

# PUBLIC DISCLOSURE

April 11, 2022

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Heartland Bank  
RSSD #853113

430 N. Hamilton Road  
Whitehall, Ohio 43213

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, OH 44101-1387

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

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

**Heartland Bank (Heartland) is rated "Outstanding"**

**The Lending Test is rated: "Satisfactory"**

**The Community Development Test is rated: "Outstanding"**

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different incomes, including low- and moderate-income (LMI) levels and businesses of different sizes; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

### SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination procedures for Intermediate Small Institutions was utilized to evaluate Heartland's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Heartland's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Heartland's 15-quarter average NLTD ratio
- Heartland's CRA performance was evaluated based on HMDA-reportable lending data for the period of January 1, 2018, through June 30, 2021. Home purchase and refinance loans were evaluated separately each year in the Columbus AA and in 2020 and 2021 in the Cincinnati AA. Home improvement, multi-family, and other purpose closed-end loans were not considered separately in this evaluation due to limited volume. The evaluation period for consumer lending, home equity lines of credit, and small business lending is January 1, 2020, through December 31, 2021. Non-reportable consumer loans are comprised of credit cards and motor vehicle loans. Consumer and small business lending were only evaluated in the Columbus AA, the only AA with enough volume to

conduct a meaningful analysis. Home equity lines of credit were evaluated in the Columbus AA and in the Cincinnati AA in 2021, the only year with enough volume to conduct a meaningful analysis. Small farm loans were not considered in this evaluation.

- Community development activities were reviewed for the period between October 2, 2018, through April 11, 2022, as part of this evaluation. Community development activities are comprised of community development loans, qualified investments, and services.
- Heartland facilitated 1,079 PPP loans totaling \$129.4 million through the U.S. government’s Paycheck Protection Program (PPP) between April 6, 2020, through April 3, 2021, to help small businesses impacted by the COVID-19 emergency. Consistent with information provided in the May 27, 2020,<sup>1</sup> joint statement on CRA Consideration for Activities in Response to Coronavirus FAQs; Heartland opted to have its PPP loans of \$1.0 million or less originated in LMI tracts evaluated in the community development test instead of the retail lending test.
- 921 (85.4%) PPP loans, totaling \$111.7 million, were made in the bank’s AAs. Shown in the table below is the breakdown by AA.

PPP Loans by AA				
Area	#	# - %	\$	\$ - %
Columbus MSA	905	98.3%	\$110,900,000	99.3%
Cincinnati MSA	16	1.7%	\$754,000	0.7%
<b>Total</b>	<b>921</b>	<b>100.0%</b>	<b>\$111,654,000</b>	<b>100.0%</b>

- 209 (22.7%) PPP loans in the bank’s AA, totaling \$33.0 million, were made LMI tracts. Shown in the table below is the breakdown by AA. These loans will be considered in the community development test.

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<sup>1</sup> [May 27 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)

PPP Loans in LMI Tracts by AA				
Area	#	# - %	\$	\$ - %
Columbus MSA	206	98.6%	\$32,934,000	99.7%
Cincinnati MSA	3	1.4%	\$91,000	0.3%
<b>Total</b>	<b>209</b>	<b>100.0%</b>	<b>\$33,025,000</b>	<b>100.0%</b>

- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.

As a full-service interstate bank, Heartland is subject to Section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act.<sup>2</sup> The scope of this evaluation includes a full-scope evaluation of at least one AA in each state where Heartland has deposit-taking facilities. The following criteria was considered in this evaluation: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations. Since the previous evaluation, Heartland entered the Cincinnati-Kentucky market; as a result, Heartland has the following two CRA delineated AAs:

- Columbus OH MSA #18140 – Full-scope evaluation
  - Consists of the entireties of Franklin and Licking counties and portions of Delaware, Fairfield, and Pickaway counties (excluding Hocking, Madison, Morrow, Perry, and Union counties)
- Cincinnati OH-KY-IN MSA #17140 (Cincinnati) – Full-scope evaluation<sup>3</sup>
  - Consists of the entireties of Boone, Campbell, and Kenton counties in Kentucky (excluding Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Bracken, Gallatin, Grant, and Pendleton counties in Kentucky; and Dearborn, Franklin, Ohio, and Union counties in Indiana)

<sup>2</sup> Section 109 of the Act prohibits a bank from establishing or acquiring a branch or branches outside its home state primarily for the purpose of deposit production.

<sup>3</sup> While the Cincinnati OH-KY-IN MSA is a multi-state metropolitan area, lending and community development activity is being evaluated in the Commonwealth of Kentucky, because the bank has no branches or deposit-taking ATMs in either the MSA’s counties in Ohio or Indiana.

Based on the total loan volume by number and dollar amounts available, HMDA loans received the greatest weight followed by small business loans, consumer loans, and home equity lines of credit, unless otherwise stated. The Columbus AA was given the greatest weight in the evaluation, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount) followed by the Cincinnati AA. Geographic and borrower distribution received equal weight in this evaluation. If lending performance differed between years, more weight was given to 2020 performance, the year with the most loans by volume and dollar amount. A detailed description of each full-scope AA is presented in subsequent sections of this performance evaluation.

Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AAs, was used as a comparison in evaluating Heartland's lending performance in 2018, 2019, and 2020.<sup>4</sup>

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Four community contacts were conducted. Interviews were conducted with representatives from a community service organization, two affordable housing agencies, and realty association. These contacts operate inside Heartland's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish context for the communities in which Heartland operates and gather information on its performance. More detailed information obtained from these contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

## DESCRIPTION OF INSTITUTION

Heartland is a community bank headquartered in Whitehall, Ohio. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Heartland Bancorp.
- The bank has total assets of \$1.5 billion and total deposits of \$1.3 billion as of December 31, 2021.
- Victory Community Bank (Victory), a federally chartered savings bank, merged into Heartland on April 8, 2020. Victory was headquartered in Fort Mitchell, Kentucky. Victory was primarily a residential real estate lender, while Heartland was

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<sup>4</sup> As of the start of this evaluation, 2021 aggregate lender data was unavailable.

traditionally a commercial lender. Heartland has retained most of Victory’s mortgage lending business model.

- In addition to its main office with a full-service ATM, the bank has 15 branches with full-service ATMs, two branches with cash-only ATMs, and three branches without ATMs. The main office and 17 branches are in Ohio. The remaining three branches are in Kentucky; Heartland acquired these branches with the acquisition of Victory.
- Since the previous evaluation, Heartland closed a branch and opened a branch in the Columbus AA. The bank also closed a loan production office, outside its delineated footprint, in Miramar Beach, Florida in November 2021.
- Heartland is a full-service retail bank that offers traditional products, including deposit and checking accounts; and commercial, residential real estate, agricultural, and consumer loans. Heartland’s website, [heartland.bank](http://heartland.bank), and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances and what transactions have posted, pay bills, transfer funds between accounts, and make deposits. Heartland also offers customers online bill pay, debit cards, Visa credit cards, overdraft protection, and financial calculators.

As shown in the table below, the loan portfolio composition as of December 31, 2021. Heartland’s primary business focus is non-farm non-residential real estate.

<b>Composition of Loan Portfolio as of December 31, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	92,566	7.9
Farmland	28,556	2.4
1-4 Family Residential Real Estate	324,613	27.6
Multifamily Residential Real Estate	43,973	3.7
Non-Farm Non-Residential Real Estate	496,169	42.2
Agricultural	26,081	2.2
Commercial and Industrial	126,379	10.7
Consumer	10,356	0.9
Other	26,946	2.3
<b>Gross Loans</b>	<b>1,175,639</b>	<b>100.0</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

Heartland’s investment portfolio as of December 31, 2021, was \$210.3 million, which represented 14.4% of total assets. Interest-bearing bank balances accounted for 25.6% of total investments, while U.S. treasury and agency securities and municipal securities comprised 18.6% and 49.0% of investments, respectively.

There are no known legal, financial or other factors impending Heartland’s ability to help meet the credit needs of its communities.

Heartland was rated “Satisfactory” under the CRA at its previous evaluation conducted October 1, 2018. The lending was rated “Satisfactory” and community development test was rated “Outstanding.”

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

Heartland’s overall CRA performance is rated “Outstanding.” Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

**LENDING TEST**

Heartland’s performance relative to the lending test is rated “Satisfactory” based on Heartland’s loan-to-deposit ratio, AA concentration, and geographic and borrower distribution.

**Net Loan-to-Deposit Ratio (NLTD)**

A financial institution’s NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Heartland’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Loan-to-Deposit Ratios							
Heartland Bank, Whitehall, OH				Commonwealth Bank and Trust Company, Louisville, KY	Heritage Bank, Inc., Erlanger, KY	The Middlefield Banking Company, Middlefield, OH	CUSTOM PEER RATIO
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Peer 3 Ratio	Custom Peer Ratio
December 31, 2021	1,160,674	1,268,460	91.5	66.3	55.3	83.0	68.2
September 30, 2021	1,136,610	1,254,822	90.6	73.3	60.3	82.9	72.2
June 30, 2021	1,135,610	1,311,055	86.6	74.5	60.8	87.1	74.1
March 31, 2021	1,134,370	1,369,176	82.9	82.6	67.2	89.0	79.6
December 31, 2020	1,126,330	1,323,929	85.1	88.1	68.3	89.0	81.8
September 30, 2020	1,168,883	1,300,109	89.9	92.1	78.3	94.0	88.1
June 30, 2020	1,184,202	1,291,997	91.7	91.9	77.0	95.2	88.1
March 31, 2020	945,658	991,188	95.4	84.5	78.0	98.5	87.0
December 31, 2019	890,855	953,476	93.4	87.2	78.1	95.5	86.9
September 30, 2019	875,609	984,003	89.0	93.0	80.2	96.0	89.7
June 30, 2019	861,990	934,440	92.3	89.1	80.2	94.2	87.8
March 31, 2019	824,323	903,450	91.2	82.2	81.6	95.8	86.5
December 31, 2018	816,752	889,340	91.8	87.3	77.8	96.7	87.3
September 30, 2018	795,336	878,126	90.6	81.3	83.0	95.1	86.5
June 30, 2018	783,805	847,730	92.5	83.4	85.0	100.2	89.6
<b>Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation</b>			<b>90.3</b>	<b>83.8</b>	<b>74.1</b>	<b>92.8</b>	<b>83.6</b>



During this period, Heartland’s NLTD ratio averaged 90.3%, which was above the custom peer group average of 83.6%. According to bank management, there has been a large increase in deposits and loans (latest seven quarters), due to direct payments to consumers and small businesses from various economic stimulus programs in response to the COVID-19 pandemic and the acquisition of Victory. The increase in loans at the end of 2021 can also be attributed to the increasing demand for loans prior to the anticipated rise in interest rates (i.e., higher interest rates tend to dampen the demand for borrowing). Given these factors, Heartland’s NLTD ratio is considered more than reasonable given the bank’s size, financial condition, and AA credit needs.

**Assessment Area Concentration**

During the evaluation period, Heartland’s lending was analyzed to determine the volume of lending inside and outside Heartland’s AA. Of the bank’s total lending, 79.0% by volume and 72.0% by dollar amount were made inside the AA. Therefore, a majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Credit Card	150	88.2	565	84.4	20	11.8	104	15.6
Motor Vehicle	147	78.6	3,557	75.9	40	21.4	1,129	24.1
Other – Secured	11	68.8	206	63.2	5	31.3	120	36.8
Other – Unsecured	29	85.3	180	82.9	5	14.7	37	17.1
<b>Total Consumer related</b>	<b>337</b>	<b>82.8</b>	<b>4,508</b>	<b>76.4</b>	<b>70</b>	<b>17.2</b>	<b>1,390</b>	<b>23.6</b>
Home Improvement	21	95.5	2,765	99.0	1	4.5	28	1.0
Home Purchase - Conventional	514	70.8	148,806	65.1	212	29.2	79,700	34.9
Home Purchase – FHA	24	58.5	5,675	58.9	17	41.5	3,968	41.1
Home Purchase – VA	11	50.0	3,092	47.0	11	50.0	3,490	53.0
Multi-Family Housing	27	96.4	84,740	96.4	1	3.6	3,164	3.6
Other Purpose Closed-End	22	81.5	1,904	79.9	5	18.5	478	20.1
Refinancing	1,059	80.5	250,980	78.5	256	19.5	68,604	21.5
<b>Total HMDA related</b>	<b>1,678</b>	<b>76.9</b>	<b>497,963</b>	<b>75.7</b>	<b>503</b>	<b>23.1</b>	<b>159,432</b>	<b>24.3</b>
Home Equity	400	85.5	36,821	88.0	68	14.5	5,009	12.0
<b>Total Non-HMDA Residential</b>	<b>400</b>	<b>85.5</b>	<b>36,821</b>	<b>88.0</b>	<b>68</b>	<b>14.5</b>	<b>5,009</b>	<b>12.0</b>
Small Business	1,448	84.1	513,374	73.4	274	15.9	186,333	26.6
<b>Total Small Business related</b>	<b>1,448</b>	<b>84.1</b>	<b>513,374</b>	<b>73.4</b>	<b>274</b>	<b>15.9</b>	<b>186,333</b>	<b>26.6</b>
Small Farm	27	18.2	7,646	11.2	121	81.8	60,330	88.8
<b>Total Small Farm related</b>	<b>27</b>	<b>18.2</b>	<b>7,646</b>	<b>11.2</b>	<b>121</b>	<b>81.8</b>	<b>60,330</b>	<b>88.8</b>
<b>Total Loans</b>	<b>3,890</b>	<b>79.0</b>	<b>1,060,312</b>	<b>72.0</b>	<b>1,036</b>	<b>21.0</b>	<b>412,494</b>	<b>28.0</b>

Note: Percentages may not total 100.0 percent due to rounding.

## **Geographic Distribution of Loans**

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs with an overall moderate level of lending gaps. The geographic distribution in the Columbus AA is reasonable for HMDA, consumer, small business, and home equity lending with moderate lending gaps. The geographic distribution in the Cincinnati AA is reasonable for HMDA lending and poor for home equity lending with moderate lending gaps. Refer to the AA summaries for additional details.

Because Heartland opted to include its PPP loans in amounts of \$1.0 million or less that are in LMI tracts for consideration under the community development test, the geographic distribution largely skewed towards the middle- and upper-income tracts, this will be considered in this evaluation.

## **Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income (including LMI) levels, and businesses of different sizes; however, small business distribution did not receive much weight since gross annual revenue information was not available for a large percentage of these loans. The borrower distribution among individuals of different income levels is reasonable in the Columbus AA for HMDA, consumer, and home equity lending; and the penetration among businesses of different sizes is reasonable. The borrower distribution among individuals of different income levels in the Cincinnati AA is reasonable for HMDA lending and poor for home equity lending. Refer to the AA summaries for additional details.

PPP loans are considered responsive to the needs of the community during the pandemic. However, banks were not required to collect revenue data for PPP loans, since the intent of the PPP is to assist small businesses; therefore, these unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency will be considered in this evaluation. As a result, the borrower distribution performance to businesses of different sizes will not receive much weight, since gross annual revenue information was not available for a large percentage of the bank's small business loans.

Heartland offers a special mortgage loan program, Heartland Hometown, designed for borrowers that do not qualify for traditional mortgage programs. This product was released in 2021. Heartland Hometown helps applicants purchasing a home in either a LMI census tract or LMI applicants (total household income below 80% area median income). To qualify a minimum credit score of 640 is required, and applicants need to take a homeownership class. No down payment or private mortgage insurance is required, the origination fee is waived, and gifts are allowed, if needed.

In response to the COVID-19 emergency, Heartland created the Heartland Helps program in early 2020. This program allowed consumer and commercial customers to defer loan payments and have some banking fees waived because of economic hardship. During the evaluation period, Heartland deferred commercial loan payments for 302 businesses and 174 consumer and mortgage loan customers. Approximately 9.0% of deferrals helped consumer customers in LMI census tracts. Heartland also waived overdraft, early withdrawal, and other fees for at least 25 customers, totaling \$1,975. These deferrals and fee waivers are considered responsive to serving the credit needs of borrowers and businesses impacted by the COVID-19 crisis.

Heartland re-branded the Heartland Helps program in 2021 to include consumer products with less stringent underwriting and qualifications criteria for personal lending such as personal installment loans and credit cards. These products help LMI individuals residing within the bank's footprint re-establish credit, improve cash flow, and/or provide financing for debt consolidation, automobile purchase/repair, and home improvements. To qualify a minimum credit score of 580 is required and applicants must be able to verify employment and income.

Heartland is designated as a Small Business Administration (SBA) preferred lender. Heartland helps small businesses understand SBA loan criteria and eligibility requirements. Heartland offers several types of SBA loans including: 7(a) loans, SBA Express, 504 loans, and working capital loans. During the evaluation period, Heartland originated 181 SBA loans totaling \$26.1 million during the evaluation period.

These products and flexible lending practices are responsive to credit needs of LMI individuals and geographies and help in serving AA credit needs.

### **Response to Complaints**

Neither Heartland nor this Reserve Bank has received any CRA-related complaints since the previous examination.

## COMMUNITY DEVELOPMENT TEST

Heartland’s performance relative to the community development test is rated “Outstanding” based on Heartland’s excellent responsiveness to community development needs by providing community development loans, qualified investments and donations, and community development services, considering Heartland’s capacity and opportunities in its AAs. Heartland’s community development performance is excellent in the Columbus AA and adequate in the Cincinnati AA.

While Heartland’s community development activities are concentrated in the Columbus AA, Franklin County has the greatest needs considering the higher levels of poverty and unemployment and the impact of the COVID-19 emergency on small businesses and LMI individuals. Despite the pandemic, Heartland was able to substantially increase its community development lending and donations by dollar amount and obtain new qualified investments since the previous evaluation. Heartland was able to invest in two certified Community Development Financial Institutions (CDFI) to address affordable housing needs in the Columbus and Cincinnati AAs. Community contacts consider the lack of affordable housing to be a significant issue across the AAs. Heartland was also able to leverage technology to continue providing community development services, including but not limited to financial literacy training, despite the pandemic.

### *Community Development Lending*

Heartland originated or renewed 238 community development loans totaling approximately \$63.9 million. The following table shows the total number of community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization/Stabilization	228	\$47,243,515
Affordable Housing	3	\$8,874,594
Community Services to LMI	7	\$7,730,698
<b>Total</b>	<b>238</b>	<b>\$63,848,807</b>

Most community development loans originated during this evaluation period were PPP loans made in response to the COVID-19 emergency to help local businesses remain open and retain their workforce. Between April 6, 2020, through April 3, 2021, Heartland originated 209 PPP loans totaling \$33.0 million that benefited area businesses located in LMI tracts across the AA. PPP

loans represent 88.0% of Heartland's total community development lending by volume and 52.0% by dollar amount. The remaining community development loans originated or renewed during the evaluation period helped to revitalize/stabilize LMI areas, support affordable housing, or provide community organizations with needed funding to continue providing services targeted toward LMI individuals and families.

The largest concentration of community development loans by dollar amount benefited the Columbus AA, accounting for nearly 97.0% of bank-wide community development lending. The remaining 3.0% of community development lending benefited the Cincinnati AA.

### *Community Development Investments*

Heartland has \$20.7 million in total qualified community development investments and donations during this evaluation period, with 90.3% by dollar amount benefiting the Columbus AA and the remaining 9.7% benefiting the Cincinnati AA.

Heartland obtained nine new investments worth approximately \$17.4 million, representing 84.2% of total qualified investments, including making legally binding commitments of \$2.0 million to a Community Development Financial Institution (CDFI) dedicated to addressing affordable housing needs in greater Columbus and another \$2.0 million to a CDFI in greater Cincinnati. Heartland also holds four outstanding investments with a current book value of approximately \$3.3 million, representing 15.8% of total investments. The majority of Heartland's qualified investments were in mortgage-backed securities and a CRA loan pool which help address affordable housing, and municipal school bonds providing needed capital to schools serving majority LMI student bodies.

Heartland has a community foundation, Heartland Bank Community Foundation, that makes contributions to nonprofit organizations to fund widespread community impact programs and/or projects. The community foundation's primary focus of giving centers around early childhood development and family strengthening and enrichment; however, consideration is given to other areas of impact as funds allow. During the evaluation period, nearly 65.0% of Heartland's qualified donations were made through the community foundation.

Heartland made 40 small dollar donations totaling \$72,205 to 30 organizations during this evaluation period. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Qualified Donation	#	\$
Community Services to LMI	38	\$71,405
Affordable Housing	2	\$800
<b>Total</b>	<b>40</b>	<b>\$72,205</b>

Most of the contributions supported organizations that provide a multitude of community services targeted to LMI people. The largest concentration of qualified donations by dollar amount was in the broader statewide area of Ohio and the Columbus AA, accounting for 96.6% of total donations. The remaining 3.4% of qualified donations benefited the Cincinnati AA.

Also, consideration was given a small dollar donation (\$500) made through the community foundation to a non-profit that provides foster care services to LMI children in a county in Ohio outside Heartland’s delineated footprint, since the bank has been responsive to community development needs in its AAs.

