PUBLIC DISCLOSURE

Date of Evaluation: **SEPTEMBER 20, 2021**

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Name of Depository Institution: **WOODLANDS BANK**

Institution's Identification Number: **1479470**

Address: **2450 EAST THIRD STREET**

WILLIAMSPORT, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106

Table of Contents

INSTITUTION'S CRA RATING

This institution is rated **outstanding**.
The Lending Test is rated **satisfactory**.
The Community Development Test is rated **outstanding**.

Major factors contributing to this rating include:

- The loan-to-deposit ratio is **reasonable** given the bank's size, financial condition, and assessment area credit needs.
- A **substantial majority** of loans and other lending-related activities are in the bank's assessment areas.
- The distribution of borrowers reflects **reasonable** penetration among individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes.
- The geographic distribution of loans reflects **excellent** dispersion throughout the bank's assessment areas.
- The bank's community development performance demonstrates **excellent** responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities in the bank's assessment areas.

SCOPE OF EXAMINATION

The performance of Woodlands Bank ("Woodlands") under the Community Reinvestment Act (CRA) was evaluated using the Interagency Intermediate Small Institution Examination Procedures adopted by the Board of Governors. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The review period for this evaluation is from July 31, 2018 through September 20, 2021.

The lending test includes an analysis of:

- The loan-to-deposit ratio;
- The volume of loans extended inside and outside the bank's assessment areas;
- The extent of lending to borrowers of different income levels, including low- and moderate-income borrowers, and businesses of different sizes, including small businesses;
- The geographic distribution of lending within the assessment areas, including low- and moderate-income census tracts; and
- The bank's response to CRA-related complaints.

The loan products reviewed include:

- Home purchase, home improvement and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not applicable," collectively titled as Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2018, 2019 and 2020; and
- A sample of 60 commercial loans, including 53 small business loans originated by the bank during calendar years 2018, 2019 and 2020.

Because the bank originated more HMDA loans by both number and dollar amount than small business loans across its two assessment areas, HMDA loans were given the most weight in determining the bank's overall performance. In total during the evaluation period, Woodlands originated 658 HMDA loans totaling over $96 million in its two assessment areas. Small business loans were weighted the second highest. Over the evaluation period, Woodlands originated 53 small business loans totaling $61 thousand in its assessment areas. It is noted that small business loans were not evaluated in the Clinton County, PA Non-MSA assessment area, because analysis of the very low number of loans would not have yielded meaningful conclusions.

Woodlands is a HMDA reporter, and therefore, the bank's HMDA loans were compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA. These data are reported annually.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of 2015 American Community Survey (ACS) data for loans originated in 2018, 2019 and 2020[1]. The distribution of loans to borrowers of different income levels for 2018, 2019 and 2020 was based upon annually-adjusted median family income data made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS data, unless otherwise noted.

Woodlands does not report small business loans for purposes of CRA, and therefore analysis of the bank's small business lending is based on a sample of 60 commercial loans originated in 2018, 2019 and 2020. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because Woodlands is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in either assessment area. Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending performance was considered for contextual purposes only.

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[1] In accordance with Federal Financial Institutions Examination Council policy, 2015 ACS data is used to analyze data starting in 2017 and thereafter.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides context for the bank's performance in the assessment areas where it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

The community development test includes an analysis of:

- The number and dollar amount of community development loans;
- The number and dollar amount of qualified investments;
- The extent to which the bank provides community development services; and
- The bank's responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

Under the community development test, Woodlands' community development loans, qualified investments, and community development services were reviewed during the entire evaluation period, from July 31, 2018 through September 20, 2021. Woodlands' level of community development activities was considered in the context of local needs and opportunities, as well as the bank's capacity to participate in such activities.

To supplement economic, demographic and performance data and to gain a better perspective on credit and community needs in the bank's two assessment areas, interviews were conducted with three community representatives during the course of the evaluation. More specifically, discussions were held with a community action group, an affordable housing group, and an economic development agency. Community representatives identified a need for decent affordable housing and rehabilitation of the aging housing stock in the area. Further, access to affordable and quality childcare services, broadband, and public transportation were cited as needs in the area. Additionally, lending to small businesses, specifically those in the technology sector, was discussed as a credit need in the assessment area. In particular, working capital and lending to start-ups were needs enumerated by community contacts.

DESCRIPTION OF INSTITUTION

Woodlands was rated outstanding at its previous CRA Evaluation dated July 30, 2018, which used the Interagency Intermediate Small Institution Examination Procedures.

Woodlands, headquartered in Williamsport, Lycoming County, Pennsylvania, is a state chartered, full-service commercial bank offering both consumer and commercial banking products and services to its customers. The bank operates eight branches located in Lycoming and Clinton counties in the Williamsport, PA Metropolitan Statistical Area (MSA) and the Clinton County, PA Non-MSA assessment area. Of the eight branches, one, located in Clinton County, is located in a low-income census tract (just under 13%), and one, located in Lycoming County, is located in a moderate-income census tract (also just under 13%).

The remaining six branches (74%) are located in middle-income tracts. The table below details the locations of the bank's branches as of the current CRA evaluation date.

Assessment Area	County	Number of branches
Williamsport, PA MSA Assessment Area	Lycoming	7
Clinton County, PA Non-MSA Assessment Area	Clinton	1
Total Full-Service Branches		**8**

Woodlands is a member of the Liberty ATM Alliance, an alliance of community banks operating in central Pennsylvania, whereby Woodlands' customers have access to the ATMs of other Liberty Alliance member banks. Woodlands is also a member of the Moneypass ATM Network, which allows bank customers to locate and access 25,000 surcharge-free ATMs around the country for deposits and withdrawals. Woodlands provides a range of checking products, some of which have no minimum balances or monthly service fees, and all of which allow for online and mobile banking.

Woodlands is the sole banking subsidiary of Woodlands Financial Service Company. According to the Consolidated Reports of Condition and Income (Call Report) as of June 30, 2021, Woodlands reported over $539 million in total assets, of which nearly $359 million (67%) were loans. Since its last CRA evaluation dated July 30, 2018, bank assets have grown 33%, from $405 million as of March 31, 2018, to $539 million as of June 30, 2021. Similarly, the bank's loans increased 22% since its last CRA evaluation, when loans totaled $295 million as of March 31, 2018, to nearly $359 million as of June 30, 2021.

On a dollar volume basis, residential mortgage loans (which include open-end and closed-end loans secured by residential properties, and multifamily loans) represent the largest segment of the bank's loan portfolio, at nearly $168 million or 47%. Commercial loans (comprised of commercial mortgages and commercial and industrial loans) represent the second largest segment of the bank's portfolio at over $165 million or 46%.

The composition of the bank's loan portfolio as of June 30, 2021 is presented in the table on the following page.

Woodlands Bank		
LOANS as of 06/30/2021	**$ (000s)**	**%**
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	106,742	29.8
Commercial and Industrial Loans	58,537	16.3
Secured by Farmland	4,913	1.4
Secured by Residential Properties (Closed-end)	112,728	31.4
Secured by Residential Properties (Open-end)	43,274	12.1
Secured by Multifamily Residential Properties	11,644	3.3
Construction & Land Development	11,254	3.1
Consumer Loans	844	0.2
Loans to Finance Agricultural Production & Other Loans to Farmers	503	0.1
States and Political Subdivisions	6,882	1.9
Other Loans	1,473	0.4
Other Leases	0	0.0
TOTAL LOANS	**358,794**	**100.0**

Source: June 30, 2021 Consolidated Reports of Condition and Income, Schedule RC-C Part 1. Loans classified as closed-end loans secured by residential real estate include business purpose loans collateralized by residential properties.

Small Business Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report, as of June 30, 2021 indicates that $71 million (43%) of the bank's outstanding commercial loans[2] were designated as small business loans. At the previous CRA evaluation, using the December 31, 2017 Call Report, nearly $61 million of outstanding commercial loans (50%) were designated as small business loans. For the purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less, as detailed in the following table.

Woodlands Bank Small Business Loans		
	Amount Outstanding as of 06/30/2021 ($000)	**%**
Loans with original amounts of $100,000 or less	8,986	5.4
Loans with original amounts of $100,001 through $250,000	14,609	8.8
Loans with original amounts of $250,001 to $1 million	47,474	28.7
TOTAL SMALL BUSINESS LOANS	**71,069**	**43.0**
Loans with originals amount of more than $1,000,000	94,210	57.0
TOTAL COMMERCIAL LOANS	**165,279**	**100.0**

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

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[2]Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

Description of Assessment Areas

For the purposes of the CRA, Woodlands has designated two assessment areas, as follows:

(1) The Williamsport, PA MSA assessment area, which consists of the entirety of Lycoming County, PA; and
(2) The Clinton County, PA Non-MSA assessment area, which includes all of Clinton County, PA.

The bank's assessment areas, which have not changed since the prior performance evaluation, were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

A full-scope review was performed in the bank's Williamsport, PA MSA assessment area, as a substantial majority of the bank's operations and lending and deposit volume is located there. More specifically, seven of the bank's eight branches (nearly 88%) are located in the Williamsport, PA MSA assessment area, and 90% of the bank's evaluated loans by number and 91% by dollar volume were made in the assessment area. Finally, nearly 95% of the bank's total deposits were in the Williamsport, PA MSA assessment area. Consequently, when determining the bank's overall CRA performance, greater weight was given to performance in this assessment area.

A limited-scope review was performed in the bank's Clinton County, PA Non-MSA assessment area, given its limited operations there and the fact that a full-scope review was conducted in the assessment area at the previous CRA evaluation. Only one branch location (under 13%) is located in the Non-MSA assessment area. Similarly, only 10% of loans by number, and 9% by dollar volume were made in this assessment area. Finally, only 5% of the bank's total deposits were in the Non-MSA assessment area. As a result, this assessment area was given considerably less weight in determining the bank's overall CRA performance.

