

PUBLIC DISCLOSURE

May 10, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Bank of Lake Village
RSSD #476445**

**201 Main Street
Lake Village, Arkansas 71653**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION’S CRA RATING: This institution is rated SATISFACTORY.

Bank of Lake Village meets the criteria for a Satisfactory rating based on the evaluation of the bank’s lending activity. The factors supporting the institution’s rating are as follows:

- The loan-to-deposit (LTD) ratio is reasonable given the institution’s size, financial condition, and assessment area credit needs.
- A majority of loans and other lending-related activities are in the assessment area.
- The borrower’s profile analysis reveals reasonable penetration among farms and businesses of different revenue sizes.
- The geographic distribution of loans reflects a poor dispersion throughout the assessment area.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.

SCOPE OF EXAMINATION

The bank’s CRA performance was evaluated using the Federal Financial Institutions Examination Council’s (FFIEC’s) Examination Procedures for Small Institutions. Small farm and small business loans were used to evaluate the bank’s lending performance, as these loan categories are considered the bank’s core business lines based on lending volume and the bank’s stated business strategy.¹ Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. However, as the bank has a particular emphasis on agricultural lending, performance based on the small farm loan product carried more significance toward the bank’s overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	September 30, 2016 – March 31, 2021
Assessment Area Concentration	January 1, 2017 – December 31, 2020
Loan Distribution by Borrower’s Profile	January 1, 2017 – December 31, 2020
Geographic Distribution of Loans	January 1, 2017 – December 31, 2020
Response to Written CRA Complaints	September 26, 2016 – May 9, 2021

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2015 U.S. Census data.

¹ Small farm loans were sampled for this review according to CA Letter 01-8, “CRA Sampling Procedures.”

Certain business and farm demographics are based on Dun & Bradstreet data for 2017, 2018, 2019, and 2020. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating in the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$63.0 million to \$81.1 million as of March 31, 2021.

To augment this evaluation, two community contact interviews were conducted with members of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment areas. Information from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section.

DESCRIPTION OF INSTITUTION

Bank of Lake Village is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Southeast Arkansas Bank Corporation, a two-bank holding company headquartered in Lake Village, Arkansas. The bank also has one noncredit-granting subsidiary of its own, BLV Realty, Inc. Bank of Lake Village is a registered Community Development Financial Institution.

The bank's branch network consists of two offices, both of which are located in Lake Village, Arkansas. Both offices are located in a distressed middle-income census tract. The main office is a full-service facility, while the second office (branch) is limited-service, as it only offers teller services. The branch has a deposit-taking automated teller machine (ATM) on site, and the bank operates one stand-alone, cash-dispensing only ATM located at Chicot Memorial Medical Center in Lake Village. The bank did not open or close any branch offices during this review period.

Based on this branch network and other service delivery systems, such as extended banking hours of operations and full-service online banking capabilities, the bank is positioned to meet the needs of the distressed geographies located in central Chicot County. The bank faces geographic and competitive challenges in the remaining portions of the assessment area. The moderate-income census tract to the north and the moderate-income census tract to the south each consist of one of the two other major towns within the assessment area (Dermott and Eudora) and are a significant distance from Lake Village. Each of the aforementioned towns has a minimum of two banks, including those that specialize in agricultural lending.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting assessment area credit needs based on its available resources and financial products. As of March 31, 2021, the bank reported total assets of \$71.9 million. As of the same date, loans and leases outstanding were \$36.1 million (50.2 percent of total assets), and deposits totaled \$62.8 million. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of March 31, 2021		
Credit Category	Amount (\$000s)	Percentage of Total Loans
Construction and Development	\$99	0.3%
Commercial Real Estate	\$2,659	7.4%
1-4 Family Residential	\$2,631	7.3%
Farmland	\$7,966	22.1%
Farm Loans	\$16,302	45.2%
Commercial and Industrial	\$5,510	15.3%
Loans to Individuals	\$910	2.5%
Total Other Loans	\$22	0.1%
TOTAL	\$36,099	100%

As indicated by the table above, a significant portion of the bank’s lending resources is directed to farm loans, loans secured by farmland, and commercial and industrial loans. The bank is primarily an agricultural lender, mainly serving Chicot County, Arkansas. The strategic operating plan is consistent with the portfolio makeup as it identifies agricultural lending as the primary product for the market area. However, the plan also underlines the importance of carrying a diverse loan portfolio.

