



## **PUBLIC DISCLOSURE**

July 29, 2019

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

Cincinnati Federal  
Charter Number 701409

6581 Harrison Avenue  
Cincinnati, OH 45247

Office of the Comptroller of the Currency

Westlake Center  
4555 Lake Forest Drive, Suite 520  
Cincinnati, OH 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

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

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

The major factors that support this rating include:

- The Lending Test rating is based on a reasonable geographic distribution of loans and an excellent distribution of loans to individuals of different income levels.
- Additionally, the bank's performance relative to the activities considered at the bank-wide level is reasonable overall. These include:
  - The bank's loan-to-deposit (LTD) ratio is more than reasonable.
  - A majority of the bank's loans are inside the assessment area (AA).

### Loan-to-Deposit Ratio

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

The bank's quarterly average LTD ratio over the 20 quarters since the prior CRA evaluation (June 2014 - March 2019) is 120.8 percent. The bank's LTD ratio ranged from a high of 132.5 percent at September 30, 2018, to a low of 107.3 percent at September 30, 2015, demonstrating an upward trend. We compared Cincinnati Federal's average LTD ratio to local competitors and similar financial institutions, which included 12 banks with branches in the AA and total assets less than \$700 million. Cincinnati Federal's quarterly average LTD ratio compares favorably with the peer quarterly average LTD ratio of 97.1 percent.

### Lending in Assessment Area

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

The bank originated and purchased 68.8 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The following table is based on the bank's 2016, 2017, and 2018 Home Mortgage Disclosure Act (HMDA) data, which includes all home mortgage loans originated or purchased during the evaluation period (2016 - 2018).

Lending 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	302	67.7	144	32.3	446	51,975	64.8	28,183	35.2	80,158
2017	315	69.1	141	30.9	456	51,323	62.5	30,839	37.5	82,162
2018	325	69.6	142	30.4	467	55,775	70.8	23,041	29.2	78,816
<b>Total</b>	<b>942</b>	<b>68.8</b>	<b>427</b>	<b>31.2</b>	<b>1,369</b>	<b>159,073</b>	<b>66.0</b>	<b>82,063</b>	<b>34.0</b>	<b>241,136</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data (HMDA data). Due to rounding, totals may not equal 100.0.</i>										

## Description of Institution

Cincinnati Federal (CF or bank) is a federally chartered savings and loan association headquartered in Cincinnati, Ohio. CF is wholly owned by Cincinnati Bancorp, a one-bank holding company. In October 2015, the bank completed a mutual-to-stock conversion. With this conversion, Cincinnati Bancorp sold approximately 45 percent of its common stock to the public and the remaining 55 percent of the common stock was issued to CF Mutual Holding Company. The holding companies are headquartered in the greater Cincinnati, Ohio area. As of March 31, 2019, the bank had approximately \$205.4 million in total assets and \$22.4 million in tier one capital.

CF acquired Kentucky Federal in October 2018. This acquisition included three branches: 6890 Dixie Highway in Florence, Kentucky, 1050 Scott Street in Covington, Kentucky, and 100 North Main Street in Williamstown, Kentucky. Shortly following the acquisition, CF closed the branch in Williamstown, Kentucky. The remaining two Kentucky branches are in moderate-income census tracts in Boone and Kenton counties. Due to the timing of the merger in late 2018, the data conversion in April 2019, and insufficient data to evaluate lending activity in 2018 (only three months of lending activity from Kentucky Federal after the merger), we did not include the lending activity of Kentucky Federal in this evaluation.

The bank's main office and three branches are in Hamilton County, Ohio. The main office is located at 6581 Harrison Avenue in a middle-income census tract. The three Cincinnati-area branches are located at 4310 Glenway Avenue in a low-income census tract, with the 1270 Nagel Road and 7553 Bridgetown Road offices in upper-income census tracts. All branches except the main office have drive-up facilities. Automated teller machines (ATMs) are onsite at the three Cincinnati branches, and can be used free of charge for all CF customers. CF customers also have free of charge access to Allpoint ATMs available at Walgreens, CVS, Target, and Speedway locations, and MoneyPass ATMs available at most US Bank locations and thousands of other ATMs nationwide. In addition, the bank offers online and mobile banking.

During the evaluation period of 2016 - 2018, CF had one AA located in the state of Ohio, which is the bank's only rating area. During this evaluation period, the bank operated within Hamilton County, Ohio and southern Clermont County, Ohio. Both Hamilton and Clermont Counties are in the Cincinnati, OH-KY-IN MSA 17140. This is a multistate MSA; however, the bank operated in only one state (Ohio)

during the evaluation period. The bank's AA includes Hamilton County in its entirety and 24 census tracts in southern Clermont County, Ohio (Cincinnati MMSA AA).

