



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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## Public Disclosure

April 7, 2003

## Community Reinvestment Act Performance Evaluation

First National Bank of Springdale  
Charter Number: 8763

100 West Emma Avenue  
Springdale, Arkansas 72765

Office of the Comptroller of the Currency

Large Bank Supervision  
250 E Street SW  
Washington, DC 20219

**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.

## Table of Contents

<b>General Information and Overall CRA Rating</b> .....	2
<b>Definitions and Common Abbreviations</b> .....	4
<b>Description of Institution</b> .....	8
<b>Scope of the Evaluation</b> .....	9
<b>Description of Fair Lending Review</b> .....	10
<b>Conclusions with Respect to Performance Tests</b>	
Lending Test .....	11
Investment Test .....	14
Service Test .....	14
<b>Appendix A: Scope of the Evaluation</b> .....	A-1
<b>Appendix B: Market Profile for Area Receiving Full-Scope Review</b> .....	B-1
<b>Appendix C: Tables of Performance Data</b> .....	C-1

## General Information and Overall CRA Rating

### General Information

The CRA requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of First National Bank of Springdale (FNB Springdale) issued by the OCC, the institution’s supervisory agency, as of December 31, 2002. The agency evaluates performance in AAs (Assessment Areas), as they are delineated by the institution, rather than individual branches. This AA evaluation may include the visits to some, but not necessarily all of the institution’s branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

### Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **“Satisfactory.”**

The following table indicates the performance level of **FNB Springdale** with respect to the Lending, Investment, and Service Tests:

Performance Levels	FNB Springdale Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Major factors that support this rating include:

- Lending levels that reflect an adequate responsiveness by FNB Springdale to the credit needs of the AA.

- Good distribution of FNB Springdale's loans among geographies.
- Good distribution of loans among borrowers of different income levels and businesses of different revenue sizes.
- Community development lending that provided a significantly positive impact on the AA.
- Investments that reflect an adequate level of responsiveness by FNB Springdale to the needs of its AA.
- Provision of services that shows good responsiveness to banking needs.

## Definitions and Common Abbreviations

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

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

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

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 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.

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

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

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

**Geography:** A census tract or a block numbering area 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 do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home Mortgage Loans:** Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given

area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call

Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

## Description of Institution

FNB Springdale is an intrastate community bank located in Springdale, Arkansas, in the northwest corner of the state. The bank serves the Fayetteville-Springdale-Rogers MSA through its four-branch network that is supplemented by eight ATMs. FNB Springdale is a wholly owned subsidiary of First Tennessee National Corporation (FTNC), which is located in Memphis, Tennessee. As of December 31, 2002 FNB Springdale had total assets of \$367 million. FTNC is a financial services company with total assets of \$23 billion. It offers a broad array of financial products and services, including several nationally branded lines of business.

FNB Springdale provides a variety of banking products and services. The bank's primary lending focus is on commercial real estate. As of December 31, 2002, the bank had net loans in the amount of \$180 million, or 49% of total assets, with 62% of the portfolio consisting of real estate secured loans. Of this amount, commercial real estate secured loans comprised 49% and residential secured loans provided another 33% of real estate loans. FNB Springdale's Tier 1 Capital as December 31, 2002, was \$41.8 million. The bank does not hold any foreign deposits.

There was no merger or acquisition activity during the evaluation period. The bank faces no financial or legal impediments in responding to the credit needs of its AA. FNB Springdale has no operating subsidiaries.

The OCC last evaluated FNB Springdale's CRA performance as of December 31, 1999. At that time, the bank received an overall "Satisfactory" rating.

## **Scope of the Evaluation**

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

Conclusions drawn throughout this evaluation are based upon bank performance during calendar years 2000, 2001 and 2002. Please refer to Appendix A for a detailed listing of products included in our review.

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

The institution designated the Fayetteville-Springdale-Rogers MSA as its only AA. There are no low-income census tracts in this MSA; therefore, the discussion of the bank's CRA performance does not address performance in low-income areas.

