



PUBLIC DISCLOSURE

Date of Evaluation: JANUARY 10, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Name of Depository Institution: AMERISERV FINANCIAL BANK

Institution's Identification Number: 928618

Address: 216 FRANKLIN STREET

JOHNSTOWN, PENNSYLVANIA

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

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 the 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 CRA RATING

OVERALL RATING: SATISFACTORY

The following table indicates the Community Reinvestment Act (CRA) performance level of AmeriServ Financial Bank (AmeriServ) with respect to the lending, investment, and service tests.

PERFORMANCE TEST RATINGS TABLE

PERFORMANCE LEVELS	AmeriServ Financial Bank		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- An adequate percentage of the bank's loans were made inside its assessment areas;
- The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The bank has made an adequate level of community development loans;
- The bank has made an adequate level of qualified investments and grants; and
- The bank provides a limited level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

AmeriServ was rated satisfactory at its previous CRA evaluation dated April 17, 2017, which also used the Interagency Large Institution CRA Examination Procedures.

AmeriServ is a state-chartered full-service commercial bank headquartered in Johnstown, Cambria County, Pennsylvania. The institution offers a variety of commercial and consumer banking services, through 17 branch offices located in Cambria, Westmoreland, Allegheny, Somerset, and Centre counties in central and western Pennsylvania, and one branch office located in Washington County, Maryland. Of the bank’s branches, none are located in low-income census tracts, and five are located in moderate-income census tracts. Eleven branches are located in middle-income tracts, and two are located in upper-income tracts. In addition to its full-service branches, the institution also maintains loan production offices (LPOs), including a mortgage and commercial lending office in Altoona, PA, and a commercial lending office in Monroeville, PA.

The bank is the sole banking, and primary operating subsidiary of AmeriServ Financial, Inc., a bank holding company also located in Johnstown, PA, with assets of \$1.3 billion as of September 30, 2021.

The table below details the locations of AmeriServ’s locations as of the CRA evaluation date.

AmeriServ Financial Bank Branch Locations			
Assessment Area	County	State	Number of Branches
Johnstown, PA Assessment Area	Cambria County	PA	8
Pittsburgh, PA Assessment Area	Allegheny & Westmoreland Counties	PA	3
State College, PA Assessment Area	Centre County	PA	1
Somerset County, PA Assessment Area	Somerset County	PA	4
Hagerstown, MD Assessment Area	Washington County	MD	1
Total Full-Service Branches			17
Johnstown, PA Assessment Area	Cambria County	PA	1
Total Limited-Service Branches			1
TOTAL BRANCHES			18
Loan Production Offices			
Altoona MSA	Blair County	PA	1
Pittsburgh MSA	Allegheny County	PA	1
Assessment Area	County	State	Number of Branches

According to the Consolidated Reports of Condition and Income (Call Report), as of September 30, 2021, AmeriServ reported \$1.3 billion in assets, of which \$996 million, or 75%, were loans.

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On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) were the most significant credit product offered by the bank and comprised \$557 million as of September 30, 2021, or 56% of the bank’s loan portfolio. Residential mortgage loans (comprised of closed-end and open-end loans secured by residential properties, and multifamily loans) represent the second largest segment of the bank’s loan portfolio at just under \$357 million, or 36%, of the bank’s total loan portfolio.

The composition of the bank’s loan portfolio as of September 30, 2021, is presented in the table below.

AmeriServ Financial Bank		
Loans as of 9/30/2021	\$ (000s)	%
Loans Secured by Nonfarm Nonresidential Properties (Commercial Mortgages)	394,948	39.7
Commercial and Industrial Loans	162,199	16.3
Secured by Farmland	2,165	0.2
Secured by Residential Properties (Closed-end)	199,735	20.1
Secured by Residential Properties (Open-end)	78,133	7.8
Secured by Multifamily Residential Properties	78,740	7.9
Construction & Land Development	59,037	5.9
Consumer Loans	15,610	1.6
Loans to Finance Agricultural Production & Other Loans to Farmers	28	0.0
States and Political Subdivisions	2,017	0.2
Other Loans	3,417	0.3
Other Leases	0	0.0
TOTAL	996,029	100.0

Small Business Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report, as of September 30, 2021, indicates that \$131 million (24%) of the bank’s outstanding commercial loans¹ were designated as small business loans. At the previous CRA evaluation, AmeriServ’s outstanding commercial loan volume was just under \$507 million, of which \$140 million (28%) was designated as small business loans. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less, as detailed in the following table.

AmeriServ Financial Bank Small Business Loans		
	Amount Outstanding as of 09/30/2021 \$ (000s)	%
Loans with original amounts of \$100,000 or less	15,048	2.7
Loans with original amounts of \$100,001 through \$250,000	20,171	3.6
Loans with original amounts of \$250,001 to \$1 million	96,177	17.3
Total Small Business Loans	131,396	23.6
Loans with original amounts of more than \$1,000,000	425,751	76.4
Total Commercial Loans	557,147	100.0

¹Commercial loans are comprised of loans secured by nonfarm, nonresidential properties, along with commercial and industrial loans.