The bank received a Satisfactory rating at its previous CRA evaluation conducted on September 26, 2016, by this Reserve Bank.

DESCRIPTION OF ASSESSMENT AREA

General Demographics

The bank’s assessment area, which is the entirety of Chicot County and has a population of 11,353, is located in southeastern nonmetropolitan statistical area (nonMSA) Arkansas and is comprised of four census tracts. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2020, there are five FDIC-insured depository institutions in the assessment area that operate seven offices. Bank of Lake Village (operating two, or 28.6 percent, offices in the assessment area) ranked second in terms of deposit market share, with 22.2 percent of the total assessment area deposit dollars.

A significant portion of the community is rural in nature, and agricultural lending products represent a significant credit need in the assessment area. Other particular credit needs in the area, as noted primarily from community contacts, include access to small business loans used to spur business expansion and increase local employment opportunities.

Income and Wealth Demographics

As previously noted, the bank’s assessment area consists of four census tracts comprising Chicot County in its entirety. The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	2	2	0	0	4
	0.0%	50.0%	50.0%	0.0%	0.0%	100%
Family Population	0	1,342	1,646	0	0	2,988
	0.0%	44.9%	55.1%	0.0%	0.0%	100%

As revealed above, the assessment area contains two moderate-income census tracts. These areas are primarily concentrated in and around the cities of Dermott and Eudora. The remaining two middle-income census tracts are delineated as distressed due to poverty, unemployment, and population loss. The largest portion of the assessment area family population resides in the middle-income census tracts.

Based on 2015 U.S. Census data, the median family income for the assessment area was \$34,554. At the same time, the nonMSA Arkansas median family income was \$45,047. More recently, the FFIEC estimates the 2017, 2018, 2019, and 2020 nonMSA Arkansas median family income to be \$46,500, \$48,200, \$49,100, and \$50,800, respectively. The following table displays population percentages of assessment area families by income level compared to the nonMSA family population as a whole.

Family Population by Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Assessment Area	985	552	444	1,007	0	2,988
	33.0%	18.5%	14.9%	33.7%	0.0%	100%
NonMSA Arkansas	63,831	53,700	58,267	123,066	0	298,864
	21.4%	18.0%	19.5%	41.2%	0.0%	100%

As shown in the table above, 51.5 percent of families within the assessment area were considered low- and -moderate-income (LMI), which is significantly higher than the LMI family percentage of 39.4 percent in nonMSA Arkansas. The assessment area also has a smaller upper-income family population (33.7 percent) compared to the nonMSA Arkansas figure (41.2 percent). Finally, the percentage of families living below the poverty threshold in the assessment area, 26.5 percent, is substantially greater than the 16.6 percent level of all nonMSA Arkansas

families. Considering these factors, the assessment area appears less affluent than nonMSA Arkansas as a whole.

Housing Demographics

Based on housing values and rental costs, housing in the assessment area appears to be more affordable than in nonMSA Arkansas. The median housing value for the assessment area was \$57,305, which is significantly below the figure for nonMSA Arkansas, \$85,869. The median gross rent for the assessment area of \$574 per month is again more affordable compared to \$588 per month for nonMSA Arkansas. Similarly, housing appears to be relatively affordable considering income levels in the assessment area. The assessment area housing affordability ratio (50.1 percent) is above the nonMSA Arkansas figure (41.0 percent). Therefore, the assessment area appears to be less affluent but more affordable for LMI borrowers when compared to nonMSA Arkansas.

