



PUBLIC DISCLOSURE

July 11, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Elizabethton Federal Savings Bank
Charter Number 704307

112 N Sycamore St Elizabethton, TN 37643-3326

Office of the Comptroller of the Currency

320 Seven Springs Way Suite 310 Brentwood, TN 37027

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, nor should it 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.



INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

Major factors that support this rating include:

- The bank's loan-to-deposit ratio is reasonable.
- A majority of loan originations are within the bank's assessment areas (AAs), meeting the standard for satisfactory performance.
- The distribution of loans to borrowers of different income levels for residential mortgage lending is reasonable.
- The geographic distribution of residential mortgage loans within the bank's AAs is excellent.
- The overall level and responsiveness of community development activities is reasonable.

Scope of Examination

We evaluated Elizabethton Federal Savings Bank (Elizabethton FSB) using the Intermediate Small Bank (ISB) examination procedures which include lending and community development tests. The evaluation period covered August 5, 2014 through July 31, 2016. Our lending test focused on residential loan originations from 2014 and 2015. In evaluating the community development, we reviewed community development (CD) loans, investments, and services for the entire evaluation period. We considered the bank's small business loans as part of our CD test.

In evaluating the bank's lending performance, we focused on the primary loan products, home purchase and home refinancing. We compared the bank's lending performance to other institutions as reported in the 2014 and 2015 Home Mortgage Disclosure Act (HMDA) aggregate data and demographic data as reported in the 2010 census.

As part of this evaluation period, we tested the accuracy of the bank's HMDA data and found the information to be accurate and reliable. We also verified all community development loans, investments, and services submitted by management to ensure they met the regulatory definition for community development. We excluded any items that did not meet the definition or purpose of community development. We performed full scope reviews for both of the bank's AAs, which considers complete performance context, quantitative, and qualitative factors.



Description of Institution

Elizabethton FSB is a federally chartered, mutual savings association established in 1937. The institution has five locations in Tennessee and does not have any affiliates or subsidiaries. There have been no changes in the institution's corporate structure, and no offices have opened or closed since the last Community Reinvestment Act (CRA) examination in August 2014, when the institution received a "Satisfactory" rating.

The institution's main office and one additional branch are located in Elizabethton (Carter County), two branches are located in neighboring Johnson City (Washington County), and one other branch is located in Mountain City (Johnson County). Elizabethton FSB operates as a traditional savings association, with a primary focus on mortgage lending and deposit acceptance.

As of June 30, 2016, the institution reported total assets of approximately \$314 million. The loan portfolio totaled \$133 million, representing 46% of earning assets. Investment securities, primarily US treasury and agency securities, comprise the remaining 54% of earning assets. Residential real estate loans continue to represent a significant portion of the loan portfolio at 74%. Multi-family property loans, construction and development loans, loans secured by farmland, and commercial real estate loans comprise the majority of the remaining loan portfolio.

The institution has experienced a decline in growth since the last performance evaluation in 2014. Total assets have decreased approximately 5%, and the loan portfolio has declined over 3%. There are no legal or financial impediments to the institution's ability to meet the credit needs of its AAs, including CD loans, qualified investments, and CD services.

Elizabethton FSB offers a full range of loan and deposit services, including conventional fixed- and adjustable-rate first and second mortgages for the purchase, refinance, improvement, and construction of single-family residences. The institution also offers residential loans with private mortgage insurance, home equity, and consumer loans, as well as commercial real estate loans to small businesses and farmers. The institution retains all of its mortgage loan originations.

Bank offices are located in areas that are generally accessible to all customers. The main office location in Elizabethton is in a downtown moderate-income census tract (CT), while the Elizabethton branch is centrally located in a middle-income CT. One of the two branches in Johnson City is located in an upper-income area, while the other is located in a business district near East Tennessee State University. The branch office in Mountain City is located just off one of the major thoroughfares in a distressed middle-income CT.



Elizabethton FSB has deposit taking Automated Teller Machines (ATMs) at each location. Customers may also access their accounts through telephone or internet banking services at <http://www.elizfed.com/services/>. Internet and telephone banking services support transfers between institution accounts, balance inquiries, and transaction history retrieval. Bill payment, check images, and account statements are also available through the internet banking product. Elizabethton FSB also offers VISA debit cards and merchant processing for commercial customers.

Description of Assessment Area(s)

The institution's AA consists of the three counties where the main office and branches are located; Carter, Washington, and Johnson. These adjacent counties are located in northeastern Tennessee, near the borders of North Carolina and Virginia and the Appalachian and Blue Ridge Mountains.

