



LIMITED PURPOSE

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

March 18, 2002

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**First USA Bank N.A.
Charter Number 17762**

**201 Walnut Street
Wilmington, Delaware 19801**

**Comptroller of the Currency
Large Bank Supervision
250 E Street, S.W.
Washington D.C. 20219-0001**

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 Outstanding.

The conclusions for the individual rating criteria are:

- The bank demonstrates a high level of qualified investments and community development services, particularly investments and services that are not routinely provided by private investors. The bank demonstrates an adequate level of community development lending.
- The bank demonstrates extensive use of innovative or complex community development services. The bank demonstrates occasional use of innovative or complex qualified investments.
- The bank demonstrates excellent responsiveness to credit and community development needs in its assessment area.

Scope of the Examination

In evaluating the bank's performance under the CRA, we reviewed community development activities from April 1, 1999 through December 31, 2001. We reviewed the level and nature of qualified investments, community development lending, and community development services. At the bank's request, we also considered qualified investments, community development lending, and community development services provided by its affiliates. At the prior examination dated June 14, 1999, we rated the bank Satisfactory. The prior examination reviewed community development activities through March 31, 1999.

If a bank has adequately addressed its assessment area needs, the OCC considers community development (CD) activities the bank submits that benefit areas outside of its assessment area in the evaluation of its performance. The bank has adequately addressed the needs of its assessment area, and therefore, outside of assessment area qualified investments, community development loans and services were considered in evaluating its performance.

Description of Institution

First USA Bank N.A. (FUSA) is a limited purpose institution specializing in credit card lending. The main office of FUSA is located in Wilmington, Delaware. FUSA has assets of \$15.4 billion and manages assets of over \$69 billion. The bank securitizes its receivables. FUSA is the result of the 1999 merger of First USA Bank N.A. and FCC National Bank. The company retained the name First USA Bank N.A. and the FCC charter. FUSA has two subsidiaries, which serve administrative purposes and have no impact upon CRA performance.

FUSA was designated a limited purpose bank for purposes of the Community Reinvestment Act on August 7, 1997. There are no financial or legal impediments that would prevent FUSA from

helping to meet the credit needs of the assessment area.

FUSA is a wholly owned subsidiary of Bank One Corporation (BOC), a publicly traded company with total assets of \$265 billion as of December 2001, based in Chicago, Illinois. It became a subsidiary of BOC in 1997 through a merger. FUSA is the largest issuer of Visa credit cards in the world. BOC operates more than 1,800 banking centers in fourteen states. In addition, BOC affiliates are involved in community development investments and lending, merchant processing, consumer finance, mortgage banking, insurance, venture capital, trust, brokerage, investment management, equipment leasing, data processing, and Internet banking.

Affiliate activities were considered in our evaluation of FUSA's CRA performance. Five affiliates made or purchased community development loans or qualified investments that benefited the assessment area, the larger statewide or regional area, and benefited areas outside the larger regional area. No other BOC affiliate received credit for these loans or investments in a CRA examination. The affiliates are Bank One Community Development Corporation, First Chicago Equity Corporation, Banc One Treasury, Bank One N.A., and Bank One Capital Corporation.

Table 1: Financial Information (000s)

	Year-end 1999	Year-end 2000	Most Recent Quarter-end 12/31/2001	Average for Evaluation Period
Tier 1 Capital	2,201,296	2,109,825	2,099,352	2,136,824
Total Income	5,421,846	3,901,298	3,526,036	4,283,060
Net Operating Income	1,085,913	(169,354) *	405,499	440,686
Total Assets	18,008,259	19,290,321	15,375,964	17,558,181
Pass-Through Receivables	68,200,000	67,000,000	69,400,000	68,180,333

Source: Consolidated Report of Condition and Income and bank reported data.

* Brackets indicate a negative number.