Industry and Employment Demographics

According to community contacts, the assessment area economy is focused primarily on farming; however, these farms do not employ a large number of individuals. Service-oriented sectors play the most crucial role when considering actual number of employees, but farming is of equal importance to the assessments area's overall economy. As of March 31, 2020, data from the Quarterly Census of Employment and Wages indicate that by number of paid private sector employees in the assessment area, healthcare and social assistance leads (653), followed by transportation and warehousing (285) and retail trade (256). By number of establishments, healthcare and social assistance leads again (248), followed by agriculture, forestry, fishing and hunting (54), and retail trade (41). Business demographic estimates from 2020 indicate that 88.5 percent of assessment area businesses and 96.9 percent of farms have gross annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to nonMSA Arkansas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	NonMSA Arkansas
2016	6.6%	4.9%
2017	6.5%	4.4%
2018	6.7%	4.3%
2019	6.9%	4.3%
2020 (January–August)	11.8%	7.4%

As shown in the table above, unemployment levels for the assessment area have had a generally increasing trend and have consistently been higher than in nonMSA Arkansas, where unemployment rates have shown a generally decreasing trend. Both the assessment area and

nonMSA Arkansas experienced sharp spikes in unemployment in 2020 due to the COVID pandemic, with the assessment area unemployment rate being more than 4 percentage points higher than nonMSA Arkansas.

Community Contact Information

Information from two community contacts was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. Of these community contact interviews, one was with an individual specializing in agricultural lending, and one was with an individual specializing in small business development.

The community contact interviewees categorized the economy as stagnant and heavily reliant on agricultural activities from small and moderate-size family farming operations. The main agricultural-related products mentioned include timber, corn, soybean, cotton, rice, cattle, and catfish. Other major industries noted in Chicot County include manufacturing, healthcare and social assistance, and public administration. One of the contacts indicated that most agriculture employers within Chicot County are located in the cities of Lake Village, Dermott, and Eudora, and both contacts stated that many residents from these areas commute to neighboring counties where they can earn higher wages. Furthermore, the contact specializing in farm services indicated that while the county's economy is stable, it has faced higher than normal unemployment during the pandemic when compared to the state of Arkansas and the nation as a whole. The contact also indicated that during the pandemic, cattle farmers were hit the hardest due to the temporary shutdown of the stockyards and periodic shutdowns and short staffing at meat packaging plants.

Regarding financial institutions, both contacts indicated banks were generally active and meeting the needs within the community. The contact specializing in farm services indicated there is healthy competition between the five banks located in Chicot County, noting that all of the financial institutions offer farm loans. The contact stated the largest credit barriers farmers face in the county are poor credit histories and the inability to demonstrate farming experience. Specific to small business, the other contact noted that many businesses within Chicot County have difficulty in meeting down payment and/or collateral requirements to qualify for small business loans through local banks. Moreover, the contact highlighted an opportunity for financial institutions to work with microlenders within the region.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The chart below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 19-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size (\$000s) as of March 31, 2021	Average LTD Ratio
Bank of Lake Village	Lake Village, Arkansas	\$71,899	61.3%
Regional Banks	Oak Grove, Louisiana	\$62,999	62.2%
	Portland, Arkansas	\$74,189	84.1%
	McGehee, Arkansas	\$81,129	70.2%

Based on data from the previous table, the bank's level of lending is below that of other banks in the region. During the review period, the bank's LTD ratio experienced a cyclical and stable trend, ranging from a low of 45.5 percent (March 2017) to a high of 83.3 percent (September 2020). This range in LTD is in line with the cyclical nature of agricultural lending institutions. The average LTD ratios for the regional peers were higher and represented a generally stable trend with similar cyclical components; as a primarily agricultural lender, the bank is most similar to the peer institution located in Oak Grove, Louisiana, whose average LTD over the period is just slightly higher than the bank's. Therefore, compared to trend data from regional banks and information displayed in the table above, the bank's average LTD ratio is reasonable given the bank's size, financial condition, agricultural focus, and assessment area credit needs.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank’s assessment area.

Lending Inside and Outside of Assessment Area January 1, 2017 through December 31, 2020						
Loan Type	Inside Assessment Area		Outside Assessment Area		TOTAL	
Small Farm	62	83.8%	12	16.2%	74	100%
	\$7,824	88.0%	\$1,070	12.0%	\$8,894	100%
Small Business	41	83.7%	8	16.3%	49	100%
	\$2,883	67.5%	\$1,387	32.5%	\$4,270	100%
TOTAL LOANS	103	83.7%	20	16.3%	123	100%
	\$10,707	81.3%	\$2,457	18.7%	\$13,164	100%

A majority of loans and other lending-related activities were made in the bank’s assessment area. As shown in the previous table, 83.7 percent of the total loans were made inside the assessment area, accounting for 81.3 percent of the dollar volume of total loans.