*Community Development Services*

Bank officers and employees worked with a variety of community service organizations, throughout its AAs during the evaluation period. The bank’s leadership and employees served as board and committee members and provided their financial and technical expertise to at least 37 organizations with a community development purpose.

Most the bank’s community development services are provided through financial literacy training; at least 34 employees provided 173 hours of financial literacy training to LMI individuals or upcoming entrepreneurs during the evaluation period. The following tables shows the total number of services, organizations, and employees by purpose.

Purpose of CD Service	# of Services	# of Hours	# of Orgs	# of Employees
Services to LMI Individuals	78	163	31	33
Economic Development	11	10	3	7
Affordable Housing	3	0	3	3
<b>Total</b>	<b>92</b>	<b>173</b>	<b>37</b>	<b>43</b>

Heartland also partnered with a third-party to provide a customized financial education program series to organizations in Central Ohio that serve LMI individuals. Heartland sponsored 10 workshops and presentations providing at least 22 hours of financial literacy training through this partnership.

The largest concentration of community development services benefited the Columbus AA, accounting for 98.0% of total services. The remaining 2.0% of community development services were in the Cincinnati AA. Community development services included the following:

**Board and Committee Membership** – Heartland’s officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as board/committee members.

**Financial Education** – Heartland created a program, Money Matters, to provide financial education programs in partnership with local community service organizations, faith-based organizations, local schools, and youth-focused organizations. Topics include ways to save money each month, planning for a strong financial future, preparing for a mortgage, teaching your kids about money, budgeting and getting out of debt, and understanding your credit score. This program is offered as either a multi-day summit or customized by individual topics. Because of COVID-19 and social distancing guidelines, Heartland had difficulty with planning and hosting in-person financial education events, in response Heartland provided virtual courses through its digital meeting platform. For example, Heartland was able to provide the YMCA with virtual presentations on personal savings and money saving tips, and budgeting program. In addition to the Money Matters presentations, Heartland also developed several youth-specific programs. Heartland customized program content at the request of the Girl Scouts in Central Ohio and provided virtual presentations on savings and budgeting and tracking spending and donations. Heartland also customized its Money Matters curriculum to provide financial literacy training on individual topics over multiple weeks at an outdoor market that primarily serves an LMI community.

#### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

In the most recent consumer examination conducted by the Federal Reserve Bank of Cleveland, a violation of Section (5) of the Federal Trade Commission Act involving unfair and deceptive practices was identified. Heartland has policies, procedures, training programs, internal assessments, and other practices in place to help prevent discriminatory or other illegal credit practices. Furthermore, management has committed to take prompt corrective action to address the violation. As a result, the violation did not result in an adjustment to the CRA rating.

## STATE OF OHIO

**CRA RATING for State of Ohio:<sup>5</sup> “Outstanding”**

**The Lending Test is rated: “Satisfactory”**

**The Community Development Test is rated: “Outstanding”**

The major factors and criteria contributing to this rating include:

- The geographic distribution of loans reflects a reasonable dispersion throughout the AA;
- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI) and businesses of different sizes; and,
- The bank’s community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA;

## SCOPE OF EXAMINATION

A full-scope review was conducted for the Columbus AA, which represents Heartland’s entire banking operations for Ohio. The period, products evaluated, and weights assigned for this AA are consistent with the scope discussed in the Scope of Examination section of this report.

Lending in Ohio accounted for 83.4% of Heartland’s total lending activity, and deposits accounted for 89.1% of Heartland’s total deposits. As of June 30, 2021, Heartland ranked 29<sup>th</sup> among 207 insured institutions and had a deposit market share of 0.2% in Ohio.

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<sup>5</sup>For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.



**METROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN COLUMBUS OH MSA #18140**

The Columbus AA consists of the entireties of Franklin and Licking counties and the contiguous portions of Delaware, Fairfield, and Pickaway counties. The AA excludes Hocking, Madison, Morrow, Perry, and Union counties in the MSA. See Appendix B for an AA map and Appendix C for additional demographic data.

- The AA remains unchanged since the previous evaluation.
- The AA was comprised of the following income-tract designations during the evaluation period.

<b>Census Tract Designations</b>	
<b>Assessment Area: Columbus, OH MSA #18140</b>	
<b>Income Tract Level</b>	<b>2018-2021</b>
Low	63
Moderate	85
Middle	89
Upper	101
Unknown	4
<b>Total</b>	<b>342</b>

- As of June 30, 2021, the Federal Deposit Insurance Corporations’ (FDIC) Deposit Market Share Report, ranks Heartland ninth among 50 institutions operating in the AA with a 1.2% market share. This is substantially lower than the two largest market holders, The Huntington National Bank and JPMorgan Chase N.A., which hold a 34.7% and 26.0% of the market, respectively. Heartland competes with 47 financial institutions for the remaining 39.3% market share. By comparison, Heartland ranks ninth among 57 institutions operating in the Columbus MSA with a 1.2% market share. Columbus is a largely fragmented and competitive market within the most populous portion of Ohio.
- The 2020 HMDA Peer Market data indicates that Heartland ranks 44<sup>th</sup> out of 573 HMDA reporters in the MSA and originated 500 loans. By comparison, first ranked The Huntington National Bank and second ranked Union Savings Bank originated 7,690 and 4,589 loans, respectively.

- Heartland operates its main office with a full-service ATM, 13 branches with full-service ATMs, one branch with a cash-only ATM, one limited-service branch with a cash-only ATM, and two limited-service branches with no ATMs in this AA.
- The main office, 11 branches, and three limited-service branches are in Franklin County. The main office in Whitehall and a branch in Columbus are in low-income tracts. A limited-service branch in Columbus is in a moderate-income tract. Three branches in Gahanna, Grove City, and Reynoldsburg have a limited-service branch with a cash-only ATM in Dublin and are in middle-income tracts. A branch, a branch with a cash-only ATM, and a limited-service branch in Columbus; and five branches in Dublin, Gahanna, Hilliard, Upper Arlington, and Westerville are in upper-income tracts.
- The bank also has a branch in Fairfield County in Pickerington (upper-income tract) and two branches in Licking County in Johnstown (middle-income tract) and Newark (moderate-income tract).
- The main office and 13 branches with full-service ATMs offer extended hours of service and a drive-thru. Eleven (85.0%) of these branches (including the two branches in LMI tracts) also offer weekend hours of service.
- The three limited-service branches serve senior assisted living communities in moderate-, middle-, and upper-income tracts. The residents have access to all Heartland's products and services during customized hours of operation.
- Since the previous evaluation, the bank closed a branch with a full-service ATM in Croton (Licking County) in an upper-income tract in March 2021 and opened a branch with a full-service ATM in Upper Arlington (Franklin County) in an upper-income tract in April 2019.

### **Community Contact**

Interviews were conducted with three community contacts to provide additional information regarding the AA. The first contact was with a representative from a realty association. The contact stated that the Columbus housing market is robust. Columbus is in the top 20% nationally for real estate appreciation. In 2021 there was an inventory shortage and strong buyer demand which continues to drive up home prices in the Columbus area. The median list price of homes in Columbus is \$224,900, trending up nearly 10% year-over-year. Homes typically sell for 100% of the asking price, even though prices rose by 16% over the last 12 months; because the housing demand is exceeding the supply, giving sellers an advantage over buyers. In 2022, housing prices in the Columbus market are expected to increase twice as quickly as national rates. There are nearly 40 colleges within 50 miles of Columbus (including The Ohio State University). The large number of colleges in the area means there is a large rental market. The average rent for a

1-bedroom is about \$902 and \$1,100 for a 2-bedroom in Columbus. The contact stated that Columbus' economy is healthy enough to retain and attract many young people to come here to work and live. According to the contact, there are at least 10 major redevelopment projects planned around Columbus. These projects will only increase the demand for homes in the area. The contact stated there are opportunities for banks to provide homeownership assistance programs and first-time homebuyer education. There are also opportunities for banks to invest in the area's redevelopment projects.

The second contact was with a representative from an affordable housing agency. While there is available housing, the price for newly constructed homes is rising; potentially making these homes out of reach for many first-time homebuyers in Central Ohio, particularly LMI homebuyers. Also, affordable housing options (via the Section 8 Housing Choice Voucher Rental Assistance Program) are concentrated in certain areas, thereby limiting location options. The contact indicated that affordable housing is a critical need in Central Ohio, and there is ample opportunity for local financial institutions to provide financial education for potential first-time homebuyers and offer solutions to address the lack of affordable housing.

The third contact was with a representative from an economic development agency. According to the contact, economic conditions in Central Ohio are very good; particularly in Delaware County, which is one of the fastest-growing counties in the country. Many businesses are migrating to surrounding counties around Columbus to reduce costs and tax burdens, while still being near the state capital and state government. The contact indicated there is a need for access to capital through microloans, commercial lending, and investment capital for businesses, (especially small businesses), as most entrepreneurs cannot start new businesses or expand existing companies without access to capital. The contact stated while Central Ohio is experiencing significant population growth, it is also experiencing housing affordability challenges, primarily because the housing production has not kept pace with the area's growth. The contact indicated that more families may be at risk for having to choose between paying rent or other vital expenses due to escalating housing costs. According to the contact, even with the area's population growth, Central Ohio is experiencing a shortage of skilled workers needed to keep pace with industry demands, and there is a critical need across public, private, and government sectors for education and training systems to address workforce development and the evolving demands of labor markets.

Population Characteristics

Population change			
Assessment Area: Columbus, OH MSA #18140			
Area	2015 Population	2020 Population	Percent Change
<b>Assessment Area</b>	<b>1,775,514</b>	<b>1,934,645</b>	<b>9.0%</b>
Delaware County	185,433	213,554	15.2%
Fairfield County	149,112	159,709	7.1%
Franklin County	1,215,761	1,324,624	9.0%
Licking County	168,693	178,100	5.6%
Pickaway County	56,515	58,658	3.8%
<b>Columbus, OH MSA</b>	<b>2,028,506</b>	<b>2,138,946</b>	<b>5.4%</b>
<b>Ohio</b>	<b>11,575,977</b>	<b>11,693,217</b>	<b>1.0%</b>

- Between 2015 and 2020, the AA experienced a net gain in population of 9.0%, while the MSA experienced a net gain of 5.4% and Ohio a meager net gain of 1.0%. According to U.S. Census data, since 2010 the MSA’s population is growing at a rate of 1.2% annually.
- Delaware County experienced a substantial net gain in population of 15.2% during this period. According to U.S. Census data, Delaware and Franklin counties, respectively are the fastest-growing counties in Ohio.
- The Columbus MSA population is projected to grow to about 2.2 million by 2040. The growth rate of the Columbus MSA is projected to continue to exceed Ohio’s growth rate. If not for the Columbus MSA, Ohio would lose population over the next 20 years.
- 76.0% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 11.1% of the population in the AA was age 65 and over, compared to 15.1% in Ohio, which is 4.0 percentage points lower than the median age in Ohio. This AA has a median resident age of 32.3 years, which indicates that much of the population is of working- and consumer-age and able to contribute to the area’s economic growth.
- 12.1% of the AA’s population resides in the low-income tract compared to 22.9% that reside in moderate-income tracts.
- Columbus (Franklin County) is the most populous city in the AA with a population of 905,748 according to 2020 U.S. Census data, representing a 15.1% increase since 2010. Columbus is the capital city of Ohio and remains the largest city in the state and the 14<sup>th</sup> largest city in the United States.

- By contrast, Newark is the most populous city in Licking County with a population of 49,934, representing a 5.0% increase since 2010. Delaware is the most populous city in Delaware County with a population of 41,302, representing a 18.8% increase since 2010. Lancaster is the most populous city in Fairfield County with a population of 40,552, representing a 4.6% increase since 2020. Circleville is the most populous city in Pickaway County with a population of 13,927, representing a 4.6% increase since 2010.

### Income Characteristics

Borrower Income Levels														
Assessment Area: Columbus, OH MSA #18140														
FFIEC Estimated Median			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2018	\$76,000		0	-	\$37,999	\$38,000	-	\$60,799	\$60,800	-	\$91,199	\$91,200	-	& above
2019	\$77,900	2.5%	0	-	\$38,949	\$38,950	-	\$62,319	\$62,320	-	\$93,479	\$93,480	-	& above
2020	\$84,600	8.6%	0	-	\$42,299	\$42,300	-	\$67,679	\$67,680	-	\$101,519	\$101,520	-	& above
2021	\$83,900	-0.8%	0	-	\$41,949	\$41,950	-	\$67,119	\$67,120	-	\$100,679	\$100,680	-	& above

Source: 2018-2021 FFIEC Census Data

- The median family income (MFI) across the MSA increased in 2018 and 2019 but decreased slightly in 2021. Overall, MFI across the MSA increased nearly 10.9% during this period and surpassed pre-COVID levels (2015 MFI was \$70,454 across the MSA).
- According to 2015 U.S. Census data, the MFI (\$69,961) in the AA was 11.4% greater than the MFI (\$62,817) in Ohio.
- According to 2018 U.S. Census data estimates, Delaware County had the highest MFI in Ohio at \$122,435; followed by Fairfield County at \$79,724 (9<sup>th</sup>), Licking County at \$77,732 (12<sup>th</sup>), Pickaway County at \$73,894 (19<sup>th</sup>), and Franklin County at \$73,207 (20<sup>th</sup>).
- MFI across the MSA increased 3.3% between 2020 to 2021 and has not rebounded to pre-COVID levels (2015 MFI was \$69,949 across the MSA).

Poverty Rates			
Assessment Area: Columbus, OH MSA #18140			
Area	2018	2019	2020
Delaware County	4.1	4.8	3.7
Fairfield County	9.3	8.1	7.5
Franklin County	15.5	13.5	15.4
Licking County	9.1	9.3	9.8
Pickaway County	12.1	11.5	12.5
<b>Ohio</b>	<b>13.8</b>	<b>12.8</b>	<b>12.6</b>
<b>United States</b>	<b>13.1</b>	<b>12.3</b>	<b>11.9</b>
<i>Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program</i>			

- Poverty rates across the AA were lower than the poverty rates in Ohio and the nation in 2018 through 2020, except in Franklin County. Poverty typically rises with population increase, which is the case in Franklin County.
- According to 2015 U.S. Census data, of the 364,976 families in the AA, 39.5% are designated as LMI with 11.2% living below the poverty level and are slightly lower than Ohio's.
- According to 2015 U.S. Census data, of the 596,776 households in the AA, 14.0% are below the poverty level and 2.9% receive public assistance.
- According to Federal Reserve Economic Data (FRED) maintained by the Federal Reserve Bank of St. Louis<sup>6</sup> in 2019; in Franklin County 11.7% of the population received Supplemental Nutrition Assistance Program (SNAP) benefits, 10.3% in Pickaway County, 9.4% in Licking County, 8.9% in Fairfield County, and 2.4% in Delaware County. SNAP helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

<sup>6</sup> [Federal Reserve Economic Data \(FRED\)](#)

## Housing Characteristics

Housing Cost Change										
Assessment Area: Columbus, OH MSA #18140										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Delaware County	\$252,700	\$256,800	1.6	\$308,800	20.2	\$781	\$953	22.0	\$1,069	12.2
Fairfield County	\$167,200	\$163,100	-2.5	\$185,300	13.6	\$733	\$799	9.0	\$867	8.5
Franklin County	\$155,300	\$150,600	-3.0	\$175,100	16.3	\$764	\$845	10.6	\$974	15.3
Licking County	\$152,600	\$152,200	-0.3	\$170,200	11.8	\$682	\$760	11.4	\$852	12.1
Pickaway County	\$144,800	\$147,700	2.0	\$163,300	10.6	\$702	\$747	6.4	\$812	8.7
<b>Ohio</b>	<b>\$136,400</b>	<b>\$129,900</b>	<b>-4.8</b>	<b>\$145,700</b>	<b>12.2</b>	<b>\$678</b>	<b>\$730</b>	<b>7.7</b>	<b>\$808</b>	<b>10.7</b>
<i>Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey 2015-2019 U.S. Census Bureau: American Community Survey</i>										

- Median housing values significantly increased from 2015 to 2019, particularly in Delaware County. Median housing values in Delaware, Fairfield, Franklin, Licking, and Pickaway counties increased between 10.6% to 20.2%, compared to median housing values across Ohio that increased by 12.2%. Median home prices increased more than MFI during the evaluation period, making housing less affordable across the AA during this period.
- Median gross rents across the AA increased from 2015 to 2019, particularly in Franklin County. Median gross rents in Delaware, Fairfield, Franklin, Licking, and Pickaway counties increased between 8.5% to 15.3%, compared to median gross rents across Ohio that increased by 10.7%. The rise in median gross rents indicates the need for more affordable housing, and 44.3% of all renters in the AA have rental costs that are at least 30% of their income.
- There are 660,745 housing units in the AA, of which 52.6% are owner occupied, 37.8% are rental, and 9.7% are vacant. In low-income tracts, 23.3% housing units are owner-occupied, 54.4% are rental, and 22.3% are vacant. In moderate-income tracts, 41.6% are owner-occupied, 47.1% are rental, and 11.3% are vacant. In low-income tracts, 76.7% of housing units are either rental or vacant. In moderate-income tracts, 58.4% of housing units are either rental or vacant.

- There are 17 colleges and universities in the Columbus MSA; including The Ohio State University, the third largest university in the country (61,369 student enrollment). This increased need for temporary student housing contributes to the high percentage of rental units in Franklin County at 41.4%. Rentals range from 17.7% to 27.3% in the remaining counties in the AA.
- With 47.4% of housing units being either rental or vacant across the AA, there may be limited opportunities to originate HMDA loans, particularly in LMI tracts.
- The median age of housing stock in the AA is 44 years old, and 15.7% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and for refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>7</sup>

Housing Cost Burden						
Assessment Area: Columbus, OH MSA #18140						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
<b>Assessment Area</b>	<b>68%</b>	<b>39%</b>	<b>19%</b>	<b>78%</b>	<b>36%</b>	<b>41%</b>
Delaware County	80%	47%	18%	81%	53%	36%
Fairfield County	62%	36%	18%	80%	27%	43%
Franklin County	70%	42%	19%	79%	37%	41%
Licking County	58%	29%	17%	73%	25%	42%
Pickaway County	59%	29%	17%	67%	13%	33%
<b>Columbus, OH MSA</b>	<b>68%</b>	<b>38%</b>	<b>19%</b>	<b>77%</b>	<b>35%</b>	<b>41%</b>
<b>Ohio</b>	<b>63%</b>	<b>32%</b>	<b>18%</b>	<b>73%</b>	<b>31%</b>	<b>41%</b>

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy*

- Within the AA, 68.0% of low-income homeowners are cost-burdened, defined as having housing costs on average that are 30.0% or more of household income. In contrast, only 39.0% of moderate-income homeowners are cost-burdened.
- This trend applies across Ohio, where low-income homeowners are cost-burdened on average more than moderate-income homeowners.
- Within the AA, 78.0% of low-income renters are cost-burdened, which is greater than low-income renters across Ohio (73.0%). Moderate-income renters in the AA are also more cost-burdened at 36.0% than moderate-income renters across Ohio (31.0%).

<sup>7</sup> [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](https://www.ohio.gov/getmedia/00000000-0000-0000-0000-000000000000)



- The data shows that cost burden disproportionately affects low-income homeowners and renters.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

<b>Building Permits by Number of Units</b>					
<b>Assessment Area: Columbus, OH MSA #18140</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>% Change between 2018 and 2019</b>	<b>2020</b>	<b>% Change between 2019 and 2020</b>
Delaware County	1,629	1,927	18.3	1,902	-1.3
Fairfield County	682	551	-19.2	744	35.0
Franklin County	5,575	4,335	-22.2	8,108	87.0
Licking County	261	262	0.4	292	11.5
Pickaway County	175	157	-10.3	157	0.0
<b>Columbus MSA</b>	<b>9,440</b>	<b>8,090</b>	<b>-14.3</b>	<b>12,358</b>	<b>52.8</b>
<b>Ohio</b>	<b>24,221</b>	<b>23,047</b>	<b>-4.8</b>	<b>29,686</b>	<b>28.8</b>
<b>United States</b>	<b>1,328,827</b>	<b>1,386,048</b>	<b>4.3</b>	<b>1,471,141</b>	<b>6.1</b>
<i>Source: U.S. Census Bureau Building Permits Survey</i>					

- Building permits are a leading indicator of future activity in the construction sector. As indicated in the table above, building permits in 2018, 2019, and 2020 underwent periods of expansion and contraction from one year to the next. When analyzing the trend of building permits between 2018 and 2020, the volume of permits in the MSA, particularly Franklin County, rebounded and surpassed the percentages in Ohio and the nation during this period.
- The overall increase in the number of permits could indicate an increased demand for home purchase loans, particularly in 2020.