Description of Assessment Area

FUSA designates New Castle County, Delaware (NCC) as its assessment area, which is in the Wilmington-Newark Metropolitan Statistical Area (MSA). The bank's only office is located in NCC. The assessment area complies with CRA guidelines and does not arbitrarily exclude low- and moderate-income areas. Based upon 1990 U.S. Census Bureau Data, NCC is the most densely populated county in Delaware with 441,946 people, or two-thirds of the state's population. Estimated 2000 census data indicates the population of NCC is now 500,265. Wilmington represents the largest city in NCC with a population of 71,529. The assessment area is in a primarily urban area of Delaware.

The assessment area (AA) contains 120 census tracts, of which 118 are populated. There are nine low-income, 23 moderate-income, 61 middle-income, 25 upper-income and 2 income not categorized census tracts in the assessment area. All low-income census tracts and nine of the 23

moderate-income census tracts are located in the city of Wilmington. The 2001 HUD adjusted median family income for NCC is \$72,100.

There are a total of 173,560 housing units in NCC, of which 95 percent are occupied and five percent are vacant. Seventy-seven percent are one-to-four family units and 20 percent are multifamily units. Sixty-five percent are owner-occupied and 30 percent are renter-occupied. NCC's weighted-average median housing value is \$119,531, and its weighted-average monthly gross rent is \$518. For the city of Wilmington, the weighted-average median housing value is \$87,873 and the weighted-average monthly gross rent is \$426.

A 1996 Delaware Statewide Housing Needs Assessment determined that approximately 2.5 percent of the housing stock in NCC was considered substandard. Wilmington was estimated to have 2,434 substandard units, or 8.4 percent of the total city housing stock. In addition, 14 percent of Wilmington's rental units were estimated to be substandard.

There is strong competition for community development deals in NCC due to the presence of several large credit card banks. There are no barriers to community development lending, services or investment in the assessment area. There are numerous community development organizations that have established good capacity.

The structure of Delaware's economy has undergone significant changes since 1990. Although the economy is still led by large companies in the chemical and automotive industries, there has been a marked diversification since 1990. Several high technology and research and development firms have been started in the State and together with the financial services industry are making a significant impact on the economy. The largest industrial sector in the state is the financial services industry followed by healthcare and education. The 2001 unemployment rate was 3.5 percent for the state of Delaware, below the U.S. rate of 4.8 percent. As of September 2001, the unemployment rate in New Castle County was 3.19 percent. The table below presents demographic data for NCC.

Table 2: Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tracts	120	7.51	19.17	50.83	20.83
Families	115,305	16.57*	18.39*	26.46*	38.58*
Businesses	18,134	11.52**	16.67**	46.93**	24.76**

Source: Demographic Data - 1990 U.S. Census, Dun & Bradstreet Data.

* Represents families by income level.

** Represents income level of the census tract.

2 Census Tracts are not income categorized

Concurrent with this review, we held discussions with two community organizations in order to gain their perspectives on community credit and development needs, related opportunities, and the performance of financial institutions in helping to meet identified needs. We also reviewed records of contacts with local community groups completed over the past two years. Based upon these meetings and other sources, primary needs are affordable housing for low- and moderate-income households; affordable home purchase and rehabilitation financing; homeownership and

credit counseling; and affordable financing for small businesses.

There are many community development investment and service opportunities throughout Delaware, including NCC. These include low-income housing tax credit programs; mortgage revenue bonds; mortgage backed securities; venture capital funds; community development corporations; and programs administered by the Federal Home Loan Bank, Delaware State Housing Authority, Delaware Economic Development Office and numerous non-profit and for profit community development organizations.

Conclusions About Performance

Summary

- FUSA provided a high level of qualified investments and community development services and an adequate level of community development loans. The bank's officers and employees are active participants in 14 boards or committees of organizations that provide community development services to the bank's AA. FUSA and its affiliates' investments and grants totaled more than \$273 million during the evaluation period. Some of the investments are not routinely provided by private investors.
- The bank extensively used innovative or complex community development services and occasionally used innovative or complex qualified investments. Many of the services were innovative and new to the market. A few of the investments involved complicated structuring.
- The bank's qualified investments, community development loans, and community development services exhibited excellent responsiveness to the credit and economic development needs within its AA. FUSA community development loans, qualified investments and grant related programs within the AA have positively impacted the creation of affordable housing, community development, and economic development initiatives throughout the AA and the state of Delaware. Community development services are provided to organizations involved in housing development and rehabilitation, neighborhood revitalization, home ownership counseling, financial literacy, social services, job training, and small business development and counseling.