For more detailed demographic and economic information on the bank's two assessment areas, please refer to the individual assessment area sections of this Performance Evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Woodlands' lending test is rated satisfactory based on a review of the bank's loan-to-deposit ratio, assessment area concentration, borrower and geographic distribution of loans, and response to CRA complaints, as discussed below.

Loan-to-Deposit Ratio

Woodlands' loan-to-deposit ratio is considered reasonable given the bank's size, financial condition, and assessment area credit needs.

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is expressed as an average, derived by adding the quarterly loan-to-deposit ratios for a given period and dividing the total by the number of quarters within that period.

The following table shows Woodlands' quarterly loan-to-deposit ratios for the period since the last CRA evaluation[3]:

As of Date	Net Loans $ (000s)	Total Deposits $ (000s)	Woodlands LTD Ratio (%)	Peer LTD Ratio (%)
Woodlands Bank **Historical Loan-to-Deposit Ratios**				
3/31/2018	291,339	352,335	82.7	81.7
6/30/2018	291,691	347,692	83.9	82.8
09/30/2018	289,027	350,471	82.5	83.2
12/31/2018	294,958	357,346	82.5	83.1
03/31/2019	295,635	366,176	80.7	82.2
06/30/2019	302,999	373,150	81.2	83.2
09/30/2019	308,330	360,679	85.5	82.9
12/31/2019	314,429	352,007	89.3	82.4
03/31/2020	307,757	366,817	83.9	81.9
06/30/2020	334,782	417,250	80.2	80.8
09/30/2020	336,907	443,992	75.9	80.4
12/31/2020	337,956	448,047	75.4	75.8
03/31/2021	345,549	482,945	71.6	72.3
06/30/2021	354,425	484,919	73.1	70.9
Quarterly Loan-to-Deposit Average Since Previous Evaluation			80.6	80.2

Source: The Uniform Bank Performance Report

Woodlands' net loan-to-deposit ratio averaged just under 81% over the 14 consecutive quarters since the CRA evaluation. The bank's ratio was consistent with the peer group's average loan-to-deposit ratio of 80%. Additionally, the ratio has remained the same as the ratio reported at the previous CRA evaluation (also 81%).

For additional context on local lending and deposit conditions, Woodlands' loan-to-deposit ratio was also compared to the ratios of two local financial institutions, Jersey Shore State Bank and Muncy Bank and Trust Company. Jersey Shore State Bank's average loan-to-deposit ratio measured 104% during the same time period, while Muncy Bank and Trust Company's ratio averaged just under 90%. Although Woodlands has an average loan-to-deposit ratio below that of the two local institutions, all three share a trend of decreasing loan-to-deposit ratios throughout the evaluation period. This is likely due to deposits increasing during the COVID-19 pandemic.

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[3]The current peer group for Woodlands consists of all insured commercial banks having assets of between $300 million and $1 billion.

In absolute terms, the bank's net loan volume has increased nearly 22% over the evaluation period, from just over $291 million as of March 31, 2018 to $354 million as of June 30, 2021. Deposits have increased by 38% from $352 million as of March 31, 2018 to $485 million as of June 30, 2021.

Assessment Area Concentration

A substantial majority of Woodlands' loans and other lending-related activities are in its assessment areas.

During the evaluation period, Woodlands made 95% of the total number of HMDA loans, and 94% of the aggregate dollar amount of HMDA loans in the bank's two assessment areas. This performance mirrored levels at the previous CRA evaluation when 96% by number and 94% by dollar volume were made within the bank's assessment areas.

With respect to small business loans, 88% of the number of small business loans sampled were extended within the bank's assessment areas, while almost 100% of the aggregate dollar amount of loans sampled were extended in its assessment areas.[4] At the prior CRA evaluation, 90% of small business loans by number, and 85% by dollar amount, were made within the assessment areas.

The table below shows the distribution of lending inside and outside the bank's assessment areas.

Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	29	90.6	1,444	82.4	3	9.4	309	17.6
Home Purchase - Conventional	314	95.2	47,766	93.0	16	4.8	3,591	7.0
Multi-Family Housing	12	100.0	3,905	100.0	0	0.0	0	0.0
Other Purpose Closed-End	20	95.2	774	96.8	1	4.8	25	3.2
Refinancing	283	95.3	42,182	94.6	14	4.7	2,412	5.4
Total HMDA related	**658**	**95.1**	**96,071**	**93.8**	**34**	**4.9**	**6,337**	**6.2**
Small Business	53	88.3	61	99.6	7	11.7	0	0.4
Total Small Business related	**53**	**88.3**	**61**	**99.6**	**7**	**11.7**	**0**	**0.4**
Total Loans	**711**	**94.5**	**96,132**	**93.8**	**41**	**5.5**	**6,337**	**6.2**

Borrower and Geographic Distribution of Lending

As discussed in more detail within the assessment area conclusions, overall, Woodlands' borrower and geographic distribution of HMDA and small business loans were considered reasonable. Performance was largely driven by the conclusions in the Williamsport, PA MSA assessment area, as the bulk of the institution's operations are within that assessment area. Further, borrower distribution was given more weight than geographic distribution, given assessment area demographics.

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[4] The analysis of small business lending is based on a statistical sample of the commercial loans originated by the bank during the exam period, spanning 2018 to 2020.

More specifically, borrower distribution of loans was reasonable in the Williamsport, PA MSA assessment area, driven by reasonable HMDA borrower distribution and excellent small business borrower distribution. Overall geographic distribution was excellent, as the result of excellent geographic distribution of HMDA loans, and poor geographic distribution of small business loans. Within the limited-scope Clinton County, PA Non-MSA assessment area, borrower and geographic distribution were considered consistent in performance with the full-scope assessment area, given the bank's limited operations in this assessment area.

Response to Substantiated Complaints

No CRA complaints were filed with the bank or the Federal Reserve Bank of Philadelphia during the evaluation period, and therefore this component of the lending test was not evaluated.

COMMUNITY DEVELOPMENT TEST

Woodlands' performance under the community development test is rated outstanding. As explained in more detail in the individual assessment area conclusions, the bank's mix of community development loans, qualified investments, and community development services demonstrates excellent responsiveness to the needs of the Williamsport, PA MSA assessment area. Community development performance in the Clinton County, PA Non-MSA assessment area was consistent with performance in the full-scope assessment area, despite the bank's limited presence in this assessment area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Woodlands is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

WILLIAMSPORT, PA MSA ASSESSMENT AREA

FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Woodlands' Williamsport, PA MSA assessment area consists of the entirety of Lycoming County, which is coterminous with the Williamsport, PA MSA. As indicated previously, for the purposes of assessing Woodlands' performance overall, greater weight was given to performance in this assessment area, as the vast majority of the bank's operations and loan and deposit activity took place in this assessment area.

Woodlands' CRA performance was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Williamsport, PA MSA assessment area included 29 census tracts. Two tracts were designated as low-income (7%), four tracts were moderate-income (14%), 21 were middle-income (72%), and two were upper-income (7%). All of the low- and moderate-income census tracts were located in the city of Williamsport. According to the 2015 ACS data, the assessment area had a population of 116,656. Almost 18% of the assessment area's population resided within the low- and moderate-income census tracts.

A map of the Williamsport, PA MSA assessment area at the 2015 ACS update is available in Appendix D.

According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, as of June 30, 2021[5], there were 13 depository institutions operating in the Williamsport, PA MSA. These institutions maintained a total of 47 banking offices, holding just over $3.0 billion in deposits in the MSA. Woodlands ranked third among these institutions, holding $459 million in deposits, or 15% of the deposit market share. Jersey Shore State Bank ranked first with almost 20% of the deposit market share, and the Manufacturers and Traders Trust Company ranked second with 18% of the deposit market share.

Woodlands reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market that report real estate loans pursuant to HMDA. This data is reported annually. According to 2018 data, there were 96 HMDA reporters in the assessment area, who originated or purchased a total of 943 HMDA loans in the Williamsport, PA MSA assessment area. Woodlands ranked tenth with under 3% of the HMDA market. Jersey Shore State Bank led the market with 28% of HMDA loans, followed by Pennsylvania State Employees Credit Union with almost 7% of the market, and Northwest Bank with 5%.

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[5] June 30, 2021 is the most recent date for which FDIC deposit data is available.

In 2019, 98 HMDA reporters originated or purchased 1,019 HMDA loans in the assessment area. Woodlands tied for tenth with 2% of the market. Once again, Jersey Shore State Bank led the HMDA market with almost 25% market share, followed by Stearns Lending, LLC (6%), and First National Bank of Pennsylvania (5%).

Finally, in 2020, 110 HMDA reporters originated or purchased 1,230 loans. Woodlands ranked fifteenth with under 2% market share. As in previous years, Jersey Shore State Bank led the market with almost 21% market share, followed by First Commonwealth Bank (9%), and Quicken Loans, LLC (6%).

As indicated previously, Woodlands does not report small business loans for the purposes of CRA, and therefore is not included in the ranking of small business lenders operating in the assessment area. Accordingly, aggregate small business lending performance is included below for performance context information only, instead of for direct comparison. This data is also reported on an annual basis. In 2018, 48 small business reporters originated or purchased a total of 634 small business loans in the Williamsport, PA MSA assessment area. Among these reporters, Northwest Bank ranked first with almost 14% market share, followed by American Express, NB (12%), and Synchrony Bank (11%).

In 2019, 46 reporters originated or purchased 751 small business loans in the assessment area. Again, Northwest Bank led reporters with almost 12% of the small business loan market. American Express, NB ranked second with almost 11% of the market, and First Commonwealth Bank followed closely, with another 11% market share.