## Labor, Employment and Economic Characteristics

- According to Ohio Office of Research:<sup>8</sup>
  - Land use in Delaware, Fairfield, Licking, and Pickaway counties is primarily rural with about 13.0% available for urban (i.e., residential, commercial, industrial, or recreational) development. By comparison, in Franklin County 63.0% of land is available for urban development.
  - The MSA is most impacted by the industries of state and local government, health care and social assistance, retail trade, accommodation and food services, administrative and waste services, and finance and insurance. The AA's median average weekly wage for the private sector is \$913, which indicates that employed persons could afford the area's highest median rent of \$1,069.
- However, a full-time worker earning Ohio's prevailing minimum wage of \$8.80/hour does not earn enough to afford the median rent. This worker can only afford \$458/month based on spending no more than 30% of their income on rent. According to 2015 Census data, less than 5.0% of renter-occupied housing units have rents below \$499/month.
- The Columbus MSA is home to 12 out of 24 Fortune 500 companies in Ohio, including but not limited to Big Lots, Nationwide Mutual Insurance, American Electric Power, and L Brands (clothing and apparel stores). Other major employers include the State of Ohio, The Ohio State University, and OhioHealth.
- According to The Ohio State University's Office of Innovation and Economic Development,<sup>9</sup> the university generates \$15.2 billion in combined economic impact annually for Ohio. One in every 57 jobs in Ohio is directly or indirectly supported or sustained by the university.
- In January 2022, Intel announced its decision to expand its chip manufacturing operations in Licking County. According to JobsOhio,<sup>10</sup> Intel's planned state-of-the-art manufacturing facility in Ohio will be their most hi-tech manufacturing campus to date. This is the largest economic development event in Ohio's history. It is a capital investment of \$20.0 billion and projected to create 3,000 new hi-tech jobs and 7,000 construction jobs over the course of the build. In addition to employee and construction jobs, tens of thousands of indirect and support jobs (e.g., contractors, suppliers, and consultants) are also expected to be created.
  - Community stakeholders in Licking and surrounding counties are currently discussing impacts to their communities from this investment, such as increased

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<sup>8</sup> [Ohio Office of Research – County Profiles](#)

<sup>9</sup> [OSU Office of Innovation and Economic Development](#)

<sup>10</sup> [JobsOhio - Intel](#)

economic development opportunities and potential strains on local infrastructure and the changing demand for housing.

Unemployment Rates						
Assessment Area: Columbus, OH MSA #18140						
Area	2016	2017	2018	2019	2020	2021
<b>Assessment Area</b>	4.2%	4.0%	3.8%	3.6%	7.1%	5.0%
Delaware County	3.6%	3.5%	3.4%	3.2%	5.3%	3.8%
Fairfield County	4.3%	4.3%	4.1%	3.8%	6.6%	4.6%
Franklin County	4.1%	4.1%	3.8%	3.6%	7.4%	5.4%
Licking County	4.4%	4.2%	4.0%	3.8%	6.5%	4.2%
Pickaway County	4.9%	4.7%	4.3%	4.0%	6.8%	4.6%
<b>Columbus, OH MSA</b>	4.2%	4.1%	3.9%	3.6%	7.0%	5.0%
<b>Ohio</b>	5.0%	5.0%	4.5%	4.2%	8.1%	5.3%

*Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics*

- Unemployment rates from 2016 through 2019 decreased each year across the AA but increased substantially in 2021 to 7.1% in response to the COVID-19 pandemic. While unemployment rates rebounded in 2021 to 5.0%, unemployment rates remain higher than pre-pandemic levels.
- Unemployment rates across the AA were lower than unemployment rates in Ohio during this period.
- The AA’s overall economy appears healthy with increases in MFI and decreases in unemployment and poverty rates.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN  
COLUMBUS OH MSA #18140**

**LENDING TEST**

The lending test performance in the Columbus AA is rated “Satisfactory.” Details of Heartland’s lending can be found in the tables in Appendix D.

**Geographic Distribution of Loans**

Heartland’s geographic distribution reflects a reasonable dispersion of loans in the Columbus AA. The geographic distribution of HMDA, consumer, and small business, and home equity lending is reasonable. Heartland has a moderate level of lending gaps in the Columbus AA.

Percentage of Lending Penetration				
Tract Income Level	2018	2019	2020	2021
Low	11.1%	27.0%	46.0%	58.7%
Moderate	23.5%	27.1%	56.5%	67.1%
Middle	41.6%	44.9%	92.1%	91.0%
Upper	44.6%	59.4%	95.0%	87.1%
Unknown	25.0%	25.0%	50.0%	25.0%
<b>Total</b>	<b>32.2%</b>	<b>41.2%</b>	<b>75.1%</b>	<b>77.2%</b>

Heartland penetrated slightly over half of its LMI tracts in 2020 and 2021; the improved penetration rate in these tracts can be attributed to the increase of small business loans through the PPP and mortgage loans due to the merger with Victory. Because the rate of owner-occupied housing is less than 25.0% in low- and 50.0% in moderate-income tracts, lending opportunities in these tracts, particularly low-income tracts, is likely to be more limited. It is noted that the lending penetration rate improved across the AA each year during the evaluation period in this highly competitive market.

***HMDA Lending***

During the evaluation period Heartland made 1,116 HMDA loans, totaling \$363.6 million. Heartland’s performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Heartland’s geographic distribution of refinance and home purchase loans is reasonable, especially considering limited opportunities to originate mortgage loans in LMI tracts which have a high percentage of rental and vacant units. See Appendix D for explicit

HMDA-reportable lending data.

### *Refinance Lending*

In 2021 Heartland originated 140 refinance loans totaling \$36.8 million. Heartland made six (4.3%) refinance loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 6.1%. Heartland made 10 (7.1%) refinance loans in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 18.9%.

In 2020 Heartland originated 365 refinance loans totaling \$88.5 million. Heartland made 10 (2.7%) refinance loans in low-income tracts, which was well below the percentage of owner-occupied units in these tracts at 6.1% but was comparable to the aggregate of all lenders at 2.7%. Heartland made 15 (4.1%) refinance loans in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 18.9% and the aggregate of all lenders at 10.9%.

In 2019 Heartland originated 120 refinance loans totaling \$26.1 million. Heartland made six (5.0%) refinance loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 6.1% but exceeded the aggregate of all lenders at 3.3%. Heartland made 18 (15.0%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.9% but exceeded the aggregate of all lenders at 13.0%.

In 2018 Heartland originated 75 refinance loans totaling \$12.8 million. Heartland made three (4.0%) refinance loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 6.1% and comparable to the aggregate of all lenders at 4.3%. Heartland made 14 (18.7%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.9% but exceeded the aggregate of all lenders at 16.4%.

Overall, Heartland's lending of refinance loans was below proxy and exceeded the aggregate of all lenders in LMI tracts. Therefore, Heartland's refinance lending in LMI tracts is reasonable.

### *Home Purchase Lending*

In 2021 Heartland originated 58 home purchase loans totaling \$21.8 million. Heartland made three (5.2%) home purchase loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 6.1%. Heartland made five (8.6%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.9%.

In 2020 Heartland originated 124 home purchase loans totaling \$37.1 million. Heartland made 11 (8.9%) home purchase loans in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 6.1% and the aggregate of all lenders at 7.7%. Heartland made 18 (14.5%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.9% and the aggregate of all lenders at 19.6%.

In 2019 Heartland originated 98 home purchase loans totaling \$33.2 million. Heartland made nine (9.2%) home purchase loans in low-income tracts, which exceeded the percentage of owner-occupied units in these tracts at 6.1% and the aggregate of all lenders at 6.9%. Heartland made nine (9.2%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 18.9% and the aggregate of all lenders at 19.3%.

In 2018 Heartland originated 67 home purchase loans totaling \$17.9 million. Heartland made one (1.5%) home purchase loan in low-income tracts, which was well below the percentage of owner-occupied units in these tracts at 6.1% and the aggregate of all lenders at 5.7%. Heartland made six (9.0%) home purchase loans in moderate-income tracts, which was well below the percentage of owner-occupied units in these tracts at 18.9% and the aggregate of all lenders at 18.9%.

Overall, Heartland's lending of home purchase loans primarily exceeded proxy and the aggregate of all lenders in low-income tracts and was below proxy and the aggregate of all lenders in moderate-income tracts. Therefore, Heartland's home purchase lending in low-income tracts is excellent and reasonable in moderate-income tracts, considering the very high percentage of rental and vacant units in these tracts.

### *Small Business Lending*

During the evaluation period Heartland originated 1,646 loans to businesses of different sizes (including PPP loans) totaling \$532.7 million. Heartland's performance was compared to the percentage of businesses by tract income (proxy).

In 2021 Heartland originated 516 loans to businesses of different sizes totaling \$259.2 million, including one PPP loan (\$10,000) in an upper-income tract. Heartland made 66 (12.8%) small business loans in the low-income tracts, which exceeded the percentage of businesses in those tracts at 10.1%. Heartland made 88 (17.1%) small business loans in moderate-income tracts, which was below the percentage of businesses in these tracts at 18.9%.

In 2020 Heartland originated 908 loans to businesses of different sizes totaling \$229.7 million, including 694 PPP loans (\$77.7 million) in middle-, upper-, and unknown-income tracts. Heartland made 18 (2.0%) small business loans in the low-income tracts, which was substantially below the percentage of businesses in those tracts at 9.9%. Heartland made 35 (3.9%) small business loans in moderate-income tracts, which was substantially below the percentage of businesses in these tracts at 18.5%.

Heartland opted to include its PPP loans in LMI tracts in amounts of \$1.0 million or less for consideration under the community development test; therefore, the geographic distribution largely skewed towards the middle- and upper-income tracts. If PPP loans were excluded from the analysis, the percentage of small business lending in LMI tracts was generally comparable to proxy, particularly in 2020 the year with the most volume. The geographic distribution of small business loans is reasonable.

### *Consumer Lending*

Heartland originated 324 consumer loans totaling \$4.3 million during the evaluation period. Heartland's performance was compared to the percentage of households by census tract (proxy). Overall Heartland's geographic distribution of credit card and motor vehicle lending is reasonable.

### *Credit Card Lending*

In 2021 Heartland originated 95 credit card loans totaling \$355,000. Heartland made 12 (12.6%) credit card loans in low-income tracts which exceeded the percentage of households at 11.9%. The bank made 18 (18.9%) credit card loans in moderate-income tracts which was below the percentage of households at 23.5%.

In 2020 Heartland originated 49 credit card loans totaling \$176,000. Heartland made two (4.1%) credit card loans in low-income tracts which was well below the percentage of households at 11.9%. The bank made six (12.2%) credit card loans in moderate-income tracts which was below the percentage of households at 23.5%.

Overall, the percentage of credit card lending in LMI tracts fell below proxy; therefore, Heartland's geographic distribution of credit card loans in LMI tracts is reasonable.

### *Motor Vehicle Lending*

In 2021 Heartland originated 116 motor vehicle loans totaling \$2.8 million. Heartland made five (4.3%) motor vehicle loans in low-income tracts which was well below the percentage of households at 11.9%. The bank made 20 (17.2%) motor vehicle loans in moderate-income tracts which was below the percentage of households at 23.5%.

In 2020 Heartland originated 25 motor vehicle loans totaling \$628,000. Heartland made one (4.0%) motor vehicle loan in low-income tracts which was well below the percentage of households at 11.9%. The bank made two (8.0%) motor vehicle loans in moderate-income tracts which was well below the percentage of households at 23.5%.

Overall, the percentage of motor vehicle lending fell well below proxy in low-income tracts and below proxy in moderate-income tracts; therefore, Heartland's geographic distribution of motor vehicle loans is poor in low-income tracts and reasonable in moderate-income tracts.

### *Home Equity Lending*

Heartland originated 319 home equity loans totaling \$30.7 million during the evaluation period. Heartland's performance was compared to the percentage of owner-occupied units (proxy).

In 2021 Heartland originated 204 home equity loans totaling \$21.4 million. Heartland made six (2.9%) home equity loans in the low-income tracts which was below the percentage of owner-occupied units at 6.1%. The bank made 16 (7.8%) home equity loans in moderate-income tracts which was well below the percentage of owner-occupied units at 18.9%.

In 2020 Heartland originated 115 home equity loans totaling \$9.3 million. Heartland made two (1.7%) home equity loans in low-income tracts which was well below the percentage of owner-occupied units at 6.1%. The bank made 10 (8.7%) home equity loans in moderate-income tracts which was below the percentage of owner-occupied units at 18.9%.

Overall, the percentage of home equity lending fell below proxy in LMI tracts; therefore, Heartland's geographic distribution of home equity loans in LMI tracts is reasonable.



## **Lending to Borrowers of Different Income Levels and Businesses of Different Sizes**

Heartland's lending penetration among borrowers of different income (including LMI) levels and businesses of different sizes is considered reasonable. The borrower distribution of HMDA, consumer, small business, and home equity lending is reasonable.

### *HMDA Lending*

During the evaluation period Heartland made 1,116 HMDA loans, totaling \$363.6 million. Heartland's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Heartland's borrower distribution of refinance and home purchase loans is reasonable, considering the increasing price of homes in the AA. See Appendix D for explicit HMDA-reportable lending data.

### *Refinance Lending*

In 2021 Heartland originated 140 refinance loans totaling \$36.8 million. Heartland also made nine (6.4%) refinance loans to borrowers with unknown-income designations. Heartland made eight (5.7%) refinance loans to low-income borrowers, which was well below the percentage of families at 22.7%. Heartland made 18 (12.9%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.8%.

In 2020 Heartland originated 365 refinance loans totaling \$88.5 million. Heartland also made 28 (7.7%) refinance loans to borrowers with unknown-income designations. Heartland made 14 (3.8%) refinance loans to low-income borrowers, which was well below the percentage of families at 22.7% and below the aggregate of all lenders at 5.3%. Heartland made 54 (14.8%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.8% and slightly exceeded the aggregate of all lenders at 14.8%.

In 2019 Heartland originated 120 refinance loans totaling \$26.1 million. Heartland also made 17 (14.2%) refinance loans to borrowers with unknown-income designations. Heartland made four (3.3%) refinance loans to low-income borrowers, which was well below the percentage of families at 22.7% and below the aggregate of all lenders at 6.0%. Heartland made 24 (20.0%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 16.8% and the aggregate of all lenders at 15.4%.

In 2018 Heartland originated 75 refinance loans totaling \$12.8 million. Heartland also made seven (9.3%) refinance loans to borrowers with unknown-income designations. Heartland made eight (10.7%) refinance loans to low-income borrowers, which was well below the percentage of families at 22.7% but exceeded the aggregate of all lenders at 9.1%. Heartland made 10 (13.3%) refinance loans to moderate-income borrowers, which was below the percentage of families at 16.8% and the aggregate of all lenders at 18.6%.

Overall, the percentage of refinance lending primarily fell below proxy and the aggregate of all lenders to LMI borrowers. Therefore, Heartland's borrower distribution of refinance loans to LMI borrowers is reasonable.

### *Home Purchase Lending*

In 2021 Heartland originated 58 home purchase loans totaling \$21.8 million. Heartland also made four (6.9%) home purchase loans to borrowers with unknown-income designations. Heartland made no home purchase loans to low-income borrowers, compared to the percentage of families at 22.7%. Heartland made seven (12.1%) home purchase loans to moderate-income borrowers, which was below the percentage of families at 16.8%.

In 2020 Heartland originated 124 home purchase loans totaling \$37.1 million. Heartland also made 15 (12.1%) home purchase loans to borrowers with unknown-income designations. Heartland made seven (5.6%) home purchase loans to low-income borrowers, which was well below the percentage of families at 22.7% and below the aggregate of all lenders at 11.0%. Heartland made 23 (18.5%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 16.8% and was below the aggregate of all lenders at 23.1%.

In 2019 Heartland originated 98 home purchase loans totaling \$33.2 million. Heartland also made 11 (11.2%) home purchase loans to borrowers with unknown-income designations. Heartland made six (6.1%) home purchase loans to low-income borrowers, which was well below the percentage of families at 22.7% and below the aggregate of all lenders at 7.9%. Heartland made six (6.1%) home purchase loans to moderate-income borrowers, which was well below the percentage of families at 16.8% and the aggregate of all lenders at 21.6%.

In 2018 Heartland originated 67 home purchase loans totaling \$17.9 million. Heartland also made six (9.0%) home purchase loans to borrowers with unknown-income designations. Heartland made two (3.0%) home purchase loans to low-income borrowers, which was well below the percentage of families at 22.7% and the aggregate of all lenders at 8.0%. Heartland made four

(6.0%) home purchase loans to moderate-income borrowers, which was well below the percentage of families at 16.8% and the aggregate of all lenders at 20.8%.

Overall, the percentage of home purchase lending fell below proxy and the aggregate of all lenders to LMI borrowers. Therefore, Heartland's borrower distribution of home purchase loans to LMI borrowers is reasonable.

### *Small Business Lending*

During the evaluation period Heartland originated 1,646 small business loans to businesses of different sizes (including PPP loans) totaling \$532.7 million. Heartland's performance was compared to the percentage of businesses (proxy).

Heartland originated 516 small business loans to businesses of different sizes totaling \$259.2 million in 2021, of which 34.5% were made to businesses with unknown gross annual revenues. Of the total small business loans, one (0.2%) loan was a PPP loan. Heartland made 158 (30.6%) loans totaling \$64.9 million to businesses with revenues of \$1.0 million or less compared to the percentage of small businesses in the AA at 91.6%.

While this is a poor distribution, Heartland made 221 (42.8%) loans in amounts of \$100,000 or less. Heartland's willingness to lend in smaller amounts exhibits adequate responsiveness to credit needs of small businesses in the AA.

Heartland originated 980 small business loans to businesses of different sizes totaling \$229.7 million, of which 82.0% were made to businesses with unknown gross annual revenues. Of the total small business loans, 694 (76.4%) loans were PPP loans. Heartland made 98 (10.8%) loans totaling \$45.4 million to businesses with revenues of \$1.0 million or less compared to the percentage of small businesses in the AA at 91.4%. If PPP loans were excluded from the analysis, the percentage of lending to small businesses was comparable to proxy. This is a reasonable distribution.

In addition, Heartland made 592 (65.2%) loans in amounts of \$100,000 or less. Heartland's willingness to lend in smaller amounts exhibits good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency.

However, this analysis is skewed by the large number of businesses with unknown gross annual revenues. Therefore, not much weight was given to small business borrower distribution.

### *Consumer Lending*

Heartland originated 324 consumer loans totaling \$4.3 million during the evaluation period. Heartland's performance was compared to the percentage of households by income (proxy). Overall Heartland's borrower distribution of credit card lending is excellent and reasonable for motor vehicle lending.

### *Credit Card Lending*

In 2021 Heartland originated 95 credit card loans totaling \$355,000. Heartland also made seven (7.4%) credit card loans to borrowers with unknown-income designations. Heartland made 34 (35.8%) credit card loans to low-income borrowers which exceeded the percentage of households at 24.6%. The bank made 23 (24.2%) credit card loans to moderate-income borrowers which exceeded the percentage of households at 16.4%.

In 2020 Heartland originated 49 credit card loans totaling \$176,000. Heartland also made 16 (32.7%) credit card loans to borrowers with unknown-income designations. Heartland made 16 (32.7%) credit card loans to low-income borrowers which exceeded the percentage of households at 24.6%. The bank made six (12.2%) credit card loans to moderate-income borrowers which was below the percentage of households at 16.4%.

Overall, the percentage of credit card lending to LMI borrowers exceeded proxy; therefore, Heartland's borrower distribution of credit card loans to LMI borrowers is excellent. Access to credit can be an important tool for wealth accumulation and for establishing the resources to withstand short-term economic hardships and may prevent LMI borrowers from using costly alternative financial services. In response to this need, Heartland recently started offering a new credit card program to help LMI borrowers re-establish credit and improve cash flow.

### *Motor Vehicle Lending*

In 2021 Heartland originated 116 motor vehicle loans totaling \$2.8 million. Heartland also made 41 (35.3%) motor vehicle loans to borrowers with unknown-income designations. Heartland made 14 (12.1%) motor vehicle loans to low-income borrowers which was well below the percentage of households at 24.6%. The bank made 14 (12.1%) motor vehicle loans to moderate-income borrowers which was below the percentage of households at 16.4%.

In 2020 Heartland originated 25 motor vehicle loans totaling \$628,000. Heartland also made five (20.0%) motor vehicle loans to borrowers with unknown-income designations. Heartland made two (8.0%) motor vehicle loans to low-income borrowers which was well below the percentage of households at 24.6%. The bank made six (24.0%) motor vehicle loans to moderate-income borrowers which exceeded the percentage of households at 16.4%.

Overall, the percentage of motor vehicle lending to LMI borrowers was generally comparable to proxy; therefore, Heartland's borrower distribution of motor vehicle loans to LMI borrowers is reasonable. Access to transportation is essential for improving upward social mobility for lower-income individuals and communities. In response to this need, Heartland offers a special loan program to help LMI borrowers have access to funds to purchase and repair their cars.

### *Home Equity Lending*

Heartland originated 319 home equity loans totaling \$30.7 million during the evaluation period. Heartland's performance was compared to the percentage of families (proxy).