Loan Distribution by Borrower’s Profile

Overall, the bank’s loan distribution by borrower’s profile is reasonable, based on performance from both loan categories reviewed. While the bank’s distribution of small farm loans to farms of various sizes is reasonable, and performance under the small business category is excellent, greater significance is placed on performance in the small farm loan category given the bank’s emphasis on agricultural lending. For more detailed information relating to the bank’s loan distribution by borrower’s profile for each year reviewed, see the tables in *Appendix B*.

The following table reflects Bank of Lake Village’s distribution of small farm loans by gross annual farm revenue and loan amount compared to Dun & Bradstreet and aggregate data.

Lending Distribution by Farm Revenue Level January 1, 2017 through December 31, 2020				
Gross Revenue	Loan Origination Amount (in \$000s)			TOTAL
	≤\$100	\$100≤\$250	\$250≤\$500	
\$1 million or less	30 48.4%	5 8.1%	9 14.5%	44 71.0%
Greater than \$1 million	12 19.4%	2 3.2%	4 6.5%	18 29.0%
TOTAL	42 67.7%	7 11.3%	13 21.0%	62 100%
Dun & Bradstreet Farms ≤ \$1 million				96.9%
2017 Small Farm Aggregate ≤ \$1 million				67.1%
2018 Small Farm Aggregate ≤ \$1 million				56.2%
2019 Small Farm Aggregate ≤ \$1 million				50.0%
2020 Small Farm Aggregate ≤ \$1million				39.5%

Based on this analysis of small farm loans, the bank’s level of lending to small farms is reasonable. As displayed above, 44 of 62 loans reviewed (71.0 percent) were made to farms with gross annual revenues of \$1 million or less. In comparison, Dun & Bradstreet data indicates that 96.9 percent of agricultural institutions inside the assessment area are small farms as of 2020. Small farm aggregate lending data for the assessment area was 67.1 percent, 56.2 percent, 50.0 percent, and 39.5 percent in 2017, 2018, 2019, and 2020, respectively. Moreover, 30 of 44 (68.2 percent) loans to small farms reviewed were in amounts of \$100,000 or less, signifying the bank’s willingness to meet the credit needs of small farms. Further, one significantly larger bank dominates agriculture lending in the assessment area. In 2020 alone, this larger bank accounted for 75.4 percent of the lending volume for small farms. As such, the bank’s borrower’s profile performance for the small farm loan category is reasonable.

Similar to the borrower’s profile analysis conducted for the small farm loan category, the bank’s distribution of loans to businesses of various sizes was reviewed. The following table reflects the bank’s distribution of small business loans by gross annual business revenue and loan amount compared to Dun & Bradstreet and aggregate data.

Lending Distribution by Business Revenue Level January 1, 2017 through December 31, 2020				
Gross Revenue	Loan Origination Amount (in \$000s)			TOTAL
	≤\$100	\$100≤\$250	\$250≤\$1,000	
\$1 million or less	33	4	1	38
	80.5%	9.8%	2.4%	92.7%
Greater than \$1 million	2	0	1	3
	4.9%	0.0%	2.4%	7.3%
TOTAL	35	4	2	41
	85.4%	9.8%	4.9%	100%
Dun & Bradstreet Businesses ≤ \$1 million				88.5%
2017 Small Business Aggregate ≤ \$1 million				42.7%
2018 Small Business Aggregate ≤ \$1 million				37.4%
2019 Small Business Aggregate ≤ \$1 million				28.9%
2020 Small Business Aggregate ≤ \$1 million				42.1%

The table above demonstrates that 38 of 41 loans reviewed (92.7 percent) were made to businesses with gross annual revenues of \$1 million or less. In comparison, Dun & Bradstreet data indicates that 88.5 percent of businesses inside the assessment area are small businesses as of 2020. Small business aggregate lending data for the assessment area was 42.7 percent, 37.4 percent, 28.9 percent, and 42.1 percent in 2017, 2018, 2019, and 2020, respectively. In addition, the fact that 33 of 38 (86.8 percent) loans to small businesses reviewed were in amounts of \$100,000 or less further indicates the bank’s willingness to meet the credit needs of small businesses. Therefore, the bank’s borrower’s profile performance for the small business loan category is excellent.