Finally, in 2020, 49 small business reporters originated or purchased 703 loans in the assessment area. First National Bank of Pennsylvania led the market with nearly 13% market share, followed by First Commonwealth Bank (12%), and Northwest Bank (11%).

To supplement economic, demographic and performance data, interviews were conducted with two local community organizations based in the assessment area, which provided perspective on credit and community needs of the Williamsport, PA MSA assessment area. One interview was held with an affordable housing agency, and the other was with a community action agency.

The two contacts indicated a pronounced need for affordable housing, as well as rehabilitation of the aged housing stock in the area. Further, contacts indicated that childcare, mental health and substance abuse programming, access to broadband and internet services, and public transportation were important community needs in the assessment area.

Economic Characteristics

Located in north central Pennsylvania, the Williamsport, PA MSA is comprised of Lycoming County, Pennsylvania, and includes the city of Williamsport, which is the largest urban center in the MSA and serves as the county seat. By area, Lycoming County is the largest county in the Commonwealth. The MSA's population measured 116,656 as of the 2015 ACS update.

According to Moody's Analytics, the Williamsport, PA MSA is in recovery mode. Though the natural gas industry presented expansion opportunities in years past, economic gains from natural gas mining have continued to decline of late. According to Moody's January 2021 Precis Report, job growth in the area is still struggling to recover from COVID-19 effects. However, the manufacturing industry has been a bright spot, with manufacturing employment levels in the MSA outpacing statewide levels. Going forward, job growth is expected to increase modestly, but is still expected to trail both state and national standards.

Strengths noted in the January 2021 Precis Report include a low rate of COVID-19 infections, the area's natural gas resources, and consistently more affordable housing than in the Commonwealth as a whole, and the nation. On the other hand, the MSA suffers demographically, from a low concentration of younger prime-age workers, low educational attainment, which leads to below-average per-capita incomes, and worsening migration patterns, with residents moving out of the MSA, and the population generally declining consistently over time.

In the MSA, the largest employment sector is education and health services, accounting for 19% of jobs. Other significant industries include manufacturing (15%), government (13%) and retail trade (12%). The largest private employers in the MSA include the Pennsylvania College of Technology, Primus Technologies Corporation, Lycoming Division, Wegmans Food Markets, Inc., and Brodart Company.

During the evaluation period, seasonally unadjusted unemployment rates in the MSA, state and country as a whole have decreased. However, the Williamsport, PA MSA exhibited higher unemployment rates than the Commonwealth and the nation as a whole. Area seasonally unadjusted unemployment rates for the years 2018, 2019 and 2020, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table.

Woodlands Bank Williamsport, PA MSA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Geographical Area	**2018 Annual**	**2019 Annual**	**2020 Annual**
Williamsport, PA MSA	5.0	4.9	8.8
Pennsylvania	4.4	4.5	9.1
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

Housing

According to 2015 ACS data, the Williamsport, PA MSA assessment area contained 52,641 housing units, of which 61% were owner-occupied, 26% were rental, and 13% were vacant. The overall owner-occupancy rate in the assessment area (61%) matched that in the Commonwealth of Pennsylvania (also 61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts.

According to 2015 ACS data, 1% of owner-occupied housing was located in the assessment area's two low-income census tracts, and 7% was located in the four moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (84%), with the remaining 7% of owner-occupied housing units in upper-income tracts.

Of the total existing housing units, 76% were single family units, 9% were two-to-four family units, 8% were multifamily units, and 7% were mobile homes. The median age of the housing stock in the MSA was 61 years, making it older than the median age of 54 years for the Commonwealth. This data was anecdotally confirmed by community contacts, who referenced the older housing stock, which is in need of rehabilitation.

Data show that the price of housing in the assessment area is more affordable than in the Commonwealth overall. The median housing value in the MSA was $138,513, which is lower than the state median housing value of $166,000. Data shows a significant disparity in median housing values in low- and moderate-income tracts compared to those in middle- and upper-income areas. In low-income tracts, the median housing value was $73,261, and in moderate-income tracts, the value increased to $88,579. These values were notably lower than the median housing value in middle- and upper-income tracts ($142,728 and $184,462), respectively.

Median gross rent (rent plus utilities) in the assessment area was lower than in Pennsylvania overall. Median gross rent for the assessment area was reported at $723, compared to statewide gross rent of $840 per month. Within the Williamsport, PA MSA assessment area, 45% of renters spent more than 30% of their income on rent, which was similar to the same measure statewide (46%).

Borrower Income Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. According to the 2015 ACS data, there were 29,537 families in the assessment area. Of the families in the assessment area, 20% were low-income families, 19% were moderate-income families, 22% were middle-income families, and 39% were upper-income families. According to 2015 ACS data, 10% of the families in the Williamsport, PA MSA assessment area lived below the poverty level, which was just above the same measure in the Commonwealth (9%).

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC. Median family incomes for the assessment area are listed in the table below for each of the years covered by the evaluation and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2018	$66,700	Less than $33,350	$33,350 - $53,359	$53,360 - $80,039	$80,040 or more
2019	$64,000	Less than $32,000	$32,000 - $51,199	$51,200 - $76,799	$76,800 or more
2020	$64,800	Less than $32,400	$32,400 - $51,839	$51,840 - $77,759	$77,760 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2018, there were 5,055 businesses located in the Williamsport, PA MSA assessment area. Of these businesses, just over 5% were located in low-income census tracts, and just over 16% of businesses were located in the area's moderate-income tracts. The majority of businesses were located in the middle-income census tracts (72%), and 6% were located in upper-income tracts. Business demographic data also revealed that of the 5,055 businesses located in the assessment area in 2018, 90% were small businesses with gross annual revenues of $1 million or less.

In 2019, a total of 5,025 businesses operated in the assessment area, though the geographic distribution of these businesses among census tracts of different incomes changed little. Using 2019 Dun & Bradstreet data, 5% of businesses were located in low-income census tracts, 16% were located in moderate-income tracts, 72% in middle-income tracts, and 7% in upper-income tracts. Business demographics also revealed that of the 5,025 businesses, 90% were small businesses with revenues of $1 million or less.

Finally, using 2020 Dun & Bradstreet data, a total of 5,032 businesses operated in the assessment area. Of these businesses, nearly 5% were located in low-income census tracts, and almost 17% were located in moderate-income tracts. As in other years, the majority of businesses were located in middle-income tracts (72%), and the remaining businesses (almost 7%) were located in upper-income tracts. Of the 5,032 businesses located in the assessment area in 2020, 90% were small businesses with gross annual revenues of $1 million or less.

The 2018, 2019 and 2020 assessment area demographics used to evaluate Woodlands' CRA performance in the Williamsport, PA MSA assessment area are detailed in the tables on the following pages.

Woodlands Bank Williamsport, PA MSA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	2	6.9	1,264	4.3	472	37.3	5,920	20.0
Moderate-income	4	13.8	2,556	8.7	473	18.5	5,531	18.7
Middle-income	21	72.4	23,712	80.3	1,978	8.3	6,509	22.0
Upper-income	2	6.9	2,005	6.7	88	4.4	11,577	39.3
Unknown-income	0	0.0	0	0.0	0	.00	0	0.0
Total Assessment Area	**29**	**100.0**	**29,537**	**100.0**	**3,011**	**10.2**	**29,537**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	2,753	457	1.4	16.6	1,766	64.1	530	19.3
Moderate-income	6,080	2,331	7.2	38.3	2,698	44.4	1,051	17.3
Middle-income	40,446	27,130	84.3	67.1	8,409	20.8	4,907	12.1
Upper-income	3,362	2,269	7.1	67.5	846	25.2	247	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**52,641**	**32,187**	**100.0**	**61.1**	**13,719**	**26.1**	**6,735**	**12.8**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	272	5.4	229	5.0	41	9.9	2	2.0
Moderate-income	828	16.4	716	15.8	106	25.5	6	5.9
Middle-income	3,640	72.0	3,301	72.7	249	59.9	90	89.1
Upper-income	315	6.2	292	6.5	20	4.7	3	3.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**5,055**	**100.0**	**4,538**	**100.0**	**416**	**100.0**	**101**	**100.0**
	Percentage of Total Businesses:		**89.8**		**8.2**			**2.0**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	184	97.9	182	97.8	1	100.0	1	100.0
Upper-income	4	2.1	4	2.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**188**	**100.0**	**186**	**100.0**	**1**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**98.9**		**0.5**			**0.5**

Information based on 2015 ACS Data and 2018 D&B Information.

15

Woodlands Bank Williamsport, PA MSA Assessment Area Assessment Area Demographics 2019								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	2	6.9	1,264	4.3	472	37.3	5,920	20.0
Moderate-income	4	13.8	2,556	8.7	473	18.5	5,531	18.7
Middle-income	21	72.4	23,712	80.3	1,978	8.3	6,509	22.0
Upper-income	2	6.9	2,005	6.7	88	4.4	11,577	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**29**	**100.0**	**29,537**	**100.0**	**3,011**	**10.2**	**29,537**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	2,753	457	1.4	16.6	1,766	64.1	530	19.3
Moderate-income	6,080	2,331	7.2	38.3	2,698	44.4	1,051	17.3
Middle-income	40,446	27,130	84.3	67.1	8,409	20.8	4,907	12.1
Upper-income	3,362	2,269	7.1	67.5	846	25.2	247	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**52,641**	**32,187**	**100.0**	**61.1**	**13,719**	**26.1**	**6,735**	**12.8**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	257	5.1	214	4.7	41	10.1	2	2.0
Moderate-income	824	16.4	715	15.8	103	25.3	6	5.9
Middle-income	3,613	71.9	3,280	72.6	243	59.7	90	88.2
Upper-income	331	6.6	307	6.9	20	4.9	4	3.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**5,025**	**100.0**	**4,516**	**100.0**	**407**	**100.0**	**102**	**100.0**
	Percentage of Total Businesses:		**89.9**		**8.1**			**2.0**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	2	1.0	2	1.0	0	0.0	0	0.0
Middle-income	187	96.9	185	96.9	1	100.0	1	100.0
Upper-income	4	2.1	4	2.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**193**	**100.0**	**191**	**100.0**	**1**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**99.0**		**0.5**			**0.5**

Information based on 2015 ACS Data and 2019 D&B Information.

