Office of the
Comptroller of the Currency
Washington, DC 20219

STRATEGIC PLAN

PUBLIC DISCLOSURE

April 28, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Varo Bank, National Association
Charter Number 25147

11781 South Lone Peak Parkway, Suite 150
Draper, UT 84020

Office of the Comptroller of the Currency

535 Mission Street, Suite 400
San Francisco, CA 94105

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 **Outstanding**.

CONCLUSIONS:

Varo Bank, N.A., (Varo, or bank) exceeds its plan goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating.

- Varo exhibits good penetration of savings accounts to customers in low- and moderate-income (LMI) geographies. The bank exceeded their goals for satisfactory performance for savings accounts in LMI areas for all three years of the evaluation period, January 1, 2023, through December 31, 2025.

- Varo exhibits an excellent level of community development (CD) services. The bank has exceeded the goals for service performance in their primary assessment area (AA) for all three years. For 2023 and 2024, the bank exceeded the goals for satisfactory performance in the Broader Statewide or Regional AA (BSRA), and in 2025 exceeded the goal for outstanding performance. For the combined AAs, the bank has exceeded the goals for outstanding performance of service activities for all three years.

- Varo exhibits an excellent level of qualified investments. The bank has exceeded their outstanding investment goals for the primary assessment area for all three years. For the BSRA, the bank met their satisfactory goal in 2023 and exceeded their outstanding goals in 2024 and 2025. For the cumulative AAs, the bank exceeded their satisfactory goal in 2023 and exceeded their outstanding investment goals in 2024 and 2025.

Description of Institution

Varo Bank, N.A. is headquartered in Draper, UT and began operating as a national bank on August 1, 2020. Varo is a wholly owned subsidiary of Varo Money, Inc., a bank holding company headquartered in San Francisco, CA. Varo is a digital bank with no branch locations that maintains offices in San Francisco, CA; Charlotte, NC; New York City, NY; and Draper, UT. As of December 31, 2025, Varo had total assets of $376.2 million, total loans of $95.7 million (25.4 percent of total assets), total deposits of $211.4 million, and tier 1 capital of $84.8 million. Total loans include $38.4 million in credit cards, $56.7 million in other revolving credit plans, and $567,000 in other loans. Total deposits are comprised only of demand deposit accounts (DDAs) to individuals, with no partnership or corporation customers.

Varo focuses on serving banking needs through the internet and has a specialized business model that differs from traditional banks. The bank operates throughout the United States and aims to serve LMI consumers. Varo's products are offered through mobile, online, and phone-based banking channels. The bank does not maintain branches or accept mailed deposits. Check deposits are accepted through the mobile app, and cash deposits are accepted at over 90,000 third-party retail locations, including thousands of participating CVS locations where the service is free. Varo does not operate any ATMs, but partners with Allpoint to provide customers with access to more than 40,000 fee-free Allpoint ATMs worldwide in stores like Target, CVS, and Walgreens.

Varo's deposit products include checking and savings accounts. Deposit products are designed to support financial inclusion by being affordable and easily accessible to encourage wealth-building. Varo does not impose monthly maintenance fees or foreign transaction fees, and the accounts do not have a minimum balance requirement or allow overdrafts. Varo also offers auto-saving features like Save Your Pay (SYP) and Save Your Change (SYC) to make saving easier.

Varo offers three lending products, Varo Believe, Varo Advance, and Varo Line of Credit. Varo Believe is a secured credit card with no fees, interest, or an upfront security deposit. The product requires no initial credit check and is more accessible for consumers with a low credit score or no credit history. Varo reports payment history to the three major credit bureaus and allows customers to view and monitor their credit scores directly in the Varo Bank app for free. Varo Believe requires a Varo bank account with direct deposit and can only be funded from a Varo bank account.

Varo Advance allows qualifying customers to borrow up to $250 instantly, and up to $500 over time. This short-term borrowing solution can be used anywhere, anytime, for any unexpected expense, allowing customers a convenient way to access extra cash. The account has a single flat fee ranging from $1.60 to $40, depending on the loan amount. Only one advance is allowed at a time, and there are no interest charges, credit checks, or late fees.