Geographic Distribution of Loans

As noted previously, the bank’s assessment area contains no low-, two moderate-, two middle-, and no upper-income census tracts. The analysis in this section illustrates the distribution of the bank’s loan activity across these geographies. Overall, the bank’s geographic distribution of loans reflects poor dispersion throughout the assessment area, based on activity analyzed from both loan categories. For more detailed information relating to the bank’s geographic distribution of loans, see the tables in *Appendix B*.

The following table displays the geographic distribution of small farm loans compared to estimated percentages of farm institutions located in each geography income category and aggregate performance.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2017 through December 31, 2020						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Small Farm Loans	0 0.0%	1 1.6%	61 98.4%	0 0.0%	0 0.0%	62 100%
Agricultural Institutions	0.0%	19.4%	80.6%	0.0%	0.0%	100%
2017 Small Farm Aggregate	0.0%	18.2%	81.8%	0.0%	0.0%	100%
2018 Small Farm Aggregate	0.0%	21.6%	78.4%	0.0%	0.0%	100%
2019 Small Farm Aggregate	0.0%	22.1%	77.9%	0.0%	0.0%	100%
2020 Small Farm Aggregate	0.0%	20.2%	79.8%	0.0%	0.0%	100%

As displayed in the table above, the bank’s penetration of the moderate-income census tracts (1.6 percent) is below demographic data that indicates 19.4 percent of assessment area farms are in moderate-income census tracts. CRA aggregate lending data for the review period (2017, 2018, 2019, and 2020), was 18.2 percent, 21.6 percent, 22.1 percent, and 20.2 percent, respectively. As Bank of Lake Village only has branches in Lake Village, Arkansas, and the moderate-income census tracts are located a substantial distance away, it is difficult for the bank to penetrate these markets. In addition both moderate-income census tracts contain a separate town with its own banks and financial institutions that specialize in agricultural lending. Despite this context, the geographic distribution of the bank’s small farm loans reflects poor dispersion throughout the assessment area.

As with the previous loan category, the bank’s geographic distribution of small business loans was also reviewed. The following table displays bank performance, Dun & Bradstreet estimates of business institutions in each geography income category, and aggregate data.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2017 through December 31, 2020						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Small Business Loans	0 0.0%	1 2.4%	40 97.6%	0 0.0%	0 0.0%	41 100%
Business Institutions	0.0%	41.5%	58.5%	0.0%	0.0%	100%
2017 Small Business Aggregate	0.0%	32.7%	65.3%	0.0%	0.0%	100%
2018 Small Business Aggregate	0.0%	23.4%	74.9%	0.0%	0.0%	100%
2019 Small Business Aggregate	0.0%	33.0%	65.5%	0.0%	0.0%	100%
2020 Small Business Aggregate	0.0%	27.9%	71.7%	0.0%	0.0%	100%

As depicted above, the bank’s level of lending in the moderate-income census tracts (2.4 percent) is below demographic data used for comparison (41.5 percent). CRA aggregate lending data is 32.7 percent, 23.4 percent, 33.0 percent, and 27.9 percent for 2017, 2018, 2019, and 2020, respectively. Furthermore, aggregate data from 2020 shows that only 69 small business loans (27.9 percent) were made in moderate-income census tracts, indicating small lending volume compared to the distressed middle-income census tracts surrounding the bank (71.7 percent). As previously stated, the bank has difficulty penetrating the moderate-income census tracts due to geographical position and competition. As such, the low-lending volume, combined with competition in moderate-income census tracts, leads to statistics that appear particularly low. Despite this context, the geographic distribution of the bank’s small business loans reflects poor dispersion throughout the assessment area.

Lastly, based on the loan activity available for review in both loan categories and previously mentioned geographic and competitive challenges, there was no evidence of conspicuous lending gaps throughout the bank’s assessment area, particularly in LMI areas.