Qualified Investments

During the evaluation period, FUSA and its affiliates made a total of \$136.3 million in qualified investments within its AA or the larger regional area. Due to its limited purpose designation, and record of adequately meeting the credit needs within its AA, FUSA can receive credit for qualified investments that it or one of its affiliates made outside the assessment area. Current period qualified investments and grants made by FUSA or its affiliates during the evaluation period totaled \$273.3 million, of which \$108.6 million were fair share contributions to Consumer

Credit Counseling Service (CCCS) organizations across the country. All fair share contributions were treated as being located outside the AA. Sixty-eight percent of total investments were made in the current period. The investments made by FUSA are highly responsive to the credit needs of the assessment area. Of the \$403.4 million in total qualified investments, \$281.4 million addressed affordable housing. These affordable housing related investments led to the retention or creation of 11,988 units of low- and moderate-income housing. The overall level of total qualified investments and grants is high. This represents 18.9% of the bank's Tier 1 Capital and 9.4% of the average total income (during the evaluation period).

Table 3a: Qualified Investment Activity (000s)

	Benefits AA	Outside AA	Totals
Originated Investments	133,019	28,463	161,482
Originated Grants	3,252	108,582	111,835
Prior-Period Investments that Remain Outstanding	105,731	24,349	130,080
Total Qualified Investments	242,002	161,395	403,397
Unfunded Commitments*	0	0	0

* "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Table 4a: Qualified Investment Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total Investments/Average Tier 1 Capital	11.33%	7.55%	18.88%
Total Investments/Average Total Income	5.65%	3.77%	9.42%
Total Investments/Average Pass-Through Receivables	.35%	.24%	.59%

The following examples illustrate the most significant community development investments and grants FUSA provided that benefit the assessment area, a greater statewide or regional area which includes the assessment area, or that are outside the bank's assessment area.

Affordable Housing

FUSA purchased \$15.75 million in Delaware Housing Bonds in the examination period. They had another \$13 million remaining on the books from prior period purchases. The proceeds from these bonds are used to finance below market interest rate mortgages for low- and moderate-income first time homebuyers.

FUSA contributed \$12 million to the Delaware Equity Funds for Housing III, IV and V during the examination period. These funds provide investment financing in the form of tax credits in affordable rental housing development projects. The bank also invested in the Delaware Equity

Funds for Housing I and II in prior periods and had investments considered as part of the prior period activity.

The bank had \$37 million in outstanding balances on affordable mortgages purchased from local financial institutions prior to the start of the examination period. All of the mortgages purchased were to low- and moderate-income borrowers in the bank's assessment area. The purchase of these mortgage pools allowed the local banks to make more mortgage loans in the local community.

The bank made a \$734,000 investment in Delaware Community Investment Corporation's (DCIC) Concord Pointe. This investment is a limited partnership formed to construct a 65-unit housing development for low- and moderate-income seniors using Low Income Housing Tax Credits (LIHTC). The investment was made through a designated Community Development Financial Institution (CDFI). Concord Pointe will also provide support services including Meals on Wheels, recreation, and case management to the residents. The multiple layers of financing on this project add to its complexity.

The bank made a \$850,000 investment in (DCIC) Quaker Village. This investment is through a tax exempt bond fund for multifamily housing bonds. DCIC purchases the bonds from government issuers and then privately places them with investors. The bonds support LIHTC projects. This particular project created a 44-unit complex for low- and moderate-income renters.

During the examination period, FUSA purchased Low Income Housing Tax Credits of more than \$93 million that allowed the creation or retention of 8,671 housing units in the region. The bank also had outstanding \$51.9 million in prior period LIHTC purchases that allowed for the creation or retention of another 2,404 housing units in the larger regional area served.