For the purpose of this evaluation, we combined Carter and Washington counties, which represent a portion of the Johnson City Metropolitan Statistical Area (MSA). Although Johnson County is adjacent to Carter County, it is not part of the MSA. Therefore, we evaluated the institution's performance in Johnson County AA separately as a rural non-MSA.

The institution's AAs meet the requirements of the CRA regulation and do not arbitrarily exclude low- and moderate-income geographies.

Carter and Washington Counties - Johnson City Partial MSA

The bank's branches in this AA are located in Elizabethton and Johnson City. Elizabethton is the county seat of Carter County, which is approximately 10 miles from Johnson City, the largest city and regional educational, medical, and commercial center of Washington County.

The FDIC's June 30, 2015 market share report shows that approximately 84% of the bank's deposits are in this combined AA. Competition in this market is very strong. The FDIC report shows 21 institutions with 68 offices. Numerous credit unions, mortgage companies, check cashing businesses, finance, and title loan companies also compete with banks and savings institutions in this market. The FDIC report shows that banks and savings institutions in this combined AA hold approximately \$2.8 billion in deposits. Elizabethton FSB ranked 6th with 6% of the deposit market share. Deposit market share leaders are much larger, multi-state, regional or national institutions.

The combined AA for Carter and Washington counties includes all 40 CTs defined in the 2010 census. There is only one low-income CT (2.5%) in this AA, which is in Washington County. The majority of the CTs in this AA are moderate- and middle-income areas. Moderate-income CTs numbered 14 (or 35%), while middle-income tracts numbered 16 (or 40%). Upper-income CTs numbered 8 (or 20%). There is one CT in this AA that did not have an income designation in the 2010 census data. This



CT is located in Washington County near East Tennessee State University, where one branch office is located.

According to the 2010 census data, the combined population of Carter and Washington counties is approximately 180 thousand. Washington County is the larger of the two counties, with a population of approximately 123 thousand, while the population of Carter County approximates 57 thousand. Washington County has experienced population growth of about 13% since the 2000 census, but growth in Carter County has been minimal at less than 1%.

The 2010 census reported 73 thousand households in this partial MSA, of which 34% receive social security benefits and 19% receive retirement income. The Carter County Chamber of Commerce website indicates that Elizabethton/Carter County has become a popular place for retirees. This is also reflected in 2015 census estimates which show that a significant percentage of the Carter County population (20%) is over 65. The percentage of population over 65 in Washington County is 17% and also slightly higher than reported for the state of Tennessee at 15%.

Census data also shows that 22% of the families in this partial MSA have low-income and 17% have moderate-incomes. Households below poverty level were 19%, which is slightly higher than 18% reported by the census bureau at the state level and 15% reported nationally. Updated 2015 FFIEC information indicates that the weighted average MSA median family income for the partial MSA AA is \$52 thousand, which is up slightly from \$49 thousand in 2013.

In the 2010 census, there were 83 thousand housing units in this AA, with a high percentage of owner occupied units at 61%. The median home value was \$125 thousand.

The AA's economy is relatively diverse with major employers consisting of government, education, health services, trade, and manufacturing. In Washington County, some of the area's largest employers include Mountain States Health Alliance, East Tennessee State University, Citi Commerce Solutions, Mountain Home Veterans Administration Medical Center, American Water Heater Co., and AT&T Mobility. There are numerous service industry businesses: federal, state, municipal, educational systems, and other medical systems serving the entire MSA.

In Carter County, other major employers include Snap-On Tools, Walmart, Summers Taylor (a concrete/asphalt paving contractor), and Sycamore Shoals Hospital. Three colleges in Elizabethton, Tennessee including the College of Applied Technology, Milligan College, and a branch of Northeast State Community College, provide employment, educational opportunities, and job training. Several nearby state and national parks support tourism in the area.

The bank's AA is also a component of the multi-state Johnson City-Kingsport-Bristol, TN, VA Combined Statistical Area (CSA), commonly known as the Tri-Cities Region,



which provides additional employment opportunities to the AA. The Tri-Cities region is the fourth largest CSA in Tennessee with an estimated population of 500 thousand.

The local economies are improving; however, management indicates that the recession and the lack of new construction have negatively impacted tradesmen in their AA. Residential building permits have shown improvement in both counties: Carter County permits increased to 110 in 2015 from 82 in 2013 while Washington County increased to 575 in 2015 from 404 in 2013.