CF serves its community with traditional deposit accounts and loans. As of March 31, 2019, CF's net loans and leases totaled \$179.4 million, or 87.3 percent of total assets. As of December 31, 2018, CF's net loans and leases totaled \$171.7 million, or 86.7 percent of total assets (\$198.1 million). The bank's loan originations and purchases during the evaluation period, based on the dollar amount of loans originated or purchased, were approximately 80 percent residential real estate (home mortgages and home equity lines of credit) and 20 percent investment real estate (commercial real estate) loans. As of the December 31, 2018, Call Report (Consolidated Reports of condition and Income), the loan portfolio consisted of approximately 71.8 percent residential real estate loans (including home equity lines of credit), 27.5 percent commercial or commercial real estate loans, and 0.7 percent consumer, farm, or other loans. The bank's primary lending focus is residential real estate lending. CF sells approximately 70 percent of its home mortgage loan originations to the secondary market.

## **Scope of the Evaluation**

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

We conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low-and moderate-income areas (LMI). We used the small bank CRA evaluation procedures to assess the bank's performance. Residential real estate lending is the bank's primary lending product and was evaluated under the Lending Test. We analyzed lending activity in full-year increments during the evaluation period, January 1, 2016 to December 31, 2018. The review included all home mortgage loans reported in the Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR) for 2016, 2017, and 2018.

CF acquired Kentucky Federal in October 2018, with a data conversion as of April 2019. After the acquisition, the bank expanded the AA to include Kenton and Boone Counties in Kentucky. This CRA evaluation did not include a review of the lending activity in Kenton and Boone Counties, as the merger and data conversion occurred outside the evaluation period. We will include a review of the lending activity in Kenton and Boone Counties at the next CRA evaluation.

Our analysis required the use of AA demographic information. Due to changes in demographic information during the evaluation period, we used the 2010 U.S. Census data for analysis and comparison purposes for loans originated or purchased in 2016 and the 2015 American Community Survey (ACS) Census data for loans originated or purchased in 2017 and 2018.

### **Selection of Areas for Full-Scope Review**

We completed a full-scope review of the Cincinnati MMSA AA, the bank's only AA during the evaluation period. Refer to appendix A (Scope of Examination) for a list of census tracts in the Cincinnati MMSA AA.

### **Ratings**

The bank's overall rating is based on the state of Ohio's rating, as CF operated in the state of Ohio during the evaluation period. The state rating is based on the full-scope review of the Cincinnati MMSA 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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Ohio

**CRA rating for the State of Ohio:** Satisfactory.

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

The major factors that support this rating include:

- The bank exhibits a reasonable geographic distribution of loans.
- The bank exhibits an excellent distribution of loans to individuals of different incomes.
- The LTD ratio is more than reasonable.
- A majority of the bank's loans are inside the bank's AA.

### Description of Institution's Operations in Ohio

During the evaluation period, CF had four offices located in the Cincinnati area in Hamilton County, Ohio. Cincinnati is the largest city in Hamilton County. CF designated one AA for the state of Ohio. The AA is part of the Cincinnati, OH-KY-IN MSA 17140 and includes Hamilton County, in its entirety, and the following census tracts in Clermont County: 405, 409, 410, 411.01, 411.02, 411.03, 412, 413.03, 413.04, 413.05, 413.06, 413.07, 414.03, 414.04, 414.05, 414.06, 415.01, 415.02, 416, 417.01, 417.02, 418, 419, and 420 (Cincinnati MMSA AA). The Cincinnati MMSA AA is located on the Ohio/Kentucky border near the southwest corner of the state. During the evaluation period, the bank operated in only one state in this multi-state MSA. Bank management selected the Cincinnati MMSA AA based on their targeted lending area and office location. The AA is contiguous, meets the requirements of the regulation, and does not arbitrarily exclude LMI geographies.

As of the 2010 U.S. Census data, the Cincinnati MMSA AA consisted of 41 low-income census tracts, 59 moderate-income census tracts, 92 middle-income census tracts, and 54 upper-income census tracts. As of the 2015 ACS U.S. Census data, the Cincinnati MMSA AA included 43 low-income census tracts, 64 moderate-income census tracts, 76 middle-income census tracts, 59 upper-income census tracts, and four census tracts with no income classification available. The underlying demographics changed in 2015 due to the ACS. The 2015 ACS Census data resulted in changes to the census tract classifications. The low-income tracts increased by two census tracts and the moderate-income tracts increased by five census tracts. The increase in LMI geographies did not materially impact the results of this evaluation.