In 2021 Heartland originated 204 home equity loans totaling \$21.4 million. Heartland also made 19 (9.3%) home equity loans to borrowers with unknown-income designations. Heartland made nine (4.4%) home equity loans to low-income borrowers which was substantially below the percentage of families at 22.7%. The bank made 25 (12.3%) home equity loans to moderate-income borrowers which was below the percentage of families at 16.8%.

In 2020 Heartland originated 115 home equity loans totaling \$9.3 million. Heartland also made 14 (12.2%) home equity loans to borrowers with unknown-income designations. Heartland made eight (7.0%) home equity loans to low-income borrowers which was well below the percentage of families at 22.7%. The bank made 10 (8.7%) home equity loans to moderate-income borrowers which was below the percentage of families at 16.8%.

Overall, the percentage of home equity lending to low-income borrowers was well below proxy and below proxy to moderate-income borrowers; therefore, Heartland's borrower distribution of home equity loans to low-income borrowers is poor and reasonable to moderate-income borrowers.

## COMMUNITY DEVELOPMENT TEST

The community development test performance in the Columbus AA is rated “Outstanding.”

Heartland community development performance demonstrates an excellent responsiveness to community development needs in this AA by providing community development loans, qualified investments and donations, and community development services, considering Heartland’s capacity and opportunities in this AA. While most of the bank’s community development activities are concentrated in the Columbus AA, Franklin County has the greatest needs considering the high levels of poverty and unemployment and the impact of the COVID-19 emergency on small businesses and LMI individuals. Despite the pandemic, Heartland was able to substantially increase its community development lending and donations by dollar amount and obtain new qualified investments since the previous evaluation. Heartland was also able to continue to provide community development services, particularly financial literacy training.

### *Community Development Loans*

Heartland originated or renewed 230 community development loans totaling approximately \$61.6 million, representing 96.5% of total community development lending. The following table shows the total number of community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization/Stabilization	220	\$45,033,900
Affordable Housing	3	\$8,874,594
Community Services to LMI	7	\$7,730,698
<b>Total</b>	<b>230</b>	<b>\$61,639,192</b>

Most community development loans originated during this evaluation period were PPP loans made in response to the COVID-19 emergency to help local businesses remain open and retain their workforce. Between April 6, 2020, through April 3, 2021, Heartland originated 206 PPP loans totaling \$32.9 million that benefited area businesses located in LMI tracts across the AA. PPP loans represent 89.6% of Heartland’s total community development lending by volume and 53.4% by dollar amount in this AA. The remaining community development loans originated or renewed during the evaluation period helped to revitalize/stabilize LMI areas, support affordable housing, or provide community organizations with needed funding to continue providing

services targeted toward LMI individuals and families.

Examples of notable community development loans include, but are not limited to, the following:

- A participation loan for \$6.5 million to a developer to construct a 130-unit apartment building for LMI seniors (100% units set aside for seniors whose incomes do not exceed 60-80% area median income). An affordable housing trust also provided funding for this project.
- A refinance loan for \$2.1 million to a developer to improve the energy efficiency of units in an 82-unit apartment building for seniors. This is a qualified LIHTC housing project.
- A debt consolidation loan for \$3.6 million to a non-profit to provide them with increased working capital to continue delivering a multitude of wraparound services to at-risk, LMI teens in Central Ohio.
- A \$255,000 loan to a developer to purchase and renovate a historic building in a low-income neighborhood (purchased from the Franklin County Land Bank) to make the building ADA<sup>11</sup> compliant for commercial business tenants.
- Two loans, totaling \$2.2 million, to a township that serves an LMI community to purchase a fire truck, three ambulances, and three police vehicles.
- A \$95,000 loan to a start-up business in a low-income area to purchase equipment and hire two permanent employees.
- Two working capital loans, totaling \$100,000, to a small business in a low-income area allowing them to expand and retain seven permanent employees and hire three new permanent employees.

Community contacts identified the need for access to capital for entrepreneurs and startups and the need to address the lack of affordable housing, which several of these community development loans supported.

### *Qualified Investments*

Heartland has \$18.7 million in total qualified community development investments and donations during this evaluation period, representing 90.3% by dollar amount of total investments and donations.

Heartland obtained nine new investments worth approximately \$13.7 million, representing 73.5% of qualified investments benefiting this AA. Heartland also holds four prior period investments

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<sup>11</sup> ADA – Americans with Disabilities Act

with a current book value worth approximately \$3.3 million, representing 26.5% of AA investments. Most of Heartland’s qualified investments were in mortgage-backed securities, a CRA loan pool, and municipal school bonds providing much needed capital to schools serving majority LMI student bodies. In response to affordable housing needs in the greater Columbus area, Heartland made a legally binding commitment of \$2.0 million to a certified CDFI that supports development of affordable housing in Franklin County. Heartland dispersed \$324,021 during the evaluation period. Investing in certified CDFIs is considered responsive to AA credit needs. The majority of Heartland’s qualified investments support affordable housing which was identified as a critical need by community contacts.

Heartland also made 37 small dollar donations totaling \$70,705 to 28 organizations (the majority by volume and dollar amount through the community foundation) during this evaluation period. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

<b>Purpose of Qualified Donation</b>	<b>#</b>	<b>\$</b>
Community Services to LMI	35	\$69,905
Affordable Housing	2	\$800
<b>Total</b>	<b>37</b>	<b>\$70,705</b>

Most of the contributions supported non-profits that provide a multitude of community services targeted to LMI people. Donations by dollar amount represent 97.9% of total donations made during the evaluation period.

Significant donations include Heartland paying above the market rate on 23 Interest on Lawyers Trust Accounts (IOLTAs) during the evaluation period. By voluntarily paying above the market rate, Heartland contributed an additional \$25,355 in interest income which benefits LMI individuals, families, and communities across Ohio. Ohio disperses these dollars to legal aid providers that provide civil legal aid without charge to LMI Ohioans.

Other notable small dollar donations that support community services include \$10,000 to a national organization that provides a multitude of wraparound services to LMI individuals and families, \$10,000 to a national organization that provides activities and wraparound services to at-risk LMI children, and \$4,500 to two non-profits that provide emergency relief for rent, utilities, and essential resources for LMI individuals, children, and families in Central Columbus.



*Community Development Services*

Bank officers and employees worked with a variety of community service organizations, throughout the Columbus AA during the evaluation period. Forty-one (41) employees provided financial literacy training and/or served as board and committee members to 35 organizations with a community development purpose. The 90 community development services benefiting the Columbus AA, account for 98.0% of total services provided during the evaluation period. The following tables shows the total number of services, organizations, and employees by purpose.

<b>Purpose of CD Service</b>	<b># of Services</b>	<b># of Hours*</b>	<b># of Orgs</b>	<b># of Employees</b>
Services to LMI Individuals	77	163	30	32
Economic Development	10	10	2	6
Affordable Housing	3	0	3	3
<b>Total</b>	<b>90</b>	<b>173</b>	<b>35</b>	<b>41</b>
<i>*Number of hours represents financial literacy training only</i>				

Most the bank’s community development services were provided through financial literacy training; 38 employees provided 173 hours of financial literacy training to LMI individuals or upcoming entrepreneurs, and three employees served on boards and committees during the evaluation period.

Heartland also partnered with a third-party to provide a customized financial education program series to organizations across the Columbus AA that serve LMI individuals. Heartland sponsored 10 workshops and presentations providing at least 22 additional hours of financial literacy training through this partnership.

Heartland’s financial literacy programs cover a variety of topics, including but not limited to first-time homebuyer education, which was identified as a critical need by community contacts.

## COMMONWEALTH OF KENTUCKY

**CRA RATING for Commonwealth of Kentucky:<sup>12</sup> "Satisfactory"**

**The Lending Test is rated: "Satisfactory"**

**The Community Development Test is rated: "Satisfactory"**

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including LMI);
- The geographic distribution of loans reflects a poor dispersion throughout the AA; and,
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

### SCOPE OF EXAMINATION

A full-scope review was conducted for the Cincinnati AA, which represents Heartland's entire banking operations for Kentucky. The period, products evaluated, and weights assigned for this AA are consistent with the scope discussed in the Scope of Examination section of this report.

Lending in Kentucky accounted for 16.6% of Heartland's total lending activity, and deposits accounted for 10.9% of Heartland's total deposits. As of June 30, 2021, Heartland ranked 103<sup>rd</sup> among 161 insured institutions and had a deposit market share of 0.1% in Kentucky.

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<sup>12</sup>For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

**METROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN  
CINCINNATI OH-KY-IN MSA #17140**

The Cincinnati AA consists of the entireties of Boone, Campbell, and Kenton counties in northern Kentucky. The AA excludes Brown, Butler, Clermont, Hamilton, and Warren counties in Ohio; Bracken, Gallatin, Grant, and Pendleton counties in Kentucky; and Dearborn, Franklin, Ohio, and Union counties in Indiana in the MSA. See Appendix B for an AA map and Appendix C for additional demographic data. Heartland entered this AA in April 2020 with the acquisition Victory.

- The AA was comprised of the following income-tract designations during the evaluation period.

<b>Census Tract Designations</b>	
<b>Assessment Area: Cincinnati OH-KY-IN MSA</b>	
<b>Income Tract Level</b>	<b>2020-2021</b>
Low	11
Moderate	14
Middle	43
Upper	19
Unknown	1
<b>Total</b>	<b>88</b>

- As of June 30, 2021, the FDIC’s Deposit Market Share Report, ranks Heartland 13<sup>th</sup> among 21 institutions operating in the AA with a 1.5% market share. This is substantially lower than the two largest market holders, Fifth Third Bank N.A. and Truist Bank, which hold a 23.5% and 14.7% of the market, respectively. Heartland competes with 18 financial institutions for the remaining 38.2% market share. By comparison, Heartland ranks 34<sup>th</sup> among 59 institutions operating in the Cincinnati multi-state MSA with a 0.1% market share. Cincinnati is a largely fragmented and competitive market.
- The 2020 HMDA Peer Market data indicates that Heartland ranks 16<sup>th</sup> out of 368 HMDA reporters in the MSA and originated 418 loans. By comparison, first ranked Guardian Savings Bank and second ranked The Huntington National Bank originated 2,005 and 1,664 loans, respectively.

- Heartland acquired and operates two branches with full-service ATMs and one branch without an ATM.
- The two branches with full-service ATMs are in Florence (Boone County) and Fort Mitchell (Kenton County). The remaining branch is in Fort Thomas (Campbell County). Each branch is in an upper-income tract.
- Each branch offers extended hours of service, and the branches in Boone and Kenton counties also offer weekend hours and a drive-thru.

### **Community Contact**

An interview was conducted with a community contact to provide additional information regarding the AA. The contact was with a representative from an affordable housing agency. The contact explained there is a lack of affordable housing and high rents in Northern Kentucky, which contributes to increasing homelessness. Most low-income Kentuckians spend more than half of their income on housing suggesting they have very little to spend on other expenses like utilities and health care. What affordable housing there is, is primarily located in Covington (Kenton County), leaving hundreds LMI individuals and families across Northern Kentucky without adequate housing. With affordable housing being concentrated in Kenton County, there are also transportation issues for low-income residents to get to and from jobs that may pay higher wages in other parts of Northern Kentucky. The contact commented that in no state, metropolitan area, or county can a full-time worker earning the prevailing minimum wage afford a modest two-bedroom apartment. There are too many low-income individuals and families without stable, affordable housing in Northern Kentucky and across the country. The contact believes homeownership is proven to build wealth, strengthen communities, and promote educational and employment achievement in areas where affordable housing opportunities are available. The contact stated construction costs remain higher than normal (building materials and contract labor) for the second year in a row, and donations from local financial institutions and other contributors helped to offset the agency's higher construction costs last year. The contact stated lack of affordable housing is a critical need in Northern Kentucky. There is a need for more rental assistance and subsidized housing and financial literacy education for LMI individuals and first-time homebuyers. The contact indicated there are opportunities for banks to support all aspects of affordable housing. The contact said local area banks are engaged in the community and donate their time and money to non-profits serving the community.

## Population Characteristics

Population Change			
Assessment Area: Cincinnati, OH-KY-IN MSA #17140			
Area	2015 Population	2020 Population	Percent Change
Assessment Area	379,099	368,867	-2.7%
Boone County, KY	124,617	118,811	-4.7%
Campbell County, KY	91,475	90,336	-1.2%
Kenton County, KY	163,007	159,720	-2.0%
Cincinnati, OH-KY-IN MSA	2,183,071	2,257,667	3.4%
Kentucky	4,397,353	4,477,251	1.8%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey</i>			
<i>U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States</i>			

- Between 2015 and 2020, the AA experienced a net loss in population of 2.7%, while the MSA experienced a net gain of 3.4% and Kentucky a net growth of 1.8%. According to U.S. Census data, since 2010 the MSA's population is growing at a rate of 0.5% annually, primarily driven by population growth in the Cincinnati region.
- In the AA Boone County experienced the largest net loss in population of 4.7% during this period.
- 75.0% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 12.0% of the population in the AA was age 65 and over, compared to 14.4% in Kentucky, which indicates that much of the population are of working- and consumer-age and able to contribute to the area's economic growth.
- 7.7% of the AA's population resides in low-income tracts compared to 13.0% that reside in moderate-income tracts.
- According to 2019 U.S. Census data, Covington (Kenton County) is the most populous city in the AA with a population of 40,548, representing a 0.2% decrease since 2010; and Florence (Boone County) has a population of 32,369, representing an 8.1% increase since 2010. These cities are among the 10 largest cities in Kentucky. By comparison, Fort Thomas (Campbell County) has a population of 16,308, representing a 0.1% decrease since 2010.

### Income Characteristics

Borrower Income Levels														
Assessment Area: Cincinnati, OH-KY-IN MSA #17140														
FFIEC Estimated Median			Low			Moderate			Middle			Upper		
Year	\$	% Change	0	-	49.9%	50%	-	79.9%	80%	-	119.9%	120%	-	& above
2020	\$56,900		0	-	\$28,449	\$28,450	-	\$45,519	\$45,520	-	\$68,279	\$68,280	-	& above
2021	\$58,800	3.3	0	-	\$29,399	\$29,400	-	\$47,039	\$47,040	-	\$70,559	\$70,560	-	& above

*Source: 2018-2021 FFIEC Census Data*

- MFI across the MSA increased 3.3% between 2020 to 2021 but has not rebounded to pre-COVID levels (2015 MFI was \$69,949 across the MSA).
- According to the U.S. Census data estimates, the 2015 MFI in the AA (\$71,403) is 29.0% larger than the MFI in Kentucky (\$55,367).

Poverty Rates			
Assessment Area: Cincinnati, OH-KY-IN MSA #17140			
Area	2018	2019	2020
Boone County	6.4	7.1	6.5
Campbell County	13.1	10.9	10.6
Kenton County	10.4	11.2	11.0
Kentucky	16.7	16.0	14.9
United States	13.1	12.3	11.9

*Source: U.S. Census Bureau Small Area Income and Poverty Estimates Program*

- Poverty rates across the AA were lower than the poverty rates in Kentucky and the United States during the evaluation period, particularly in Boone County.
- Of the 96,343 families in the AA, 37.1% are designated as LMI with 9.7% living below the poverty level and are lower than Kentucky's.
- According to 2015 U.S. Census data, of the 142,411 households in the AA, 12.2% are below the poverty level and 2.2% receive public assistance.
- According to FRED maintained by the Federal Reserve Bank of St. Louis<sup>13</sup> in 2019; in Kenton County 8.1% of the population received SNAP benefits, 6.5% in Campbell County, and 4.9% in Boone County. SNAP helps LMI individuals and families, the elderly, and

<sup>13</sup> [Federal Reserve Economic Data \(FRED\)](#)

the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

### Housing Characteristics

Housing Cost Change										
Assessment Area: Cincinnati, OH-KY-IN MSA #17140										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Boone County	\$175,900	\$175,100	-0.5	\$189,800	8.4	\$797	\$905	13.6	\$986	9.0
Campbell County	\$146,300	\$150,400	2.8	\$172,000	14.4	\$672	\$748	11.3	\$850	13.6
Kenton County	\$145,200	\$145,200	0.0	\$161,100	11.0	\$667	\$747	12.0	\$811	8.6
Kentucky	\$116,800	\$123,200	5.5	\$141,000	14.4	\$601	\$675	12.3	\$763	13.0

Source: 2006-2010 U.S. Census Bureau: American Community Survey  
2011-2015 U.S. Census Bureau: American Community Survey  
2015-2019 U.S. Census Bureau: American Community Survey

- Median housing values increased from 2015 to 2019 in the AA and at a comparable rate compared to median housing values across Kentucky. Median home prices increased more than MFI during the evaluation period, making housing less affordable across the AA during this period.
- Median gross rents across the AA increased from 2015 to 2019 and at a comparable rate compared to median gross rents across Kentucky. The rise in median gross rents indicates the need for more affordable housing, and 41.1% of all renters in the AA have rental costs that are at least 30% of their income.
- There are 156,589 housing units in the AA, of which 62.7% are owner occupied, 28.3% are rental, and 9.1% are vacant. In low-income tracts, 32.4% housing units are owner-occupied, 50.8% are rental, and 16.8% are vacant. In moderate-income tracts, 48.0% are owner-occupied, 39.1% are rental, and 12.9% are vacant. With 67.6% of housing units in low- and 52.0% in moderate-income tracts being either rental or vacant, there appears to be less opportunities to originate HMDA loans in LMI tracts compared to middle- and upper-income tracts.
- The median age of housing stock in the AA is 43 years old, and 22.3% of housing units were built prior to 1950. The median age of housing stock in LMI tracts is 61 years old, demonstrating a potential need for home improvement lending, since aging structures have an increased need for repairs and maintenance.

Housing Cost Burden						
Assessment Area: Cincinnati, OH-KY-IN MSA #17140						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Assessment Area	64%	33%	17%	72%	23%	38%
Boone County	66%	36%	16%	80%	30%	36%
Campbell County	69%	31%	19%	73%	19%	39%
Kenton County	58%	33%	16%	68%	21%	37%
Cincinnati, OH-KY-IN MSA	65%	34%	18%	72%	25%	41%
Kentucky	56%	28%	17%	69%	31%	39%

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy*

- Within the AA, 64.0% of low-income homeowners are cost-burdened, defined as having housing costs on average that are 30.0% or more of household income. In contrast, within the AA, only 33.0% of moderate-income homeowners are cost-burdened.
- This trend applies across Kentucky, where low-income homeowners are cost-burdened on average more than moderate-income homeowners.
- Within the AA, 72.0% of low-income renters are cost-burdened, which is greater than renters across Kentucky (69.0%). By comparison, 23.0% of moderate-income renters in the AA are less cost-burdened than across Kentucky (31.0%).
- The data shows that cost burden disproportionately affects low-income homeowners and renters.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.



Building Permits by Number of Units					
Assessment Area: KY Cincinnati MSA #17140					
Area	2018	2019	% Change between 2018 and 2019	2020	% Change between 2019 and 2020
Boone County	702	504	-28.2	817	62.1
Campbell County	469	208	-55.7	235	13.0
Kenton County	267	308	15.4	311	1.0
<b>KY Cincinnati MSA</b>	<b>6,076</b>	<b>6,023</b>	<b>-0.9</b>	<b>7,297</b>	<b>21.2</b>
<b>Kentucky</b>	<b>13,826</b>	<b>11,811</b>	<b>-14.6</b>	<b>11,281</b>	<b>-4.5</b>
<b>United States</b>	<b>1,328,827</b>	<b>1,386,048</b>	<b>4.3</b>	<b>1,471,141</b>	<b>6.1</b>
<i>Source: U.S. Census Bureau Building Permits Survey</i>					

- Building permits are a leading indicator of future activity in the construction sector. As indicated in the table above, building permits in 2018, 2019, and 2020 underwent periods of expansion and contraction from one year to the next for many counties. When analyzing the trend of building permits between 2018 and 2020, the volume of permits in the MSA, particularly Boone County, rebounded and surpassed the percentages in Kentucky and the nation during this period.
- The overall increase in the number of permits could indicate an increased demand for home purchase loans, particularly in 2020.

### Labor, Employment and Economic Characteristics

- As indicated in *The Opioid Epidemic and Its Effects: A Perspective on What We Know from the Federal Reserve Bank of Cleveland*,<sup>14</sup> research suggests that counties that have higher levels of opioid prescriptions have substantially lower prime-age labor force participation rates and reduced labor market activity, which ultimately impacts economic growth potential of a local area. In addition, the Centers of Disease Control and Prevention identified Campbell County as vulnerable to high rates of certain types of infections because of the

<sup>14</sup> [Cleveland Fed: Opioid Epidemic and Its Effects](#)

opioid epidemic.<sup>15</sup> As a result, Campbell County may be particularly susceptible to reduced labor market activity and stunted economic growth potential.