Woodlands Bank Williamsport, PA MSA Assessment Area Assessment Area Demographics 2020							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	2	6.9	1,264	4.3	472	37.3	5,920	20.0
Moderate-income	4	13.8	2,556	8.7	473	18.5	5,531	18.7
Middle-income	21	72.4	23,712	80.3	1,978	8.3	6,509	22.0
Upper-income	2	6.9	2,005	6.7	88	4.4	11,577	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**29**	**100.0**	**29,537**	**100.0**	**3,011**	**10.2**	**29,537**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	2,753	457	1.4	16.6	1,766	64.1	530	19.3
Moderate-income	6,080	2,331	7.2	38.3	2,698	44.4	1,051	17.3
Middle-income	40,446	27,130	84.3	67.1	8,409	20.8	4,907	12.1
Upper-income	3,362	2,269	7.1	67.5	846	25.2	247	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**52,641**	**32,187**	**100.0**	**61.1**	**13,719**	**26.1**	**6,735**	**12.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	237	4.7	196	4.3	40	9.9	1	1.0
Moderate-income	831	16.5	721	15.9	103	25.4	7	6.9
Middle-income	3,631	72.2	3,302	73.0	240	59.1	89	87.3
Upper-income	333	6.6	305	6.8	23	5.6	5	4.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**5,032**	**100.0**	**4,524**	**100.0**	**406**	**100.0**	**102**	**100.0**
	Percentage of Total Businesses:		**89.9**			**8.1**		**2.0**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	2	1.1	2	1.1	0	0.0	0	0.0
Middle-income	180	96.8	179	96.8	1	100.0	0	0.0
Upper-income	4	2.1	4	2.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**186**	**100.0**	**185**	**100.0**	**1**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**99.5**			**0.5**		**0.0**

Information based on 2015 ACS Data and 2020 D&B Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST

LENDING TEST

Performance under the lending test in the Williamsport, PA MSA assessment area is rated satisfactory. As discussed below, the bank's borrower distribution of loans is reasonable, and geographic distribution of loans is excellent.

Borrower Distribution of Lending[6]

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending, given the product lines offered, reflects reasonable penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, given demographics. Further, due to loan volumes, HMDA loans are given the most weight in determining the bank's overall borrower distribution, followed by small business loans. Woodlands is a significant originator of home mortgage loans in the Williamsport, PA MSA assessment area. Over the three-year evaluation period, the bank reported 592 HMDA loans in the assessment area, in an aggregate amount of nearly $88 million.

Home-Mortgage Lending

Woodlands' distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is reasonable.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to 2015 ACS data, 20% of assessment area families were low-income, 19% were moderate-income, 22% were middle-income, and 39% were upper-income families. More than one third of families in the Williamsport, PA MSA were designated as low- or moderate-income, indicating a notable need for home-mortgage credit among this segment of the population.

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[6]The information used to evaluate lending activity by Woodlands is detailed in the Loan Distribution Tables contained in the Appendices.

The following tables compare Woodlands' home-mortgage lending to aggregate home-mortgage lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand.

Woodlands Bank Williamsport, PA MSA Assessment Area Distribution of HMDA Loans by Borrower Income Level							
	% Families by Family Income (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
Income Level		% Woodlands Lending	% Aggregate Lending	% Woodlands Lending	% Aggregate Lending	% Woodlands Lending	% Aggregate Lending
Low	20.0	7.6	9.4	4.5	6.2	2.1	4.6
Moderate	18.7	19.3	20.3	14.0	17.3	14.9	15.6
Middle	22.0	20.5	24.1	19.6	22.7	22.3	22.6
Upper	39.3	32.2	35.7	40.2	40.1	55.0	42.0
Unknown	0.0	20.4	10.5	21.7	13.7	5.7	15.2
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Lending to Low-Income Borrowers

For the period under review, Woodlands' lending to low-income borrowers was reasonable.

Woodlands' lending in 2018 to low-income borrowers was reasonable. In 2018, 8% of the bank's HMDA loans (13 loans) were originated to low-income borrowers, falling just short of the performance of aggregate lenders (9%). Both the bank's performance and that of aggregate lenders were significantly lower than the proxy of families by family income (20%). By product type, Woodlands made 4% of home purchase, 12% of refinance, 22% of home improvement, and no multifamily or loans with purpose "not applicable" to low-income borrowers in 2018. Comparatively, aggregate lenders made 9% of home purchase loans, 11% of refinance loans, 8% of home improvement loans, 2% of loans with purpose "not applicable," and no multifamily loans to low-income borrowers.

The bank's lending in 2019 to low-income borrowers was reasonable. In 2019, 5% of the bank's HMDA loans (eight loans) were originated to low-income borrowers, falling just short of the performance of aggregate lenders (6%), and far below the proxy of families by family income (20%). By product type, in 2019, the bank made 2% of home purchase loans, 9% of refinance loans, 8% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers. Aggregate lenders made 6% of home purchase loans, 7% of refinance loans, 8% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers.

Woodlands' lending in 2020 to low-income borrowers continued to decline and was poor. In 2020, 2% of the bank's HMDA loans (five loans) were originated to low-income borrowers, below the performance of aggregate lenders (5%), and the proxy (20%). By product, the bank made 3% of refinance loans (four loans), and 20% of home improvement loans (one loan) to low-income borrowers. In comparison, aggregate lenders made 5% of home purchase loans, 4% of refinance loans, 6% of home improvement loans, 1% of loans with purpose "not applicable," and no multifamily loans to low-income borrowers in 2020.

As indicated previously, affordable housing was noted as an important need in the Williamsport MSA assessment area. However, it is recognized that a large percentage of renters in the assessment area (45%) spend more than 30% of their income on rent, which makes it difficult, particularly for low- and moderate-income renters, to save the customary down payment and closing costs necessary to purchase a home. This fact helps to explain why bank and aggregate lending data trail far behind the proxy of low-income families in the assessment area.

Lending to Moderate-Income Borrowers

Although challenges and obstacles to homeownership also exist for moderate-income families and individuals, Woodlands' overall level of HMDA lending in the Williamsport, PA MSA assessment area to moderate-income borrowers was significantly higher than its lending level to low-income borrowers and was reasonable overall.

In 2018, the bank's lending to moderate-income borrowers was reasonable. In 2018, 19% of the bank's HMDA loans (33 loans) were originated to moderate-income borrowers, which fell just below aggregate performance (20%), but met proxy (19%). By loan type, Woodlands made 17% of home purchase loans, 30% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 22% of home purchase loans, 20% of refinance loans, 14% of home improvement loans, 3% of multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2018.

Woodlands' lending in 2019 to moderate-income borrowers was reasonable. In 2019, 14% of the bank's HMDA loans (25 loans) were originated to moderate-income borrowers, which was below the aggregate (17%) and the proxy (19%). By loan type, Woodlands made 15% of home purchase loans, 15% of refinance loans, 8% of home improvement loans, and no multifamily or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 20% of home purchase loans, 16% of refinance loans, 13% of home improvement, and no multifamily or loans with purpose "not applicable" to moderate-income borrowers in 2019.

Finally, the bank's lending in 2020 to moderate-income borrowers was reasonable. In 2020, 15% of the bank's HMDA loans (36 loans) were originated to moderate-income borrowers, which was consistent with aggregate performance (16%) but fell below proxy of moderate-income families (19%). By loan type, Woodlands made 19% of home purchase loans, 13% of refinance loans, and no home improvement, multifamily or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 21% of home purchase loans, 13% of refinance loans, 15% of home improvement loans, 2% of multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2020.

Small Business Lending

An analysis of Woodlands' borrower distribution of small business loans reflects excellent penetration among business customers of different sizes, including small businesses, in the Williamsport, PA MSA assessment area. For purposes of the evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the Williamsport, PA MSA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2018 Dun & Bradstreet business data, there were 5,055 businesses operating in the assessment area, with 4,538 (90%) designated as small businesses. In 2019, 5,025 businesses operated in the assessment area, 4,516 (90%) of which were small businesses. Finally, in 2020, Dun & Bradstreet data indicate that there were 5,032 businesses operating in the assessment area, 4,524 (90%) of which were small businesses.

As previously mentioned, Woodlands is not a CRA small business reporter, and as such, a statistical sample of 60 of the bank's small business loans from the period spanning 2018 through 2020 was used to evaluate small business lending performance.

In 2018, Woodlands' borrower distribution of small business loans was excellent. In 2018, the bank made 10 small business loans in the Williamsport, PA MSA assessment area. Of those small business loans, 100% were originated to small businesses with gross annual revenues of $1 million or less. This compares favorably to the performance of aggregate lenders, who originated 40% of loans to small businesses, and to the percentage of small businesses in the assessment area (90%).

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting credit needs of smaller businesses. In 2018, 100% of small business loans were extended in amounts of $100 thousand or less, compared with 90% of loans made by aggregate lenders.

In 2019, the bank's borrower distribution of small business loans was excellent. Of the 17 loans made in the Williamsport, PA MSA assessment area in 2019, 100% were originated to small businesses with gross annual revenues of $1 million or less. This compares favorably to the performance of aggregate lenders, who originated 39% of loans to small businesses, and to the proxy of small businesses in the assessment area (90%). In 2019, 100% of small business loans were extended in amounts of $100 thousand or less, compared with 92% of loans made by aggregate lenders.

