



PUBLIC DISCLOSURE

September 9, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Second Federal Savings & Loan Association of Philadelphia

Charter Number 703776

1727 Chestnut Street
Philadelphia, PA 19103

Office of the Comptroller of the Currency

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Suite 303
Trevese, PA 19053

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.

Major factors that support this rating are:

- The quarterly average loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the bank's loans are originated inside its assessment area.
- The bank had no consumer complaints regarding its community reinvestment performance.

Definitions and Common Abbreviations

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

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

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Second Federal Savings & Loan Association of Philadelphia (Second FS&LA) was founded in 1924 as the Thomas E. Coale Building & Loan Association in Philadelphia, Pennsylvania. The institution renamed itself Second FS&LA in 1936 and became a federally-chartered mutual thrift. The institution operates out of one office located in the Center City area of Philadelphia. It is open 9:00 AM to 3:00 PM, Monday through Friday. The institution does not offer Saturday or Sunday banking hours or any automated teller machines (ATMs). A website was developed and launched in mid-2015 (www.secondfed.com), which offers information on banking hours as well as products and services offered. No branches have been opened or closed since the last evaluation.

Second FS&LA offers a limited range of banking services that include pass book savings accounts, money market accounts, certificates of deposit, and traditional IRA accounts. Loan products are also limited to include residential mortgages for personal and investment purposes.

As of December 31, 2018, Second FS&LA reported \$12.2 million in total assets, \$6.6 million in net loans, and \$5.9 million in total deposits. The loan portfolio consists mainly of 1-4 family residential real estate loans, with \$6.43 million or 97.83 percent in that category and \$142 thousand or 2.17 percent in other loans. The institution originated six mortgage loans in 2016, six mortgage loans in 2017, and eight mortgage loans in 2018. The institution stated that efforts to originate or purchase loans have continued to be difficult, based on their small asset size, limited resources, and conservative underwriting.

Second FS&LA's last Public Evaluation (PE) was dated September 14, 2015, and the institution received a rating of "Substantial Noncompliance." Since the previous PE, Second FS&LA has made a concerted effort to increase lending in low- and moderate-geographies. Second FS&LA has not opened or closed any branches since the prior CRA examination. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We performed a full scope evaluation of Second FS&LA using the Small Bank CRA examination procedures, which only includes a lending test. The current evaluation period covered lending activity from January 1, 2016 to December 31, 2018. We used two evaluation periods for the examination. In 2017, the Office of Management and Budget revised the 2010 U.S. Census data. The changes resulted in differences to the MSA/MD, census tracts, and income designations. The first evaluation period covers the bank's lending performance from January 1, 2016 to December 31, 2016. To reflect the census changes, the second evaluation period covered lending performance from January 1, 2017 to December 31, 2018. Our lending performance review focused on home mortgage loans.

Data Integrity

Second FS&LA's primary loan products are home mortgage loans. The institution is not required to collect and report loan data under the Home Mortgage Disclosure Act (HMDA). In order to assess the institution's lending activity, we reviewed all mortgages originated during the evaluation period.

Selection of Areas for Full-Scope Review

Second FS&LA's has one AA that includes entire Philadelphia County, PA, where the bank is headquartered. The AA has changed since the last PE due to changes in census data. It continues to meet regulatory requirements and does not arbitrarily exclude any low- or moderate- income geographies. We performed a full-scope review of the bank's sole AA. Refer to the table in Appendix A for more information.

Ratings

The bank's overall rating is based on the full scope review of the AA described above. The only applicable performance test is the lending test.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

Second FS&LA's performance under the Lending Test is satisfactory.

Loan-to-Deposit Ratio

Second FS&LA's quarterly average net loan-to-deposit ratio is reasonable. During the evaluation period, the bank originated 20 total loans. The bank's quarterly average net loan-to-deposit ratio over the 12-quarter evaluation period was 72.74 percent. During this period, the ratio ranged from a quarterly low of 53.18 percent to a quarterly high of 118.33 percent. Second FS&LA's quarterly average net loan-to-deposit ratio is lower than that of a custom peer group of eight banks located in Philadelphia County, PA with asset sizes below \$350 million. The quarterly average of these banks over the same 12 quarters was 100.22 percent, with a quarterly low of 93.07 and quarterly high of 106.78. Net loan-to-deposits have continued to trend upwards as part of the bank's initiatives to increase loan originations.

Lending in Assessment Area

A substantial majority of the home mortgage loans originated during the evaluation period were made inside the bank's AA. Table D below shows the comparison of mortgages extended inside and outside of the assessment area:

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	6	100.0	0	0.0	6	522	100.0	0	0.0	522
2017	5	83.3	1	16.7	6	968	77.3	285	22.7	1,253
2018	8	100.0	0	0.0	8	2,193	100.0	0	0.0	2,193
Subtotal	19	95.0	1	5.0	20	3,683	92.8	285	7.2	3,968
Total	19	95.0	1	5.0	20	3,683	92.8	285	7.2	3,968

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

In 2016, the bank originated 100 percent by number and 100 percent by dollar volume within the AA. In 2017-2018, the bank originated 92.9 percent by number and 91.7 percent by dollar value within the AA. In aggregate, management originated 95 percent of loans by number and 92.8 percent by dollar value within the AA.