### **Ratings**

The Lending Test had greater influence on the overall rating than the Investment Test or Service Test. For the Lending Test, small business lending received slightly more consideration than small farm and residential lending. The weighting is reflective of FNB Springdale's loan volume over the evaluation period. Based on loan volume, community development lending provided a positive impact on Lending Test performance. The analysis of the bank's Investment Test performance equally considered investment and grant activity as well as responsiveness to community development needs initiatives. Accessibility to branching offices as well as branch hours and services provided the most weight when determining Service Test conclusions. Nonetheless, community development services provided a positive impact to overall Service Test conclusions.

### **Data Integrity**

FNB Springdale's public lending information is accurate. As part of this CRA evaluation, we tested the accuracy of the bank's publicly filed information for home mortgage, small business and small farm lending. We identified some errors in reporting; however, testing results validated the general effectiveness of the bank's internal testing of each reportable loan type.

We also verified community development loans, investments and services submitted by bank management to ensure that they met the regulatory definition and purpose test for community development. As a result of our analysis, those items that did not meet the definition were not given consideration in our evaluation process.

### **Community Contacts**

This evaluation considers input received from community members. In total, we conducted three contacts in the Fayetteville-Springdale-Rogers MSA.

**Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

#### **Conclusions for Area Receiving Full-Scope Review**

##### **Lending Activity**

Lending activity in the Fayetteville-Springdale-Rogers MSA is adequate. With the third largest deposit market share, the bank has the 43rd, 8th, and 25th largest market shares for home purchase, home improvement and home refinance loans within the MSA, respectively. The bank's small business lending market rank of 9<sup>th</sup> is also below its deposit market rank.

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

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

Home purchase loan geographic distribution within the Fayetteville-Springdale-Rogers MSA is excellent. The portion of loans made in moderate-income geographies exceeds the percent of owner occupied units in like geographies. In addition, the market share of home purchase loans in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Fayetteville-Springdale-Rogers MSA is excellent. The portion of loans made in moderate-income geographies exceeds the percent of owner occupied units in like geographies. However, the market share of home improvement loans in moderate-income geographies is below the bank's overall market share within the MSA.

Home refinance loan geographic distribution within the Fayetteville-Springdale-Rogers MSA is excellent. The portion of loans originated in moderate-income geographies exceeds the percent of owner occupied units within like geographies. The market share of home refinance loans in moderate-income geographies exceeds the bank's overall market share within the MSA.

###### **Small Loans to Businesses**

The geographic distribution of small loans to businesses in the Fayetteville-Springdale-Rogers MSA is adequate. The distribution of small loans to businesses in moderate-income geographies is significantly below the percent of businesses in like geographies.

However, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of small business loans in the MSA.

### **Small Loans to Farms**

The geographic distribution of small loans to farms in the Fayetteville-Springdale-Rogers MSA is excellent. The distribution of small loans to farms in moderate-income geographies exceeds the percent of farms in like geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of small farm loans in the MSA.

### **Multi-family Loans**

The volume of multifamily lending in the Fayetteville-Springdale-Rogers MSA was insignificant and was not used in the Lending Test evaluation. The bank originated two multifamily loans during the evaluation period.

### **Lending Gap Analysis**

Based on review of lending activity by census tract, no conspicuous lending gaps exist that would impact the analysis of the distribution of loans by income level of the geography.

### **Inside/Outside Ratio**

FNB Springdale originates almost all of its loans within its AA. For home purchase, improvement and refinance, the bank originated 97%, 95%, and 99% of its loans, respectively, within the AA. Lending within the AA was also high for small business and small farm at 96% and 71% respectively.

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

#### **Home Mortgage Loans**

Home purchase loan borrower distribution in the Fayetteville-Springdale-Rogers MSA is adequate. The portion of loans originated to low-income borrowers is significantly below the percent of low-income families within the MSA. However, the portion of loans made to moderate-income borrowers is near to the percent of moderate-income families within the MSA. The market share of home purchase loans to LMI borrowers is below the bank's overall market share for this type of loan within the MSA.