Varo Line of Credit allows qualifying customers to borrow between $600 and $2,000 depending on credit score and prior Varo activity. There is a single flat fee with no interest, and monthly payments are up to 12 months depending on the amount. There are no late or pre-payment fees, and your credit can grow as you bank, borrow, and repay on time.

Given the unique operating model, the bank received approval to operate under a CRA Strategic Plan that establishes performance goals for the savings product, CD investments, and CD service hours. Varo has designated two AAs with the Salt Lake City-Provo-Orem Combined Statistical Area (CSA) is its primary AA. The primary AA is situated near the headquarters in Draper, Utah, and includes the Salt Lake City Metropolitan Statistical Area (MSA), the Ogden-Clearfield MSA, the Provo-Orem MSA, and a Micropolitan Statistical Area (Heber). The second AA (BSRA) includes the portion of the State of Utah that is not in the SLC CSA and all states in the western region of the United States. The states that serve as the BSRA are Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, Oregon, Utah (excluding Salt Lake City-Provo-Orem CSA), Washington, and Wyoming.

There are no bank affiliates that impacted this evaluation, nor any merger activity during the review period. The most recent performance evaluation of the bank was dated February 27, 2023, with an overall rating of Satisfactory. There are no legal, financial, or other factors impacting Varo's ability to meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The CRA evaluation period is January 1, 2023, through December 31, 2025. Varo's evaluation goals are set forth in their first CRA Strategic Plan, which was approved by the OCC on June 30, 2020, and covers a five-year period. The plan took effect on August 1, 2020, when Varo began operations as a national bank.

A second CRA Strategic Plan was approved by the OCC on November 3, 2025, which covers the next five-year period August 2, 2025, through July 31, 2030. This second plan was taken into consideration for the last part of the evaluation period that covers August 2, 2025, through December 31, 2025. The evaluation scope included savings accounts, CD investments, and CD services as outlined by the CRA Strategic Plan.

While the bank is evaluated based on its performance within the designated AA and the BSRA, the bank offers its products and services to customers throughout the United States, primarily via its online platforms. In doing so, customers in the 37 states outside of the AAs benefit from services that aid LMI individuals and geographies. The bank received favorable consideration in the overall performance rating for providing lending and deposit products nationally that contribute to the financial well-being of LMI individuals.

Selection of Areas for Full-Scope Review

Both designated AAs received full-scope reviews. This includes the primary Salt Lake City-Provo-Orem CSA and the BSRA.

Ratings

The bank's overall rating is based on the performance as agreed upon in the strategic planning application process.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 (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 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.

State Rating

State of Utah

CRA Rating for the State of Utah: Outstanding

The major factors that support this rating include:

- Varo exhibits good penetration of savings accounts to customers in LMI geographies.
- Varo exhibits an excellent level of CD services.
- Varo exhibits an excellent level of qualified CD investments.

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN UTAH:

The bank exceeds its plan goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating within the state of Utah.

DISCUSSION OF PERFORMANCE IN SLC CSA AND BSRA:

Savings Accounts

Salt Lake City-Provo-Orem CSA – Bank Services Goals and Actual Performance

Bank services performance is good. Varo exceeded its savings account goals for each year for satisfactory performance of the evaluation period but only met its outstanding performance goal for August 2, 2025, through December 31, 2025. From January 1, 2023, through August 1, 2025, the goals for satisfactory performance included opening new savings accounts for customers residing in LMI census tracts, representing at least 0.50 percent of savings accounts opened each year in the SLC CSA and at least five percent in the BSRA. For outstanding performance during this period, the bank aimed to encourage at least 20 percent of new LMI account owners to enroll in one of its auto-savings programs in both SLC CSA and BSRA. Beginning August 2, 2025, however, the revised goal for the remainder of 2025 shifted to focus solely on achieving five percent of total savings accounts in LMI census tracts for satisfactory performance and 8.3 percent for outstanding performance, across both AAs.

