



PUBLIC DISCLOSURE

January 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Warsaw Federal Savings & Loan Association
Charter Number 701158

3533 Warsaw Ave
Cincinnati, Ohio 45205-1850

Office of the Comptroller of the Currency

Central Ohio Field Office
Westlake Center
4555 Lake Forest Drive, Suite 520
Cincinnati, Ohio 45242-3760

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: Outstanding.

The Lending Test is rated: Outstanding.

The Warsaw Federal Savings and Loan Association (Warsaw or the thrift) has an outstanding record of meeting the credit needs of its community. The major factors supporting the outstanding rating include:

- Lending to borrowers of different income levels reflects excellent distribution.
- Geographic distribution of lending reflects excellent distribution.
- Warsaw's quarterly average loan-to-deposit (LTD) ratio is more than reasonable.
- Warsaw makes a majority of its loans inside its assessment area (AA).

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 (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; 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 (MSA): 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 geography.

Description of Institution

Warsaw is a federally-chartered mutual savings and loan association headquartered in Cincinnati, Ohio, with two full-service offices. Warsaw is a stand-alone mutual, with no holding company. The main office is located in Price Hill, approximately four miles southwest of downtown Cincinnati, Ohio, in a low-income census tract (CT). The branch office is located in Saylor Park in a middle-income CT. Both offices are located in Hamilton County, Ohio. Warsaw operates a drive-thru facility at each full-service office and has one stand-alone ATM near the main office. Thrift customers can also access the PNC ATM network at no cost. Warsaw has not opened or closed any offices since the last CRA evaluation.

In addition to the full-service offices, the thrift operates a loan production office (mortgage office) in Sycamore Township (Hamilton County). Beginning in 2017, the mortgage office is located in a middle-income CT. The Cincinnati loan production office moved from West Fork Road in Cincinnati to East Kemper Road in Cincinnati in June 2016. The thrift closed the Columbus, Ohio, loan production office in December 2017.

Warsaw has designated one AA consisting of the entire multi-state Cincinnati, OH-KY-IN MSA 17140 (Cincinnati MSA AA), which includes areas located in Ohio, Kentucky, and Indiana. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. As of the 2010 U.S. Census, 56 CTs were low-income, 124 CTs were moderate-income, 197 CTs were middle-income, 117 CTs were upper-income, and four geographies were listed as not-applicable as the CTs were not assigned an income classification. As of the 2015 American Community Survey (ACS) U.S. Census, 65 CTs were low-income, 120 CTs were moderate-income, 185 CTs were middle-income, 119 CTs were upper-income, and nine geographies were listed as not-applicable as the CTs were not assigned an income classification. Refer to "Appendix B: Community Profiles for Full-Scope Areas" for specific details regarding the AA.

Warsaw serves its community with traditional deposit accounts and one-to-four family residential real estate (home mortgage) loans. As of September 30, 2018, total assets were \$62.6 million, with net loans and leases totaling \$40.6 million, representing 64.8 percent of total assets. Tier 1 capital was \$8.0 million, or 12.7 percent of total assets, for the same time period. As of the September 30, 2018 Consolidated Reports of Condition and Income (Call Report), residential real estate loans totaled 90 percent, Home Equity Lines of Credit totaled eight percent, and commercial/commercial real estate loans (business loans) totaled two percent of total loans. The majority of the thrift's residential real estate loans are sold in the secondary market, with over \$225.5 million sold during the lending evaluation period (2015 – 2017). The thrift's primary lending focus is residential real estate lending.

Competition in the AA is strong with state and national banks, savings associations, and branches of larger financial institutions. Financial institutions with significant deposit activity in the AA include U.S. Bank National Association and Fifth Third Bank.

According to thrift management, primary competitors for Warsaw include Cincinnati Federal, Guardian Savings Bank, and Union Savings Bank. As of the June 30, 2018, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, 64 financial institutions with 718 offices operated in the Cincinnati MSA AA. As of the June 30, 2017, FDIC's Deposit Market Share Report, 66 financial institutions with 740 offices operated in in the Cincinnati MSA AA. Warsaw held 0.05 percent of the deposit market share for both time periods. As of the 2017 Peer Mortgage Data for the Cincinnati MSA AA, Warsaw originated/purchased 434 loans, representing a 0.44 percent market share. As of the 2016 Peer Mortgage Data, Warsaw originated/purchased 517 loans, representing 0.47 percent market share. Warsaw was ranked 54th and 48th out of over 500 lenders with loans originated/purchased in 2017 and 2016, respectively.