Unemployment data from the Bureau of Labor and Statistics and the Tennessee Department of Labor and Workforce shows improvement in unemployment trends as the region slowly recovers from the recession. The March 2016 monthly unemployment rate for Carter County, *not seasonally adjusted*, was 6.7%, which is down significantly from an annual rate of 10% in 2010. In Washington County, the unemployment rate for March 2016 was 5.5%, which is also down from an annual rate of 8.5% in 2010. However, unemployment rates in the bank's AAs are still slightly higher than state and national rates, which were 4.1% and 4.9% respectively in June 2016.

Johnson County - (Non MSA)

Johnson County is located in a rural portion of upper east Tennessee. The bank's branch office is located in the rural community of Mountain City, which is the county seat and 33 miles from Elizabethton. Based upon the FDIC's June 30, 2015 deposit market share report, approximately 16% of the bank's deposits are from the Johnson County AA.

This AA includes all five CTs designated in the 2010 census data. Two of which are designated as moderate-income tracts, while the remaining three tracts are middle-income tracts. In the years 2015 and 2016, the middle-income CTs were all designated as distressed areas due primarily to the high poverty rates. The bank's Mountain City branch office is located in one of the distressed middle-income tracts.

According to the 2010 census data, the total population in Johnson County is approximately 18 thousand, with 2.5 thousand in Mountain City. Population growth in the County has been minimal over the past 10 years, with approximately 1% growth. Census data shows 7 thousand households in the county, with 41% receiving social security benefits and 19% receiving retirement income. Over 21% of the population was over 65 according to the 2015 census estimates.

The percentage of households below poverty levels at 24% is much higher in Johnson County than in the bank's other AA. This percentage is also much higher than state and national poverty rates. Census data shows that 28% of the families in this AA are low-income and 23% are considered moderate-income. Middle-income families represented 17% of total families while upper-income families represented 32%. The updated 2015 FFIEC information shows the weighted average median family income



for the county was \$48 thousand, which is approximately the same as in 2010.

According to the 2010 census, there were 9 thousand housing units in the AA, with 63% of the units being owner occupied. Approximately 20% of the units were occupied rental properties and 17% were vacant. In addition, a fairly high percentage of persons (9%) lived in correctional institutions. The median housing value was \$93 thousand.

The economy in Johnson County has been slow to rebound from the recession. There have been no large, new employers in the area since 2010; however, the state has recently opened Doe Mountain Park, which is an 8,600 acre park/mountain providing outdoor recreational opportunities and possibly creating new business opportunities and industries supporting tourism and recreation. Many of the individuals in Johnson County commute to larger communities in the region for employment. 2015 data shows only one building permit for the county. Unemployment rates show some improvement declining to 6.4% in March 2016 from 8% in June 2014.

Major employers in the county include the Northeast Correction Center (prison), Parkdale Mills (cotton processing), Maymead, Inc. (lime manufacturer), Mountain City Care Center (nursing and convalescent) and local schools and hospitals.

The FDIC's June 30, 2015 market share report only shows three (3) banks in this County. Elizabethton FSB ranks last of the 3 banks with 14% of the deposit market share. Although there are only 3 banks in this AA, competition is considered fairly strong when considering the size of the community, distressed economic conditions, and the number of other lenders in this county, which include a credit union, Farm Credit, mortgage companies, and finance companies.

The high poverty rates, high percentage of low-income families, and the lack of development in this AA present challenges for residential lending opportunities. In addition, information provided by the local county reflects that there are few opportunities in this AA for multi-family properties, as all 5 unit apartments in the AA are government subsidized.

Community Contacts

As part of this evaluation, we determined the community credit needs in the bank's AAs by reviewing the CRA Public Evaluations of other banks operating in the same areas and updating two community contacts with local non-profit organizations focusing on affordable housing and community services. We determined that the most pressing credit needs in the AA are affordable housing and small business lending. Other identified needs included financial literacy and low cost depository services.

Conclusions with Respect to Performance Tests

LENDING TEST

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



Loan-to-Deposit Ratio

- Based upon the bank’s resources, financial capacity, competitive environment, and other performance context factors, the bank’s loan-to-deposit ratio is reasonable and meets the standard for satisfactory performance.

Elizabethton FSB’s quarterly average loan-to-deposit (LTD) ratio since the last CRA evaluation is reasonable at 65%, which is near the 73% quarterly average of nine similarly situated banks in the AA. The range of the average LTD ratio for these similarly situated banks was 61% to 90%. The banks used for comparative purposes are included in the table below.