- According to the Northern Kentucky Area Development District (NKADD),<sup>16</sup> Boone, Kenton, and Campbell counties are considered urban (i.e., built-up) areas.
- According to the Bureau of Labor Statistics (BLS):<sup>17</sup>
  - The counties in the AA are most impacted by the industries of transportation and warehousing, state and local government, healthcare and social services, manufacturing, retail trade, and accommodation and retail services. The AA’s median average weekly wage for the private sector is \$1,015, which indicates that employed persons could afford the median rent of \$986.
- Major employers in Northern Kentucky include Cincinnati-Northern Kentucky International Airport, St. Elizabeth Healthcare, Fidelity Investments, Amazon (fulfillment center), and Boone County School District.
- However, as the community contact indicated, a full-time worker earning Kentucky’s prevailing minimum wage of \$7.25/hour does not earn enough to afford the median rent. This worker can only afford \$377/month based on spending no more than 30% of their income on rent. According to 2015 Census data, less than 7.0% of renter-occupied housing units have rents between \$350-\$499/month.

Unemployment Rates						
Assessment Area: Cincinnati, OH-KY-IN MSA #17140						
Area	2016	2017	2018	2019	2020	2021
Assessment Area	3.9%	3.8%	3.3%	3.3%	5.6%	4.1%
Boone County	3.8%	3.8%	3.3%	3.3%	5.4%	3.8%
Campbell County	3.8%	3.7%	3.2%	3.3%	5.6%	4.1%
Kenton County	4.1%	3.9%	3.3%	3.4%	5.8%	4.3%
Cincinnati, OH-KY-IN MSA	4.4%	4.3%	3.9%	3.7%	7.0%	4.6%
Kentucky	5.0%	4.8%	4.2%	4.1%	6.6%	4.6%

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

- Unemployment rates from 2016 through 2019 generally decreased across the AA but increased in 2021 to 5.6% in response to the COVID-19 pandemic. While unemployment rates rebounded in 2021 to 4.1%, unemployment rates remain higher than pre-pandemic levels.

<sup>15</sup> [amfAR – Kentucky Opioid Epidemic](#)

<sup>16</sup> [NKADD – County Map](#)

<sup>17</sup> [Bureau of Labor Statistics \(BLS\) – Kentucky](#)

- The unemployment rates across the AA were lower than unemployment rates in Kentucky during this period.
- The AA's overall economy appears to be healthy with increasing MFI and decreasing unemployment and poverty rates.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI OH-KY-IN MSA #17140

#### LENDING TEST

The lending test performance in the Cincinnati AA is rated "Satisfactory." Details of Heartland's lending can be found in the tables in Appendix D.

#### **Lending to Borrowers of Different Income Levels**

Heartland's lending penetration among borrowers of different income (including LMI) levels is considered reasonable. HMDA lending is reasonable and home equity lending is poor.

#### *HMDA Lending*

During the evaluation period Heartland made 562 HMDA loans, totaling \$134.3 million. Heartland's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Heartland's borrower distribution of refinance and home purchase loans is reasonable. See Appendix D for explicit HMDA-reportable lending data.

#### *Refinance Lending*

In 2021 Heartland originated 89 refinance loans totaling \$20.9 million. Heartland also made two (2.2%) refinance loans to borrowers with unknown-income designations. Heartland made two (2.2%) refinance loans to low-income borrowers, which was well below the percentage of families at 20.0%. Heartland made 16 (18.0%) refinance loans to moderate-income borrowers, which exceeded the percentage of families at 17.1%.

In 2020 Heartland originated 270 refinance loans totaling \$65.9 million. Heartland also made one (0.4%) refinance loans to borrowers with unknown-income designations. Heartland made five (1.9%) refinance loans to low-income borrowers, which was well below the percentage of families

at 20.0% and below the aggregate of all lenders at 5.4%. Heartland made 37 (13.7%) refinance loans to moderate-income borrowers, which was below the percentage of families at 17.1% and the aggregate of all lenders at 15.7%.

Overall, the percentage of refinance lending primarily fell below proxy and the aggregate of all lenders to LMI borrowers. Therefore, Heartland's borrower distribution of refinance loans to LMI borrowers is reasonable.

### *Home Purchase Lending*

In 2021 Heartland originated 55 home purchase loans totaling \$12.1 million. Heartland made four (7.3%) home purchase loans to low-income borrowers, which was well below the percentage of families at 20.0%. Heartland made 13 (23.6%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 17.1%.

In 2020 Heartland originated 147 home purchase loans totaling \$35.4 million. Heartland made 10 (6.8%) home purchase loans to low-income borrowers, which was well below the percentage of families at 20.0% and below the aggregate of all lenders at 11.2%. Heartland made 28 (19.0%) home purchase loans to moderate-income borrowers, which exceeded the percentage of families at 17.1% and was below the aggregate of all lenders at 25.5%.

Overall, the percentage of home purchase lending fell well below proxy and below the aggregate of all lenders to low-income borrowers and exceeded proxy and fell below the aggregate of all lenders to moderate-income borrowers. Therefore, Heartland's borrower distribution of home purchase loans to low-income borrowers is poor and excellent to moderate-income borrowers.

### *Home Equity Lending*

Heartland originated 81 home equity loans totaling \$6.1 million during the evaluation period. Heartland's performance was compared to the percentage of families (proxy).

In 2021 Heartland originated 58 home equity loans totaling \$5.0 million. Heartland also made four (6.9%) home equity loans to borrowers with unknown-income designations. Heartland made one (1.7%) home equity loan to low-income borrowers which was substantially below the percentage of families at 20.0%. The bank made four (6.9%) home equity loans to moderate-income borrowers which was well below the percentage of families at 17.1%. Therefore, Heartland's borrower distribution of home equity loans to low-income borrowers is very poor and poor to moderate-income borrowers.

### Geographic Distribution of Loans

Heartland’s geographic distribution reflects a reasonable dispersion of loans in the Cincinnati AA. HMDA lending is reasonable and home equity lending is poor. Heartland has a moderate level of lending gaps in the Cincinnati AA.

Percentage of Lending Penetration		
Tract Income Level	2020	2021
Low	27.3%	18.2%
Moderate	35.7%	35.7%
Middle	90.7%	90.7%
Upper	100.0%	100.0%
Unknown	0.0%	0.0%
<b>Total</b>	<b>75.0%</b>	<b>73.9%</b>

Heartland entered this market in April 2020 and penetrated nearly one-third of its LMI tracts in 2020 and 2021. Because the rate of owner-occupied housing is less than 25.0% in low- and 50.0% in moderate-income tracts, and with 67.6% of housing units in low- and 52.0% in moderate-income tracts being either rental or vacant, there appears to be less opportunities to originate HMDA loans in LMI tracts.

#### *HMDA Lending*

During the evaluation period Heartland made 562 HMDA loans, totaling \$134.3 million. Heartland’s performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Heartland’s geographic distribution of refinance and home purchase loans is reasonable, especially considering this is a new and competitive market for Heartland, and the limited opportunities to originate mortgage loans in LMI tracts which have a high percentage of rental and vacant units. See Appendix D for explicit HMDA-reportable lending data.

#### *Refinance Lending*

In 2021 Heartland originated 89 refinance loans totaling \$20.9 million. Heartland made three (3.4%) refinance loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 4.5%. Heartland made five (5.6%) refinance loans in moderate-income

tracts, which was below the percentage of owner-occupied units in these tracts at 10.9%. In 2020 Heartland originated 270 refinance loans totaling \$65.9 million. Heartland made no refinance loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 4.5% and the aggregate of all lenders at 1.9%. Heartland made 10 (3.7%) refinance loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 10.9% and the aggregate of all lenders at 6.8%.

Overall, Heartland's lending of refinance loans fell well below proxy and the aggregate of all lenders in low-income tracts and below proxy and the aggregate of all lenders in moderate-income tracts. Therefore, Heartland's refinance lending in low-income tracts is poor and reasonable in moderate-income tracts.

### *Home Purchase Lending*

In 2021 Heartland originated 55 home purchase loans totaling \$12.1 million. Heartland made two (3.6%) home purchase loans in low-income tracts, which was below the percentage of owner-occupied units in these tracts at 4.5%. Heartland made five (9.1%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 10.9%.

In 2020 Heartland originated 147 home purchase loans totaling \$35.4 million. Heartland made two (1.4%) home purchase loans in low-income tracts, which was well below the percentage of owner-occupied units in these tracts at 4.5% and the aggregate of all lenders at 4.7%. Heartland made 10 (6.8%) home purchase loans in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts at 10.9% and the aggregate of all lenders at 10.0%.

Overall, Heartland's lending of home purchase loans fell well below proxy and the aggregate of all lenders in low-income tracts and below proxy and the aggregate of all lenders in moderate-income tracts. Therefore, Heartland's home purchase lending in low-income tracts is poor and reasonable in moderate-income tracts.

### *Home Equity Lending*

Heartland originated 81 home equity loans totaling \$6.1 million during the evaluation period. Heartland's performance was compared to the percentage of owner-occupied units (proxy).

In 2021 Heartland originated 58 home equity loans totaling \$5.0 million. Heartland made one

(1.7%) home equity loan in low-income tracts which was below the percentage of owner-occupied units at 4.5%. The bank made one (1.7%) home equity loan in moderate-income tracts which was well below the percentage of owner-occupied units at 10.9%. Therefore, Heartland's geographic distribution of home equity loans in LMI tracts is poor.

## COMMUNITY DEVELOPMENT TEST

The community development test performance in the Cincinnati AA is rated "Satisfactory."

Heartland community development performance demonstrates an adequate responsiveness to community development needs in this AA by providing community development loans, qualified investments and donations, and community development services, considering Heartland's capacity and opportunities in this AA.

### *Community Development Loans*

Heartland originated eight community development loans totaling \$2.2 million, representing 3.5% of the bank's total community development lending during this evaluation period. These loans supported revitalization and stabilization.

Five community development loans totaling approximately \$2.1 million helped three small businesses retain and expand their businesses in LMI areas. Three loans provided capital to a small business in a low-income area to purchase equipment. The new equipment helped the business take on more work, retain eight employees, and potentially hire an additional employee. The fourth loan provided funds to a female entrepreneur to purchase an existing drug rehabilitation center, retain eight LMI employees, and continue providing drug treatment in Campbell County, which is impacted by the opioid epidemic. The fifth loan provided start-up funds to a female entrepreneur to open her own business in a moderate-income area and hire six employees.

The remaining three community development loans totaling \$91,000 were PPP loans made in response to the COVID-19 crisis to help local businesses remain open and retain their workforce.

### *Qualified Investments*

Heartland has approximately \$2.0 million in total qualified community development investments and donations during this evaluation period, representing 9.7% by dollar amount of total

investments and donations.

Heartland made a legally binding commitment of \$2.0 million to a certified CDFI that supports affordable housing initiatives and commercial development in Northern Kentucky. No funds were disbursed during the evaluation period. Investing in a CDFI is considered responsive to AA credit needs and the community contact identified supporting all aspects of affordable housing as a critical need in the AA.

Heartland also made three small dollar donations, through the community foundation, totaling \$2,500 and representing 2.1% of Heartland's total qualified donations during the evaluation period. These donations supported community services provided to LMI individuals and families to two non-profit organizations. One organization provides a multitude of wraparound services to LMI individuals and families, and the remaining non-profit addresses food insecurity in schools across the AA.

### *Community Development Services*

Two of Heartland's bank leadership provided their financial expertise as board and committee members to two community organizations by engaging in activities that promoted or facilitated services LMI individuals and economic development. Community development services benefiting the Cincinnati AA, account for 2.0% of total services provided during the evaluation period.



**Appendix A – Scope of Examination Tables**

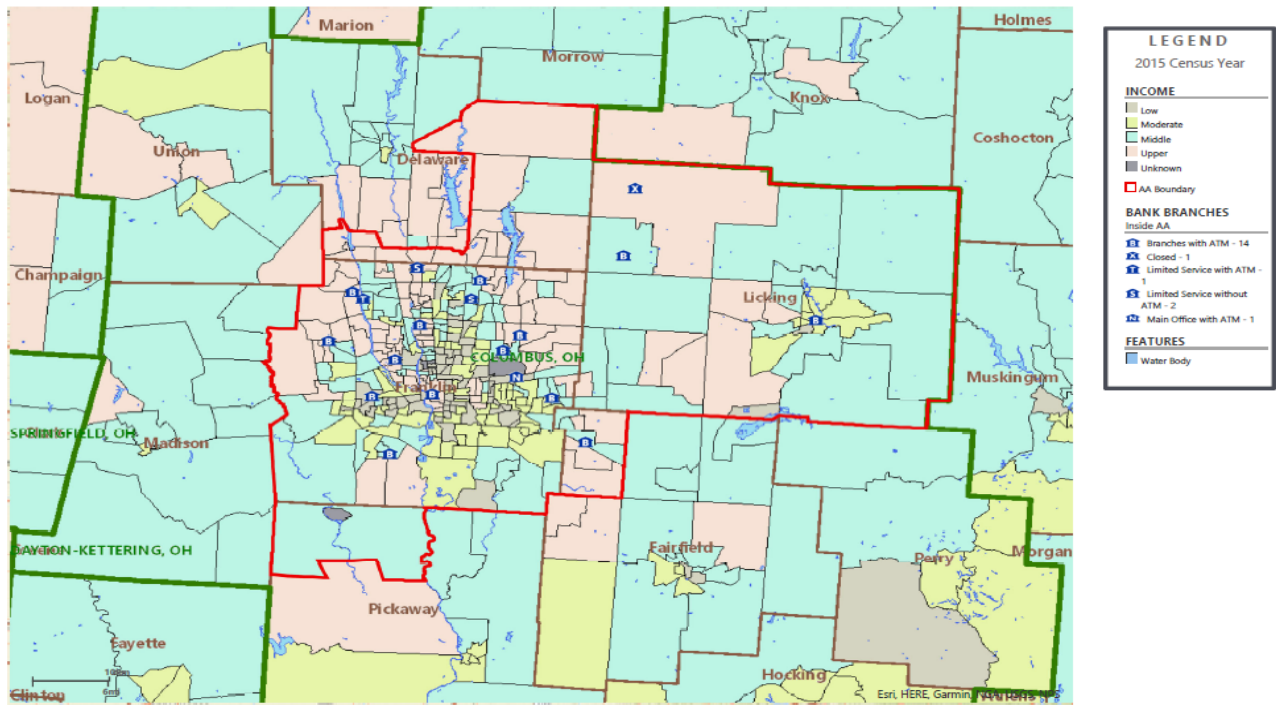
<b>Scope of Examination</b>			
<b>TIME PERIOD REVIEWED</b>		Lending Test: January 1, 2018 – December 31, 2021  Community Development Test: October 2, 2018 – April 11, 2022	
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
Heartland Bank, Whitehall, Ohio			HMDA – home purchase & refinance Small Business, HELOCs, Consumer – motor vehicle & credit cards
The Heartland Bank Company has no affiliate relationships subject to examination.			

There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

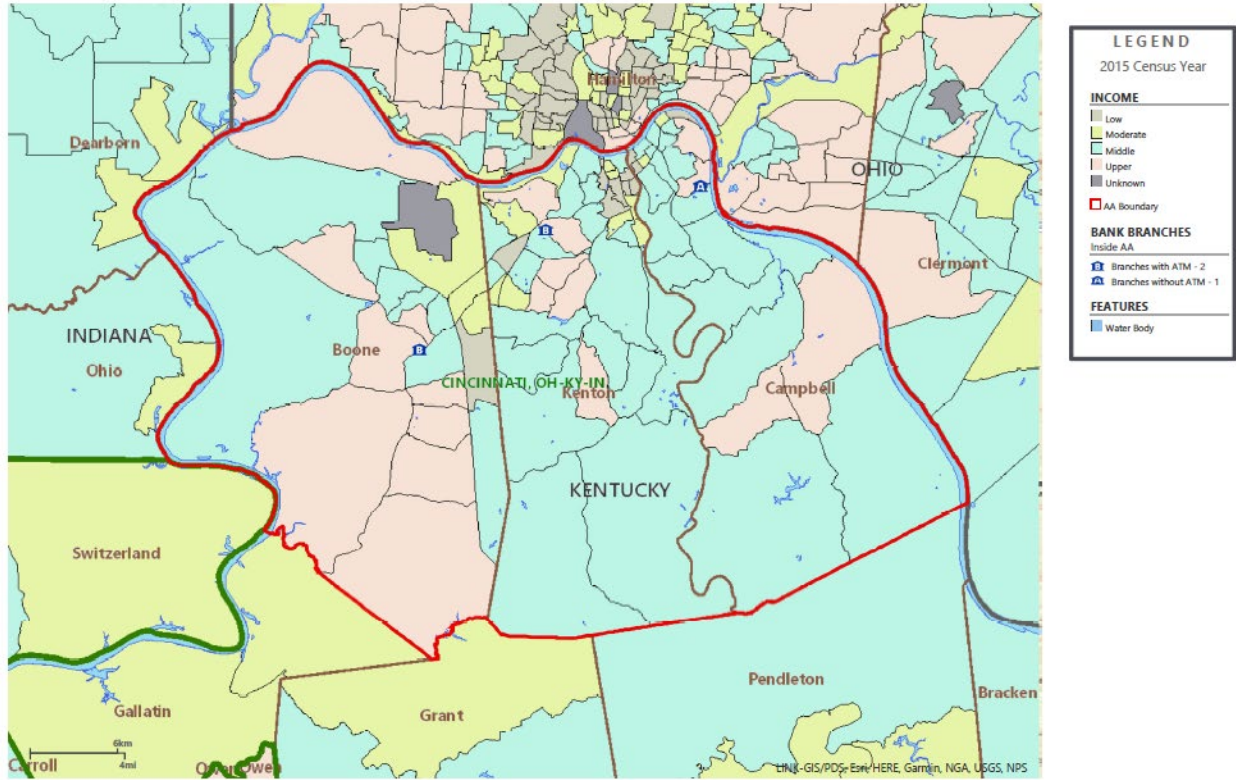
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
<b>OHIO</b> <b>Columbus OH MSA</b>	<b>Full-scope review</b>	<b>N/A</b>	
<b>KENTUCKY</b> <b>Cincinnati OH-KY-IN MSA</b>	<b>Full-scope review</b>	<b>N/A</b>	.