Responses to Complaints

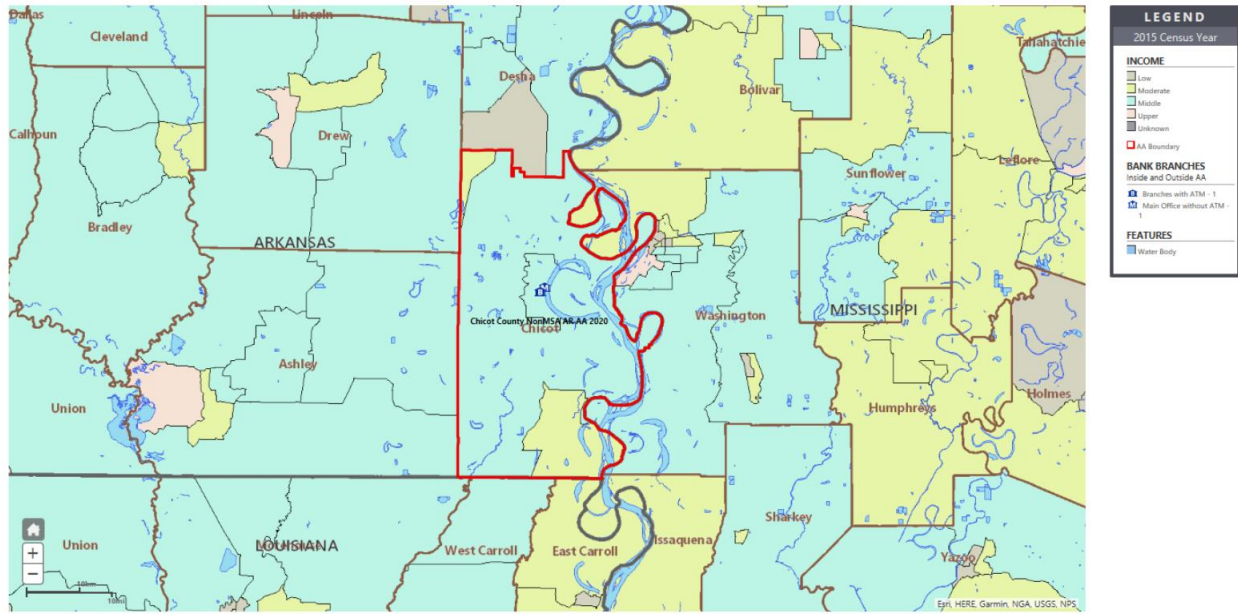
No CRA-related complaints were filed against the bank during this review period (September 26, 2016 through May 9, 2021).

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

ASSESSMENT AREA DETAIL

Bank of Lake Village - Lake Village, AR 2021
Chicot County NonMSA AR AA



LENDING PERFORMANCE TABLES

Small Farm Loans by Revenue and Loan Size								
Farm Revenue and Loan Size		2017						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 million or less	12	85.7%	67.1%	2041	72.7%	74.6%	97.7%
	Over \$1 million/ unknown	2	14.3%	32.9%	768	27.3%	25.4%	2.3%
	TOTAL	14	100.0%	100.0%	2809	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	6	42.9%	62.9%	164	5.8%	18.0%	
	\$100,001–\$250,000	2	14.3%	24.5%	402	14.3%	39.0%	
	\$250,001–\$500,000	6	42.9%	12.6%	2243	79.9%	43.0%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	14	100.0%	100.0%	2809	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	6	50.0%		164	8.0%		
	\$100,001–\$250,000	2	16.7%		402	19.7%		
	\$250,001–\$1 million	4	33.3%		1475	72.3%		
	Over \$1 million	0	0.0%		0	0.0%		
	TOTAL	12	100.0%		2041	100.0%		

Small Farm Loans by Revenue and Loan Size								
Farm Revenue and Loan Size		2018						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 million or less	7	87.5%	56.2%	699	62.1%	71.5%	98.0%
	Over \$1 million/ unknown	1	12.5%	43.8%	426	37.9%	28.5%	2.0%
	TOTAL	8	100.0%	100.0%	1125	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	6	75.0%	68.6%	213	18.9%	20.0%	
	\$100,001–\$250,000	0	0.0%	19.5%	0	0.0%	34.3%	
	\$250,001–\$500,000	2	25.0%	11.9%	912	81.1%	45.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	8	100.0%	100.0%	1125	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	6	85.7%		213	30.5%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 million	1	14.3%		486	69.5%		
	Over \$1 million	0	0.0%		0	0.0%		
	TOTAL	7	100.0%		699	100.0%		