The bank provided \$1.3 million in grants to 18 organizations that provided affordable housing related services in NCC. These grants provided operational funding and funding targeted to homeownership counseling, transitional housing, down payment assistance, property acquisition, and construction. Operational funding was a specific need identified during community contacts. Groups funded include NCALL Research; Wilmington Housing Partnership; YWCA; First State Community Action Agency; Milford Housing Development Corporation; Interfaith Housing; Neighborhood House and Community Housing Inc.

Economic Development

The bank lent more than \$10 million to small businesses through a Small Business Investment Corporation (SBIC). FUSA also made grants totaling \$102,600 to four organizations to support small business lending and the revitalization of the local Enterprise Community. Services included counseling and technical assistance to local small businesses. Groups funded include the Delaware Small Business Development Center, Nehemiah Gateway and the Wilmington Renaissance Corporation.

Community Services

The bank provided \$1.9 million to 18 community organizations that provide community services in NCC. These funds support groups like the Challenge Program, which is a job-training program. It teaches construction-related vocational skills to local low- and moderate-income at-risk youth. The students involved in this program are performing rehabilitation for other community development organizations. Other donations were used for financial literacy training, small business counseling and start-up technical assistance, job training and placement and to fund a food pantry. Community organizations include the YWCA; the Delaware Association of Non-Profits; the Latin American Community Center; the Wilmington Housing Authority; Salvation Army and the Delaware Community Foundation among others.

The most substantial qualified grant is the financial support that FUSA provides to non-profit CCCS agencies. This activity benefits individuals throughout the country, including low- and moderate-income persons. The dollars that FUSA contributes to CCCS agencies through fair share contributions help to fund consumer education and credit counseling services in communities across the United States. During the evaluation period contributions totaled \$108.6 million. The entire amount was treated as being located outside the bank’s assessment area or larger statewide or regional area.

Community Development Lending

During the evaluation period, FUSA and its affiliates made a total of \$1.8 million in community development loans within its AA or the larger regional area. The overall level of community development loans is adequate. This is due to the bank’s focus on qualified investments rather than community development lending. The loans were used for affordable housing, small business seed money, and redevelopment of a targeted Enterprise Community. The loans were highly responsive to the needs of the community.

Table 5a: Community Development Lending Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total CD Lending/Average Tier 1 Capital	.08%	0	.08%
Total CD Lending/Average Total Income	.04%	0	.04%
Total CD Lending/ Average Pass-Through Receivables	.003%	0	.003%

The following examples illustrate some of the most significant community development loans that benefit the bank’s assessment area or a larger statewide or regional area, which includes the AA.

Cabean Square

This project involves the rehabilitation of nine existing unfinished townhomes, which had sat vacant for ten years, and the construction of 18 new units. All occupants will be low- or moderate-income. The loan involved is a revolving construction loan participated with two other

local financial institutions. FUSA formed the partnerships on this project and developed the tri-party agreement structure for the three lenders involved. In addition to the tri-party loan, there were also grants from FUSA and five other foundations, non-profits and banks. This was the first project of its kind in the Wilmington Enterprise Community and involves a grant back of earned interest on the loan by two of the lenders.

Delaware Innovation Fund

FUSA provided two loans totaling \$200,000 to the Delaware Innovation Fund (DIF). DIF is a non-profit venture capital fund established by the Delaware Economic Development Office, foundations and corporations to assist in the initial capitalization of pre-seed and early stage business development in Delaware. DIF provides early stage investment funding in the form of long-term debt and royalty based paybacks, provides technical assistance through counseling and seminars. The loan is at a below market rate with principal repayment deferred until the 10th anniversary of funding. This loan responds to the need for small business financing.

DCIC Community Investment Corporation Loan Fund

DCIC - Community Investment Corporation Loan Fund provides permanent loans for commercial real estate projects in areas targeted for community revitalization. This includes economic development projects and historical preservation of commercial buildings. A priority of the fund is to invest in projects, which create employment opportunities in the community. FUSA lent \$100,000 to this fund.