Home improvement loan borrower distribution in the Fayetteville-Springdale-Rogers MSA is good. The amount of loans originated to LMI borrowers is near to the percent of LMI families within the MSA. In addition, the market share of loans to low-income borrowers exceeds and to moderate-income borrowers is significantly below the bank's overall market share of home improvement loans within the MSA.

Home refinance loan borrower distribution in the Fayetteville-Springdale-Rogers MSA is good. The portion of loans originated to low-income borrowers is significantly below the percent of low-income families within the MSA. However, the amount of loans originated to moderate-income borrowers exceeds the percent of moderate-income families within the MSA. In addition, the market share of home purchase loans to LMI borrowers is near to the bank's overall market share for this type of loan within the MSA.

### **Small Loans to Businesses**

The borrower distribution of small loans to businesses in the Fayetteville-Springdale-Rogers MSA is excellent. The percentage of loans to small businesses exceeds the percentage of small businesses in the MSA. The bank's market share of small loans to businesses exceeds its overall business loan market share. The bank also makes a significant majority of these loans in smaller amounts.

### **Small Loans to Farms**

The borrower distribution of small loans to farms in the Fayetteville-Springdale-Rogers MSA is excellent. The percentage of loans to small farms exceeds the percentage of small farms in the MSA. The bank's market share of small loans to farms exceeds its overall business loan market share. The bank also makes a significant majority of these loans in smaller amounts.

### **Community Development Lending**

Community development lending had a positive impact on lending performance in the Fayetteville-Springdale-Rogers MSA. During the evaluation period, the bank originated 54 community development loans totaling \$4.3 million. FNB Springdale's community development loan portfolio consists entirely of short-term affordable housing construction loans. Community development lending activities were directly responsive to local affordable housing needs.

### **Product Innovation and Flexibility**

FNB Springdale has not specifically created loan products that are innovative or flexible.

## **INVESTMENT TEST**

Investment Test performance in the Fayetteville-Springdale-Rogers MSA is rated Low Satisfactory.

FNB Springdale provided 24 contributions in the MSA totaling \$36 thousand during the evaluation period. Contributions benefited local groups pursuing community service objectives targeted at LMI individuals. Investment activity is moderately responsive to the needs of the Fayetteville-Springdale-Rogers MSA. Based on community contacts conducted during this review, there is a high level of community development opportunities in the MSA.

FNB Springdale also has one prior period investment with a book value of \$417 thousand still outstanding. This amount represents an investment in a bond issue for a local mental health care clinic that serves a predominantly LMI client base. The Ozark Guidance Center provides mental health services to clients in a "fee for service" program. Fees are based on the client's ability to pay and 80% of the organization's clients are low- or moderate-income. The mental health care clinic used the funds from this bond issue for capital improvements.

## **SERVICE TEST**

Service Test performance in the Fayetteville-Springdale-Rogers MSA is rated High Satisfactory.

### **Retail Banking Services**

The bank's delivery systems are adequate. FNB Springdale has located all of its branches in middle-income census tracts. There have been no branch openings or closings during the evaluation period. Bank hours and services are excellent and are tailored to the convenience and needs of the AA. The bank supplements normal Monday through Friday branch hours and services with Saturday hours. On Saturdays, the bank offers limited services at drive through facilities located at each branch.

### **Community Development Services**

The bank provided a good level of community development services that occasionally addressed the community development need of the MSA. The bank worked with ten organizations pursuing a variety of initiatives targeted at LMI areas and individuals. These services addressed community development needs such as technical assistance for organizations providing community development, housing, and financial services to LMI areas or individuals.

Refer to Tables 1-15 in Appendix C for the facts and data that support all Test conclusions.