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

AmeriServ was rated satisfactory at its previous CRA evaluation performed by the Federal Reserve Bank of Philadelphia dated April 17, 2017. The previous examination was performed using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System (Board of Governors).

DESCRIPTION OF ASSESSMENT AREAS

For purposes of CRA, AmeriServ has designated five assessment areas, as follows:

1. The Johnstown, PA assessment area, consisting of Cambria County, which comprises the entire Johnstown, PA Metropolitan Statistical Area (MSA);
2. The Pittsburgh, PA assessment area, consisting of Allegheny and Westmoreland Counties in the larger Pittsburgh, PA MSA;
3. The State College, PA assessment area, consisting of Centre County, which comprises the entire State College, PA MSA;
4. The Somerset County, PA assessment area, a non-MSA; and,
5. The Hagerstown, MD assessment area, consisting of twenty-six census tracts within and around the city of Hagerstown, MD, which is part of the larger Hagerstown-Martinsburg, MD-WV MSA.

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

The bank's assessment area has changed since the last examination with the addition of the Hagerstown, MD assessment area in November 2018. At the previous evaluation, the bank operated a LPO in Hagerstown, MD, and this was consolidated into the new branch as of November 2018.

SCOPE OF EXAMINATION

The current evaluation of AmeriServ's CRA performance covers the period from April 18, 2017, through January 10, 2022, and was conducted using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors.

Under the lending test, loan products evaluated included:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank in calendar year 2017;
- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose “not applicable,” collectively titled HMDA loans, reported by the bank in calendar years 2018, 2019 and 2020²;
- Small business loans reported by the bank pursuant to the CRA for calendar years 2017, 2018, 2019, and 2020; and
- Other loans that qualified as community development loans during the entire evaluation period from April 18, 2017, through January 10, 2022.

Because the bank originated more HMDA loans, by both number and dollar volume, than small business loans, HMDA loans were generally given the most weight in determining AmeriServ’s overall rating, followed by small business loans. In total, within the bank’s assessment areas, the bank originated 952 HMDA loans totaling nearly \$236 million, and 682 CRA small business loans totaling \$97 million over the evaluation period. Though HMDA loans were weighted more heavily than small business loans in most assessment areas, there were two exceptions. In the Johnstown, PA assessment area, the volume and dollar amount of small business loans exceeded HMDA loans, and therefore, small business loans were given greater weight in that assessment area. In the Somerset County, PA assessment area, HMDA and small business loans were weighted equally, as their number and dollar amount were comparable. Additional details on these weighting decisions are contained in the assessment area discussions.

Additionally, it is noted that small business loans were not evaluated in the State College, PA assessment area, and HMDA loans were not evaluated within the Hagerstown, MD assessment area because analysis of the very low volume of loans made by the bank in those assessment areas would not have yielded meaningful conclusions.

AmeriServ’s HMDA and small business loans were compared to the aggregate of all lenders in the bank’s assessment areas that report home-mortgage loans pursuant to HMDA, and small business loans pursuant to CRA. These data are reported annually.

²In October 2015 and August 2017, through final rules that amended Regulation C, the Consumer Financial Protection Bureau (CFPB) modified: (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered transactions); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. See 80 Fed. Reg. 66127 (October 28, 2015) (final rule); and 82 Fed. Reg. 43088 (September 13, 2017) (correction). The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the “home-mortgage loan” definition in the CRA regulations to mean a “closed-end mortgage loan” or an “open-end line of credit,” as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions under HMDA; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, “home equity loan” was deleted from the CRA definition of “consumer loan” because home equity loans are now included within the CRA definition of “home-mortgage loan.”

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

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of American Community Survey (ACS) for loans originated in 2017, 2018, 2019, and 2020³. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 Census data in 2017, 2018, 2019, and 2020, unless otherwise noted.

For small business loans, examiners used annual Dun & Bradstreet data for comparison in the applicable years. Dun & Bradstreet collects and publishes this self-reported data detailing the revenues and locations of local businesses.

To supplement economic, demographic and performance data, and gain a better perspective on community credit needs, interviews were conducted with ten community representatives during the course of the evaluation. Discussions were held with four community contacts focused on affordable housing, two involved in revitalization and stabilization activities, three community contacts involved in economic development, and one involved in the provision of community services targeted to low- and moderate-income individuals within the bank's assessment areas. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

For purposes of assessing the bank's overall CRA performance, greatest weight was given to the bank's performance in the Commonwealth of Pennsylvania. In reaching the statewide conclusions within the Commonwealth of Pennsylvania, greatest weight was given to the bank's performance in the Johnstown, PA assessment area, followed by performance in the Pittsburgh, PA, State College, PA, and Somerset County, PA assessment areas, as detailed below.