Salt Lake City-Provo-Orem CSA – Community Development Savings Accounts								
Year*	LMI Records	All Records	Percent of Total Savings Accounts in LMI	Goal for Satisfactory	LMI Records with SYC/ SYP Accounts	LMI Records	Percent of Savings Accounts in LMI with Auto-Savings†	Goal for Outstanding‡
2023	1,303	3,632	35.9%	0.5%	82	1,303	6.3%	20.0%
2024	1,095	3,146	34.8%	0.5%	37	1,095	3.4%	20.0%
2025 (Jan – Aug 1)*	639	1,966	32.5%	0.5%	31	639	4.9%	20.0%
2025 (Aug 2 – Dec)*	740	2,087	35.5%	5.0%	N/A	N/A	N/A	8.3%

*2025 data is split into two reporting periods: January 1 – August 1, 2025, and August 2 – December 31, 2025.
†A savings account is enrolled in an automatic savings plan (Save Your Pay "SYP"/Save Your Change "SYC") if there has been at least one SYP or SYC transaction made since the account was opened.
‡January 1, 2023 – August 1, 2025: Percentage of Savings Accounts in LMI Enrolled in Auto Savings Plan. August 2 – December 31, 2025: Percentage of Savings Accounts in LMI.

In 2023, 35.9 percent of the total savings accounts were held in LMI census tracts, significantly exceeding the satisfactory goal of 0.5 percent. Of the 1,303 LMI savings account records, 82 accounts (6.3 percent) were enrolled in automatic savings plans SYP or SYC, performing below the outstanding goal of 20 percent, but reflecting higher engagement with these programs compared to subsequent years. In 2024, the percentage of total savings accounts in LMI census tracts was relatively stable at 34.8 percent, remaining well above the satisfactory benchmark. Among the 1,095 LMI savings account records, 37 accounts (3.4 percent) were enrolled in automatic savings plans, representing a decline in participation from the previous year. For the first half of 2025 (January 1 – August 1), the percentage of savings accounts in LMI census tracts declined to 32.5 percent, still significantly surpassing the satisfactory goal of 0.5 percent. Of the 639 LMI savings account records, 31 accounts (4.9 percent) were enrolled in automatic savings plans. For the remainder of 2025 (August 2 - December 31), the bank reported 740 savings accounts in LMI census tracts out of a total of 2,087 accounts, achieving a proportion of 35.5 percent. This performance far exceeded the satisfactory goal of five percent and the outstanding goal of 8.3 percent. This performance aligns with the updated CRA strategic plan, which emphasizes increasing the proportion of savings accounts in LMI census tracts without factoring enrollment in auto-save programs as a criterion for achieving ratings. While the goals for LMI market penetration on automatic savings accounts were below the thresholds for outstanding, the percentages of savings accounts in LMI census tracts were consistently very high in a range between 45.3 percent and 42.2 percent. This amount was over eight times the goal for satisfactory, reflecting good performance that contributed positively to the overall rating.

BSRA – Bank Services Goals and Actual Performance

Broader Statewide/Regional AA – Community Development Savings Accounts								
Year*	LMI Records	All Records	Percent of Total Savings Accounts in LMI	Goal for Satisfactory	LMI Records with SYC/ SYP Accounts	LMI Records	Percent of Savings Accounts in LMI with Auto-Savings†	Goal for Outstanding‡
2023	50,527	111,606	45.3%	5.0%	2,509	50,527	5.0%	20.0%
2024	53,859	127,745	42.2%	5.0%	1,759	53,859	3.3%	20.0%
2025 (Jan – Aug 1)*	28,713	67,289	42.7%	5.0%	830	28,713	2.9%	20.0%
2025 (Aug 2 – Dec)*	34,073	79,953	42.6%	5.0%	N/A	N/A	N/A	8.3%

*2025 data is split into two reporting periods: January 1 – August 1, 2025, and August 2 – December 31, 2025.
†A savings account is enrolled in an automatic savings plan (Save Your Pay "SYP"/Save Your Change "SYC") if there has been at least one SYP or SYC transaction made since the account was opened.
‡January 1, 2023 – August 1, 2025: Percentage of Savings Accounts in LMI Enrolled in Auto Savings Plan. August 2 – December 31, 2025: Percentage of Savings Accounts in LMI.