Loan-To-Deposit Ratios					
Institution	City	State	County	Total Assets (3/31/16)	Average Loan-to-Deposit Ratio
Elizabethton FSB	Elizabethton	TN	Carter	\$313,863	64.65%
Citizens Bank	Elizabethton	TN	Carter	\$709,797	83.66%
Johnson County Bank	Mountain City	TN	Johnson	\$119,785	61.67%
Farmers State Bank	Mountain City	TN	Johnson	\$142,197	69.97%
TriSummit Bank	Kingsport	TN	Sullivan	\$335,790	85.42%
Sevier County Bank	Sevierville	TN	Sevier	\$307,361	62.33%
Cbbc Bank	Maryville	TN	Blount	\$333,308	61.14%
First Community Bank of East Tennessee	Rogersville	TN	Hawkins	\$181,546	72.91%
Civis Bank	Rogersville	TN	Hawkins	\$108,670	71.65%
Andrew Johnson Bank	Greeneville	TN	Greene	\$341,578	90.07%

We did note that the bank’s average LTD ratio has declined from 80% during the previous evaluation period. The decreased loan volume is attributed to increased competitive pressures and weak loan demand. Refinancing volume has also slowed in recent periods as mortgage rates have increased slightly from historic lows.

Lending in Assessment Area

- Lending in the bank’s assessment areas meets the standard for satisfactory performance with a majority inside.

A majority of the bank's lending volume is within its AAs. We performed this analysis at the bank level for all AAs as opposed to the AA level. As illustrated in Table 1 below, Elizabethton FSB originated 85% of its HMDA loans and 81% of the dollar volume within its AAs during the periods 2014 and 2015.



Table 1 - Lending in the Assessment Areas

Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Purchase	136	79.53	35	20.47	171	20,444	75.94	6,479	24.06	26,923
Improvement	49	92.45	4	7.55	53	3,303	93.73	221	6.27	3,524
Refinance	75	92.59	6	7.41	81	9,518	90.87	956	9.13	10,474
Totals	260	85.25	45	14.75	305	33,265	81.29	7,656	18.71	40,921

Source: 2014 and 2015 HMDA Data

Lending to Borrowers of Different Incomes

- The distribution of residential loans to borrowers of different income levels is reasonable, meeting the standard for satisfactory performance.

Washington and Carter Counties - Johnson City Partial MSA

Overall, the distribution of loans to borrowers of different income levels is reasonable in Washington and Carter Counties. As reflected in Table 2 below, the distribution of all residential loans, including home purchase, home refinance, and home improvement, to low- and moderate- income borrowers falls within a reasonable range above or below the performance of institutions in this AA.

Table 2 Borrower Distribution of Residential Real Estate Loans in Carter & Washington Counties AA

Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans
Home Purchase	9.88	5.93	19.95	11.86	20.14	18.64	37.13	62.71
Home Improvement	20.68	21.95	22.49	26.83	21.08	14.63	33.13	21.95
Home Refinance	11.09	11.11	19.06	11.11	21.82	31.48	33.88	35.19

Source: 2014 - 2015 HMDA Data

When compared to the demographic factor of percentage of families by income level, the bank's performance for home improvement loans fall within a reasonable range of the AA demographics, while home purchase and home refinance are significantly lower than the comparators for low-income borrowers. Performance for home purchase and



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home refinance falls within a reasonable range above or below the AA demographics for moderate-income borrowers, while the home improvement performance significantly exceeds the comparator.

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	22.23	5.93	17.11	11.86	19.85	18.64	40.81	62.71
Home Improvement	22.23	21.95	17.11	26.83	19.85	14.63	40.81	21.95
Home Refinance	22.23	11.11	17.11	11.11	19.85	31.48	40.81	35.19

Source: 2014 - 2015 HMDA Data, 2010 U.S. Census data.

When considering the AA competition and the AA demographics including high poverty rates and significant percentage of low- and moderate-income families in the AA, the bank's performance in this AA is considered reasonable.

Johnson County - Non MSA

Overall, borrower loan distribution in Johnson County is reasonable. As reflected in Table 2.2 below, Elizabethton FSB's performance for all loan types fall within a reasonable range above or below the industry percentage of aggregate HMDA loans to low-income borrowers. Performance for home purchase and home refinance falls within a reasonable range above or below the industry percentage for moderate-income borrowers, while the home improvement performance significantly exceeds comparators.