A full-scope review was conducted in the Johnstown, PA assessment area. The majority of the bank's operations and lending were in the Johnstown, PA assessment area. Nine of the bank's 18 branches (50%) were located in this assessment area. Likewise, 67% of the bank's deposits were held in the assessment area. From a loan perspective, 40% of the bank's total loans by number and 21% by dollar were made within the Johnstown, PA assessment area.

³In accordance with FFIEC policy, 2015 ACS data is used to analyze data starting in 2017 and thereafter.

Likewise, the Pittsburgh, PA assessment area was evaluated using full-scope review procedures. During the evaluation period, the bank operated three branches (nearly 17%) within the assessment area, and these branches generated almost 16% of deposits. From a loan standpoint, 23% of total loans by number and 41% of total loans by dollar were made within the Pittsburgh, PA assessment area.

The State College, PA assessment area was also evaluated using full-scope review procedures. During the evaluation period, the bank operated one branch (less than 6%) within the assessment area, and this branch generated under 4% of total deposits. From a loan perspective, nearly 26% of loans by total number, and 31% of loans by total dollar were made within the State College, PA assessment area.

Finally, the Somerset County, PA assessment area received a limited-scope review, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance in the full-scope areas. AmeriServ operated four branches (22%) within the assessment area, and these branches generated almost 13% of total deposits, 10% of total loans by number, and 5% of total loans by dollar.

Performance in the State of Maryland was given significantly less weight than in the Commonwealth of Pennsylvania. In reaching the statewide conclusions for the State of Maryland, performance was based solely on performance in the Hagerstown, MD assessment area, the bank's only assessment area in the State of Maryland.

A full-scope review of the Hagerstown, MD assessment area was conducted. AmeriServ operated one branch (less than 6%) in the Hagerstown, MD assessment area, which generated under 2% of total deposits, 2% of total loans by number, and 2% of total loans by dollar volume.

As explained previously, the bank's assessment area has changed since the last examination with the addition of the Hagerstown, Maryland branch location in November 2018. With this addition, the bank is now defined as an interstate bank.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated high satisfactory.

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA, and small business lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes, including small businesses;

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- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Overall, AmeriServ lending levels reflect good responsiveness to the credit needs of its assessment areas in Pennsylvania and Maryland.

As indicated previously, as of September 30, 2021, AmeriServ reported total loans of just over \$996 million, or 75% of bank assets. This percentage exceeded the same measure for the bank’s peer group⁴, for which total loans represented 63% of total assets. At the previous evaluation conducted as of April 17, 2017, total loans represented 78% of total assets, using figures as of December 31, 2016.

The bank’s loan-to-deposit ratio averaged 90.4% over the 19-quarter period ending September 30, 2021, while the peer ratio averaged 85.2% over the same 19-quarter time frame. AmeriServ’s loan-to-deposit ratio averaged 94% over the 12 quarters of operation evaluated at the previous exam from January 1, 2014, through December 31, 2016.

The table below depicts the bank’s HMDA and CRA small business lending activity during the evaluation period.

AmeriServ Financial Bank Summary of Lending Activity				
Loan Types	#	%	\$ (000s)	%
Home Improvement	48	1.9	445	0.1
Home Purchase	898	36.2	177,226	33.3
Multifamily Housing	49	2.0	69,263	13.0
Refinancing	560	22.6	132,759	24.9
Other Purpose Closed-End	2	0.0	359	0.1
Total HMDA related	1,557	62.7	380,052	71.4
Total Small Business related	917	37.0	151,171	28.4
Total Small Farm related	7	0.3	912	0.2
Total Consumer related	1	0.0	60	0.0
TOTAL LOANS	2,482	100.0	532,195	100.0

⁴ AmeriServ’s Uniform Bank Performance Report peer group includes insured commercial banks having assets between \$1 billion and \$3 billion.

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Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank’s assessment areas. The analysis consisted of an evaluation of AmeriServ’s HMDA loans and small business loans. The assessment area concentration analysis indicated that an adequate percentage of loans were made in the bank’s assessment areas.

More specifically, during the evaluation period, AmeriServ made 61% of HMDA loans by number and 62% by dollar amount in the bank’s assessment areas. This percentage of lending was a decrease from the previous evaluation, where 72% of the bank’s HMDA loans by total number, and 70% by dollar amount, were made inside the bank’s assessment areas. The bank attributes the decline primarily to an increase in the volume of Pennsylvania State Education Association (PSEA) home mortgage loans, which are originated throughout the state of Pennsylvania as a product offering to union members in public education. Such loans are often located outside of the bank’s defined assessment areas.