Competition in the AA is strong, with competition from large financial institutions, state and national banks, savings bank, and credit unions. According to the June 30, 2018, Deposit Market Share Report from the Federal Deposit Insurance Corporation (FDIC), CF has a deposit market share of 0.12 percent consisting of \$118.1 million in total deposits in the AA and ranks 19<sup>th</sup> of 41 financial institutions. Financial institutions with significant deposit market share in the AA include U.S. Bank National Association and Fifth Third Bank. As of the 2015 ACS U.S. Census data, the 2017 Peer Mortgage Data (HMDA data) shows CF holding 1.17 percent of the lending market share in the AA, which is 20<sup>th</sup> of 408 financial institutions. Primary home mortgage lenders in the AA as of 2017 peer mortgage data include Union Savings Bank, U.S. Bank National Association, and Fifth Third Mortgage Company.

Economic conditions in Hamilton and Clermont counties are overall stable. As of the June 2019 Office of Workforce Development/Bureau of Labor Market Information statistics data, both Hamilton and Clermont counties had an unemployment rate (not seasonally adjusted) of 3.9 percent, which is lower than or commensurate with Ohio's statewide unemployment rate of 4.2 percent, and the national unemployment rate of 3.8 percent. The AA has a diverse mix of industries, including manufacturing and services industries. Large employers in the AA include The Kroger Company, The University of Cincinnati, Procter and Gamble, Cincinnati Children's Hospital, and Fifth Third Bancorp.

In addition to traditional mortgage products, the bank developed a special loan program since the last CRA evaluation to provide mortgage loans to LMI borrowers. CF has a pool of \$2 million set aside for the loan program. During the evaluation period, the bank originated seven loans through this program, totaling approximating \$680,000.

As part of this CRA evaluation, we reviewed information provided from interviews with representatives from three affordable housing and economic development community organizations that serve Hamilton County and/or Clermont County. One of the community contacts mentioned 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 and rehabilitation loans, auto loans, and small dollar loans. The other two contacts identified affordable housing and/or small business lending as credit needs in the community. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

### Cincinnati MMSA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA AA, 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	246	16.7	24.0	37.4	22.0	0.0
Population by Geography	926,121	10.2	21.5	42.2	26.1	0.0
Housing Units by Geography	430,765	12.5	23.4	40.7	23.4	0.0
Owner-Occupied Units by Geography	234,608	4.2	16.7	46.8	32.3	0.0
Occupied Rental Units by Geography	139,888	19.7	32.3	35.4	12.6	0.0
Vacant Units by Geography	56,269	29.0	29.3	28.8	12.9	0.0
Businesses by Geography	57,804	8.9	22.1	38.6	30.4	0.0
Farms by Geography	1,224	4.9	13.6	50.9	30.6	0.0
Family Distribution by Income Level	228,884	23.4	17.4	19.8	39.4	0.0
Household Distribution by Income Level	374,496	27.9	16.5	17.1	38.5	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$67,016	Median Housing Value			\$161,390
			Median Gross Rent			\$671
			Families Below Poverty Level			10.7%

Source: 2010 U.S. Census and 2016 D&B Data.  
Due to rounding, totals may not equal 100.0.  
(\* ) The NA category consists of geographies that have not been assigned an income classification.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA AA, 2017-2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	246	17.5	26.0	30.9	24.0	1.6
Population by Geography	929,663	12.5	23.6	35.6	27.5	0.8
Housing Units by Geography	429,546	14.8	24.8	34.6	25.4	0.4
Owner-Occupied Units by Geography	226,077	5.7	19.3	40.6	34.3	0.1
Occupied Rental Units by Geography	153,497	23.2	32.4	27.9	15.9	0.6
Vacant Units by Geography	49,972	30.1	26.4	28.0	14.5	1.0
Businesses by Geography	60,097	7.9	23.2	31.0	36.6	1.4
Farms by Geography	1,301	4.2	19.1	44.7	31.7	0.3
Family Distribution by Income Level	226,589	26.0	16.1	18.7	39.2	0.0
Household Distribution by Income Level	379,574	29.8	15.7	16.1	38.5	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$70,589	Median Housing Value			\$156,166
			Median Gross Rent			\$725
			Families Below Poverty Level			13.1%
<i>Source: 2015 ACS Census and 2018 D&amp;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.</i>						

## Scope of Evaluation in Ohio

We conducted a full-scope review of the Cincinnati MMSA AA to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The bank's AA includes Hamilton County, Ohio, in its entirety, and 24 census tracts in southern Clermont County, Ohio. The data for both counties was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage lending is the bank's primary lending product. The review included an evaluation of all home mortgage loans reported in the HMDA LARs for 2016, 2017, and 2018.

## LENDING TEST

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

Based on a full-scope review, the bank's performance in the state of Ohio is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the Cincinnati MMSA AA.

In 2018, as of the 2015 ACS Census data, the bank had 43 low-income and 64 moderate-income census tracts in the Cincinnati MMSA AA. The lending analysis reflected lending in most areas, with no conspicuous gaps in lending.

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

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits reasonable geographic distribution of home mortgage loans in the Cincinnati MMSA AA.