Geographic Distribution of Loans

The bank originated too few loans in the assessment area to draw a statistically sound conclusion. Please see tables O1 and O2 in Appendix C for details on the geographic distribution of loans.

Lending to Borrowers of Different Incomes

The bank originated too few loans in the assessment area to draw a statistically sound conclusion. Please see tables P1 and P2 in Appendix C for details on lending to borrowers of different incomes.

Responses to Complaints

The bank has not received any CRA-related consumer complaints since the last CRA examination.

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2016 to 12/31/2018) Investment and Service Tests and CD Loans: NA	
Financial Institution	Products Reviewed	
Second Federal Savings & Loan Association of Philadelphia	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No Affiliates	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Philadelphia County AA	Full Scope Review	For the period from January 1, 2016 through December 31, 2016, the data from the 2010 U.S. Census was used in our analysis. For the period from January 1, 2017 through December 31, 2018, data from the 2010 U.S. Census was also used in our analysis but was modified to include 2017 Office of Management and Budget census updates.

Appendix B: Community Profiles for Full-Scope Areas

Second FS&LA AA 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	15.9	28.9	26.6	25.5	3.1
Population by Geography	1,526,006	15.8	31.7	28.8	23.1	0.6
Housing Units by Geography	668,944	15.2	31.1	28.8	24.8	0.1
Owner-Occupied Units by Geography	317,755	11.0	29.1	33.5	26.4	0.0
Occupied Rental Units by Geography	256,733	17.9	31.5	25.4	25.0	0.1
Vacant Units by Geography	94,456	21.8	36.8	22.5	18.8	0.1
Businesses by Geography	89,478	10.9	22.1	25.8	39.3	2.0
Farms by Geography	496	7.1	20.4	26.8	43.5	2.2
Family Distribution by Income Level	311,376	30.2	17.6	17.6	34.6	0.0
Household Distribution by Income Level	574,488	31.9	15.0	16.0	37.1	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$54,139	Median Housing Value			\$159,504
			Median Gross Rent			\$834
			Families Below Poverty Level			20.0%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

In 2016, the AA consisted of 384 CTs. Based on the 2010 Census data, there were 61 (15.9 percent) low-income tracts, 111 (28.9 percent) moderate-income tracts, 102 (26.6 percent) middle-income tracts, 98 (25.5 percent) upper-income tracts, and 12 (3.1 percent) designated as N/A.

Based on data from the 2010 Census, the weighted average median cost of housing in the AA was \$159,504. The FFIEC adjusted median family income for the Philadelphia MD in 2016 was \$54,139. The percentage of households below the poverty level in 2010 in the AA was 20 percent. The population for the AA was comprised of 311,376 families. The unemployment rate across Philadelphia County was 6.8 percent, higher than the 5.4 percent unemployment rate for the Commonwealth of Pennsylvania and 4.9 percent for the U.S. The family income distribution details that 30.2 percent were low-income, 17.6 percent were moderate-income, 17.6 percent were middle-income, and 34.6 percent were upper-income.

According to 2016 Peer Deposit Data, Second FS&LA is ranked 44th out of 69 institutions in the AA with a market deposit share of 0.01 percent of total deposits. The primary competitors within the AA are: Wells Fargo Bank, NA (38 branches, 23.51 percent market share), PNC Bank, NA (38 branches, 14.72 percent market share), Bank of America, NA (18 branches, 13.73 percent market share), Citizens Bank of Pennsylvania (51 branches, 13.39 percent market share), and TD Bank, NA (21 branches, 7.26 percent market share).

The institution is not subject to the reporting requirements of the HMDA. However, market share data for all HMDA reporting institutions in the AA show that in 2016, there were 563 lending institutions within Second FS&LA's AA competing for mortgage loans. The four largest competitors are Wells Fargo Bank, NA with a 9.42 percent market share; New York Community Bank with a 5.18 percent of market share; Loan Depot.Com LLC with a 3.70 percent of market share, and Trident Mortgage Company LP with a 2.98 percent market share.

The economy is stable, expanding at a moderate pace, consistent with economic expansion for Pennsylvania. The major employment sectors in the Philadelphia area are health care, educational services and retail. The major employers are University of Pennsylvania and Health System, Thomas Jefferson University and Jefferson Health, Comcast Corporation, and the Vanguard Group Inc.