With respect to small business loans, 74% of the number of small business loans, and 64% by dollar amount were extended in the bank’s assessment areas. These levels represent an increase from the previous evaluation when 70% of small business loans by number and 55% by total dollar amount, were made within the bank’s assessment areas.

Due to the negligible volume in comparison to HMDA and small business loans, other loans and small farm loans were not included in this analysis.

Overall, 66% of loans by number, and 63% of loans by dollar volume were made within the five assessment areas included in this evaluation.

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

AmeriServ Financial Bank								
Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Improvement	42	87.5	355	79.8	6	12.5	90	20.2
Home Purchase - Conventional	489	69.2	97,426	67.2	218	30.8	47,660	32.8
Home Purchase - FHA	91	61.5	11,962	55.0	57	38.5	9,807	45.0
Home Purchase - VA	32	74.4	8,005	77.2	11	25.6	2,366	22.8
Multifamily Housing	42	85.7	60,747	87.7	7	14.3	8,516	12.3
Other Purpose Closed-End	1	50.0	205	57.1	1	50.0	154	42.9
Refinancing	255	45.5	56,991	42.9	305	54.5	75,768	57.1
Total HMDA related	952	61.1	235,691	62.0	605	38.9	144,361	38.0
Total Other Loans	0	0	0	0	1	100.0	60	100.0
Total Small Business related	682	74.4	97,107	64.2	235	25.6	54,064	35.8
Total Small Farm related	6	85.7	468	61.3	1	14.3	444	48.7
TOTAL LOANS	640	66.1	333,266	62.6	842	33.9	198,929	37.4

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, the bank's distribution of HMDA loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate, due to adequate performance in all Pennsylvania full-scope assessment areas, and consistent performance in the limited-scope Somerset County, PA assessment area. HMDA loans were not evaluated in the state of Maryland as a result of very low loan volume in the Hagerstown, MD assessment area.

The geographic distribution of HMDA loans reflects good penetration throughout the bank's assessment areas, primarily due to adequate performance in the Johnstown, PA assessment area, excellent performance in the Pittsburgh, PA assessment area, and good performance in the State College, PA assessment area. Performance in the limited-scope Somerset County, PA assessment area was consistent with that of the full-scope assessment areas in the State of Pennsylvania. HMDA loans were not evaluated in the state of Maryland as a result of very low loan volume in the Hagerstown, MD assessment area.

Small Business Lending

Overall, the borrower distribution of small business loans reflects adequate penetration throughout the bank's assessment areas, due to adequate performance in the Johnstown, PA, Pittsburgh, PA, and Hagerstown, MD assessment areas. Performance in the limited-scope Somerset County, PA assessment area was consistent with performance in the full-scope Pennsylvania assessment areas. Small business loans were not evaluated in the State College, PA assessment area due to low loan volumes, which would not have been sufficient from which to draw conclusions.

The geographic distribution of small business loans reflects good penetration throughout the bank's assessment areas, due to excellent performance in the Johnstown, PA and Pittsburgh, PA assessment areas, and adequate performance in the Hagerstown, MD assessment areas. The geographic distribution of small business lending in the limited-scope Somerset County, PA assessment area was below the levels in the full-scope review areas in Pennsylvania. Small business loans were not evaluated in the State College, PA assessment area due to limited loan volume.

Responsiveness to Credit Needs

Overall, AmeriServ exhibits a good record of serving the credit needs of low- and moderate-income individuals and very small businesses. Affordable housing was a credit need identified by nearly all of the community contacts in the bank's assessment areas, and the bank's HMDA lending record shows that home-mortgage loans are being originated throughout the bank's assessment areas, and include loans made to low- and moderate-income borrowers. Another enumerated credit need was lending to small businesses, particularly low dollar loans, and loans to start-ups, which may not have the credit experience of larger and more well-established businesses. Additionally, as described below, the bank made loans to assist low- and moderate-income borrowers and to small businesses.

Additionally, AmeriServ took steps throughout the pandemic to address the needs of customers impacted by the pandemic. All customers including individuals, small businesses, and small farms were offered payment relief in the form of complete deferral of payments or interest only payments, based on need or anticipation of need. More detail on the bank's responsiveness to credit needs can be found within individual assessment area discussions.

Innovative and Flexible Lending Practices

In an effort to address the credit needs of low- and moderate-income borrowers, AmeriServ makes limited use of innovative and flexible lending programs in servicing credit needs in its assessment areas. AmeriServ participates in loan programs for first-time homebuyers through the Federal Housing Administration's (FHA) loan program, and the U.S. Department of Veterans Affairs' (VA) loan program.

Additionally, the bank makes grants to first-time homebuyers through the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door (FFD) program. Under the program, FHLB of Pittsburgh matches the qualified homebuyer's contribution for down payment and closing costs up to a maximum of \$5,000.

Since affordable housing was mentioned by nearly all community contacts as a need, AmeriServ's participation in these programs is one way that the bank is using innovative and flexible lending practices to meet community credit needs. All special program loans are discussed in more detail by assessment area.