Finally, Woodlands' borrower distribution of small business loans was excellent in 2020. Of the 20 loans made in the Williamsport, PA MSA assessment area in 2020, 100% were originated to small businesses with gross annual revenues of $1 million or less. This compares favorably to the performance of aggregate lenders, who originated 38% of loans to small businesses, and to the proxy of small businesses in the assessment area (90%). As in prior years, in 2020, 100% of the bank's small business loans were extended in amounts of $100 thousand or less, compared with 86% of loans made by aggregate lenders.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects excellent penetration throughout the Williamsport, PA MSA assessment area, including low- and moderate-income tracts. As in the borrower distribution analysis, HMDA loans were given greater weight than small business loans in determining this conclusion as a result of relative lending volumes. Further, given the very few low-income tracts in this assessment area, performance in moderate-income tracts is considered more heavily in deriving the bank's overall geographic distribution performance.

Home-Mortgage Lending

Woodlands' distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts, is excellent. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, which was used as a proxy for lending in 2018, 2019 and 2020, just over 1% of owner-occupied units were located in the MSA's two low-income census tracts, and 7% of owner-occupied units were located in the four moderate-income tracts. The majority of owner-occupied units were located in middle-income tracts (84%), While the remaining 7% of owner-occupied units were located in upper-income tracts.

The following table presents Woodlands' geographic distribution of HMDA lending, in comparison to the applicable owner-occupied housing proxy and the aggregate lending levels in the assessment area for the evaluation period.

		Aggregate Comparison					
Woodlands Bank **Williamsport, PA MSA Assessment Area** **Geographic Distribution of HMDA Loans**							
Census Tract Income Level	**% Owner-Occupied Units (2015 ACS Data)**	**2018**		**2019**		**2020**	
		% Woodlands Lending	**% Aggregate Lending**	**% Woodlands Lending**	**% Aggregate Lending**	**% Woodlands Lending**	**% Aggregate Lending**
Low	1.4	1.2	1.4	3.4	1.5	1.7	1.1
Moderate	7.2	13.5	8.1	15.1	7.1	9.5	6.5
Middle	84.3	76.0	82.5	73.7	83.8	73.6	83.4
Upper	7.1	9.3	8.0	7.8	7.6	15.2	9.0
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Based on owner-occupied demographics, lending opportunities in low-income census tracts were quite limited. As discussed below, over the evaluation period, neither Woodlands Bank nor aggregate lenders made a significant number of home-mortgage loans in low-income census tracts, given the very sparse owner-occupied housing units located in such tracts. Overall, Woodlands' HMDA lending in low-income tracts was reasonable.

Woodlands' geographic distribution of HMDA loans in the Williamsport, PA MSA assessment area in 2018 was reasonable in low-income census tracts. The bank's performance (1%, or two loans) in low-income tracts was consistent with aggregate lenders (1%) and the proxy of owner-occupied housing in low-income tracts (1%). By product type, both of the bank's loans in low-income tracts were refinance loans. By comparison, aggregate lenders made just under 2% of home purchase loans, 1% of refinance loans, 1% of home improvement loans, 19% of multifamily loans, and 4% of loans with purpose "not applicable" in low-income census tracts.

The bank's geographic distribution of HMDA loans in low-income tracts in 2019 was excellent. The bank's lending of 3% (six loans) exceeded aggregate lending (2%) and the proxy of owner-occupied housing (1%). By product type, 3% of the bank's home purchase loans, 3% of refinance loans, 50% of multifamily loans, and no home improvement or loans with purpose "not applicable" were made in low-income tracts. By comparison, aggregate lenders made 1% of home purchase, refinance, and home improvement loans, 19% of multifamily loans, and 4% of loans with purpose "not applicable" in low-income tracts in 2019.

Woodlands' lending in low-income tracts in 2020 was reasonable. The bank made 2% of HMDA loans (four loans) in low-income tracts, which exceeded aggregate lending (1%) and proxy (1%). However, due to the low and decreasing number of loans, this performance is considered reasonable. By product type, 1% of the bank's home purchase loans, 1% of refinance loans, 20% of home improvement loans, 25% of multifamily loans, and no loans with purpose "not applicable" were made in low-income census tracts. Aggregate lenders made 1% of home purchase, 1% of refinance, 2% of home improvement, 10% of multifamily, and 4% of loans with purpose "not applicable" in low-income tracts in 2020.

Lending in Moderate-Income Census Tracts

Woodlands' HMDA lending in moderate-income tracts was excellent. As with the low-income census tracts, opportunities for lending in the assessment area's moderate-income tracts were limited, but the bank made many more HMDA loans in moderate-income tracts than in low-income tracts.

Woodlands' geographic distribution of HMDA loans was excellent in moderate-income census tracts. In 2018, 14% of the bank's HMDA loans (23 loans) were made in moderate-income tracts. This performance far exceeded both aggregate lenders (8%) and the proxy of owner-occupied housing (7%). By loan type, 10% of the bank's home purchase loans, 14% of refinance loans, 22% of home improvement loans, 75% of multifamily loans, and no loans with purpose "not applicable" were in moderate-income census tracts. Aggregate lenders made 9% of home purchase loans, 7% of refinance loans, 5% of home improvement loans, 36% of multifamily loans, and 16% of loans with purpose "not applicable" in moderate-income tracts in 2018.

Woodlands' geographic distribution of HMDA loans was excellent in moderate-income census tracts. The bank's performance (15% or 27 loans) far exceeded both aggregate lending and the proxy of owner-occupied housing (both 7%). By loan type, 22% of the bank's home purchase loans, 9% of refinance loans, 8% of home improvement loans, and no multifamily or loans with purpose "not applicable" were made in moderate-income census tracts. Aggregate lenders made 9% of home purchase loans, 5% of refinance loans, 6% of home improvement loans, 19% of multifamily loans, and 18% of loans with purpose "not applicable" in moderate-income tracts in 2019.

Woodlands' geographic distribution of HMDA loans in 2020 was excellent in moderate-income census tracts. In 2020, 10% of the bank's HMDA loans (23 loans) were originated in moderate-income tracts. This performance exceeded both aggregate lending and the proxy of owner-occupied housing (both 7%). By loan type, 14% of the bank's home purchase loans, 5% of refinance loans, 40% of home improvement loans, 50% of multifamily loans, and no loans with purpose "not applicable" were in moderate-income census tracts. Comparatively, aggregate lenders made 10% of home purchase loans, 4% of refinance loans, 6% of home improvement loans, 29% of multifamily loans, and 10% of loans with purpose "not applicable" in moderate-income tracts in 2020.

Small Business Lending

The geographic distribution of Woodlands' small business loans reflects poor penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period. As indicated previously, because the bank is not a small business reporter, conclusions are based on a sample of 60 small business loans made in 2018, 2019, and 2020.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans within the tract. Based on 2018 Dun & Bradstreet data, just over 5% of the businesses in the assessment area were located in low-income census tracts, and just over 16% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts (72%), and the remaining 6% were located in upper-income tracts. The geographic distribution of businesses changed very little in 2019 and 2020.

The tables below present Woodlands' small business geographic distribution in comparison to the business proxy and aggregate lending levels for the years evaluated.

Woodlands Bank Williamsport, PA MSA Assessment Area Geographic Distribution of Small Business Loans 2018			
		Aggregate Comparison	
		2018	
Census Tract Income Level	**% Businesses By Tract Income Level (2015 ACS)**	**% Woodlands Lending**	**% Aggregate Lending**
Low	5.4	0.0	4.1
Moderate	16.4	10.0	14.3
Middle	72.0	80.0	73.7
Upper	6.2	10.0	7.4
Unknown	0.0	0.0	0.5
Total	**100.0**	**100.0**	**100.0**

Woodlands Bank Williamsport, PA MSA Assessment Area Geographic Distribution of Small Business Loans 2019			
		Aggregate Comparison	
		2019	
Census Tract Income Level	**% Businesses By Tract Income Level (2015 ACS)**	**% Woodlands Lending**	**% Aggregate Lending**
Low	5.1	0.0	4.3
Moderate	16.4	17.6	15.4
Middle	71.9	76.5	71.2
Upper	6.6	5.9	8.1
Unknown	0.0	0.0	1.0
Total	**100.0**	100.0	**100.0**

Woodlands Bank Williamsport, PA MSA Assessment Area Geographic Distribution of Small Business Loans 2020			
		Aggregate Comparison	
		2020	
Census Tract Income Level	**% Businesses By Tract Income Level (2015 ACS)**	**% Woodlands Lending**	**% Aggregate Lending**
Low	4.7	15.0	3.7
Moderate	16.5	10.0	14.5
Middle	72.2	75.0	76.1
Upper	6.6	0.0	5.6
Unknown	0.0	0.0	0.1
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Overall, Woodlands' small business lending in low-income tracts was poor.

Woodlands' geographic distribution of small business loans for 2018 in the Williamsport, PA MSA assessment area was poor in low-income census tracts. The bank made no loans to small businesses in low-income census tracts within the assessment area, which fell below both aggregate lending in low-income tracts (4%) and the proxy of businesses located in low-income census tracts (5%).

Woodlands' 2019 small business lending in low-income tracts was poor. Again, the bank made no small business loans in low-income census tracts. By comparison, aggregate lenders made 4% of small business loans in low-income tracts, and the proxy was 5%.

Woodlands' geographic distribution of small business loans was excellent in low-income census tracts in 2020. The bank made three loans (15%) in low-income census tracts within the assessment area, which far exceeded both aggregate lending (4%), and the proxy (5%).

Lending in Moderate-Income Census Tracts

Overall, the bank's small business lending in moderate-income tracts was poor.