DCIC Urban Renewal Fund

The Urban Renewal Fund provides short term financing for property acquisition and site control for entities whose mission is to promote economic development and revitalization in targeted urban areas. This is the only designated urban renewal fund for property acquisition in the state. Loans from the fund are made to government and public agencies, not for profit and for profit developers. FUSA made a loan of \$500,000 to the fund.

Community Development Services

FUSA's employees hold leadership roles in numerous community development organizations including board memberships in the following: First State Community Loan Fund; ARC of Delaware; Bayard House; First State Community Action Agency; First State Project with Industry; Meals on Wheels; NCALL Research; Salvation Army; Wilmington Housing Partnership; Wilmington Renaissance Corporation and the YWCA. The CRA Officer is also the president of NCALL Research and First State Community Action Agency. A bank Vice President is on the Finance Committee of Neighborhood House, another bank AVP is on the Investment Committee of Delaware Community Investment Corporation. The bank and its senior officers have received awards and special recognition from several community and governmental organizations for services provided.

Through their consistent involvement on the boards and committees of community organizations, bank officers have been highly responsive to credit and community development

needs. The groups in which the bank is active facilitate the creation of programs to make homes affordable to low- and moderate-income families, advance the goal of affordable housing development, and educate the community on home-ownership and financial management. The table below lists the most notable community development services, including those that are complex or innovative. The list is followed by program descriptions.

Table 7: Community Development Service Activities

CD Service	Benefits AA	Outside AA
Developed Internet Based Financial Literacy Program	X	
CRA Officer taught grant/proposal writing class for non-profits	X	
Assisted in CDC formation, mission, and obtaining Government involvement for Hilltop Neighborhood Revitalization	X	
Conducted first-time home-buyer seminars for low- and moderate-income employees (240)	X	
Assisted in development of rural housing consortium	X	

X means yes; Blank means No

My Money Matters

The bank created a web-based financial literacy program that provides information on the use of financial services. A three-hour basic orientation to computers and the Internet is also provided since most students do not have a familiarity with computers. This program was piloted in 2001 through two community partners, YWCA of New Castle County and First State Community Action Agency. It is targeted to low- and moderate-income adults and helps to address an unmet development need in the market.

The program is both innovative and complex. FUSA brought together educators, web developers, community development practitioners, and financial education experts to develop this program. The program is broken into five segments of 1.5 hours each. The segments address: tracking expenses; building savings and assets; understanding credit; beginning banking services and developing a budget. It uses interactive characters and games in an audio-visual format. The community partners have expressed a desire to expand the program to additional sites. The bank is working on a plan to roll this product out for national use.

Proposal Writing Classes for Non-Profits

In 2001, FUSA provided class materials and conducted the two proposal/grant-writing classes for local non-profit organizations. The classes lasted six hours and were developed from a curriculum the CRA Officer uses when teaching a similar class at a local junior college. These courses enable non-profit agency representatives to write effective grant proposals to obtain additional funding. This enables these groups to provide more services to the community that address the community developments needs. The attendees are from local community

development organizations. Two of these groups have written grant proposals that were used to obtain additional funding that was used to provide services to the communities. This is a new and innovative offering to the market.

Hilltop Neighborhood Revitalization and Stabilization Initiative

The Hilltop area is in the designated Enterprise Community and is the largest Hispanic community in Wilmington. The Latin American Community Center (LACC) provides community services to this neighborhood. FUSA developed the original strategy for the Hilltop Neighborhood Revitalization and Stabilization Initiative to include housing rehabilitation, increased home-ownership and reduced crime. FUSA provided technical assistance to Latin American Community Center in the formation of their LACC CDC, whose mission is to acquire, construct, and rehabilitate vacant properties in the Hilltop area. FUSA took the lead in establishing partnerships with government officials, politicians, civic leaders who would form the Hilltop Neighborhood Working Group. This group would become the foundation of the project, address the various needs associated with this initiative. Partnerships include the following: LACC CDC; Mayor's Office; City Council; Licensing and Inspections Dept.; Wilmington Police Department; Conectiv; Public Works; NCALL Research; Milford Housing Development Corp.; The Challenge Program, Inc.; other civic associations and other financial institutions. The number of groups involved in this initiative made it very complex as did the organizational role taken on by the CRA Officer.