Community Development Lending Activities

AmeriServ makes an adequate level of community development loans. During the evaluation period, the bank originated 23 community development loans totaling \$20 million within its assessment areas. Though the number of community development loans increased since the previous evaluation period, the dollar amount of those loans remained relatively consistent (seven loans totaling \$19 million).

By dollar amount of community development loans, the bank's lending was highest in the Johnstown, PA assessment area (\$9.6 million, or 48%), followed by the Pittsburgh, PA assessment area (\$6.4 million, or 32%), the State College, PA assessment area (\$4.1 million, or 20%), and the Somerset County, PA (limited-scope) assessment area (\$12.5 thousand, or less than 1%). No community development loans were made in the Hagerstown, MD assessment area. In addition to community development loans made within its assessment areas, AmeriServ made two community development loans totaling almost \$2.3 million in the greater statewide region. Because the bank adequately met the community development needs within its assessment areas, these community development loans also receive consideration.

By purpose, 54% of community development loan dollars were for activities that revitalized or stabilized low- and moderate-income areas, 24% were for affordable housing activities, 21% provided community development services for low- and moderate-income individuals, and just under 1% were for loans that provided economic development through the financing of small businesses.

The bank's lending test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

INVESTMENT TEST

Performance under the investment test is rated low satisfactory.

The investment test was rated high satisfactory in the Johnstown, PA assessment area, low satisfactory in the Pittsburgh, PA assessment area, and needs to improve in the State College, PA and Hagerstown, MD assessment areas. Performance in the limited-scope Somerset County, PA assessment area was below performance in the full-scope assessment areas in Pennsylvania.

Overall, AmeriServ has an adequate level of qualified investments, grants, and donations, which exhibit adequate responsiveness to community development needs. Qualified investments, grants, and donations in the bank's assessment areas total \$4.4 million, and have increased from \$3.8 million at the previous examination. The majority of investment dollars were made in the Johnstown, PA assessment area (\$2.9 million, or 65%), followed by the Pittsburgh, PA assessment area (\$1.5 million, or 35%). Investments in the State College, PA, Somerset County, PA, and Hagerstown, MD assessment areas were negligible, each totaling only \$5 thousand. Combined, investments in these three assessment areas represented less than 1% of total investment dollars. In addition to the investments made within its assessment areas, AmeriServ made one investment in the amount of \$100 thousand in the greater statewide region of Pennsylvania. Since the bank adequately met the qualified investment needs within its assessment areas, this investment, which was made in the greater statewide/regional area, also received qualified investment consideration.

Of the assessment area investments, 77% supported affordable housing, 21% supported efforts to revitalize/stabilize low- and moderate-income areas census tracts within the assessment areas, and 2% supported community services targeted to low- and moderate-income individuals and communities.

AmeriServ exhibits adequate responsiveness to the credit and community development needs of its assessment areas. The vast majority of the bank's qualified investments and donations supported affordable housing. Community contacts interviewed during the course of the evaluation emphasized the primary need of affordable housing in each of the bank's assessment areas. Overall, AmeriServ makes limited use of innovative and/or complex investments to support community development initiatives when opportunities exist, most notably in the Johnstown, PA and Pittsburgh, PA assessment areas.

The bank's investment test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

SERVICE TEST

Performance under the service test is rated low satisfactory.

The service test was rated low satisfactory in the Johnstown, PA assessment area, the Pittsburgh, PA assessment area, the State College, PA and the Hagerstown, MD assessment areas. Performance in the limited-scope Somerset County, PA assessment area was consistent with performance in the full-scope areas in Pennsylvania.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone banking, and online banking, are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas. As noted previously, AmeriServ provides retail services through 17 branches in Pennsylvania and one in Maryland. AmeriServ operates a network of 19 ATMs, which provide electronic access to banking services. ATMs and drive-up service are located in all of the bank's branches, with the exception of the Pittsburgh, PA branch location, which is located in the United Steelworkers building in downtown Pittsburgh. The bank has one location in the Johnstown, PA assessment area that is a stand-alone ATM.

Nine of the bank's 18 branches (50%) are located in the Johnstown, PA assessment area, four (22%) in the Somerset County, PA limited-scope assessment area, three (17%) in the Pittsburgh, PA assessment area, and one branch (less than 6%) is located in the State College, PA assessment area. The bank has one branch (less than 6%) located in the Hagerstown, Maryland assessment area. None of the bank's branches are located in low-income census tracts, and five (28%) are located in moderate-income census tracts. The remaining branches are located in middle- (11 or 61%) and upper-income (two or 11%) census tracts.