Woodlands' geographic distribution of small business loans was poor in moderate-income census tracts. The bank made a single loan (10%) in a moderate-income census tract, which was below the performance of aggregate lenders (14%) and proxy (16%).

Woodlands' small business lending in moderate-income tracts was reasonable. The bank made three loans (18%) in moderate-income census tracts, exceeding both aggregate lending (15%) and the proxy of businesses located in moderate-income census tracts (16%).

Woodlands' geographic distribution of small business loans was poor in moderate-income census tracts. In 2020, the bank made two small business loans (10%) in moderate-income census tracts within the assessment area. This performance was below both aggregate lending (15%) and the proxy (17%).

COMMUNITY DEVELOPMENT TEST

Woodlands' performance under the community development test is rated outstanding. The bank's mix of community development loans, qualified investments and community development services demonstrates excellent responsiveness to the community development needs of the Williamsport, PA MSA assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. As indicated previously, community development activities were reviewed for the entire evaluation period, from July 31, 2018 through September 20, 2021.

Community Development Loans

During the period evaluated, the bank originated 25 qualified community development loans, totaling over $17 million. Of these loans, 19 loans aggregating $15 million (86%) were to organizations that provide community development services to the low- and moderate-income population across the Williamsport, PA MSA assessment area. As indicated previously, low- and moderate-income families account for 39% of the assessment area's population, with 10% of families falling below the poverty line. In addition, six loans aggregating almost $2.4 million (14%) support organizations that provide affordable housing in the assessment area. These initiatives include building and rehabilitating affordable homes for low- and moderate-income families, and financing affordable rental housing in the city of Williamsport, both of which were noted as important assessment area needs by community contacts.

Qualified Investments

Woodlands made 20 qualified community development investments and 21 qualified donations during the evaluation period for a combined total of over $1.7 million in the Williamsport, PA MSA assessment area. Of these, 98% supported organizations providing community development services to low- and moderate-income individuals, and the balance supported affordable housing initiatives in the area. Of note, two large investments were made in educational improvement tax credit programs for local school districts where over 50% of students receive free or reduced-price lunches. Additionally, one bond with the Williamsport Sanitary Authority was renewed, which provides municipal water and wastewater services for the greater Williamsport area, including all of the assessment area's low- and moderate-income census tracts.

Community Development Services

In addition to the bank's retail services within the Williamsport, PA MSA assessment area, which include seven of the bank's eight branches, Woodlands' officers and employees provide technical expertise by serving on the boards and operating committees of numerous community development organizations. Noteworthy examples of the bank's participation with community development organizations include, but are not limited to, the following activities:

- A bank employee serves as a Loan Committee Member for the Susquehanna Economic Development Association Council of Governments (SEDA-COG). SEDA-COG offers small businesses in 11 central Pennsylvania counties, including Lycoming and Clinton counties, access to local, state, and federal loans including the SBA 504 Program;

- A bank employee and the bank's president serve on the Lycoming County Revolving Loan Fund. This organization provides low interest loans to small businesses and start-ups in Lycoming County;

- A bank executive serves as a board member of the Lycoming Housing Authority, which offers an array of housing-related programs and services to low- and moderate-income homeowners; and

- An employee serves as treasurer of Thrive International, a community group that provides emergency assistance, community services, and immigration assistance for low-income immigrants and their families.

CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA

LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Clinton County, PA Non-MSA assessment area was conducted. During the evaluation period, lending activity in this assessment area represented 10% of the bank's overall lending by number of loans, and less than 9% by dollar amount. The assessment area accounted for under $26 million in deposits, or 5% of the bank's total deposits as of June 30, 2021. Woodlands operated one branch in the assessment area (13% of the bank's total branches). For purposes of assessing the institution's overall performance, less weight was given to this assessment area, as a majority of the bank's branching, lending and depository activity take place in the Williamsport, PA MSA, of which a full-scope review was conducted for the purposes of this examination.

Given the bank's limited operations in this assessment area, the bank's overall performance in the Clinton County, PA Non-MSA assessment area is consistent with its performance in the Williamsport, PA MSA full-scope review assessment area, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the Appendices. Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Community Development Test
Clinton County	Consistent	Consistent

DESCRIPTION OF INSTITUTION'S OPERATIONS

At the time of the previous evaluation, Woodlands had just expanded its CRA assessment area to include Clinton County, and as a result, this assessment area was reviewed using full-scope review procedures at the previous CRA evaluation. Clinton County is a predominantly rural Non-MSA county, located directly west of Lycoming County. Clinton County's county seat is Lock Haven, PA, home of Lock Haven University.

Woodlands' CRA performance was evaluated in terms of the demographic and business context in which the bank operates. According to 2015 ACS data, the assessment area contained nine census tracts, one was designated as low-income (11%), one of which was moderate-income (11%), and seven of which were middle-income (78%). There were no tracts designated as upper-income. According to the 2015 ACS data, the assessment area had a population of 39,614. Approximately 13% of the assessment area's population resided in the low- and moderate-income census tracts.

A map of the Clinton County, PA Non-MSA assessment area is available in Appendix D.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were eight depository institutions operating in Clinton County. These institutions maintained a total of 12 banking offices in the market, holding almost $633 million in deposits. Woodlands ranked sixth among these institutions with 4% of the deposit market share. Jersey Shore State Bank ranked first with 25% of deposits, followed by First Commonwealth Bank with 21% of deposits, and First National Bank of Pennsylvania with just under 20% of deposits.

Woodlands reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the market that report real estate loans pursuant to HMDA. This data is reported annually. Over the time period between 2018 and 2020, Woodlands Bank was within the top fifteen HMDA lenders in Clinton County. In 2018, 96 HMDA reporters originated or purchased 943 HMDA loans in the assessment area. Woodlands ranked tenth in in the market, with just under 3% of the HMDA market. Jersey Shore State Bank led the market with 28% of HMDA loans, followed by Pennsylvania State Employees Credit Union with 7%, and Northwest Bank with 5% of HMDA market.

In 2019, 98 HMDA reporters originated or purchased 1,019 HMDA loans. Woodlands again ranked tenth with 2% of the market. Jersey Shore State Bank remained the market leader with 25% of the HMDA market, followed by Stearns Lending, LLC with 6%, and First National Bank of Pennsylvania with 5%.

Finally, in 2020, 110 HMDA reporters originated or purchased 1,230 HMDA loans. Woodlands ranked fifteenth with less than 2% of the market. As in previous years, Jersey Shore State Bank led the market with 21% of HMDA loans, followed by First Commonwealth Bank with 9% market share, and Quicken Loans, LLC with 6% of the market.

With regard to small business lending, Woodlands does not report small business loans for purposes of CRA, and therefore is not included in the ranking of small business lenders operating in the assessment area. Further, because the bank made so few small business loans in the assessment area during the evaluation period (the bank made two small business loans in each of the three years evaluated), small business lending is not included in the evaluation for the Clinton County, PA Non-MSA assessment area, as it would not have a meaningful impact on overall performance.

According to the Pennsylvania Department of Labor and Industry, top industries in Clinton County in 2021 include manufacturing, services including restaurants, education, including both elementary and secondary schools and colleges and universities, and retail trade. Top employers in the second quarter of 2021 included First Quality Tissue, LLC and First Quality Products, Inc., the Keystone Central School District, the PA State System of Higher Education, and Wal-Mart Associates, Inc.

To supplement economic, demographic and performance data, an interview was held with a local economic development organization that serves Clinton County, as well as other local areas. The contact highlighted the need for small business support, particularly for start-ups and new and unproven entrepreneurs. Further, the contact noted a need for decent affordable housing, and indicated that in many cases, rehabilitation of existing stock is needed.

The 2018, 2019, and 2020 assessment area demographics used to evaluate Woodlands' CRA performance in the Clinton County, PA Non-MSA assessment area are detailed in the tables contained on the following pages.

Woodlands Bank Clinton County, PA Non-MSA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	11.1	478	4.8	216	45.2	1,840	18.6
Moderate-income	1	11.1	833	8.4	144	17.3	1,968	19.9
Middle-income	7	77.8	8,600	86.8	760	8.8	2,002	20.2
Upper-income	0	0.0	0	0.0	0	0.0	4,101	41.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**9**	**100.0**	**9,911**	**100.0**	**1,120**	**11.3**	**9,911**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	1,113	225	2.1	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	9.4	31.2	300	9.4	1,890	59.4
Middle-income	14,740	9,332	88.5	63.3	3,122	21.2	2,286	15.5
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**19,035**	**10,549**	**100.0**	**55.4**	**4,247**	**22.3**	**4,239**	**22.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	144	10.2	123	9.8	18	17.0	3	6.1
Moderate-income	95	6.7	78	6.2	4	3.8	13	26.5
Middle-income	1,170	83.1	1,053	84.0	84	79.2	33	67.4
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,409**	**100.0**	**1,254**	**100.0**	**106**	**100.0**	**49**	**100.0**
	Percentage of Total Businesses:		**89.0**		**7.5**			**3.5**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	2.0	1	2.0	0	0.0	0	0.0
Middle-income	50	98.0	48	98.0	2	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**51**	**100.0**	**49**	**100.0**	**2**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.1**		**3.9**			**0.0**