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans
Home Purchase	7.50	5.56	25.63	22.22	25.00	33.33	35.00	33.33
Home Improvement	4.35	0.00	17.39	37.50	21.74	25.00	56.52	37.50
Home Refinance	9.47	9.52	18.34	19.05	22.49	28.57	38.46	42.86

Source: 2014 - 2015 HMDA Data



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Home Purchase	1.35	0.00	22.36	27.97	41.15	38.98	35.10	33.05
Home Improvement	2.21	2.44	26.31	34.15	45.18	48.78	26.31	14.63
Home Refinance	1.65	0.00	21.59	38.89	42.16	53.71	34.59	7.41

Source: 2014 - 2015 HMDA Data

When compared to the demographic factor of percentage of owner occupied housing units, the bank's results are similar. Performance for all loan types falls within a reasonable range above or below the comparators for low-income CTs. Home improvement and home refinance significantly exceeds the AA demographics in the moderate-income CTs, while the home purchase performance falls within a reasonable range as reflected in Table 3.1 below.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans
Home Purchase	0.89	0.00	24.23	27.97	45.27	38.98	29.60	33.05
Home Improvement	0.89	2.44	24.23	34.15	45.27	48.78	29.60	14.63
Home Refinance	0.89	0.00	24.23	38.89	45.27	53.71	29.60	7.41

Source: 2014-2015 HMDA Data, 2010 Census

Johnson County - Non MSA

Due to the number and income distribution of geographies in this AA, we determined this was not sufficient for a meaningful analysis. All CTs in this AA are either moderate-income or distressed middle-income. Therefore, 100% of the loans in this AA are to one or the other CT type. See Table 3.2 and 3.3 for data.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans	% of AA Aggregate	% of Number of Loans
Home Purchase	0.00	0.00	43.75	61.11	56.25	38.89	0.00	0.00
Home Improvement	0.00	0.00	43.48	50.00	56.52	50.00	0.00	0.00
Home Refinance	0.00	0.00	41.42	42.86	58.58	57.14	0.00	0.00



Table 3.3 - Geographic Distribution of Residential Real Estate Loans in Johnson County AA

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans	% of Owner Occupied	% of Number of Loans
Home Purchase	0.00	0.00	46.48	61.11	53.52	38.89	0.00	0.00
Home Improvement	0.00	0.00	46.48	50.00	53.52	50.00	0.00	0.00
Home Refinance	0.00	0.00	46.48	42.86	53.52	57.14	0.00	0.00

Responses to Complaints

The bank has not received any complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

- The bank’s performance under the Community Development (CD) Test is rated “Satisfactory”.

The bank's CD performance demonstrates an adequate responsiveness to community development needs in its AAs through a combination of CD loans, investments, and services. Due to the rural nature, lack of loan demand, and other demographic data for Johnson County, we are combining the AAs for the Community Development Test.

Number and Amount of Community Development Loans

Elizabethton FSB originated an adequate level of CD loans in the bank’s AA. During the evaluation period, the bank made 20 CD loans totaling \$4.4 million.

There were thirteen loans supporting affordable housing for low- and moderate-income individuals totaling \$3.5 million and seven small business loans totaling \$955 thousand. Small business loans have revenues less than \$1 million. The volume of CD loans represented approximately 4% of the bank’s Tier 1 Capital. The majority of these loans were made in Washington and Carter counties which are part of the MSA. One small business loan was made in Johnson County in a middle-income distressed CT.

Number and Amount of Qualified Investments

Considering the needs and opportunities in the bank's AA and the bank's performance context and capacity, the bank’s performance is adequate for both AAs. The bank’s investments are meaningful and support the needs of low- and moderate-income individuals.



The bank has 21 investments in the form of donations to non-profit organizations totaling \$13 thousand that provide services to low-and moderate-income people and local organizations that promote economic development.

Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of CD services through its branches, products, services, and activities with local organizations that support community development and services to low- and moderate-income people.

During the evaluation period, several bank employees were involved in services to organizations within the bank's AA that meet the definition of community development including providing financial literacy to students in rural Johnson County, where a majority of the students are from low- to moderate-income families.

Elizabethton FSB maintains one branch location in a moderate-income CT in Elizabethton and one in middle-income distressed CT in Mountain City. The branch office's presence in these geographies assist in the stabilization of the areas.

Responsiveness to Community Development Needs

The volume and responsiveness of the bank to the CD needs of both assessment areas is adequate as a whole and per AA. The bank is aware of affordable housing needs, small business needs, and the need for services to low- and moderate-income people in both AAs. Community contacts consistently rank affordable housing as the most pressing need in the AAs and the bank has supported affordable housing. The bank's locations in moderate- and distressed middle-income areas are reasonably accessible to low- and moderate-income individuals. Full service operations at each location, the hours of operation, and onsite ATMs also help to ensure accessibility of banking services. Online banking features further support accessibility by allowing customers to access their accounts, transfer funds, and pay bills remotely.



Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal Savings Association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.