AmeriServ's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals or areas. Since the previous exam, the bank has had two branch openings, one branch closure, and one branch consolidation.⁵

Overall, banking services do not vary in a way that inconveniences the institution's constituents, particularly low- and moderate-income consumers in the bank's assessment areas. Generally, hours of operation are reasonable, with the majority of the bank's branches offering extended business hours once a week, as well as Saturday hours. Though services generally do not vary in a way that inconveniences customers, it is noted that two branches in the Johnstown, PA assessment area, and one branch in the Pittsburgh, PA assessment area do not offer extended hours on Friday, as other branches do. Of these branches, only one was located in a moderate-income census tract. Similarly, seven branches do not offer Saturday hours, as other branches do. Of these seven branches, four were located in moderate-income tracts. As mentioned above, all but one of the bank's branches offers drive-up facilities.

⁵ AmeriServ had two branch openings during the exam period. One branch in Somerset County, PA was acquired as a result of its merger with Riverview Bank on May 24, 2021. Another branch was established and opened in Hagerstown, MD on November 19, 2018. The bank closed one branch at its Galleria Mall location in Johnstown, PA (upper-income census tract) on September 30, 2017. Finally, one branch was consolidated in Somerset County, PA on November 19, 2018. More specifically, the Somerset, PA office was consolidated into the neighboring full-service AmeriServ office at 108 West Main Street / Somerset, PA 15501.

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Additionally, the bank provides alternative delivery systems that include mobile deposit capture, night deposit, telephone banking, online and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, and make loan and other bill payments. The bank's website is fully transactional, providing the capability to open accounts and apply for loans online.

Finally, the bank provides a limited level of community development services in its assessment areas. While the bank provides an adequate level of community development services in the Johnstown, PA assessment area, performance is considerably more limited in the bank's other assessment areas.

The bank's service test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

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

COMMONWEALTH OF PENNSYLVANIA

STATE RATING

Performance Test	Performance Level
Lending	High Satisfactory
Investment	Low Satisfactory
Service	Low Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects good penetration throughout the Pennsylvania assessment areas;
- The bank made an adequate level of community development loans in Pennsylvania;
- The bank has an adequate level of qualified community development investments and grants in the state;
- The bank exhibits good responsiveness to credit and community development needs; and
- The bank provides a limited level of community development services.

SCOPE OF EXAMINATION

AmeriServ's CRA performance in Pennsylvania was evaluated for the period from April 18, 2017, through January 10, 2022. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development. It is noted that due to low loan volumes, small business loans were not included in the lending analysis in the State College, PA assessment area, as they would not have been sufficient upon which to draw meaningful conclusions. However, data on small business lending in the State College, PA assessment area is included in Appendix E, for contextual purposes.

As mentioned previously, for purposes of assessing AmeriServ's performance in the Commonwealth of Pennsylvania, and overall, greater weight was given to performance in three of the bank's four Pennsylvania assessment areas, all of which received full-scope reviews, since the overwhelming amount of bank branches, loans and deposits come from these areas.

More specifically, the Johnstown, PA assessment area received a full-scope review and was weighted most heavily in determining the Pennsylvania and overall ratings, followed by the Pittsburgh, PA assessment area, and the State College, PA assessment area. Finally, the Somerset County, PA assessment area, which was evaluated as a limited-scope assessment area was given the least amount of weight in determining both state and overall CRA ratings.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In the Commonwealth of Pennsylvania, the majority of the bank's business was conducted in the Johnstown, PA assessment area, and thus, it was given the most weight in determining the overall CRA rating in the Commonwealth, and was evaluated using full-scope review procedures. In total, nine of the bank's branches (50%) were located in this assessment area. Likewise, nearly 67% of the bank's deposits were held in the Johnstown, PA assessment area. From a loan perspective, 40% of loans by number, and 21% by dollar volume were made within the assessment area.

The Pittsburgh, PA assessment area was given the second highest weight in determining the state rating in Pennsylvania, and was reviewed using full-scope review procedures. During the evaluation period AmeriServ operated three branches (17%) in the assessment area, and these branches generated almost 16% of the bank's total deposits. From a loan standpoint, 23% of loans by number, and 41% by dollar volume were made within the Pittsburgh, PA assessment area.

The State College, PA assessment area was given the third highest weight in the Commonwealth of Pennsylvania, and was also reviewed using full-scope review procedures. AmeriServ operated one branch in the assessment area (6%), which generated nearly 4% of overall deposits. However, from a loan perspective, almost 26% of the bank's loans by number, and 31% by dollar volume were made within the State College, PA assessment area.