There are no financial or legal impediments that affect Warsaw's ability to help meet the credit needs in its AA. Warsaw's previous CRA rating was "Outstanding" as of the Performance Evaluation (PE) dated April 1, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted a full-scope CRA evaluation to assess the thrift's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used the small savings association CRA evaluation procedures to assess the thrift's performance. The Lending Test includes loans originated and purchased from January 1, 2015 to December 31, 2017, (lending evaluation period). Residential real estate loans are the thrift's primary lending product and were evaluated under the Lending Test. For analysis purposes, we used the 2010 U.S. Census data for loans originated and purchased in 2015 – 2016 and the 2015 ACS U.S. Census data for loans originated and purchased in 2017.

Data Integrity

We completed a data integrity examination of the thrift's home mortgage loans, as reported in the HMDA Loan Application Registers (2015 – 2017), to determine the accuracy of the data. We found the data was accurate and reliable for CRA analysis purposes and was used in its entirety in this evaluation.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the thrift's only AA, the Cincinnati MSA AA. Refer to the tables in Appendices A, B, and C for additional information.

Ratings

Warsaw's overall rating is based on the full-scope review of its only AA, the Cincinnati MSA AA.

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 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

Warsaw's lending performance is outstanding.

Loan-to-Deposit Ratio

Warsaw's quarterly average LTD ratio is more than reasonable given its size, financial condition, and AA credit needs. The thrift's quarterly average LTD ratio over the 22 quarters since the prior CRA evaluation (June 2013 to September 2018) was 99.6 percent. The ratio ranged from a high of 122.4 percent at June 30, 2016, to a low of 75.0 percent at September 30, 2018. The thrift's LTD ratios have trended down over the past few years. Since the prior CRA evaluation, Warsaw shifted their business model and sold more loans to the secondary market. In addition, the bank has grown deposits over the past several years. The quarterly average LTD ratio for similarly situated financial institutions in the AA (financial institutions in the AA with total assets less than \$1 billion) was 90.1 percent, and Warsaw's quarterly average LTD ratio of 99.6 percent compares favorably with peer.

Lending in Assessment Area

Warsaw originated or purchased a majority of its residential real estate loans (home mortgage) inside its AA. The thrift's primary lending product is home mortgage lending. During the lending evaluation period, Warsaw originated or purchased 69.6 percent of its loans by number or 70.0 percent by dollar amount inside its AA. Refer to Table 1 below for the number and dollar volume of loans originated or purchased inside the AA per year.

Table 1 - Lending Inside and Outside of the Cincinnati MSA AA										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	297	73.2	109	26.8	406	44,028	72.3	16,877	27.7	60,905
2016	378	69.5	166	30.5	544	63,339	72.0	24,607	28.0	87,946
2017	310	66.7	155	33.3	465	49,423	65.8	25,700	34.2	75,123
Total	985	69.6	430	30.4	1,415	156,790	70.0	67,184	30.0	223,974
<i>Source: 01/01/2015-12/31/2017 Bank Data (Warsaw's HMDA loan data). Due to rounding, totals may not equal 100.0 percent.</i>										

Lending to Borrowers of Different Incomes

Lending to borrowers of different incomes reflects excellent distribution.

Warsaw's lending to low- and moderate-income income borrowers in 2015 – 2017 exceeds the aggregate peer data, demonstrating excellent distribution of lending among borrowers of different income levels. Refer to the data in Table P in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the borrower distribution of the thrift's loan originations and purchases.

Geographic Distribution of Loans

Warsaw's geographic distribution of loans reflects excellent distribution.

Warsaw's AA consists of 65 low-income CTs and 120 moderate-income CTs, as of the 2015 ACS U.S. Census data. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

The thrift's geographic distribution of lending in 2015 – 2016 in low-and moderate-income CTs exceeds or is commensurate with the aggregate peer data, reflecting excellent distribution. The level of lending to low-income borrowers is slightly lower than the aggregate peer data, but is overall considered to be excellent.