Second FS&LA AA 2017- 2018

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	13.0	33.9	22.9	26.8	3.4
Population by Geography	1,555,072	13.8	36.2	25.5	23.9	0.6
Housing Units by Geography	670,229	13.1	35.7	24.5	26.3	0.4
Owner-Occupied Units by Geography	305,884	10.0	32.1	28.3	29.6	0.0
Occupied Rental Units by Geography	275,166	15.0	36.9	22.0	25.3	0.8
Vacant Units by Geography	89,179	17.5	44.8	19.1	18.4	0.3
Businesses by Geography	92,637	8.6	26.3	21.3	41.6	2.2
Farms by Geography	570	6.5	21.1	24.4	46.0	2.1
Family Distribution by Income Level	309,568	30.6	17.8	16.5	35.1	0.0
Household Distribution by Income Level	581,050	31.3	15.5	15.4	37.8	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$169,604
			Median Gross Rent			\$956
			Families Below Poverty Level			21.0%

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

The census data change in 2017 altered the income designations of several CTs in the bank's AA. The same 384 CTs remained in the AA. Based on the 2015 ACS Census data effective as of 2017, there were 50 (13 percent) low-income tracts, 130 (33.9 percent) moderate-income tracts, 88 (22.9 percent) middle- income tracts, 103 (26.8 percent) upper-income tracts, and 13 (3.4 percent) designated as N/A.

Based on data from the 2015 ACS Census, the weighted average median cost of housing in the AA was \$169,604. The FFIEC adjusted family income for the Philadelphia, PA MD in 2017 was \$56,411. The percentage of households below the poverty level in the AA was 21 percent.

The population for the AA was comprised of 309,568 families. The unemployment rate across Philadelphia County in 2017 was 6.2 percent, exceeding the 4.9 percent unemployment rate for the Commonwealth of Pennsylvania and 4.4 percent unemployment for the U.S. in 2017. The family income distribution details 30.6 percent are low-income, 17.8 percent are moderate-income, 16.5 percent are middle-income, and 35.1 percent are upper-income.

According to 2017 Peer Deposit Data, Second FS&LA is ranked 40th out of 62 institutions in the AA with a market deposit share of 0.01 percent of total deposits. The primary competitors within the AA are: Wells Fargo Bank, NA (37 branches, 21.36 percent market share), PNC Bank, NA (37 branches, 16.12 percent market share), Bank of America, NA (18 branches, 14.86 percent market share), Citizens Bank of Pennsylvania (50 branches, 12.96 percent market share), and TD Bank, NA (22 branches, 6.92 percent market share).

Lending information for 2017- 2018 is similar to 2016. Market share data for all HMDA reporting institutions in the AA show that in 2017, there were 574 lending institutions within Second FS&LA's AA competing for mortgage loans. The four largest competitors are Wells Fargo Bank, NA with a 8.42 percent market share; New York Community Bank with a 3.74 percent market share; Police and Fire Federal Credit Union with a 2.99 percent market share; and Trident Mortgage Company with a 2.90 percent market.

Economic conditions in 2017-2018 remained essentially the same as 2016. The major employment sectors in Philadelphia area general medical and surgical hospitals, colleges and universities, restaurants, individual and family services, and elementary and secondary schools. The major employers are Trustees of the University of Pennsylvania, City of Philadelphia, the Federal Government, School District of Philadelphia, and the Children's Hospital of Philadelphia.

Community Contact

We reviewed the OCC Community Contact Database during this examination to determine the credit needs of the local community. We reviewed a community contact interview of a local economic development group conducted in 2019. The group's purpose is to assist small businesses by helping entrepreneurs and existing businesses solve problems through mentoring and support programs. The organization is seeing an influx of small businesses entering and leaving Philadelphia. The organization is noticing that individuals need credit for home purchase and new business start-ups. The organization is currently actively involved in Northeast Philadelphia, West Philadelphia, and parts of Center City. The organization is looking to participate and partner more with Community Development Corporations, community banks, and the City of Philadelphia for workshops and programs.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- 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 MA/AA. The table also presents aggregate peer data for the years the data is available.

Table O1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia County	6	522	100.0	33,790	11.0	33.3	6.3	29.1	50.0	23.6	33.5	16.7	34.7	26.4	0.0	35.2	0.0	0.0	0.2
Total	6	522	100.0	33,790	11.0	33.3	6.3	29.1	50.0	23.6	33.5	16.7	34.7	26.4	0.0	35.2	0.0	0.0	0.2

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia County	13	3,161	100.0	33,639	10.0	15.4	5.5	32.1	46.2	28.6	28.3	15.4	29.6	29.6	23.1	36.3	0.0	0.0	0.1
Total	13	3,161	100.0	33,639	10.0	15.4	5.5	32.1	46.2	28.6	28.3	15.4	29.6	29.6	23.1	36.3	0.0	0.0	0.1

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

Table P1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia County	6	522	100.0	33,790	30.2	0.0	5.6	17.6	16.7	12.9	17.6	33.3	17.5	34.6	50.0	43.1	0.0	0.0	20.8
Total	6	522	100.0	33,790	30.2	0.0	5.6	17.6	16.7	12.9	17.6	33.3	17.5	34.6	50.0	43.1	0.0	0.0	20.8

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia County	13	3,161	100.0	33,639	30.6	0.0	6.4	17.8	0.0	13.3	16.5	0.0	18.0	35.1	100.0	44.1	0.0	0.0	18.2
Total	13	3,161	100.0	33,639	30.6	0.0	6.4	17.8	0.0	13.3	16.5	0.0	18.0	35.1	100.0	44.1	0.0	0.0	18.2

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