Small Farm Loans by Revenue and Loan Size								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 million or less	7	63.6%	50.0%	767	55.3%	70.4%	97.0%
	Over \$1 million/ unknown	4	36.4%	50.0%	620	44.7%	29.6%	3.0%
	TOTAL	11	100.0%	100.0%	1387	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	8	72.7%	67.9%	344	24.8%	15.3%	
	\$100,001–\$250,000	1	9.1%	14.3%	131	9.4%	25.8%	
	\$250,001–\$500,000	2	18.2%	17.9%	912	65.8%	58.9%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	11	100.0%	100.0%	1387	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	5	71.4%		212	27.6%		
	\$100,001–\$250,000	1	14.3%		131	17.1%		
	\$250,001–\$1 million	1	14.3%		424	55.3%		
	Over \$1 million	0	0.0%		0	0.0%		
	TOTAL	7	100.0%		767	100.0%		

Small Farm Loans by Revenue and Loan Size								
Farm Revenue and Loan Size		2020						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 million or less	18	62.1%	39.5%	1862	74.4%	59.4%	96.9%
	Over \$1 million/ unknown	11	37.9%	60.5%	642	25.6%	40.6%	3.1%
	TOTAL	29	100.0%	100.0%	2504	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	22	75.9%	58.8%	725	29.0%	15.7%	
	\$100,001–\$250,000	4	13.8%	21.9%	697	27.8%	27.6%	
	\$250,001–\$500,000	3	10.3%	19.3%	1082	43.2%	56.7%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	29	100.0%	100.0%	2504	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	13	72.2%		345	18.5%		
	\$100,001–\$250,000	2	11.1%		435	23.4%		
	\$250,001–\$1 million	3	16.7%		1082	58.1%		
	Over \$1 million	0	0.0%		0	0.0%		
	TOTAL	18	100.0%		1862	100.0%		

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 million or less	3	100.0%	42.7%	\$161	100.0%	37.3%	86.7%
	Over \$1 million/ unknown	0	0.0%	57.3%	\$0	0.0%	62.7%	13.3%
	TOTAL	3	100.0%	100.0%	\$161	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	2	66.7%	91.5%	\$56	34.8%	42.3%	
	\$100,001–\$250,000	1	33.3%	7.0%	\$105	65.2%	36.1%	
	\$250,001–\$1 million	0	0.0%	1.5%	\$0	0.0%	21.6%	
	Over \$1 million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	3	100.0%	100.0%	\$161	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	2	66.7%		\$56	34.8%		
	\$100,001–\$250,000	1	33.3%		\$105	65.2%		
	\$250,001–\$1 million	0	0.0%		\$0	0.0%		
	Over \$1 million	0	0.0%		\$0	0.0%		
	TOTAL	3	100.0%		\$161	100.0%		

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 million or less	3	100.0%	37.4%	\$588	100.0%	15.5%	86.8%
	Over \$1 million/ unknown	0	0.0%	62.6%	\$0	0.0%	84.5%	13.2%
	TOTAL	3	100.0%	100.0%	\$588	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	1	33.3%	88.3%	\$14	2.4%	22.9%	
	\$100,001–\$250,000	1	33.3%	6.4%	\$224	38.1%	18.3%	
	\$250,001–\$1 million	1	33.3%	5.3%	\$350	59.5%	58.8%	
	Over \$1 million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	3	100.0%	100.0%	\$588	100.0%	100.0%	
Loan Size Revenue \$1 million or less	\$100,000 or less	1	33.3%		\$14	2.4%		
	\$100,001–\$250,000	1	33.3%		\$224	38.1%		
	\$250,001–\$1 million	1	33.3%		\$350	59.5%		
	Over \$1 million	0	0.0%		\$0	0.0%		
	TOTAL	3	100.0%		\$588	100.0%		

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 million or less	6	85.7%	28.9%	\$310	96.0%	19.1%	88.1%
	Over \$1 million/ unknown	1	14.3%	71.1%	\$13	4.0%	80.9%	11.9%
	TOTAL	7	100.0%	100.0%	\$323	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	6	85.7%	89.8%	\$123	38.1%	39.2%	
	\$100,001–\$250,000	1	14.3%	7.6%	\$200	61.9%	30.0%	
	\$250,001–\$1 million	0	0.0%	2.5%	\$0	0.0%	30.8%	
	Over \$1 million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	7	100.0%	100.0%	\$323	100.0%	100.0%	
Loan Size	Revenue \$1 million or less	\$100,000 or less	5	83.3%		\$110	35.5%	
		\$100,001–\$250,000	1	16.7%		\$200	64.5%	
		\$250,001–\$1 million	0	0.0%		\$0	0.0%	
		Over \$1 million	0	0.0%		\$0	0.0%	
		TOTAL	6	100.0%		\$310	100.0%	