Finally, the Somerset County, PA assessment area was given the least amount of weight in determining the statewide rating, and was reviewed using the limited-scope review procedures. The bank operated four branches (22%) in the assessment area, which generated almost 13% of deposits. However, the fewest amount of loans were made in this Pennsylvania assessment area. More specifically, under 10% of loans by number, and 5% of loans by dollar volume were made within the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be high satisfactory in the Commonwealth of Pennsylvania. The lending test was rated high satisfactory in the Johnstown, PA and Pittsburgh, PA assessment areas, and low satisfactory in the State College, PA assessment area. Using limited-scope review procedures, the Somerset County, PA assessment area lending test performance was consistent with performance in full-scope review Pennsylvania assessment areas. Primary drivers of the overall lending test rating were borrower and geographic distribution of lending, and community development lending. It is noted that borrower distribution was weighted more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on the lending test components is provided in the discussions of each Pennsylvania assessment areas.

INVESTMENT TEST

Overall, the investment test was considered to be low satisfactory in Pennsylvania. The bank's performance on the investment test in the Johnstown, PA assessment area was high satisfactory, while performance in the Pittsburgh, PA assessment area was low satisfactory, and performance in the State College, PA assessment area was needs to improve. Performance in the limited-scope Somerset County, PA assessment area was below performance in the full-scope Pennsylvania assessment areas. The investment test rating is driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness, and innovativeness and complexity of such investments. More detail on the investment test components is provided in the discussion of each Pennsylvania assessment area.

SERVICE TEST

Overall, the service test was determined to be low satisfactory in the Commonwealth of Pennsylvania. The service test was rated low satisfactory in the Johnstown, PA, Pittsburgh, PA, and State College, PA assessment areas. Performance in the limited-scope Somerset County, PA assessment area was consistent with performance in the full-scope Pennsylvania assessment areas. The service test was influenced by retail service aspects, particularly the accessibility of delivery systems, and reasonableness of hours and services in serving assessment area needs, as well as the level of community development services provided by the bank in the Commonwealth. More detail on the service test components is provided in the discussions of each Pennsylvania assessment area.

JOHNSTOWN, PA ASSESSMENT AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

AmeriServ's Johnstown, PA assessment area consists of Cambria County, which represents the entire Johnstown MSA.

For the purposes of assessing AmeriServ's CRA performance in the Commonwealth of Pennsylvania, and overall, the greatest weight was given to the performance in the Johnstown, PA assessment area. Of the bank's total loans, 40% by total number, and 21% by total dollar can be attributed to this assessment area. As mentioned previously, AmeriServ operates nine branches (50% of its total branches) in the assessment area, which hold \$778 million in deposits, or 67% of the bank's total deposits as of September 30, 2021.

AmeriServ's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to the 2015 ACS data, the Johnstown, PA assessment area consisted of 42 census tracts. Of these, two were designated as low-income census tracts (5%), 10 were moderate-income tracts (24%), 21 were middle-income tracts (50%), and nine were upper-income census tracts (21%). Both low-income tracts, and nine of the ten moderate-income tracts are located in and around the city of Johnstown. The remaining moderate-income tract is located in the borough of Blandburg and surrounding Reade Township, in the far northeastern corner of Cambria County.

A map of the Johnstown, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, 13 institutions operated 64 offices in the market which held nearly \$4.0 billion in total deposits. AmeriServ, with nine branches in the market, ranked third with nearly 20% of total deposits (\$778 million). First National Bank of Pennsylvania held the largest share of deposits, with 25% market share, followed by 1st Summit Bank with 23% market share.

AmeriServ reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2017 data, there were 152 HMDA reporters in the assessment area, who originated or purchased 2,414 loans in the Johnstown, PA assessment area. AmeriServ ranked fifth with 4% of the HMDA market. First National Bank of Pennsylvania ranked first with 12% of the HMDA market, followed by 1st Summit Bank (11%), and First Commonwealth Bank (8%).

According to 2018 data, there were 139 HMDA reporters in the assessment area, who originated or purchased 2,617 loans in the Johnstown, PA assessment area. AmeriServ ranked twelfth with less than 2% of the HMDA market. First Commonwealth Bank led reporters with 16% of the market, followed by First National Bank of Pennsylvania (11%), and 1st Summit Bank (8%).

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According to the 2019 data, there were 144 HMDA reporters in the assessment area, who originated or purchased 2,637 loans in the assessment area. AmeriServ ranked eleventh with 2% of the HMDA market. First Commonwealth Bank once again led reporters with 14% of the market, followed by First National Bank of Pennsylvania (12%), and 1st Summit Bank (9%).

Finally, according to the 2020 data, there were 151 HMDA reporters in the assessment area, who originated or purchased 3,223 loans in the Johnstown, PA assessment area. AmeriServ ranked tenth in the market with over 2% of the HMDA market. First Commonwealth ranked first in the market with 16% of the HMDA market, followed by First National Bank of Pennsylvania (10%), and 1st Summit Bank (9%).

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2017 data, there were 55 small business and small farm reporters in the assessment area, who originated or purchased 1,767 loans in the Johnstown, PA assessment area. AmeriServ ranked twelfth in the market with just under 3% of the CRA market. 1st Summit Bank ranked first with 20% of the market, followed by American Express Bank, FSB (11%), and Capital One Bank USA, N.A. (8%).