## Appendix A: Scope of the Evaluation

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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 metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

<b>Time Period Reviewed</b>	Lending, Investment and Service Tests: January 1, 2000 to December 31, 2002	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank Of Springdale (FNB Springdale) Springdale, Arkansas	Home Purchase, Improvement and Refinance; Small Business; Small Farm and Community Development Lending & Investments	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Fayetteville- Springdale- Rogers MSA #2580	Full-Scope	Includes Benton and Washington Counties.

## Appendix B: Market Profile for Area Receiving Full-Scope Review

### Fayetteville-Springdale-Rogers MSA

<b>DEMOGRAPHIC INFORMATION FOR FULL SCOPE AREA: FAYETTEVILLE-SPRINGDALE-ROGERS</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	56	0.00	7.14	80.36	8.93	3.57
Population by Geography	210,908	0.00	7.14	79.82	13.04	0.00
Owner-Occupied Housing by Geography	54,160	0.00	3.10	81.88	15.02	0.00
Business by Geography	16,725	0.00	10.60	77.80	11.59	0.01
Farms by Geography	651	0.00	3.69	89.71	6.61	0.00
Family Distribution by Income Level	59,575	17.03	19.93	25.13	37.92	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	22,015	0.00	8.42	83.00	8.58	0.00
Median Family Income = \$29,073 HUD Adjusted Median Family Income = \$49,100 Households Below Poverty Level = 13.21% Median Housing Value = \$55,434 Unemployment Rate (1990 Census) = 1.87%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 US Census and 2001 HUD updated MFI

FNB Springdale’s AA consists of the entire Fayetteville-Springdale-Rogers MSA, which is comprised of Benton and Washington counties. While 1990 U.S. Census lists a total population of 210,939, this amount grew to 311,121 based on 2000 U.S. Census results. This is an increase of 47.49% over 1990 Census based statistics.

FNB Springdale provides a full range of loan and deposit products to the AA throughout its four full service branches. The bank supplements its branch network with eight ATMs and one drive in. (Note- one ATM is located at Springdale High School and is only available during school hours.)

Competition is strong with 19 direct competitors operating over 100 branches in the MSA. FNB Springdale operates four branches in the MSA and has 6.82% or the third largest deposit market share as of June 30, 2002. Primary competitors include Arvest Bank (AB), Arkansas National Bank (ANB), and First Security Bank (FSB). AB is the largest deposit holder in the MSA with a 41.02% market share. ANB and FSB are the second largest and sixth largest deposit holders in the MSA with a 7.12% and 4.46% market share, respectively.

The MSA has three airports, one railroad and 26 motor freight carriers. There are nine colleges and universities within a 60-mile radius. The Fayetteville-Springdale-Rogers MSA has a low unemployment rate of 1.87% for 2000. The civilian labor force is 233,900. The MSA's manufacturing, trade, services and government sectors provide over 134,000 jobs to the MSA. Major employers include George's Incorporated, Wal-Mart Stores, Incorporated, J.B. Hunt Transport Services, Incorporated and Tyson's Foods Incorporated.

Information was obtained from community contacts conducted by bank regulatory agencies. The information provided assisted in developing this profile. The following needs were identified from the community contact forms:

- Affordable housing due to the substantial growth in lower paying jobs;
- Financial literacy training;
- Affordable day care for minimum wage earners;
- Stored value cards for unbanked population or those with previous deposit account problems and
- Transportation services.

Based on information obtained from the above sources, there is a high level of community development opportunities for participation in and leadership by local banks.

## **Appendix C: Tables of Performance Data**

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### **Table of Contents**

**Content of Standardized Tables .....C-2**

#### **Tables of Performance Data**

Fayetteville-Springdale-Rogers MSA .....C-5

## Content of Standardized Tables

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A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Evaluation). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/AA. 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 performance evaluation.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/AA. Community development loans to statewide or regional entities or made outside the bank's AA may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MSA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents

market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MSA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** – FNB Springdale did not elect to provide consumer lending data for consideration in this Evaluation. Therefore, this table is not included among the Tables of Performance Data.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MSA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.



