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 million or less	26	92.9%	42.1%	\$1,147	63.3%	22.8%	88.5%
	Over \$1 million/ unknown	2	7.1%	57.9%	\$665	36.7%	77.2%	11.5%
	TOTAL	28	100.0%	100.0%	\$1,812	100.0%	100.0%	100.0%
Loan Size	\$100,000 or less	26	92.9%	87.4%	\$1,042	57.5%	39.6%	
	\$100,001–\$250,000	1	3.6%	8.5%	\$145	8.0%	26.0%	
	\$250,001–\$1 million	1	3.6%	4.0%	\$625	34.5%	34.4%	
	Over \$1 million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	28	100.0%	100.0%	\$1,812	100.0%	100.0%	
Loan Size	Revenue \$1 million or less	\$100,000 or less	25	96.2%		\$1,002	87.4%	
		\$100,001–\$250,000	1	3.8%		\$145	12.6%	
		\$250,001–\$1 million	0	0.0%		\$0	0.0%	
		Over \$1 million	0	0.0%		\$0	0.0%	
		TOTAL	26	100.0%		\$1,147	100.0%	

Appendix B (Continued)

Geographic Distribution of Small Farm Loans							
Tract Income Levels	2017						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	18.2%	\$0	0.0%	22.0%	14.9%
Middle	14	100.0%	81.8%	\$2,809	100.0%	78.0%	85.1%
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%
TOTAL	14	100.0%	100.0%	\$2,809	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans							
Tract Income Levels	2018						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	21.6%	\$0	0.0%	29.3%	20.8%
Middle	8	100.0%	78.4%	\$1,125	100.0%	70.7%	79.2%
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%
TOTAL	8	100.0%	100.0%	\$1,125	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans							
Tract Income Levels	2019						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	22.1%	\$0	0.0%	28.1%	22.0%
Middle	11	100.0%	77.9%	\$1,386	100.0%	71.9%	78.0%
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%
TOTAL	11	100.0%	100.0%	\$1,386	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans							
Tract Income Levels	2020						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	3.4%	20.2%	\$150	6.0%	24.3%	19.4%
Middle	28	96.6%	79.8%	\$2,354	94.0%	75.7%	80.6%
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%
TOTAL	29	100.0%	100.0%	\$2,504	100.0%	100.0%	100.0%

Appendix B (Continued)

Geographic Distribution of Small Business Loans							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	32.7%	\$0	0.0%	24.0%	37.8%
Middle	3	100.0%	65.3%	\$161	100.0%	75.7%	62.2%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	2.0%	\$0	0.0%	0.4%	0.0%
TOTAL	3	100.0%	100.0%	\$161	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	23.4%	\$0	0.0%	17.4%	39.3%
Middle	3	100.0%	74.9%	\$588	100.0%	82.4%	60.7%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	1.8%	\$0	0.0%	0.1%	0.0%
TOTAL	3	100.0%	100.0%	\$588	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	33.0%	\$0	0.0%	24.6%	39.8%
Middle	7	100.0%	65.5%	\$323	100.0%	75.1%	60.2%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	1.5%	\$0	0.0%	0.3%	0.0%
TOTAL	7	100.0%	100.0%	\$323	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	3.6%	27.9%	\$60	3.3%	22.5%	41.5%
Middle	27	96.4%	71.7%	\$1,751	96.7%	77.4%	58.5%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.1%	0.0%
TOTAL	28	100.0%	100.0%	\$1,811	100.0%	100.0%	100.0%

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/assessment area.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan 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 their physical size varies widely depending on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (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 low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed non-metropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who 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 applicants; the amount of loan requested; and the disposition of the application (e.g., 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 refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

Appendix C (continued)

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

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

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

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports 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 secured by either 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 non-mortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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