2015 ACS Data and 2018 D&B Information.

32

Woodlands Bank Clinton County, PA Non-MSA Assessment Area Assessment Area Demographics 2019								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	11.1	478	4.8	216	45.2	1,840	18.6
Moderate-income	1	11.1	833	8.4	144	17.3	1,968	19.9
Middle-income	7	77.8	8,600	86.8	760	8.8	2,002	20.2
Upper-income	0	0.0	0	0.0	0	0.0	4,101	41.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**9**	**100.0**	**9,911**	**100.0**	**1,120**	**11.3**	**9,911**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	1,113	225	2.1	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	9.4	31.2	300	9.4	1,890	59.4
Middle-income	14,740	9,332	88.5	63.3	3,122	21.2	2,286	15.5
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**19,035**	**10,549**	**100.0**	**55.4**	**4,247**	**22.3**	**4,239**	**22.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	153	10.9	134	10.7	16	15.5	3	6.4
Moderate-income	95	6.8	78	6.2	4	3.9	13	27.7
Middle-income	1,158	82.3	1,044	83.1	83	80.6	31	65.9
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,406**	**100.0**	**1,256**	**100.0**	**103**	**100.0**	**47**	**100.0**
	Percentage of Total Businesses:		**89.3**		**7.3**			**3.3**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	2.0	1	2.0	0	0.0	0	0.0
Middle-income	50	98.0	48	98.0	2	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**51**	**100.0**	**49**	**100.0**	**2**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.1**		**3.9**			**0.0**

2015 ACS Data and 2019 D&B Information.

Woodlands Bank Clinton County, PA Non-MSA Assessment Area Assessment Area Demographics 2020							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1	11.1	478	4.8	216	45.2	1,840	18.6
Moderate-income	1	11.1	833	8.4	144	17.3	1,968	19.9
Middle-income	7	77.8	8,600	86.8	760	8.8	2,002	20.2
Upper-income	0	0.0	0	0.0	0	0.0	4,101	41.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**9**	**100.0**	**9,911**	**100.0**	**1,120**	**11.3**	**9,911**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	1,113	225	2.1	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	9.4	31.2	300	9.4	1,890	59.4
Middle-income	14,740	9,332	88.5	63.3	3,122	21.2	2,286	15.5
Upper-income	0	0	0.0	0.0	0	0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0	0	0.0
Total Assessment Area	**19,035**	**10,549**	**100.0**	**55.4**	**4,247**	**22.3**	**4,239**	**22.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	156	11.1	139	11.1	14	13.5	3	6.8
Moderate-income	83	5.9	69	5.5	4	3.8	10	22.7
Middle-income	1,161	83.0	1,044	83.4	86	82.7	31	70.5
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,400**	**100.0**	**1,252**	**100.0**	**104**	**100.0**	**44**	**100.0**
	Percentage of Total Businesses:		**89.4**		**7.5**			**3.1**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	1.9	1	2.0	0	0.0	0	0.0
Middle-income	51	98.1	49	98.0	2	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**52**	**100.0**	**50**	**100.0**	**2**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.2**		**3.8**			**0.0**

2015 ACS Data and 2020 D&B Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST

The bank's performance in this assessment area is consistent with the lending test and community development test in the full-scope assessment area.

LENDING TEST

The bank's lending in this assessment area is consistent with the bank's lending levels in the full-scope review assessment area. As discussed previously, the lending test includes only analysis of the bank's home mortgage loans. However, it is acknowledged that the analysis of HMDA loans is based on a limited number of loans, given the bank's relatively small amount of lending in this assessment area. Small business lending is not included in the analysis because the bank's very low level of such lending in this assessment area would not have had an appreciable effect on overall conclusions. However, lending data for small business loans is included in Appendix C, for informational purposes.

Borrower and Geographic Distribution of Lending[7]

HMDA lending was limited in the Clinton County, PA Non-MSA assessment area. In 2018, the bank originated 25 HMDA loans totaling $2.6 million. The bank's borrower distribution of loans to low-income borrowers (16% or four loans) exceeded aggregate lending levels (9%), but trailed proxy (19%). Loans to moderate-income borrowers (8% or two loans) was below both aggregate lending (22%) and proxy (20%). The bank's geographic distribution of HMDA loans outperformed both aggregate lenders and proxy in low-income census tracts (8% or two loans, 3%, and 2%, respectively). In moderate-income tracts, the bank's lending (8% or two loans) exceeded aggregate lending (5%), but trailed proxy (9%).

In 2019, Woodlands originated 21 HMDA loans totaling nearly $2.5 million. Lending to both low- and moderate-income borrowers was below both aggregate lending levels and the proxy of the percentage of families by family income. In 2019, Woodlands made no HMDA loans to low-income borrowers, while aggregate lenders made 7% of loans to such borrowers, and proxy was 19%. The bank's lending to moderate-income borrowers (14% or three loans) also trailed both aggregate lending and proxy (21% and 20%, respectively). Similarly, geographic distribution of lending was below both aggregate lenders and proxy. In 2019, Woodlands made no loans in low-income tracts, compared with aggregate performance of 1% and proxy of 2%. The bank made no loans in moderate-income tracts, while aggregate lenders made 6% of their HMDA loans in such tracts, and 9% of owner-occupied housing units were located in moderate-income tracts.

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[7]The information used to evaluate lending activity by Woodlands is detailed in the Loan Distribution Tables contained in the Appendices.

Finally, in 2020, the bank originated 20 HMDA loans totaling nearly $3.3 million. In 2020, Woodlands made no HMDA loans to low-income borrowers, while aggregate lenders made 6% of loans to such borrowers, and proxy measured 19%. The bank's lending to moderate-income borrowers (20% or four loans) matched aggregate lending and proxy (19% and 20%, respectively). In 2020, the bank's geographic distribution exceeded both aggregate lending and proxy. More specifically, Woodlands' lending in low-income tracts (5% or one loan) exceeded aggregate lending of 1% and proxy of 2%. Similarly, the bank's lending in moderate-income tracts (10% or two loans) exceeded aggregate lending of 5% and the proxy of owner-occupied units in moderate-income tracts of 9%.

COMMUNITY DEVELOPMENT TEST

Community development performance in the Clinton County, PA Non-MSA assessment area is consistent with performance in the full-scope assessment area, given the bank's limited operations in that assessment area.

Though no community development loans were made in the Clinton County, PA Non-MSA assessment area, eight qualified investments and one donation totaling more than $2.1 million were made in this assessment area. A majority of this funding (87%) was to provide affordable housing for seniors, while another 13% of the investment dollars were community service-related and consisted of contributions to educational improvement credit programs for local school districts where over 50% of students receive free or reduced-price lunches. The remaining $10,000 investment, which was less than 1% of the bank's total investments, provided economic development through the financing of small businesses in the area. The bank's sizable investments in affordable housing initiatives were responsive to community development needs identified by the community contact in this assessment area. Finally, two employees serve on the boards of four different community development organizations that serve the Clinton County, PA Non-MSA assessment area.

CRA APPENDICES

CRA APPENDIX A: GLOSSARY

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 metropolitan area or assessment area.

Census tract: 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its 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: All Agencies have adopted the following language.
(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) 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;
(4) Activities that revitalize or stabilize-
      (i) Low-or moderate-income geographies;
      (ii) Designated disaster areas; or
      (iii)Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
            A. Rates of poverty, unemployment, and population loss; or
            B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or

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-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings 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-scope review: Performance under the lending, investment, and service tests is analyzed using only quantitative factors (for example, 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.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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 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) 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.

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.

CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES

2018 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	4	4.1	352	2.4
Moderate	10	10.3	903	6.3	16	16.5	1,686	11.7
Middle	78	80.4	12,065	83.7	20	20.6	2,357	16.3
Upper	9	9.3	1,449	10.0	33	34.1	6,709	46.6
Unknown	0	0.0	0	0.0	24	24.7	3,314	23.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**97**	**100.0**	**14,418**	**100.0**	**97**	**100.0**	**14,418**	**100.0**
	Refinance							
Low	2	3.5	113	1.8	7	12.3	469	7.4
Moderate	8	14.0	1,554	24.5	17	29.8	1,347	21.2
Middle	40	70.2	3,995	63.0	11	19.3	1,210	19.1
Upper	7	12.3	684	10.7	17	29.8	1,775	28.0
Unknown	0	0.0	0	0.0	5	8.8	1,545	24.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**57**	**100.0**	**6,346**	**100.0**	**57**	**100.0**	**6,346**	**100.0**
	Home Improvement							
Low	0	0.0	0	0.0	2	22.2	83	16.3
Moderate	2	22.2	57	11.2	0	0.0	0	0.0
Middle	7	77.8	451	88.8	1	11.1	13	2.6
Upper	0	0.0	0	0.0	4	44.5	265	52.1
Unknown	0	0.0	0	0.0	2	22.2	147	29.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**508**	**100.0**	**9**	**100.0**	**508**	**100.0**
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	75.0	1,552	85.2	0	0.0	0	0.0
Middle	1	25.0	270	14.8	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	4	100.0	1,822	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,822**	**100.0**	**4**	**100.0**	**1,822**	**100.0**
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	100.0	268	100.0	3	75.0	228	85.1
Upper	0	0.0	0	0.0	1	25.0	40	14.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**268**	**100.0**	**4**	**100.0**	**268**	**100.0**
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	HMDA Totals							
Low	2	1.2	113	0.5	13	7.6	904	3.9
Moderate	23	13.5	4,066	17.4	33	19.3	3,033	13.0
Middle	130	76.0	17,049	73.0	35	20.5	3,808	16.3
Upper	16	9.3	2,134	9.1	55	32.1	8,789	37.6
Unknown	0	0.0	0	0.0	35	20.5	6,828	29.2
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**171**	**100.0**	**23,362**	**100.0**	**171**	**100.0**	**23,362**	**100.0**