### Appendix B – Maps of Assessment Areas

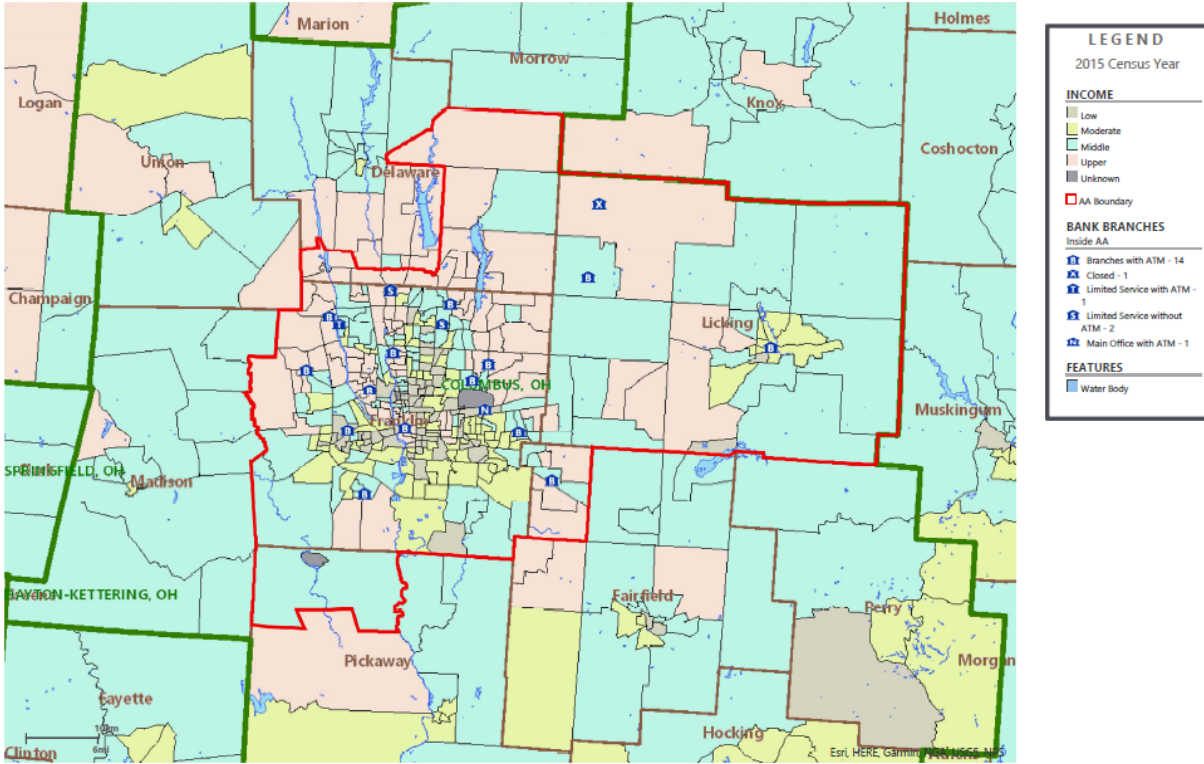
Assessment Area: 2021 Columbus, OH MSA #18140



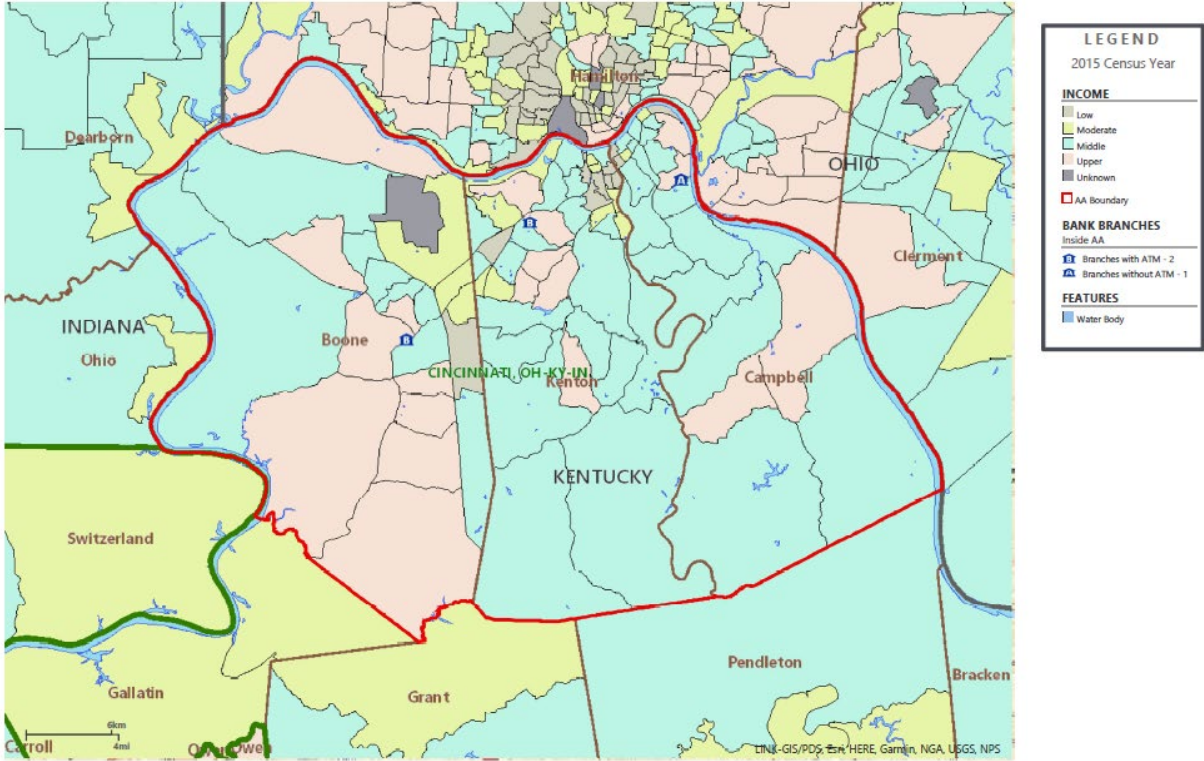
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Assessment Area: 2020 Columbus, OH MSA #18140

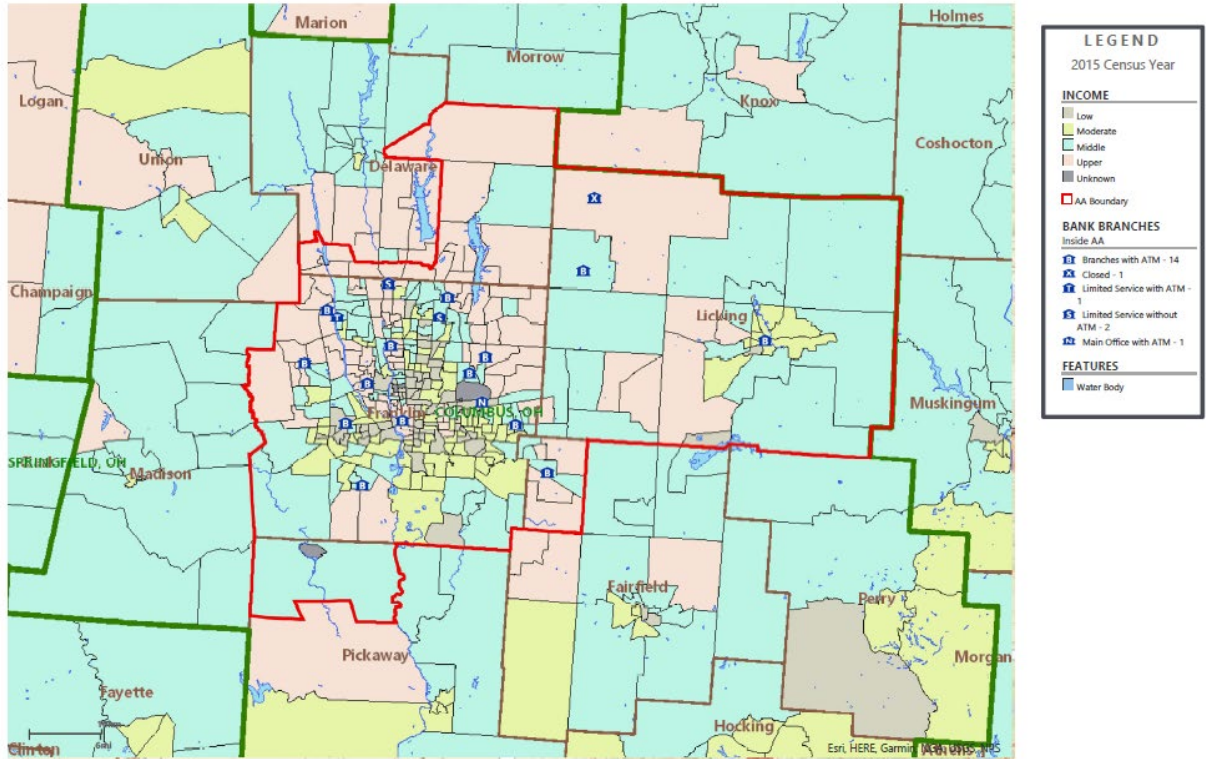


Assessment Area: 2020 Cincinnati, OH-KY-IN MSA #17140

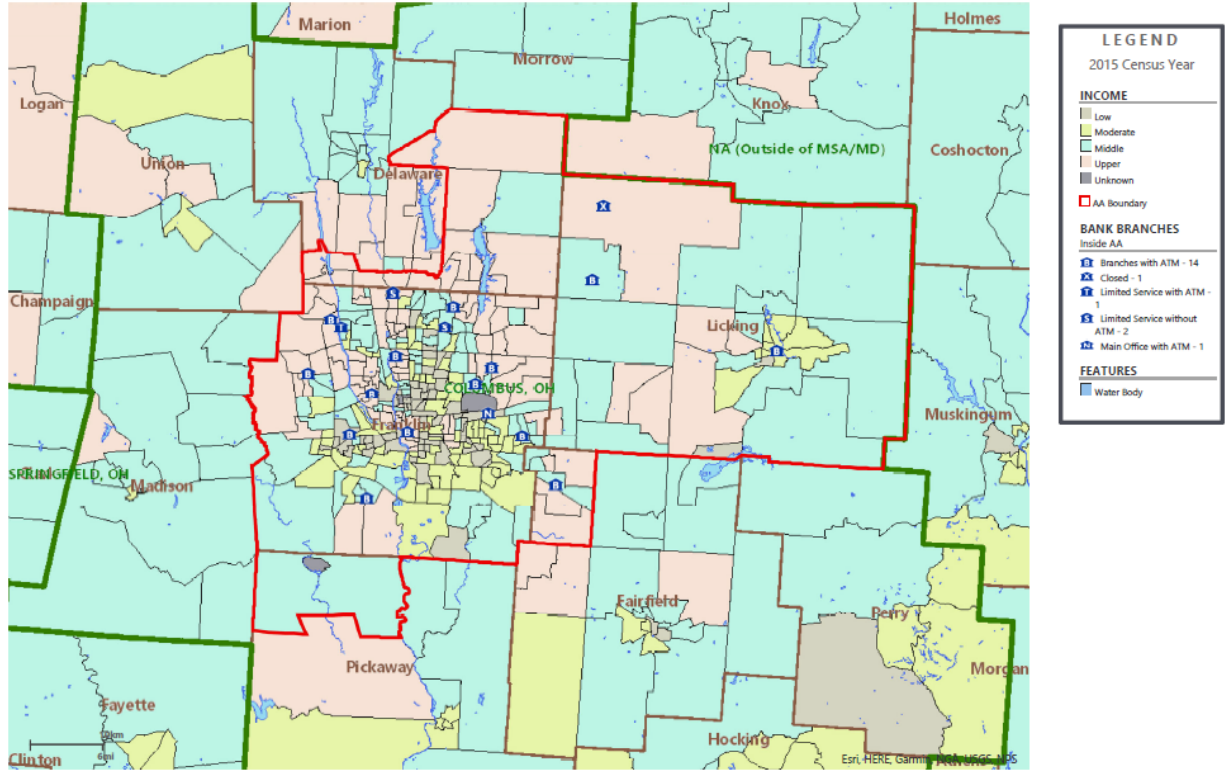




Assessment Area: 2019 Columbus, OH MSA #18140



Assessment Area: 2018 Columbus, OH MSA #18140





Appendix C – Demographic Tables

2021 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	63	18.4	37,433	10.3	13,606	36.3	82,903	22.7
Moderate	85	24.9	80,137	22.0	15,295	19.1	61,211	16.8
Middle	89	26.0	108,314	29.7	8,062	7.4	70,357	19.3
Upper	101	29.5	138,940	38.1	3,924	2.8	150,505	41.2
Unknown	4	1.2	152	0.0	54	35.5	0	0.0
<b>Total AA</b>	<b>342</b>	<b>100.0</b>	<b>364,976</b>	<b>100.0</b>	<b>40,941</b>	<b>11.2</b>	<b>364,976</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,227	21,273	6.1	23.3	49,592	54.4	20,362	22.3
Moderate	157,842	65,693	18.9	41.6	74,257	47.0	17,892	11.3
Middle	191,313	108,595	31.3	56.8	68,999	36.1	13,719	7.2
Upper	218,706	151,694	43.7	69.4	55,417	25.3	11,595	5.3
Unknown	1,657	29	0.0	1.8	1,227	74.0	401	24.2
<b>Total AA</b>	<b>660,745</b>	<b>347,284</b>	<b>100.0</b>	<b>52.6</b>	<b>249,492</b>	<b>37.8</b>	<b>63,969</b>	<b>9.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,593	10.1	6,851	10.0	699	12.3	43	6.4
Moderate	14,197	18.9	13,059	19.0	1,052	18.6	86	12.7
Middle	20,000	26.7	18,562	27.0	1,275	22.5	163	24.1
Upper	32,891	43.8	29,939	43.6	2,572	45.4	380	56.3
Unknown	329	0.4	261	0.4	65	1.1	3	0.4
<b>Total AA</b>	<b>75,010</b>	<b>100.0</b>	<b>68,672</b>	<b>100.0</b>	<b>5,663</b>	<b>100.0</b>	<b>675</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.6</b>		<b>7.5</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	28	4.0	26	3.8	2	10.0	0	0.0
Moderate	62	8.8	59	8.6	3	15.0	0	0.0
Middle	308	43.6	300	43.7	8	40.0	0	0.0
Upper	308	43.6	301	43.8	7	35.0	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
<b>Total AA</b>	<b>707</b>	<b>100.0</b>	<b>687</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.2</b>		<b>2.8</b>		<b>0.0</b>
<p>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2012-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

2020 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	63	18.4	37,433	10.3	13,606	36.3	82,903	22.7
Moderate	85	24.9	80,137	22.0	15,295	19.1	61,211	16.8
Middle	89	26.0	108,314	29.7	8,062	7.4	70,357	19.3
Upper	101	29.5	138,940	38.1	3,924	2.8	150,505	41.2
Unknown	4	1.2	152	0.0	54	35.5	0	0.0
<b>Total AA</b>	<b>342</b>	<b>100.0</b>	<b>364,976</b>	<b>100.0</b>	<b>40,941</b>	<b>11.2</b>	<b>364,976</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,227	21,273	6.1	23.3	49,592	54.4	20,362	22.3
Moderate	157,842	65,693	18.9	41.6	74,257	47.0	17,892	11.3
Middle	191,313	108,595	31.3	56.8	68,999	36.1	13,719	7.2
Upper	218,706	151,694	43.7	69.4	55,417	25.3	11,595	5.3
Unknown	1,657	29	0.0	1.8	1,227	74.0	401	24.2
<b>Total AA</b>	<b>660,745</b>	<b>347,284</b>	<b>100.0</b>	<b>52.6</b>	<b>249,492</b>	<b>37.8</b>	<b>63,969</b>	<b>9.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,434	9.9	6,684	9.8	706	12.1	44	7.0
Moderate	13,842	18.5	12,678	18.5	1,085	18.6	79	12.5
Middle	19,990	26.6	18,513	27.0	1,321	22.6	156	24.6
Upper	33,408	44.5	30,398	44.4	2,659	45.5	351	55.5
Unknown	337	0.4	259	0.4	75	1.3	3	0.5
<b>Total AA</b>	<b>75,011</b>	<b>100.0</b>	<b>68,532</b>	<b>100.0</b>	<b>5,846</b>	<b>100.0</b>	<b>633</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.4</b>		<b>7.8</b>		<b>0.8</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	27	3.6	25	3.4	2	10.0	0	0.0
Moderate	69	9.2	66	9.0	3	15.0	0	0.0
Middle	315	42.0	307	42.1	8	40.0	0	0.0
Upper	338	45.1	331	45.3	7	35.0	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
<b>Total AA</b>	<b>750</b>	<b>100.0</b>	<b>730</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>97.3</b>		<b>2.7</b>		<b>0.0</b>	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2019 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	63	18.4	37,433	10.3	13,606	36.3	82,903	22.7
Moderate	85	24.9	80,137	22.0	15,295	19.1	61,211	16.8
Middle	89	26.0	108,314	29.7	8,062	7.4	70,357	19.3
Upper	101	29.5	138,940	38.1	3,924	2.8	150,505	41.2
Unknown	4	1.2	152	0.0	54	35.5	0	0.0
<b>Total AA</b>	<b>342</b>	<b>100.0</b>	<b>364,976</b>	<b>100.0</b>	<b>40,941</b>	<b>11.2</b>	<b>364,976</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,227	21,273	6.1	23.3	49,592	54.4	20,362	22.3
Moderate	157,842	65,693	18.9	41.6	74,257	47.0	17,892	11.3
Middle	191,313	108,595	31.3	56.8	68,999	36.1	13,719	7.2
Upper	218,706	151,694	43.7	69.4	55,417	25.3	11,595	5.3
Unknown	1,657	29	0.0	1.8	1,227	74.0	401	24.2
<b>Total AA</b>	<b>660,745</b>	<b>347,284</b>	<b>100.0</b>	<b>52.6</b>	<b>249,492</b>	<b>37.8</b>	<b>63,969</b>	<b>9.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,384	9.9	6,616	9.7	733	12.2	35	5.6
Moderate	13,683	18.3	12,480	18.3	1,125	18.7	78	12.6
Middle	20,022	26.7	18,469	27.0	1,401	23.3	152	24.5
Upper	33,493	44.7	30,454	44.6	2,685	44.6	354	57.0
Unknown	348	0.5	273	0.4	73	1.2	2	0.3
<b>Total AA</b>	<b>74,930</b>	<b>100.0</b>	<b>68,292</b>	<b>100.0</b>	<b>6,017</b>	<b>100.0</b>	<b>621</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.1</b>		<b>8.0</b>		<b>0.8</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	30	3.9	28	3.7	2	10.0	0	0.0
Moderate	70	9.0	67	8.9	3	15.0	0	0.0
Middle	322	41.6	314	41.6	8	40.0	0	0.0
Upper	352	45.5	345	45.8	7	35.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>774</b>	<b>100.0</b>	<b>754</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>97.4</b>		<b>2.6</b>		<b>0.0</b>	
<p>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

2018 COLUMBUS, OH MSA #18140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	63	18.4	37,433	10.3	13,606	36.3	82,903	22.7
Moderate	85	24.9	80,137	22.0	15,295	19.1	61,211	16.8
Middle	89	26.0	108,314	29.7	8,062	7.4	70,357	19.3
Upper	101	29.5	138,940	38.1	3,924	2.8	150,505	41.2
Unknown	4	1.2	152	0.0	54	35.5	0	0.0
<b>Total AA</b>	<b>342</b>	<b>100.0</b>	<b>364,976</b>	<b>100.0</b>	<b>40,941</b>	<b>11.2</b>	<b>364,976</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	91,227	21,273	6.1	23.3	49,592	54.4	20,362	22.3
Moderate	157,842	65,693	18.9	41.6	74,257	47.0	17,892	11.3
Middle	191,313	108,595	31.3	56.8	68,999	36.1	13,719	7.2
Upper	218,706	151,694	43.7	69.4	55,417	25.3	11,595	5.3
Unknown	1,657	29	0.0	1.8	1,227	74.0	401	24.2
<b>Total AA</b>	<b>660,745</b>	<b>347,284</b>	<b>100.0</b>	<b>52.6</b>	<b>249,492</b>	<b>37.8</b>	<b>63,969</b>	<b>9.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,255	9.7	6,441	9.5	750	12.2	64	7.6
Moderate	13,525	18.2	12,257	18.2	1,154	18.8	114	13.5
Middle	19,861	26.7	18,245	27.0	1,426	23.2	190	22.5
Upper	33,492	45.0	30,279	44.9	2,742	44.6	471	55.8
Unknown	333	0.4	257	0.4	71	1.2	5	0.6
<b>Total AA</b>	<b>74,466</b>	<b>100.0</b>	<b>67,479</b>	<b>100.0</b>	<b>6,143</b>	<b>100.0</b>	<b>844</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.6</b>		<b>8.2</b>		<b>1.1</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	25	3.2	23	3.0	2	8.7	0	0.0
Moderate	65	8.3	62	8.1	3	13.0	0	0.0
Middle	338	42.9	329	43.1	9	39.1	0	0.0
Upper	358	45.5	349	45.7	9	39.1	0	0.0
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
<b>Total AA</b>	<b>787</b>	<b>100.0</b>	<b>764</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.1</b>		<b>2.9</b>		<b>0.0</b>
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2021 CINCINNATI, OH-KY-IN MSA #17140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	12.5	6,438	6.7	2,559	39.7	19,280	20.0
Moderate	14	15.9	11,684	12.1	1,682	14.4	16,501	17.1
Middle	43	48.9	51,217	53.2	4,165	8.1	20,470	21.2
Upper	19	21.6	27,004	28.0	906	3.4	40,092	41.6
Unknown	1	1.1	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>88</b>	<b>100.0</b>	<b>96,343</b>	<b>100.0</b>	<b>9,312</b>	<b>9.7</b>	<b>96,343</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,691	4,438	4.5	32.4	6,956	50.8	2,297	16.8
Moderate	22,299	10,700	10.9	48.0	8,719	39.1	2,880	12.9
Middle	84,649	54,040	55.1	63.8	23,266	27.5	7,343	8.7
Upper	35,950	28,931	29.5	80.5	5,361	14.9	1,658	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>156,589</b>	<b>98,109</b>	<b>100.0</b>	<b>62.7</b>	<b>44,302</b>	<b>28.3</b>	<b>14,178</b>	<b>9.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	786	5.5	677	5.2	102	8.9	7	3.8
Moderate	2,523	17.5	2,188	16.8	299	26.2	36	19.4
Middle	7,426	51.6	6,763	51.8	560	49.0	103	55.4
Upper	3,625	25.2	3,410	26.1	175	15.3	40	21.5
Unknown	22	0.2	15	0.1	7	0.6	0	0.0
<b>Total AA</b>	<b>14,382</b>	<b>100.0</b>	<b>13,053</b>	<b>100.0</b>	<b>1,143</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.8</b>		<b>7.9</b>		<b>1.3</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	1.5	3	1.5	0	0.0	0	0.0
Moderate	12	6.1	12	6.1	0	0.0	0	0.0
Middle	119	60.4	119	60.4	0	0.0	0	0.0
Upper	63	32.0	63	32.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>197</b>	<b>100.0</b>	<b>197</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>0.0</b>		<b>0.0</b>	
<p>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