In 2023, 45.3 percent of total savings accounts in the BSRA were held in LMI census tracts, far exceeding the satisfactory goal of 5.0 percent. Of the 50,527 LMI savings account records, 2,509 accounts (5.0 percent) were enrolled in automatic savings plans, performing below the outstanding goal of 20 percent but showing the highest engagement compared to subsequent years. In 2024, the percentage of savings accounts in LMI census tracts declined to 42.2 percent, remaining well above the satisfactory goal. For the 53,859 LMI savings account records, 1,759 accounts (3.3 percent) were enrolled in automatic savings plans, continuing to perform below the outstanding goal and reflecting a drop in participation from 2023. For the first half of 2025 (January 1 – August 1), 42.7 percent of savings accounts in the BSRA were in LMI census tracts, exceeding the satisfactory goal of 5.0 percent. For the 28,713 LMI savings account records, 830 accounts (2.9 percent) were enrolled in automatic savings plans, showing the lowest level of engagement and remaining far below the outstanding goal of 20 percent. For August 2, 2025, through December 31, 2025, the bank reported 34,073 savings accounts

in LMI census tracks out of a total of 79,953 accounts (42.6 percent) within the BSRA, which exceeded the outstanding goal of 8.3 percent. With the updated CRA strategic plan focusing solely on increasing the percentage of accounts in LMI census tracts and removing auto-save enrollment as a criterion, the bank achieved good results in supporting these communities.

Community Development Services

Salt Lake City-Provo-Orem CSA - CD Services Goals and Actual Performance

CD services performance is excellent. The bank showed consistent progress in CD service hours in the Salt Lake City-Provo-Orem CSA. In both 2023 and 2024, the bank significantly exceeded its goals of 24 hours for a satisfactory rating and 36 hours for an outstanding rating, achieving 77 and 84 hours, respectively. For 2025, the bank met its annual goals in the first half of the year, recording 45 hours of CD-qualified service by July 31, surpassing the requirements for both ratings.

Salt Lake City-Provo-Orem CSA Community Development Services			
Year	Service Hours Goal for Satisfactory	Service Hours Goal for Outstanding	Actual CD Qualified Volunteer Service Hours
2023	24	36	77
2024	24	36	84
2025	24	36	45

In 2023, the bank's volunteers actively contributed to financial education and workforce development in the Salt Lake City-Provo-Orem CSA through community service organizations and economic development organization. Activities included instruction on savings-related topics, hosting career panels, and leading an interactive financial education event for 5th-grade students at a local elementary school, where 86 percent of students were eligible for free and reduced meals, directly benefiting LMI students.

In 2024, the bank continued its efforts with a youth-based community service organization where they held experiential learning sessions for elementary school students that included simulations of budgeting and financial decision-making through interactive activities. For 2025, the bank focused on another youth-based community service organization in its AA, including interactive events held on March 11 and April 10, which primarily served students eligible for free and reduced lunch, reinforcing its commitment to financial literacy and development in LMI communities.

BSRA – CD Service Goals and Actual Performance

In the broader assessment area, the bank consistently met its satisfactory goal of 83 service hours and approached the outstanding benchmark of 123 hours in both 2023 and 2024, recording 116 hours both years. In 2025, the bank reported 75 hours before the strategic plan was updated in August to no longer require CD service hours for the BSRA. The hours completed through July 2025 met the requirements for an outstanding rating. Additionally, the bank reported 12 service hours in the BSRA for August 2 through December 31, 2025, but these do not count toward the goals as service targets for the BSRA were removed in the second CRA Strategic Plan.

Broader Statewide/Regional AA Community Development Services			
Year	Service Hours Goal for Satisfactory	Service Hours Goal for Outstanding	Actual CD Qualified Volunteer Service Hours
2023	83	123	116
2024	83	123	116
2025	41.5	61.5	75

In 2023, the bank participated in multiple initiatives across the BSRA, including events with community service organizations and economic development organizations. Volunteers taught savings and personal finance, hosted career panels, and provided job preparation support, while also delivering Junior Achievement presentations focused on business, STEM, entrepreneurship, and job opportunities to 4th-grade students, serving LMI communities virtually and in-person. In 2024, the bank continued its focus on financial education through events with a youth-based community service organization, facilitating activities on personal finance, career discussions, mock interviews with junior and senior high school students, and courses on auto finance designed to empower students from LMI backgrounds.

In 2025, the bank supported another youth-based community service organization, engaging high school students to discuss financial literacy and budgeting, along with board-level involvement to develop financial education strategies for underserved communities. Although the bank does not include service hours in the broader assessment area under the new CRA Strategic Plan effective August 2, 2025, management indicated it will continue to conduct service hours in this area.