The thrift's geographic distribution of lending in 2017 in low-and moderate-income CTs exceeds the aggregate peer data, reflecting excellent distribution.

Refer to the data in Table O in Appendix C and the community profiles in Appendix B for the facts and data used to evaluate the geographic distribution of the thrift's loan originations and purchases.

Responses to Complaints

Warsaw has not received any complaints about its performance in helping to meet the credit needs of its AA during the lending evaluation period.

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): 01/01/2015 – 12/31/2017 Investment and Service Tests and CD Loans: Not applicable (NA)	
Financial Institution	Products Reviewed	
Warsaw Federal Savings & Loan Association (Warsaw) Cincinnati, Ohio	Residential Real Estate Loans (Home Mortgage Loans)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cincinnati, OH-KY-IN MSA 17140 Ohio, Kentucky, and Indiana	Full-Scope	Multi-state MSA

Appendix B: Community Profiles for Full-Scope Areas

Cincinnati MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	498	11.2	24.9	39.6	23.5	0.8
Population by Geography	2,114,580	6.3	21.3	42.7	29.2	0.5
Housing Units by Geography	906,230	8.0	23.7	42.2	26.1	0.0
Owner-Occupied Units by Geography	557,647	2.7	17.9	46.1	33.3	0.0
Occupied Rental Units by Geography	250,515	14.7	33.9	37.1	14.3	0.0
Vacant Units by Geography	98,068	20.3	31.0	33.5	15.2	0.0
Businesses by Geography	119,722	5.4	22.6	39.2	32.6	0.1
Farms by Geography	3,872	2.1	17.7	54.1	26.2	0.0
Family Distribution by Income Level	537,645	20.8	17.3	21.1	40.8	0.0
Household Distribution by Income Level	808,162	24.3	16.1	17.7	41.9	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$67,016	Median Housing Value			\$160,708
			Median Gross Rent			\$703
			Families Below Poverty Level			8.8%
<p>Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0 percent. (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Table A-1 – Demographic Information of the Assessment Area**Assessment Area: Cincinnati MSA AA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	498	13.1	24.1	37.1	23.9	1.8
Population by Geography	2,139,466	8.2	21.2	40.1	29.3	1.2
Housing Units by Geography	916,861	10.1	22.9	39.9	26.6	0.5
Owner-Occupied Units by Geography	546,346	4.0	17.7	44.1	34.0	0.1
Occupied Rental Units by Geography	276,333	18.1	31.1	33.6	16.1	1.1
Vacant Units by Geography	94,182	21.8	28.8	33.4	14.8	1.2
Businesses by Geography	121,778	6.6	21.4	36.4	34.6	1.0
Farms by Geography	3,954	2.7	19.4	51.8	25.9	0.2
Family Distribution by Income Level	539,212	22.2	16.8	20.0	41.0	0.0
Household Distribution by Income Level	822,679	25.2	15.5	17.2	42.1	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$156,233
			Median Gross Rent			\$763
			Families Below Poverty Level			10.3%

Source: 2015 ACS Census and 2017 D&B Data.

Due to rounding, totals may not equal 100.0 percent.

(*) The NA category consists of geographies that have not been assigned an income classification.

Warsaw has designated the entire Cincinnati, OH-KY-IN MSA 17140 (Cincinnati MSA AA) as its AA. The Cincinnati MSA AA is a multi-state MSA, which includes counties located in Ohio, Kentucky, and Indiana. The following counties are included in the Cincinnati MSA for Ohio: Brown, Butler, Clermont, Hamilton, and Warren. The following counties are included in the AA for Kentucky: Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton. The following counties are included in the AA for Indiana: Dearborn, Ohio, and Union. The entire AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas. The thrift expanded their AA to include the entire multi-state Cincinnati, OH-KY-IN MSA 17140 since the prior CRA evaluation, which included just Clermont, Hamilton, Warren, and Butler counties at the 2013 CRA evaluation.