2019 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	3	3.1	433	3.3	2	2.1	150	1.1
Moderate	21	21.9	1,622	12.2	14	14.6	1,536	11.5
Middle	64	66.7	9,527	71.6	14	14.6	1,616	12.1
Upper	8	8.3	1,722	12.9	40	41.6	7,222	54.4
Unknown	0	0.0	0	0.0	26	27.1	2,781	20.9
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	96	100.0	13,304	100.0	96	100.0	13,304	100.0
	Refinance							
Low	2	3.4	399	5.0	5	8.5	270	3.4
Moderate	5	8.5	321	4.0	9	15.3	896	11.2
Middle	46	78.0	6,219	77.7	14	23.7	1,623	20.3
Upper	6	10.1	1,067	13.3	24	40.6	4,243	53.0
Unknown	0	0.0	0	0.0	7	11.9	975	12.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	59	100.0	8,005	100.0	59	100.0	8,005	100.0
	Home Improvement							
Low	0	0.0	0	0.0	1	8.3	10	2.5
Moderate	1	8.3	115	29.0	1	8.3	6	1.5
Middle	11	91.7	281	71.0	2	16.7	37	9.3
Upper	0	0.0	0	0.0	5	41.7	178	44.9
Unknown	0	0.0	0	0.0	3	25.0	165	41.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	12	100.0	396	100.0	12	100.0	396	100.0
	Multi-Family							
Low	1	50.0	625	94.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	50.0	40	6.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	665	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	665	100.0	2	100.0	665	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	10.0	91	26.5
Middle	10	100.0	343	100.0	5	50.0	140	40.8
Upper	0	0.0	0	0.0	3	30.0	82	24.0
Unknown	0	0.0	0	0.0	1	10.0	30	8.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	10	100.0	343	100.0	10	100.0	343	100.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	6	3.4	1,456	6.4	8	4.5	430	1.9
Moderate	27	15.1	2,058	9.1	25	14.0	2,528	11.1
Middle	132	73.7	16,411	72.3	35	19.6	3,415	15.0
Upper	14	7.8	2,788	12.2	72	40.1	11,724	51.7
Unknown	0	0.0	0	0.0	39	21.8	4,616	20.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	179	100.0	22,714	100.0	179	100.0	22,714	100.0

2020 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	1.1	65	0.4	0	0.0	0	0.0
Moderate	12	13.6	1,340	8.4	17	19.3	1,870	11.7
Middle	65	73.9	12,472	77.9	27	30.7	4,134	25.8
Upper	10	11.4	2,135	13.3	38	43.2	8,543	53.4
Unknown	0	0.0	0	0.0	6	6.8	1,465	9.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**88**	**100.0**	**16,012**	**100.0**	**88**	**100.0**	**16,012**	**100.0**
	Refinance							
Low	1	0.7	99	0.4	4	2.8	341	1.4
Moderate	7	4.9	427	1.8	18	12.5	1,708	7.1
Middle	110	76.4	18,619	77.0	27	18.8	3,918	16.2
Upper	26	18.0	5,047	20.8	91	63.1	17,473	72.2
Unknown	0	0.0	0	0.0	4	2.8	751	3.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**144**	**100.0**	**24,192**	**100.0**	**144**	**100.0**	**24,192**	**100.0**
	Home Improvement							
Low	1	20.0	50	17.8	1	20.0	110	39.2
Moderate	2	40.0	117	41.5	0	0.0	0	0.0
Middle	1	20.0	80	28.5	0	0.0	0	0.0
Upper	1	20.0	34	12.2	3	60.0	121	43.0
Unknown	0	0.0	0	0.0	1	20.0	50	17.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**281**	**100.0**	**5**	**100.0**	**281**	**100.0**
	Multi-Family							
Low	1	25.0	480	43.4	0	0.0	0	0.0
Moderate	2	50.0	326	29.4	0	0.0	0	0.0
Middle	1	25.0	300	27.2	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	25.0	188	17.0
Unknown	0	0.0	0	0.0	3	75.0	918	83.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,106**	**100.0**	**4**	**100.0**	**1,106**	**100.0**
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	100.0	32	100.0
Middle	1	100.0	32	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	32	100.0	1	100.0	32	100.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	4	1.7	694	1.7	5	2.1	451	1.1
Moderate	23	9.5	2,209	5.3	36	14.9	3,610	8.7
Middle	178	73.6	31,503	75.7	54	22.3	8,052	19.3
Upper	37	15.2	7,216	17.3	133	54.9	26,325	63.3
Unknown	0	0.0	0	0.0	14	5.8	3,183	7.6
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	242	100.0	41,622	100.0	242	100.0	41,622	100.0

2018 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	5.0	100	4.3	4	20.0	196	8.4
Moderate	2	10.0	50	2.2	1	5.0	71	3.1
Middle	17	85.0	2,166	93.5	2	10.0	153	6.6
Upper	0	0	0	0.0	10	50.0	1,536	66.4
Unknown	0	0.0	0	0.0	3	15.0	360	15.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**2,316**	**100.0**	**20**	**100.0**	**2,316**	**100.0**
	Refinance							
Low	1	50.0	26	14.6	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	50.0	149	85.4
Middle	1	50.0	149	85.4	1	50.0	26	14.6
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**175**	**100.0**	**2**	**100.0**	**175**	**100.0**
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	123	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	100.0	123	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**1**	**100.0**	**123**	**100.0**	**1**	**100.0**	**123**	**100.0**
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	30	100.0	2	100.0	30	100.
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**30**	**100.0**	**2**	**100.0**	**30**	**100.0**
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	HMDA Totals							
Low	2	8.0	126	4.7	4	16.0	196	7.4
Moderate	2	8.0	50	1.9	2	8.0	221	8.3
Middle	21	84.0	2,468	93.4	5	20.0	209	7.9
Upper	0	0.0	0	0.0	11	44.0	1,659	62.8
Unknown	0	0.0	0	0.0	3	12.0	360	13.6
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**25**	**100.0**	**2,644**	**100.0**	**25**	**100.0**	**2,644**	**100.0**

2019 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	20.0	162	18.4
Middle	5	100.0	884	100.0	1	20.0	196	22.1
Upper	0	0.0	0	0.0	3	60.0	526	59.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**884**	**100.0**	**5**	**100.0**	**884**	**100.0**
Refinance								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	8.3	120	8.4
Middle	12	100.0	1,425	100.0	4	33.3	549	38.5
Upper	0	0.0	0	0.0	7	58.4	756	53.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**12**	**100.0**	**1,425**	**100.0**	**12**	**100.0**	**1,425**	**100.0**
Home Improvement								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
MultiFamily								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	38	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	38	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**1**	**100.0**	**38**	**100.0**	**1**	**100.0**	**38**	**100.0**
Other Purpose LOC								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	33.3	14	14.0
Middle	3	100.0	100	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	2	66.7	86	86.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	3	100.0	100	100.0	3	100.0	100	100.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	3	14.3	296	12.1
Middle	21	100.0	2,447	100.0	5	23.8	744	30.4
Upper	0	0.0	0	0.0	12	57.1	1,369	55.9
Unknown	0	0.0	0	0.0	1	4.8	38	1.6
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	21	100.0	2,447	100.0	21	100.0	2,447	100.0

2020 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	25.0	266	31.9	2	25.0	236	28.3
Middle	6	75.0	567	68.1	2	25.0	122	14.7
Upper	0	0.0	0	0.0	4	50.0	474	57.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**8**	**100.0**	**832**	**100.0**	**8**	**100.0**	**832**	**100.0**
Refinance								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	2	22.2	138	6.8
Middle	9	100.0	2,039	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	7	77.8	1,901	93.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**2,039**	**100.0**	**9**	**100.0**	**2,039**	**100.0**
Home Improvement								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	136	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	50.0	76	55.9
Unknown	0	0.0	0	0.0	1	50.0	60	44.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**136**	**100.0**	**2**	**100.0**	**136**	**100.0**
Multi-Family								
Low	1	100.0	274	100.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	274	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**1**	**100.0**	**274**	**100.0**	**1**	**100.0**	**274**	**100.0**
Other Purpose LOC								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	HMDA Totals							
Low	1	5.0	274	8,4	0	0.0	0	0.0
Moderate	2	10.0	266	8.1	4	20.0	374	11.4
Middle	17	85.0	2,742	83.5	2	10.0	122	3.7
Upper	0	0.0	0	0.0	12	60.0	2,451	74.7
Unknown	0	0.0	0	0.0	2	10.0	344	10.2
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**3,281**	**100.0**	**20**	**100.0**	**3,281**	**100.0**

CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	10.0	0	12.1	0	0.0	0	0.0
Middle	8	80.0	0	75.8	0	0.0	0	0.0
Upper	1	10.0	0	12.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**10**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Revenue								
Total $1 Million or Less	10	100.0	1	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**10**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size								
$100,000 or less	10	100.0	1	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**10**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	10	100.0	1	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**10**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	17.6	0	21.6	0	0.0	0	0.0
Middle	13	76.5	1	75.0	0	0.0	0	0.0
Upper	1	5.9	0	3.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**17**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Revenue								
Total $1 Million or Less	17	100.0	1	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**17**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size								
$100,000 or less	17	100.0	1	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**17**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	17	100.0	1	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**17**	**100.0**	**1**	**100.0**	**0**	**0.0**	**0**	**0.0**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (WILLIAMSPORT, PA MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	3	15.0	50	84.1	0	0.0	0	0.0
Moderate	2	10.0	0	0.3	0	0.0	0	0.0
Middle	15	75.0	10	15.6	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**60**	**100.0**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	20	100.0	60	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**60**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	20	100.0	60	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**60**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	20	100.0	60	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**20**	**100.0**	**60**	**100.0**	**0**	0.0	**0**	0.0

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	0	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	2	100.0	0	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	50.0	0	80.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	50.0	0	20.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	2	100.0	0	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	50.0	0	57.1	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	50.0	0	42.9	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	2	100.0	0	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	2	100.0	0	100.0	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**0**	**100.0**	**0**	0.0	**0**	0.0

CRA APPENDIX D: ASSESSMENT AREA MAPS

WILLIAMSPORT, PA MSA ASSESSMENT AREA (2015 ACS DATA)

CLINTON COUNTY, PA NON-MSA ASSESSMENT AREA (2015 ACS DATA)