator of 5.9 percent. The bank's percentage of loans to moderate-income borrowers was 18.6 percent, compared to the local demographic of 19.3 percent and the demographic comparator of 22.0 percent. We consider this to be reasonable performance.

#### Rural Idaho Non-MSA AA

Our review of home mortgages in the RIAA showed a reasonable borrower distribution. The bank's percentage of loans to low-income borrowers was well below the local demographic but in line with the demographic comparator. The bank's percentage of loans to moderate-income borrowers was in line with both the local demographic and the demographic comparator. For 2016, the bank's percentage of loans to low-income borrowers was 7.0 percent, compared to the local demographic of 18.0 percent and the demographic comparator of 5.4 percent. The bank's percentage of loans to moderate-income borrowers was 18.6 percent, compared to the local demographic of 21.8 percent and the demographic comparator of 21.2 percent. For 2017/2018, the bank's percentage of loans to low-income borrowers was 6.3 percent, compared to the local demographic of 19.2 percent and the demographic comparator of 7.7 percent. The bank's percentage of loans to moderate-income borrowers was 22.2 percent, compared to the local demographic of 20.6 percent and the demographic comparator of 22.6 percent. We consider this to be reasonable performance.

## **Responses to Complaints**

The bank did not receive any complaints about the CRA performance during this evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

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

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state of Idaho 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 assessment areas.

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

The level of qualified CD loans in both the Twin Falls Idaho MSA AA and Rural Idaho Non-MSA AA represent adequate responsiveness to the needs of the community. During the evaluation period, the bank originated 14 CD qualified loans in the community, which totaled \$6.9 million. Of this total, 10 loans totaling \$4.3 million were in the Twin Falls Idaho MSA AA, and four loans totaling \$2.5 million were in the Rural Idaho AA. These loans were funded to aid low- to moderate-income level individuals and areas or to revitalize CRA designated areas.

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

The level of qualified CD investments in the AAs represents adequate responsiveness to the needs of the community. The bank operates a grant foundation called the First Federal Foundation that provides grants to non-profits and government organizations. Of these grants, \$94,705 qualifies as CRA investments. Outside of these donations, the bank also sponsors several qualified events/organizations annually. Since the last examination, the bank has purchased a total of \$4.5 million in qualified investments to qualified organizations such as the Twin Falls School District, Latah County School District, Caribou/Franklin/Bannock County School Districts, and the Canyon County School District.

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

The level of qualified CD services in the AAs represents excellent responsiveness to the needs of the community. During the evaluation period, the bank has provided over 1,000 hours of banking and financial related services to the community to aid low- to moderate-income level individuals and areas. Services from the bank ranged from serving on the board of directors of the United Way to educating young individuals on banking and fiscal responsibility.

## Appendix A: Scope of Examination

---

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

<b>Time Period Reviewed:</b>	1/1/2016 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage, Community development loans, Qualified investments, Community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Idaho</b>		
Twin Falls Idaho MSA AA	Full-scope	The MSA consists of the entire Twin Falls county and the entire Jerome county.
Rural Idaho AA	Full-scope	The AA consists of the following entire counties: Gooding, Lincoln, Minidoka, and Cassia

## Appendix B: Summary of State Ratings

---

RATINGS		First Federal Savings Bank of Twin Falls	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State
FFSB	Satisfactory	Satisfactory	Satisfactory
State:			
Idaho	Satisfactory	Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

---

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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



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

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table 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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
RID Non-MSA AA	172	21,969	30.0	1,177	0.0	0.0	0.0	4.9	4.1	4.7	95.1	95.9	95.3	0.0	0.0	0.0	0.0	0.0	0.0
TF MSA AA	402	57,773	70.0	3,038	0.0	0.0	0.0	12.0	8.7	15.0	82.6	84.1	79.8	5.4	7.2	5.2	0.0	0.0	0.0
<b>Total</b>	<b>574</b>	<b>79,742</b>	<b>100.0</b>	<b>4,215</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.2</b>	<b>7.3</b>	<b>12.1</b>	<b>87.6</b>	<b>87.6</b>	<b>84.1</b>	<b>3.2</b>	<b>5.1</b>	<b>3.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S. Census; 08/08/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0.  
Filter: 082019FFSBTF2016HMDA: Action Date is between 08/08/2016 and 12/31/2016.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
RID Non-MSA AA	508	68,978	26.8	1,125	0.0	0.0	0.0	5.2	5.7	3.2	89.4	84.8	92.9	5.4	9.4	3.9	0.0	0.0	0.0
TF MSA AA	1,391	211,498	73.2	2,872	0.0	0.0	0.0	2.1	1.3	2.3	87.8	88.8	90.2	10.1	9.9	7.6	0.0	0.0	0.0
<b>Total</b>	<b>1,899</b>	<b>280,476</b>	<b>100.0</b>	<b>3,997</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>3.3</b>	<b>2.5</b>	<b>2.5</b>	<b>88.4</b>	<b>87.7</b>	<b>90.9</b>	<b>8.3</b>	<b>9.8</b>	<b>6.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
RID Non-MSA AA	172	21,969	30.0	1,177	18.0	7.0	5.4	21.8	18.6	21.2	26.4	28.5	24.2	33.8	45.9	33.1	0.0	0.0	16.1
TF MSA AA	402	57,773	70.0	3,038	17.9	5.5	4.5	20.6	16.7	18.7	23.5	25.4	22.9	38.0	52.5	33.5	0.0	0.0	20.3
<b>Total</b>	<b>574</b>	<b>79,742</b>	<b>100.0</b>	<b>4,215</b>	<b>18.0</b>	<b>5.9</b>	<b>4.7</b>	<b>21.0</b>	<b>17.2</b>	<b>19.4</b>	<b>24.6</b>	<b>26.3</b>	<b>23.3</b>	<b>36.3</b>	<b>50.5</b>	<b>33.4</b>	<b>0.0</b>	<b>0.0</b>	<b>19.2</b>

Source: 2010 U.S. Census ; 08/08/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.00.  
Filter: 082019FFSBTF2016HMDA: Action Date is between 08/08/2016 and 12/31/2016.

<b>Table P2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
RID Non-MSA AA	508	68,978	26.8	1,125	19.2	6.3	7.7	20.6	22.2	22.6	23.4	26.4	22.8	36.8	43.7	29.1	0.0	1.4	17.8
TF MSA AA	1,391	211,498	73.2	2,872	18.8	5.5	5.9	19.3	18.6	22.0	22.3	23.7	23.9	39.5	49.4	32.3	0.0	2.8	16.0
<b>Total</b>	<b>1,899</b>	<b>280,476</b>	<b>100.0</b>	<b>3,997</b>	<b>19.0</b>	<b>5.7</b>	<b>6.4</b>	<b>19.8</b>	<b>19.6</b>	<b>22.2</b>	<b>22.7</b>	<b>24.4</b>	<b>23.6</b>	<b>38.5</b>	<b>47.9</b>	<b>31.4</b>	<b>0.0</b>	<b>2.4</b>	<b>16.5</b>

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