First Time Homebuyers Seminars for Employees

FUSA conducted three First Time Homebuyer Seminars in 1999 using local partners in the real estate, mortgage and housing counseling fields for employees. Two hundred and forty employees, many of whom are at or below the poverty level due to low starting pay in the industry, attended these seminars. The bank chose to provide services to its qualifying employees as well as the greater community.

NCALL Research - Delaware Rural Housing Consortium

The bank provided technical assistance in establishing the Delaware Rural Housing Consortium. The consortium is comprised of seven rural non-profit housing development organizations, and was established in 2000 in an effort to utilize combined resources for the development of affordable housing in rural communities. The technical assistance provided included guidance in the formation of the consortium and establishing its mission. It also involved assistance in the development of an investment strategy to support a rental subsidy program and participation in meetings with the Delaware General Assembly to officially roll out the investment strategy. The bank also played a substantial role in the creation of a videotape to market the consortium and its mission, with the CRA Officer appearing in the presentation. The level of assistance provided and the number of groups made this a complex service. It was also innovative to the market by bringing together a number of independent organizations to meet a common community development goal.

Fair Lending Review

We reviewed the bank's compliance with fair lending laws and regulations during our March 18, 2002 examination. We reviewed the bank's policies and procedures with respect to the underwriting of credit cards. We reviewed the bank's account acquisition policies and practices, the use of underwriting exceptions, training, and complaints. In addition, a review of the bank's credit scoring process and the use of credit scorecards was performed in 2001. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified in either examination.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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 both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Assessment Area (AA) – A geographic area that consists generally of one or more MSAs (using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

Benefit to Assessment Area – A qualified Community Development activity benefits the assessment area if (i) the activity benefits areas within the assessment area, or (ii) the activity benefits a broader statewide or regional area that includes the bank’s assessment area. If a bank has adequately addressed the needs of its assessment area, then the OCC also considers activities submitted by the bank that benefit areas outside of its assessment area.

Block Numbering Area (BNA) – Statistical subdivisions of counties in which census tracts have not been established. The United States Census Bureau has established BNAs in conjunction with state agencies.

Census Tract (CT) – Small, locally defined statistical areas within Metropolitan Statistical Areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

Community Development (CD) – Affordable 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 size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies.

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

Geography – A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Limited Purpose Institution – An institution that offers only a narrow product line (such as

credit cards or automobile loans) to a regional or broader market and for which a designation as limited purpose bank is in effect.

Median Family Income (MFI) – The median income determined by the United States Census Bureau every 10 years and used to determine the income level category of geographies. Also, it is the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of families. For any given geography, the median is the point at which half of the families have income above it and half below it. (See the four categories of median income below.)

- **Low-Income** – An income level that is less than 50% of the MFI.
- **Moderate-Income** – An income level that is at least 50% and less than 80% of the MFI.
- **Middle-Income** – An income level that is at least 80% and less than 120% of the MFI.
- **Upper-Income** – An income level that is 120% or more of the MFI.

Metropolitan Area (MSA) – Area defined by the director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Net Operating Income – As listed in the Consolidated Report of Condition and Income: Income before income taxes and extraordinary items and other adjustments.

Pass-Through Receivables – Outstanding receivables tied to all accounts issued or owned by the bank. Pass-through receivables include receivables attributable and receivables retained on balance sheet as those terms are used in 12 CFR 8.

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

Tier 1 Capital – The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Total Assets – Total bank assets as listed in the Consolidated Report of Condition and Income.

Total Income – From the Consolidated Report of Condition and Income – Total Interest income plus Total Noninterest income.