2020 CINCINNATI, OH-KY-IN MSA #17140 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	12.5	6,438	6.7	2,559	39.7	19,280	20.0
Moderate	14	15.9	11,684	12.1	1,682	14.4	16,501	17.1
Middle	43	48.9	51,217	53.2	4,165	8.1	20,470	21.2
Upper	19	21.6	27,004	28.0	906	3.4	40,092	41.6
Unknown	1	1.1	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>88</b>	<b>100.0</b>	<b>96,343</b>	<b>100.0</b>	<b>9,312</b>	<b>9.7</b>	<b>96,343</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,691	4,438	4.5	32.4	6,956	50.8	2,297	16.8
Moderate	22,299	10,700	10.9	48.0	8,719	39.1	2,880	12.9
Middle	84,649	54,040	55.1	63.8	23,266	27.5	7,343	8.7
Upper	35,950	28,931	29.5	80.5	5,361	14.9	1,658	4.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>156,589</b>	<b>98,109</b>	<b>100.0</b>	<b>62.7</b>	<b>44,302</b>	<b>28.3</b>	<b>14,178</b>	<b>9.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	804	5.4	688	5.0	109	9.2	7	3.8
Moderate	2,606	17.4	2,255	16.5	319	26.8	32	17.6
Middle	7,730	51.5	7,059	51.8	569	47.9	102	56.0
Upper	3,833	25.6	3,606	26.5	186	15.6	41	22.5
Unknown	24	0.2	18	0.1	6	0.5	0	0.0
<b>Total AA</b>	<b>14,997</b>	<b>100.0</b>	<b>13,626</b>	<b>100.0</b>	<b>1,189</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.9</b>		<b>7.9</b>		<b>1.2</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	1.4	3	1.4	0	0.0	0	0.0
Moderate	12	5.6	12	5.6	0	0.0	0	0.0
Middle	131	60.9	131	60.9	0	0.0	0	0.0
Upper	69	32.1	69	32.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>215</b>	<b>100.0</b>	<b>215</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>0.0</b>		<b>0.0</b>	
<p>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Appendix D – Lending Tables

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	3	5.2	269	1.2	6.1
Moderate	5	8.6	937	4.3	18.9
Middle	16	27.6	4,160	19.1	31.3
Upper	34	58.6	16,455	75.4	43.7
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>21,820</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	6	4.3	1,082	2.9	6.1
Moderate	10	7.1	1,156	3.1	18.9
Middle	43	30.7	8,992	24.4	31.3
Upper	81	57.9	25,581	69.5	43.7
<b>Total</b>	<b>140</b>	<b>100.0</b>	<b>36,809</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	6.1
Moderate	0	0.0	0	0.0	18.9
Middle	1	100.0	250	100.0	31.3
Upper	0	0.0	0	0.0	43.7
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>					<b>Multifamily Units %</b>
Low	0	0.0	0	0.0	17.6
Moderate	0	0.0	0	0.0	28.7
Middle	0	0.0	0	0.0	28.6
Upper	0	0.0	0	0.0	24.4
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>					<b>Owner Occupied Units %</b>
Low	10	5.0	1,375	2.3	6.1
Moderate	15	7.4	2,093	3.6	18.9
Middle	61	30.2	13,409	22.7	31.3
Upper	116	57.4	42,081	71.4	43.7
<b>Total</b>	<b>202</b>	<b>100.0</b>	<b>58,958</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
<b>Other Purpose LOC</b>					
Low	0	0.0	0	0.0	6.1
Moderate	0	0.0	0	0.0	18.9
Middle	0	0.0	0	0.0	31.3
Upper	0	0.0	0	0.0	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>					
Low	1	33.3	25	32.1	6.1
Moderate	0	0.0	0	0.0	18.9
Middle	1	33.3	8	10.0	31.3
Upper	1	33.3	45	58.1	43.7
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>					
Low	0	0.0	0	0.0	6.1
Moderate	0	0.0	0	0.0	18.9
Middle	0	0.0	0	0.0	31.3
Upper	0	0.0	0	0.0	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>					



Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	11	8.9	7.7	2,119	5.7	5.2	6.1
Moderate	18	14.5	19.6	3,306	8.9	13.3	18.9
Middle	33	26.6	31.0	10,378	28.0	27.7	31.3
Upper	62	50.0	41.6	21,271	57.4	53.8	43.7
<b>Total</b>	<b>124</b>	<b>100.0</b>	<b>100.0</b>	<b>37,074</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	10	2.7	2.7	1,521	1.7	1.8	6.1
Moderate	15	4.1	10.9	2,494	2.8	6.7	18.9
Middle	115	31.5	29.0	22,466	25.4	23.5	31.3
Upper	225	61.6	57.4	62,047	70.1	68.0	43.7
<b>Total</b>	<b>365</b>	<b>100.0</b>	<b>100.0</b>	<b>88,528</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.7	0	0.0	3.3	6.1
Moderate	0	0.0	11.2	0	0.0	7.5	18.9
Middle	0	0.0	27.4	0	0.0	21.5	31.3
Upper	0	0.0	57.8	0	0.0	67.7	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	29.1	0	0.0	14.8	17.6
Moderate	1	11.1	26.7	510	2.3	24.3	28.7
Middle	6	66.7	23.3	20,965	94.9	26.1	28.6
Upper	2	22.2	19.3	620	2.8	33.4	24.4
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>22,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	21	4.2	4.7	3,640	2.5	4.0	6.1
Moderate	34	6.8	14.4	6,310	4.3	10.5	18.9
Middle	156	31.1	29.8	54,110	36.6	25.3	31.3
Upper	290	57.9	51.1	83,953	56.7	60.0	43.7
<b>Total</b>	<b>501</b>	<b>100.0</b>	<b>100.0</b>	<b>148,013</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<small>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$(000)	
<b>Other Purpose LOC</b>							
Low	0	0.0	2.7	0	0.0	1.4	6.1
Moderate	0	0.0	10.8	0	0.0	6.3	18.9
Middle	0	0.0	27.4	0	0.0	22.1	31.3
Upper	0	0.0	59.1	0	0.0	70.2	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	5.9	0	0.0	3.5	6.1
Moderate	0	0.0	16.7	0	0.0	8.6	18.9
Middle	2	66.7	33.0	301	95.3	27.4	31.3
Upper	1	33.3	44.4	15	4.7	60.4	43.7
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>316</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	9.5	0	0.0	5.6	6.1
Moderate	0	0.0	31.1	0	0.0	23.1	18.9
Middle	0	0.0	34.9	0	0.0	37.1	31.3
Upper	0	0.0	24.5	0	0.0	34.2	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	9	9.2	6.9	2,559	7.7	4.3	6.1
Moderate	9	9.2	19.3	2,071	6.2	12.4	18.9
Middle	27	27.6	31.5	8,946	26.9	28.2	31.3
Upper	53	54.1	42.3	19,625	59.1	55.1	43.7
<b>Total</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>33,201</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	6	5.0	3.3	1,011	3.9	2.0	6.1
Moderate	18	15.0	13.0	1,651	6.3	7.9	18.9
Middle	40	33.3	30.5	7,432	28.5	24.8	31.3
Upper	55	45.8	53.1	15,411	59.1	65.1	43.7
Unknown	1	0.8	0.0	585	2.2	0.1	0.0
<b>Total</b>	<b>120</b>	<b>100.0</b>	<b>100.0</b>	<b>26,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	12.5	4.7	40	2.9	4.2	6.1
Moderate	1	12.5	13.4	160	11.5	9.4	18.9
Middle	3	37.5	28.3	485	34.7	24.0	31.3
Upper	3	37.5	53.6	712	51.0	62.3	43.7
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,397</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	3	27.3	20.2	4,320	8.2	9.5	17.6
Moderate	3	27.3	23.3	3,257	6.2	11.1	28.7
Middle	1	9.1	26.7	2,050	3.9	27.7	28.6
Upper	4	36.4	27.0	43,171	81.8	51.0	24.4
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>52,798</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	20	8.2	5.4	8,140	7.1	4.3	6.1
Moderate	31	12.8	16.6	7,139	6.3	10.7	18.9
Middle	73	30.0	30.8	18,962	16.6	26.8	31.3
Upper	118	48.6	47.2	79,064	69.4	58.0	43.7
Unknown	1	0.4	0.0	585	0.5	0.2	0.0
<b>Total</b>	<b>243</b>	<b>100.0</b>	<b>100.0</b>	<b>113,890</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<small>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</small>							
<small>Note: Percentages may not total 100.0 percent due to rounding.</small>							

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	2.7	0	0.0	1.5	6.1
Moderate	0	0.0	11.1	0	0.0	6.9	18.9
Middle	0	0.0	28.8	0	0.0	22.5	31.3
Upper	0	0.0	57.5	0	0.0	69.1	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	1	16.7	6.6	210	52.0	5.5	6.1
Moderate	0	0.0	20.5	0	0.0	12.3	18.9
Middle	2	33.3	30.8	49	12.1	21.2	31.3
Upper	3	50.0	42.0	145	35.9	61.0	43.7
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>404</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	8.7	0	0.0	5.0	6.1
Moderate	0	0.0	34.0	0	0.0	25.9	18.9
Middle	0	0.0	34.2	0	0.0	34.9	31.3
Upper	0	0.0	23.1	0	0.0	34.1	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	1.5	5.7	375	2.1	3.1	6.1
Moderate	6	9.0	18.9	791	4.4	11.8	18.9
Middle	23	34.3	32.2	4,846	27.0	28.0	31.3
Upper	37	55.2	43.2	11,917	66.5	57.0	43.7
<b>Total</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>17,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	3	4.0	4.3	314	2.5	2.6	6.1
Moderate	14	18.7	16.4	1,414	11.0	10.5	18.9
Middle	20	26.7	30.9	1,992	15.6	26.4	31.3
Upper	38	50.7	48.4	9,088	71.0	60.5	43.7
<b>Total</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>	<b>12,808</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	9.1	3.6	150	13.7	3.0	6.1
Moderate	2	18.2	12.4	50	4.6	8.6	18.9
Middle	4	36.4	28.8	135	12.4	23.5	31.3
Upper	4	36.4	55.2	757	69.3	64.9	43.7
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,092</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	1	14.3	22.7	773	7.9	10.4	17.6
Moderate	0	0.0	27.1	0	0.0	27.1	28.7
Middle	3	42.9	25.8	3,069	31.2	33.7	28.6
Upper	2	28.6	23.4	1,280	13.0	28.5	24.4
Unknown	1	14.3	1.0	4,725	48.0	0.3	0.7
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>9,847</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	7	4.1	5.2	1,634	3.8	4.1	6.1
Moderate	23	13.5	17.6	2,280	5.3	13.9	18.9
Middle	53	31.2	31.1	10,174	23.8	28.1	31.3
Upper	86	50.6	46.1	23,969	56.0	53.7	43.7
Unknown	1	0.6	0.0	4,725	11.0	0.1	0.0
<b>Total</b>	<b>170</b>	<b>100.0</b>	<b>100.0</b>	<b>42,782</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Columbus, OH MSA #18140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	2.6	0	0.0	1.6	6.1
Moderate	0	0.0	11.6	0	0.0	6.6	18.9
Middle	0	0.0	27.8	0	0.0	21.0	31.3
Upper	0	0.0	58.1	0	0.0	70.8	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	1	10.0	7.5	22	2.0	4.2	6.1
Moderate	1	10.0	16.8	25	2.3	12.7	18.9
Middle	3	30.0	31.0	132	11.9	19.9	31.3
Upper	5	50.0	44.3	927	83.8	62.5	43.7
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,106</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	8.7	0	0.0	4.6	6.1
Moderate	0	0.0	28.7	0	0.0	20.0	18.9
Middle	0	0.0	26.9	0	0.0	24.5	31.3
Upper	0	0.0	35.7	0	0.0	51.0	43.7
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
Low	66	12.8	28,211	10.9	10.1
Moderate	88	17.1	38,994	15.0	18.9
Middle	168	32.6	85,342	32.9	26.7
Upper	191	37.0	103,166	39.8	43.8
Unknown	3	0.6	3,492	1.3	0.4
<b>Total</b>	<b>516</b>	<b>100.0</b>	<b>259,205</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Small Business Lending by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
Low	18	2.0	8,203	3.6	9.9
Moderate	35	3.9	30,828	13.4	18.5
Middle	378	41.6	95,910	41.7	26.6
Upper	474	52.2	94,634	41.2	44.5
Unknown	3	0.3	161	0.1	0.4
<b>Total</b>	<b>908</b>	<b>100.0</b>	<b>229,736</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Consumer Loans by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	%	
<b>Credit Cards</b>					
Low	12	12.6	27	7.6	11.9
Moderate	18	18.9	38	10.7	23.5
Middle	38	40.0	164	46.2	29.8
Upper	27	28.4	127	35.8	34.7
<b>Total</b>	<b>95</b>	<b>100.0</b>	<b>355</b>	<b>100.0</b>	<b>100.0</b>
<b>Motor Vehicle Loans</b>					
Low	5	4.3	118	4.3	11.9
Moderate	20	17.2	442	15.9	23.5
Middle	48	41.4	951	34.3	29.8
Upper	43	37.1	1,261	45.5	34.7
<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>2,772</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	2	28.6	10	9.5	11.9
Moderate	1	14.3	19	18.1	23.5
Middle	1	14.3	31	29.5	29.8
Upper	3	42.9	45	42.9	34.7
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	0	0.0	0	0.0	11.9
Moderate	6	40.0	30	40.0	23.5
Middle	7	46.7	35	46.7	29.8
Upper	2	13.3	11	14.7	34.7
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	19	8.2	155	4.7	11.9
Moderate	45	19.3	529	16.0	23.5
Middle	94	40.3	1,181	35.7	29.8
Upper	75	32.2	1,444	43.7	34.7
<b>Total</b>	<b>233</b>	<b>100.0</b>	<b>3,307</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					



Distribution of 2020 Consumer Loans by Income Level of Geography Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
<b>Credit Cards</b>					
Low	2	4.1	3	1.7	11.9
Moderate	6	12.2	10	5.7	23.5
Middle	22	44.9	88	50.0	29.8
Upper	19	38.8	75	42.6	34.7
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>176</b>	<b>100.0</b>	<b>100.0</b>
<b>Motor Vehicle Loans</b>					
Low	1	4.0	11	1.8	11.9
Moderate	2	8.0	75	11.9	23.5
Middle	9	36.0	247	39.3	29.8
Upper	13	52.0	295	47.0	34.7
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>628</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	0	0.0	0	0.0	11.9
Moderate	0	0.0	0	0.0	23.5
Middle	3	100.0	73	100.0	29.8
Upper	0	0.0	0	0.0	34.7
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	0	0.0	0	0.0	11.9
Moderate	2	14.3	16	15.2	23.5
Middle	3	21.4	20	19.0	29.8
Upper	9	64.3	68	64.8	34.7
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	3	3.3	14	1.4	11.9
Moderate	10	11.0	101	10.3	23.5
Middle	37	40.7	428	43.6	29.8
Upper	41	45.1	438	44.6	34.7
<b>Total</b>	<b>91</b>	<b>100.0</b>	<b>982</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2021 Home Equity Lines of Credit by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	%	\$(000)	\$%	
Low	6	2.9	284	1.3	6.1
Moderate	16	7.8	1,832	8.6	18.9
Middle	62	30.4	5,109	23.9	31.3
Upper	120	58.8	14,148	66.2	43.7
<b>Total</b>	<b>204</b>	<b>100.0</b>	<b>21,373</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 Home Equity Lines of Credit by Income Level of Geography					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	%	\$(000)	\$%	
Low	2	1.7	65	0.7	6.1
Moderate	10	8.7	677	7.3	18.9
Middle	46	40.0	3,170	34.0	31.3
Upper	57	49.6	5,416	58.1	43.7
<b>Total</b>	<b>115</b>	<b>100.0</b>	<b>9,327</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Columbus, OH MSA #18140					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	\$%	
<b>Home Purchase Loans</b>					
Low	0	0.0	0	0.0	22.7
Moderate	7	12.1	1,366	6.3	16.8
Middle	16	27.6	4,133	18.9	19.3
Upper	31	53.4	14,993	68.7	41.2
Unknown	4	6.9	1,328	6.1	0.0
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>21,820</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	8	5.7	818	2.2	22.7
Moderate	18	12.9	2,570	7.0	16.8
Middle	36	25.7	5,721	15.5	19.3
Upper	69	49.3	25,791	70.1	41.2
Unknown	9	6.4	1,910	5.2	0.0
<b>Total</b>	<b>140</b>	<b>100.0</b>	<b>36,809</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	22.7
Moderate	0	0.0	0	0.0	16.8
Middle	0	0.0	0	0.0	19.3
Upper	0	0.0	0	0.0	41.2
Unknown	1	100.0	250	100.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>					
Low	9	4.5	826	1.4	22.7
Moderate	27	13.4	4,007	6.8	16.8
Middle	52	25.7	9,854	16.7	19.3
Upper	100	49.5	40,784	69.2	41.2
Unknown	14	6.9	3,487	5.9	0.0
<b>Total</b>	<b>202</b>	<b>100.0</b>	<b>58,958</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.</p>					

Distribution of January 1, 2021 - June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Columbus, OH MSA #18140					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	%	\$(000)	%	
<b>Other Purpose LOC</b>					
Low	0	0.0	0	0.0	22.7
Moderate	0	0.0	0	0.0	16.8
Middle	0	0.0	0	0.0	19.3
Upper	0	0.0	0	0.0	41.2
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>					
Low	1	33.3	8	10.0	22.7
Moderate	2	66.7	70	90.2	16.8
Middle	0	0.0	0	0.0	19.3
Upper	0	0.0	0	0.0	41.2
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>					
Low	0	0.0	0	0.0	22.7
Moderate	0	0.0	0	0.0	16.8
Middle	0	0.0	0	0.0	19.3
Upper	0	0.0	0	0.0	41.2
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.</i>					