The bank exhibits reasonable geographic distribution of loans in the Cincinnati MMSA AA in 2016. CF originated or purchased 3.0 percent of loans in low-income census tracts, which compares similarly to the percentage of home mortgage loans of other home mortgage lenders (aggregate data) of 3.0 percent. CF originated or purchased 10.6 percent of bank loans in moderate-income census tracts, which is below aggregate and demographic data (percentage of owner-occupied housing units).

The bank exhibits reasonable geographic distribution of loans in the Cincinnati MMSA AA in 2017-2018. CF originated or purchased 4.1 percent of the loans in low-income census tracts, which is below aggregate data of 4.9 percent. CF originated or purchased 21.3 percent of the loans in moderate-income census tracts, which exceeds aggregate and demographic data.

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

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

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

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits excellent distribution of home mortgage loans to individuals of different income levels in the Cincinnati MMSA AA. During the evaluation period (2016-2018), CF's percentage of bank loans to low-income borrowers exceeds aggregate data. CF's percentage of bank loans to moderate-income borrowers significantly exceeds aggregate and demographic data (percentage of AA families).

### **Responses to Complaints**

Cincinnati Federal has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2016 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Residential Real Estate Loans (Home Mortgage)	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Ohio</b>		
Cincinnati MMSA AA	Full-scope	The AA includes all of Hamilton County, Ohio and the following census tracts in southern Clermont County, Ohio: 405, 409, 410, 411.01, 411.02, 411.03, 412, 413.03, 413.04, 413.05, 413.06, 413.07, 414.03, 414.04, 414.05, 414.06, 415.01, 415.02, 416, 417.01, 417.02, 418, 419 and 420. The Cincinnati MMSA AA is in the Cincinnati, OH-KY-IN MSA 17140.

## Appendix B: Summary of State Ratings

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RATINGS: Cincinnati Federal	
Overall Bank:	Lending Test Rating
Cincinnati Federal	Satisfactory
State:	
Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area (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.

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

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

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

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

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

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

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- 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 that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are 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 (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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 in 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 MMSA/assessment area.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2016</b>
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 MMSA AA	302	51,975	100.0	29,071	4.2	3.0	3.0	16.7	10.6	14.4	46.8	41.7	46.5	32.3	44.7	36.1	0.0	0.0	0.0	
<b>Total</b>	<b>302</b>	<b>51,975</b>	<b>100.0</b>	<b>29,071</b>	<b>4.2</b>	<b>3.0</b>	<b>3.0</b>	<b>16.7</b>	<b>10.6</b>	<b>14.4</b>	<b>46.8</b>	<b>41.7</b>	<b>46.5</b>	<b>32.3</b>	<b>44.7</b>	<b>36.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-18</b>
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 MMSA AA	640	107,098	100.0	26,834	5.7	4.1	4.9	19.3	21.3	19.7	40.6	43.0	42.7	34.3	31.4	32.5	0.1	0.3	0.2	
<b>Total</b>	<b>640</b>	<b>107,098</b>	<b>100.0</b>	<b>26,834</b>	<b>5.7</b>	<b>4.1</b>	<b>4.9</b>	<b>19.3</b>	<b>21.3</b>	<b>19.7</b>	<b>40.6</b>	<b>43.0</b>	<b>42.7</b>	<b>34.3</b>	<b>31.4</b>	<b>32.5</b>	<b>0.1</b>	<b>0.3</b>	<b>0.2</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati MMSA AA	302	51,975	100.0	29,071	23.4	12.6	7.7	17.4	23.5	17.8	19.8	19.5	17.6	39.4	41.1	38.9	0.0	3.3	18.0	
<b>Total</b>	<b>302</b>	<b>51,975</b>	<b>100.0</b>	<b>29,071</b>	<b>23.4</b>	<b>12.6</b>	<b>7.7</b>	<b>17.4</b>	<b>23.5</b>	<b>17.8</b>	<b>19.8</b>	<b>19.5</b>	<b>17.6</b>	<b>39.4</b>	<b>41.1</b>	<b>38.9</b>	<b>0.0</b>	<b>3.3</b>	<b>18.0</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-18</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cincinnati MMSA AA	640	107,098	100.0	26,834	26.0	14.5	9.7	16.1	26.9	19.7	18.7	22.3	20.0	39.2	31.3	33.0	0.0	5.0	17.6	
<b>Total</b>	<b>640</b>	<b>107,098</b>	<b>100.0</b>	<b>26,834</b>	<b>26.0</b>	<b>14.5</b>	<b>9.7</b>	<b>16.1</b>	<b>26.9</b>	<b>19.7</b>	<b>18.7</b>	<b>22.3</b>	<b>20.0</b>	<b>39.2</b>	<b>31.3</b>	<b>33.0</b>	<b>0.0</b>	<b>5.0</b>	<b>17.6</b>	

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