Combined AA Community Development Services			
Year	Service Hours Goal for Satisfactory	Service Hours Goal for Outstanding	Actual CD Qualified Volunteer Service Hours
2023	107	159	193
2024	107	159	200
2025	65.5	97.5	120

Community Service Hours Outside of the Bank's Assessment Areas

In 2023, the bank volunteered an additional 50 hours with a youth-based community service organization in the Carolinas, conducting events at various schools to teach financial education to students, focusing on budgeting, savings, and financial decision-making. In 2025, the bank contributed an additional 25 hours through participation in Finance Committee meetings, a board retreat, and a Finance Park event to further promote financial literacy and organizational development. These activities occurred outside the bank's AAs and are not addressed in the CRA Strategic Plan. As such, CD services provided outside the AAs are not included in the performance results.

Lending and Investment Performance

Salt Lake City-Provo-Orem CSA - Investment Goals and Actual Performance

CD investment performance is excellent. The bank originated a total of $1.4 million in CD investments over the evaluation period. Prior advances from the previous evaluation period totaled an additional $6.6 million. The bank exceeded their investment goals established for outstanding performance within the SLC CSA throughout the three-year evaluation period.

Salt Lake City-Provo-Orem CSA Investment Goals and Actual Performance					
Year	Goal for Satisfactory	Goal for Outstanding	Actual		
			$ Volume Current Advances	Book Value Prior Advances	Dollar Volume / Avg Assets
2023	0.20%	0.22%	$8,952	$1,180,281	0.23%
2024	0.20%	0.25%	$0	$1,144,121	0.27%
2025	0.25%	0.30%	$0	$1,109,872	0.37%

BSRA - Investment Goals and Actual Performance

Within the BSRA, Varo met their investment goal for satisfactory performance in 2023 and exceeded their goals for outstanding performance in 2024 and 2025.

Broader Statewide/Regional AA Investment Goals and Actual Performance					
Year	Goal for Satisfactory	Goal for Outstanding	Actual		
			$ Volume Current Advances	Book Value Prior Advances	Dollar Volume/ Avg Assets
2023	0.20%	0.23%	$300,178	$722,920	0.20%
2024	0.20%	0.25%	$1,077,486	$700,122	0.43%
2025	0.25%	0.30%	$10,000	$1,716,543	0.57%

Cumulative AAs – Investment Goals and Actual Performance

For the cumulative AAs, the bank exceeded their satisfactory goal in 2023 and exceeded their outstanding investment goals in 2024 and 2025.

Cumulative Investment Goals and Actual Performance					
Year	Goal for Satisfactory	Goal for Outstanding	Actual		
			$ Volume Current Advances	Book Value Prior Advances	Dollar Volume / Avg Assets
2023	0.40%	0.45%	$309,130	$1,903,201	0.43%
2024	0.40%	0.50%	$1,077,486	$1,844,243	0.70%
2025	0.50%	0.60%	$10,000	$2,826,415	0.94%

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, loan products considered, and affiliate activities that were reviewed. The table also reflects the MSAs and non-MSAs that received comprehensive examination review

Time Period Reviewed:	01/01/2023 to 12/31/2025	
Bank Products Reviewed:	Savings Accounts Qualified Investments Community Development Services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Other Information**	
State of Utah	Full Scope	
Salt Lake City-Provo-Orem, UT CSA	Full Scope	
Salt Lake City MSA (41620)	Counties of Salt Lake (035) and Toole (045)	
Ogden-Clearfield MSA (36260)	Counties of Box Elder (003), Davis (011), Morgan (029), and Weber (057)	
Provo-Orem MSA (39340)	Counties of Juab (023) and Utah (049)	
Heber Micro (non-MSA 25720)	Counties of Summit (043) and Wasatch (051)	
Broader Statewide/Regional Area		
Census Bureau – West Region	States of Alaska (02), Arizona (04), California (06), Colorado (08), Hawaii (15), Idaho (16), Montana (30), Nevada (32), New Mexico (35), Oregon (41), Utah (49), (excluding Salt Lake City CSA), Washington (53), and Wyoming (56)	

Appendix B: Summary of State Area Ratings

State or Multistate Metropolitan Area Name	State or Multistate Metropolitan Area Rating
Utah	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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 low- and moderate- income 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): 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 state/AA.

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

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least

50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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.