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	7	5.6	11.0	922	2.5	6.3	22.7
Moderate	23	18.5	23.1	4,681	12.6	17.7	16.8
Middle	17	13.7	20.8	4,187	11.3	20.0	19.3
Upper	62	50.0	30.5	21,189	57.2	42.6	41.2
Unknown	15	12.1	14.6	6,095	16.4	13.3	0.0
<b>Total</b>	<b>124</b>	<b>100.0</b>	<b>100.0</b>	<b>37,074</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	14	3.8	5.3	1,505	1.7	2.7	22.7
Moderate	54	14.8	14.8	7,946	9.0	10.0	16.8
Middle	73	20.0	21.5	15,635	17.7	18.3	19.3
Upper	196	53.7	42.4	57,227	64.6	52.5	41.2
Unknown	28	7.7	16.0	6,215	7.0	16.5	0.0
<b>Total</b>	<b>365</b>	<b>100.0</b>	<b>100.0</b>	<b>88,528</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	5.7	0	0.0	3.9	22.7
Moderate	0	0.0	14.6	0	0.0	10.6	16.8
Middle	0	0.0	22.6	0	0.0	19.0	19.3
Upper	0	0.0	53.7	0	0.0	61.7	41.2
Unknown	0	0.0	3.4	0	0.0	4.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	21	4.2	7.2	2,427	1.6	3.8	22.7
Moderate	78	15.6	17.3	12,652	8.5	11.8	16.8
Middle	92	18.4	20.8	20,113	13.6	17.3	19.3
Upper	258	51.5	37.9	78,416	53.0	44.8	41.2
Unknown	52	10.4	16.7	34,405	23.2	22.2	0.0
<b>Total</b>	<b>501</b>	<b>100.0</b>	<b>100.0</b>	<b>148,013</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2012-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%		\$%
<b>Other Purpose LOC</b>							
Low	0	0.0	6.5	0	0.0	4.0	22.7
Moderate	0	0.0	15.2	0	0.0	10.9	16.8
Middle	0	0.0	23.4	0	0.0	18.7	19.3
Upper	0	0.0	53.3	0	0.0	65.2	41.2
Unknown	0	0.0	1.7	0	0.0	1.2	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	9.9	0	0.0	5.6	22.7
Moderate	1	33.3	18.5	25	7.9	10.3	16.8
Middle	2	66.7	22.6	291	92.1	16.2	19.3
Upper	0	0.0	41.8	0	0.0	60.0	41.2
Unknown	0	0.0	7.2	0	0.0	7.9	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>316</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.4	0	0.0	0.3	22.7
Moderate	0	0.0	0.4	0	0.0	0.3	16.8
Middle	0	0.0	0.2	0	0.0	0.1	19.3
Upper	0	0.0	0.2	0	0.0	0.1	41.2
Unknown	0	0.0	98.7	0	0.0	99.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		\$%
<b>Home Purchase Loans</b>							
Low	6	6.1	7.9	489	1.5	4.2	22.7
Moderate	6	6.1	21.6	856	2.6	15.7	16.8
Middle	11	11.2	20.5	1,897	5.7	18.9	19.3
Upper	64	65.3	34.4	26,728	80.5	47.3	41.2
Unknown	11	11.2	15.6	3,231	9.7	13.9	0.0
<b>Total</b>	<b>98</b>	<b>100.0</b>	<b>100.0</b>	<b>33,201</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	4	3.3	6.0	253	1.0	3.0	22.7
Moderate	24	20.0	15.4	2,858	11.0	10.1	16.8
Middle	17	14.2	20.8	2,382	9.1	17.3	19.3
Upper	58	48.3	42.6	17,009	65.2	52.7	41.2
Unknown	17	14.2	15.1	3,588	13.8	16.9	0.0
<b>Total</b>	<b>120</b>	<b>100.0</b>	<b>100.0</b>	<b>26,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	6.7	0	0.0	4.8	22.7
Moderate	0	0.0	15.6	0	0.0	11.4	16.8
Middle	1	12.5	22.0	160	11.5	18.4	19.3
Upper	5	62.5	51.9	1,147	82.1	59.9	41.2
Unknown	2	25.0	3.8	90	6.4	5.6	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,397</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	10	4.1	6.9	742	0.7	3.2	22.7
Moderate	31	12.8	18.2	3,924	3.4	11.4	16.8
Middle	31	12.8	20.5	4,505	4.0	15.6	19.3
Upper	129	53.1	38.7	44,997	39.5	42.6	41.2
Unknown	42	17.3	15.7	59,722	52.4	27.2	0.0
<b>Total</b>	<b>243</b>	<b>100.0</b>	<b>100.0</b>	<b>113,890</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	6.5	0	0.0	3.8	22.7
Moderate	0	0.0	15.5	0	0.0	11.3	16.8
Middle	0	0.0	23.6	0	0.0	19.9	19.3
Upper	0	0.0	52.0	0	0.0	62.5	41.2
Unknown	0	0.0	2.3	0	0.0	2.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	9.4	0	0.0	5.6	22.7
Moderate	1	16.7	19.0	210	52.0	12.9	16.8
Middle	2	33.3	20.4	66	16.3	15.0	19.3
Upper	2	33.3	43.4	113	28.0	56.7	41.2
Unknown	1	16.7	7.8	15	3.7	9.9	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>404</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.3	0	0.0	0.0	22.7
Moderate	0	0.0	0.8	0	0.0	0.6	16.8
Middle	0	0.0	0.8	0	0.0	1.1	19.3
Upper	0	0.0	1.6	0	0.0	2.8	41.2
Unknown	0	0.0	96.5	0	0.0	95.4	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		%
<b>Home Purchase Loans</b>							
Low	2	3.0	8.0	141	0.8	4.1	22.7
Moderate	4	6.0	20.8	403	2.2	14.6	16.8
Middle	8	11.9	20.3	1,168	6.5	18.6	19.3
Upper	47	70.1	34.8	15,057	84.0	48.3	41.2
Unknown	6	9.0	16.2	1,160	6.5	14.4	0.0
<b>Total</b>	<b>67</b>	<b>100.0</b>	<b>100.0</b>	<b>17,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	8	10.7	9.1	518	4.0	5.2	22.7
Moderate	10	13.3	18.6	1,120	8.7	13.5	16.8
Middle	12	16.0	22.9	1,363	10.6	20.3	19.3
Upper	38	50.7	40.6	7,813	61.0	51.5	41.2
Unknown	7	9.3	8.8	1,994	15.6	9.5	0.0
<b>Total</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>	<b>12,808</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	2	18.2	5.6	70	6.4	3.3	22.7
Moderate	1	9.1	14.5	10	0.9	10.6	16.8
Middle	1	9.1	22.2	15	1.4	17.9	19.3
Upper	6	54.5	51.4	847	77.6	60.1	41.2
Unknown	1	9.1	6.4	150	13.7	8.1	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,092</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	12	7.1	7.8	729	1.7	3.6	22.7
Moderate	17	10.0	18.6	1,623	3.8	11.6	16.8
Middle	24	14.1	20.7	2,696	6.3	15.7	19.3
Upper	95	55.9	37.5	24,573	57.4	41.3	41.2
Unknown	22	12.9	15.3	13,161	30.8	27.9	0.0
<b>Total</b>	<b>170</b>	<b>100.0</b>	<b>100.0</b>	<b>42,782</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Columbus, OH MSA #18140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		\$%
<b>Other Purpose LOC</b>							
Low	0	0.0	7.1	0	0.0	4.5	22.7
Moderate	0	0.0	14.5	0	0.0	10.6	16.8
Middle	0	0.0	23.4	0	0.0	18.6	19.3
Upper	0	0.0	50.9	0	0.0	62.8	41.2
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	7.3	0	0.0	4.2	22.7
Moderate	2	20.0	17.4	90	8.1	12.1	16.8
Middle	3	30.0	22.9	150	13.6	15.8	19.3
Upper	4	40.0	45.1	856	77.4	58.0	41.2
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,106</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	1.4	0	0.0	1.0	22.7
Moderate	0	0.0	1.0	0	0.0	0.9	16.8
Middle	0	0.0	1.6	0	0.0	1.3	19.3
Upper	0	0.0	1.0	0	0.0	1.0	41.2
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Columbus, OH MSA #18140					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	158	30.6	64,934	25.1	91.6
<b>Over \$1 Million</b>	180	34.9	159,601	61.6	7.5
<b>Revenue Unknown</b>	178	34.5	34,670	13.4	0.9
<b>Total</b>	516	100.0	259,205	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	221	42.8	9,901	3.8	
<b>\$100,001 - \$250,000</b>	110	21.3	19,941	7.7	
<b>\$250,001 - \$1 Million</b>	131	25.4	70,882	27.3	
<b>Total</b>	516	100.0	259,205	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	64	40.5	3,122	4.8	
<b>\$100,001 - \$250,000</b>	42	26.6	7,657	11.8	
<b>\$250,001 - \$1 Million</b>	37	23.4	18,608	28.7	
<b>Total</b>	158	100.0	64,934	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2020 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Columbus, OH MSA #18140					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	98	10.8	45,407	19.8	91.4
<b>Over \$1 Million</b>	65	7.2	59,586	25.9	7.8
<b>Revenue Unknown</b>	745	82.0	124,743	54.3	0.8
<b>Total</b>	908	100.0	229,736	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	592	65.2	19,176	8.3	
<b>\$100,001 - \$250,000</b>	159	17.5	25,531	11.1	
<b>\$250,001 - \$1 Million</b>	109	12.0	52,304	22.8	
<b>Total</b>	908	100.0	229,736	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	35	35.7	1,617	3.6	
<b>\$100,001 - \$250,000</b>	27	27.6	4,750	10.5	
<b>\$250,001 - \$1 Million</b>	25	25.5	11,221	24.7	
<b>Total</b>	98	100.0	45,407	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Distribution of 2021 Consumer Loans by Borrower Income Level					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
<b>Credit Cards</b>					
Low	34	35.8	90	25.4	24.6
Moderate	23	24.2	83	23.4	16.4
Middle	14	14.7	77	21.7	17.2
Upper	17	17.9	76	21.4	41.8
Unknown	7	7.4	30	8.5	0.0
<b>Total</b>	<b>95</b>	<b>100.0</b>	<b>355</b>	<b>100.0</b>	<b>100.0</b>
<b>Motor Vehicle Loans</b>					
Low	14	12.1	142	5.1	24.6
Moderate	14	12.1	300	10.8	16.4
Middle	16	13.8	437	15.8	17.2
Upper	31	26.7	942	34.0	41.8
Unknown	41	35.3	952	34.3	0.0
<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>2,772</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	2	28.6	23	21.9	24.6
Moderate	1	14.3	31	29.5	16.4
Middle	1	14.3	5	4.8	17.2
Upper	3	42.9	45	42.9	41.8
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	3	20.0	14	18.7	24.6
Moderate	7	46.7	28	37.3	16.4
Middle	2	13.3	12	16.0	17.2
Upper	1	6.7	8	10.7	41.8
Unknown	2	13.3	13	17.3	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	53	22.7	269	8.1	24.6
Moderate	45	19.3	442	13.4	16.4
Middle	33	14.2	531	16.1	17.2
Upper	52	22.3	1,071	32.4	41.8
Unknown	50	21.5	995	30.1	0.0
<b>Total</b>	<b>233</b>	<b>100.0</b>	<b>3,307</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2020 Consumer Loans by Borrower Income Level					
Assessment Area: Columbus, OH MSA #18140					
Geographic Income Level	Bank Loans				Households by Household Income %
	#	%	\$(000)	%	
<b>Credit Cards</b>					
Low	16	32.7	32	18.2	24.6
Moderate	6	12.2	16	9.1	16.4
Middle	3	6.1	16	9.1	17.2
Upper	8	16.3	59	33.5	41.8
Unknown	16	32.7	54	30.7	0.0
<b>Total</b>	<b>49</b>	<b>100.0</b>	<b>176</b>	<b>100.0</b>	<b>100.0</b>
<b>Motor Vehicle Loans</b>					
Low	2	8.0	31	4.9	24.6
Moderate	6	24.0	140	22.3	16.4
Middle	3	12.0	32	5.1	17.2
Upper	9	36.0	354	56.4	41.8
Unknown	5	20.0	71	11.3	0.0
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>628</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Secured Loans</b>					
Low	0	0.0	0	0.0	24.6
Moderate	0	0.0	0	0.0	16.4
Middle	2	66.7	50	68.5	17.2
Upper	1	33.3	23	31.5	41.8
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>
<b>Other – Unsecured Loans</b>					
Low	4	28.6	25	23.8	24.6
Moderate	1	7.1	9	8.6	16.4
Middle	0	0.0	0	0.0	17.2
Upper	7	50.0	62	59.0	41.8
Unknown	2	14.3	9	8.6	0.0
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Consumer Loans</b>					
Low	22	24.2	88	9.0	24.6
Moderate	13	14.3	165	16.8	16.4
Middle	8	8.8	98	10.0	17.2
Upper	25	27.5	498	50.7	41.8
Unknown	23	25.3	134	13.6	0.0
<b>Total</b>	<b>91</b>	<b>100.0</b>	<b>982</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data					
2012-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Distribution of 2021 Home Equity Lines of Credit by Borrower Income Level					
Assessment Area: Columbus, OH MSA #18140					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	%	\$(000)	\$%	
Low	9	4.4	262	1.2	22.7
Moderate	25	12.3	1,078	5.0	16.8
Middle	39	19.1	3,245	15.2	19.3
Upper	112	54.9	13,839	64.7	41.2
Unknown	19	9.3	2,949	13.8	0.0
<b>Total</b>	<b>204</b>	<b>100.0</b>	<b>21,373</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 Home Equity Lines of Credit by Borrower Income Level					
Assessment Area: Columbus, OH MSA #18140					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	%	\$(000)	\$%	
Low	8	7.0	270	2.9	22.7
Moderate	10	8.7	685	7.3	16.8
Middle	15	13.0	994	10.7	19.3
Upper	68	59.1	6,486	69.5	41.2
Unknown	14	12.2	892	9.6	0.0
<b>Total</b>	<b>115</b>	<b>100.0</b>	<b>9,327</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Cincinnati, OH-KY-IN MSA #17140					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	4	7.3	556	4.6	20.0
Moderate	13	23.6	2,714	22.4	17.1
Middle	10	18.2	2,067	17.0	21.2
Upper	28	50.9	6,794	56.0	41.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>12,131</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	2	2.2	142	0.7	20.0
Moderate	16	18.0	2,597	12.4	17.1
Middle	14	15.7	2,582	12.4	21.2
Upper	55	61.8	15,258	73.0	41.6
Unknown	2	2.2	318	1.5	0.0
<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>20,897</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	20.0
Moderate	0	0.0	0	0.0	17.1
Middle	0	0.0	0	0.0	21.2
Upper	0	0.0	0	0.0	41.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>					
Low	6	4.2	698	2.1	20.0
Moderate	29	20.1	5,311	16.1	17.1
Middle	24	16.7	4,650	14.1	21.2
Upper	83	57.6	22,053	66.8	41.6
Unknown	2	1.4	318	1.0	0.0
<b>Total</b>	<b>144</b>	<b>100.0</b>	<b>33,029</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. *Aggregate data is not currently available.</i>					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Borrower Income Level Assessment Area: Cincinnati, OH-KY-IN MSA #17140					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	%	\$(000)	%	
<b>Other Purpose LOC</b>					
Low	0	0.0	0	0.0	20.0
Moderate	0	0.0	0	0.0	17.1
Middle	0	0.0	0	0.0	21.2
Upper	0	0.0	0	0.0	41.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>					
Low	0	0.0	0	0.0	20.0
Moderate	0	0.0	0	0.0	17.1
Middle	0	0.0	0	0.0	21.2
Upper	0	0.0	0	0.0	41.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>					
Low	0	0.0	0	0.0	20.0
Moderate	0	0.0	0	0.0	17.1
Middle	0	0.0	0	0.0	21.2
Upper	0	0.0	0	0.0	41.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2012-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>					
<i>*Aggregate data is not currently available.</i>					



Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cincinnati, OH-KY-IN MSA #17140							
Borrower Income Level	Bank and Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%		%
<b>Home Purchase Loans</b>							
Low	10	6.8	11.2	1,430	4.0	6.6	20.0
Moderate	28	19.0	25.5	4,993	14.1	19.8	17.1
Middle	43	29.3	22.8	9,277	26.2	22.9	21.2
Upper	66	44.9	29.1	19,717	55.7	39.4	41.6
Unknown	0	0.0	11.4	0	0.0	11.3	0.0
<b>Total</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>	<b>35,417</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	5	1.9	5.4	580	0.9	2.9	20.0
Moderate	37	13.7	15.7	5,930	9.0	11.0	17.1
Middle	70	25.9	21.4	14,293	21.7	18.5	21.2
Upper	157	58.1	41.3	44,800	68.0	50.4	41.6
Unknown	1	0.4	16.2	244	0.4	17.2	0.0
<b>Total</b>	<b>270</b>	<b>100.0</b>	<b>100.0</b>	<b>65,847</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	6.2	0	0.0	3.4	20.0
Moderate	0	0.0	17.3	0	0.0	12.2	17.1
Middle	0	0.0	21.6	0	0.0	17.2	21.2
Upper	1	100.0	47.5	26	100.0	57.0	41.6
Unknown	0	0.0	7.3	0	0.0	10.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	15	3.6	7.7	2,010	2.0	4.2	20.0
Moderate	65	15.6	19.3	10,923	10.8	13.8	17.1
Middle	113	27.0	21.4	23,570	23.3	19.0	21.2
Upper	224	53.6	36.2	64,543	63.7	42.9	41.6
Unknown	1	0.2	15.3	244	0.2	20.1	0.0
<b>Total</b>	<b>418</b>	<b>100.0</b>	<b>100.0</b>	<b>101,290</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2020 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cincinnati, OH-KY-IN MSA #17140							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	8.2	0	0.0	4.7	20.0
Moderate	0	0.0	17.6	0	0.0	14.2	17.1
Middle	0	0.0	20.1	0	0.0	15.9	21.2
Upper	0	0.0	51.4	0	0.0	62.5	41.6
Unknown	0	0.0	2.8	0	0.0	2.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	10.1	0	0.0	5.6	20.0
Moderate	0	0.0	17.3	0	0.0	11.8	17.1
Middle	0	0.0	17.3	0	0.0	10.6	21.2
Upper	0	0.0	46.9	0	0.0	62.3	41.6
Unknown	0	0.0	8.4	0	0.0	9.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	0.0	0	0.0	0.0	20.0
Moderate	0	0.0	0.0	0	0.0	0.0	17.1
Middle	0	0.0	0.0	0	0.0	0.0	21.2
Upper	0	0.0	0.0	0	0.0	0.0	41.6
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2021 Home Equity Lines of Credit by Borrower Income Level						
Assessment Area: Cincinnati, OH-KY-IN MSA #17140						
Borrower Income Level	Bank Loans				Families by Family Income %	
	#	%	\$(000)	%		
Low	1	1.7	20	0.4	20.0	
Moderate	4	6.9	120	2.4	17.1	
Middle	13	22.4	1,148	23.2	21.2	
Upper	36	62.1	3,481	70.3	41.6	
Unknown	4	6.9	183	3.7	0.0	
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>4,952</b>	<b>100.0</b>	<b>100.0</b>	
Source: 2021 FFIEC Census Data						
2011-2015 U.S. Census Bureau: American Community Survey						
Note: Percentages may not total 100.0 percent due to rounding.						

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Cincinnati, OH-KY-IN MSA #17140					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	2	3.6	242	2.0	4.5
Moderate	5	9.1	927	7.6	10.9
Middle	33	60.0	6,762	55.7	55.1
Upper	15	27.3	4,201	34.6	29.5
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>12,131</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	3	3.4	300	1.4	4.5
Moderate	5	5.6	658	3.1	10.9
Middle	40	44.9	9,430	45.1	55.1
Upper	41	46.1	10,510	50.3	29.5
<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>20,897</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	4.5
Moderate	0	0.0	0	0.0	10.9
Middle	0	0.0	0	0.0	55.1
Upper	0	0.0	0	0.0	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>					<b>Multifamily Units %</b>
Low	0	0.0	0	0.0	12.7
Moderate	0	0.0	0	0.0	15.3
Middle	0	0.0	0	0.0	61.1
Upper	0	0.0	0	0.0	11.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>					<b>Owner Occupied Units %</b>
Low	5	3.5	542	1.6	4.5
Moderate	10	6.9	1,585	4.8	10.9
Middle	73	50.7	16,192	49.0	55.1
Upper	56	38.9	14,710	44.5	29.5
<b>Total</b>	<b>144</b>	<b>100.0</b>	<b>33,029</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					

Distribution of January 1, 2021 – June 30, 2021 HMDA Reportable Loans by Income Level of Geography Assessment Area: Cincinnati, OH-KY-IN MSA #17140					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	%	\$(000)	%	
<b>Other Purpose LOC</b>					
Low	0	0.0	0	0.0	4.5
Moderate	0	0.0	0	0.0	10.9
Middle	0	0.0	0	0.0	55.1
Upper	0	0.0	0	0.0	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>					
Low	0	0.0	0	0.0	4.5
Moderate	0	0.0	0	0.0	10.9
Middle	0	0.0	0	0.0	55.1
Upper	0	0.0	0	0.0	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>					
Low	0	0.0	0	0.0	4.5
Moderate	0	0.0	0	0.0	10.9
Middle	0	0.0	0	0.0	55.1
Upper	0	0.0	0	0.0	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>					

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Cincinnati, OH-KY-IN MSA #17140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	2	1.4	4.7	213	0.6	2.7	4.5
Moderate	10	6.8	10.0	2,942	8.3	7.1	10.9
Middle	93	63.3	57.1	20,502	57.9	54.3	55.1
Upper	42	28.6	28.3	11,760	33.2	35.8	29.5
<b>Total</b>	<b>147</b>	<b>100.0</b>	<b>100.0</b>	<b>35,417</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.9	0	0.0	1.2	4.5
Moderate	10	3.7	6.8	1,903	2.9	5.0	10.9
Middle	116	43.0	53.4	25,639	38.9	49.6	55.1
Upper	144	53.3	37.8	38,305	58.2	44.2	29.5
<b>Total</b>	<b>270</b>	<b>100.0</b>	<b>100.0</b>	<b>65,847</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.9	0	0.0	1.1	4.5
Moderate	0	0.0	6.5	0	0.0	5.8	10.9
Middle	0	0.0	53.1	0	0.0	49.3	55.1
Upper	1	100.0	38.6	26	100.0	43.7	29.5
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	10.8	0	0.0	13.6	
Moderate	0	0.0	21.5	0	0.0	25.9	15.3
Middle	0	0.0	58.5	0	0.0	57.9	61.1
Upper	0	0.0	9.2	0	0.0	2.6	11.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	2	0.5	3.1	213	0.2	2.5	
Moderate	20	4.8	8.2	4,845	4.8	7.1	10.9
Middle	209	50.0	54.9	46,141	45.6	52.1	55.1
Upper	187	44.7	33.9	50,091	49.5	38.3	29.5
<b>Total</b>	<b>418</b>	<b>100.0</b>	<b>100.0</b>	<b>101,290</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2020 HMDA Reportable Loans by Income Level of Geography Assessment Area: Cincinnati, OH-KY-IN MSA #17140							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Other Purpose LOC</b>							
Low	0	0.0	2.5	0	0.0	1.5	4.5
Moderate	0	0.0	5.0	0	0.0	3.1	10.9
Middle	0	0.0	49.8	0	0.0	48.2	55.1
Upper	0	0.0	42.6	0	0.0	47.2	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	3.9	0	0.0	1.9	4.5
Moderate	0	0.0	8.9	0	0.0	5.3	10.9
Middle	0	0.0	59.8	0	0.0	63.1	55.1
Upper	0	0.0	27.4	0	0.0	29.7	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	4.4	0	0.0	2.5	4.5
Moderate	0	0.0	14.3	0	0.0	9.8	10.9
Middle	0	0.0	58.2	0	0.0	57.3	55.1
Upper	0	0.0	23.2	0	0.0	30.5	29.5
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<small>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>							

Distribution of 2021 Home Equity Lines of Credit by Income Level of Geography Assessment Area: Cincinnati, OH-KY-IN MSA #17140					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	%	\$(000)	%	
Low	1	1.7	20	0.4	4.5
Moderate	1	1.7	250	5.0	10.9
Middle	26	44.8	2,415	48.8	55.1
Upper	30	51.7	2,266	45.8	29.5
<b>Total</b>	<b>58</b>	<b>100.0</b>	<b>4,952</b>	<b>100.0</b>	<b>100.0</b>
<small>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>					

## Appendix E – Glossary of Terms

**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.

**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 their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income 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 lines of credit, 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 nonrelatives 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 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 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) 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 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.

**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.