The local economy is stable, with unemployment rates lower than or commensurate with state and national levels. The national unemployment rate (not seasonally adjusted) was 3.5 percent as of November 2018. For the same time period, it was 4.1 percent for Ohio, 3.5 percent for Kentucky, and 3.7 percent for Indiana. The November 2018 unemployment rates in Ohio for each county in the AA were: 4.8 percent in Brown, 3.7 percent in Butler, 3.6 percent in Clermont, 3.8 percent in Hamilton, and 3.5 percent in Warren. For the counties in Kentucky in the AA, the November 2018 unemployment rates were: 2.7 percent in Boone, 3.7 percent in Bracken, 2.8 percent in Campbell, 3.3 percent in Gallatin, 3.6 percent in Grant, 2.8 percent in Kenton, and 3.2 percent in Pendleton. For the same time period, the unemployment rate was 3.6 percent in Dearborn and Ohio Counties in Indiana and 3.2 percent for Union County, Indiana. The source of the unemployment data was from the Bureau of Labor Market Information/Workforce Development in each state.

The AA has a diverse mix of national and international companies across many industries. The largest industries in the AA include healthcare, manufacturing, and retail trade. Major employers in the Cincinnati MSA AA include The Kroger Company, University of Cincinnati, Cincinnati Children's Hospital Medical Center, The Procter & Gamble Company, Fifth Third Bank, and the Internal Revenue Service.

According to the 2010 U.S. Census data, the median housing value in the Cincinnati MSA AA was \$160,708. Based on the 2016 median family income of \$68,800, low-income families make less than \$34,400 and moderate-income families make less than \$55,040. Overall median housing values are approximately 2.9 to 4.7 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 906,230 total housing units in the AA, of which 61.5 percent are owner-occupied and 27.6 percent are rental occupied units.

According to the 2015 ACS U.S. Census data, the median housing value in the Cincinnati MSA AA was \$156,233. Based on the 2017 median family income of \$73,600, low-income families make less than \$36,800 and moderate-income families make less than \$58,880. Overall median housing values are approximately 2.7 to 4.3 times the annual income of low- and moderate-income families in the AA. The housing costs relative to income may have a limiting effect on mortgage demand among some low- and moderate-income families. There are 916,861 total housing units in the AA, of which 59.6 percent are owner-occupied and 30.1 percent are rental occupied units.

We conducted an interview with a representative from one community organization as part of this CRA evaluation. The community contact mentioned that there is a need for short-term loans, especially for emergency auto repairs or other emergency needs. The contact also identified a need for home maintenance loans and home rehabilitation loans. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). 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/assessment area. Deposit data is compiled by the FDIC and is 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 results from how they are generated in supervisory analytical systems.

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 MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. Because small business data is not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography – The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

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
Cincinnati MSA AA	675	107,367	100.0	75,026	2.7	1.6	1.8	17.9	14.1	13.9	46.1	46.7	44.6	33.3	37.6	39.8	0.0	0.0	0.0
Total	675	107,367	100.0	75,026	2.7	1.6	1.8	17.9	14.1	13.9	46.1	46.7	44.6	33.3	37.6	39.8	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data (HMDA data), 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017**

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
Cincinnati MSA AA	310	49,423	100.0	67,955	4.0	5.2	3.3	17.7	16.5	16.2	44.1	42.9	44.7	34.0	35.2	35.7	0.1	0.3	0.2
Total	310	49,423	100.0	67,955	4.0	5.2	3.3	17.7	16.5	16.2	44.1	42.9	44.7	34.0	35.2	35.7	0.1	0.3	0.2

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2015-16**

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
Cincinnati MSA AA	675	107,367	100.0	75,026	20.8	10.2	7.3	17.3	28.7	17.4	21.1	20.9	18.8	40.8	37.0	38.8	0.0	3.1	17.7
Total	675	107,367	100.0	75,026	20.8	10.2	7.3	17.3	28.7	17.4	21.1	20.9	18.8	40.8	37.0	38.8	0.0	3.1	17.7

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data (HMDA data), 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

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
Cincinnati MSA AA	310	49,423	100.0	67,955	22.2	15.5	9.1	16.8	30.0	19.7	20.0	24.5	20.7	41.0	29.7	33.8	0.0	0.3	16.6
Total	310	49,423	100.0	67,955	22.2	15.5	9.1	16.8	30.0	19.7	20.0	24.5	20.7	41.0	29.7	33.8	0.0	0.3	16.6

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