According to 2018 data, there were 60 CRA small business reporters in the assessment area, who originated or purchased 1,880 loans in the assessment area. AmeriServ ranked eleventh in the market with 3% of the CRA market. 1st Summit Bank led reporters with 18% of the market, followed by American Express, NB (11%), and Chase Bank USA, N.A. (8%).

According to 2019 data, there were 53 CRA reporters in the assessment area, who originated or purchased 1,939 loans in the assessment area. AmeriServ ranked fourteenth in the market with 2% of the CRA market. 1st Summit Bank ranked first with 15% of the market, followed by American Express, NB (13%), and JP Morgan Chase Bank USA, N.A. (11%).

Finally, according to 2020 data, there were 60 CRA small business reporters in the assessment area, who originated or purchased 2,815 loans in the Johnstown, PA assessment area. AmeriServ ranked fourth in the market with 8% of the CRA market. 1st Summit Bank led reporters with 25% of the market, followed by First National Bank of Pennsylvania (17%), and First Commonwealth Bank (9%).

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on credit needs of the Johnstown, PA assessment area. One interview was held with an agency focused on affordable housing, and the other was with an agency that focused on revitalization and economic development.

These contacts identified blight as the largest concern in the assessment area, as well as a need to attract new residents to reverse the declining population trend. Community contacts noted a need for quality affordable housing options, and suggested that the development of first-floor commercial buildings with housing units on higher stories was a way to attract new residents. Finally, contacts indicated that financial literacy and job training programs were important community needs, and that mortgages tailored to low- to moderate-income borrowers were a specific credit need.

Economic Characteristics

As mentioned previously, the bank’s Johnstown, PA assessment area encompasses Cambria County in west central Pennsylvania, which is coterminous with the Johnstown, PA MSA. Per the 2015 ACS, the Johnstown, PA assessment area had a population of 139,381. Johnstown is the largest city in the MSA, and it is noteworthy that the city has been plagued by financial difficulties and, since 1992, has been declared a distressed municipality under Pennsylvania’s Act 47. Of note, Johnstown’s deadline to exit Pennsylvania’s Act 47 program for distressed municipalities was extended until April 28, 2023. The city was scheduled to leave the program on Oct. 28, 2021, but in response to the COVID-19 pandemic, the state amended the law, allowing the municipality to increase its time under Act 47 by 18 months.⁶

According to Moody’s Analytics, the Johnstown, PA MSA’s economy is in recovery mode, though it is slowing, and trails that of the nation. Following an initial rebound in employment after the pandemic recession, the metro area has been rapidly losing jobs for the past year. Education/healthcare was most affected by losses, followed closely by government, while the goods-producing sector has made modest progress.

Strengths noted in the September 2021 Moody’s Analytics Precis Report include low business costs, including office rents, a resilient healthcare industry, general industrial diversity, and below-average employment volatility. On the other hand, weaknesses include few high-paying jobs, low levels of spending, and a declining population.

The largest employment sector in the Johnstown MSA is education and health services, which accounts for 26% of all jobs. Government employment accounts for 14% of all jobs, followed by retail trade which is responsible for 12% of area employment. In the MSA, Conemaugh Valley Memorial Hospital is the largest employer, followed by St. Francis University, and Cambria Care Center. Other large employers are the University of Pittsburgh, Giant Eagle, Inc., and DRS Laurel Technologies.

Seasonally unadjusted unemployment rates, according to the U.S. Department of Labor’s Bureau of Labor and Statistics, are presented in the following table. As indicated below, Cambria County experienced higher unemployment rates than the state and nation as a whole in each year of the evaluation period.

AmeriServ Financial Bank Johnstown, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)				
Location	% 2017 Annual	% 2018 Annual	% 2019 Annual	% 2020 Annual
Cambria County	6.1	5.4	5.4	9.5
Johnstown, PA MSA	6.1	5.4	5.4	9.5
Commonwealth of Pennsylvania	5.0	4.5	4.5	9.1
National	4.4	3.9	3.7	8.1
Unemployment data is from the Bureau of Labor Statistics				

⁶By remaining in Act 47, Johnstown will continue to receive direct assistance from the Pennsylvania Department of Community and Economic Development and collect a local service tax at \$3 per week, as opposed to only \$1 allowed to municipalities not in the program, adding an extra \$900,000 to the city’s annual revenue.

Housing

According to 2015 ACS data, the Johnstown, PA assessment area contained 65,413 housing units, approximately 65% of which were owner-occupied, 23% of which were rental units, and just over 12% of which were vacant. The overall owner-occupancy rate in the assessment area (65%) was slightly higher than that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2015 ACS data, just over 1% of owner-occupied housing was located in low-income tracts, and 13% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (59%, and 26%, respectively).

Of the total existing housing units, 81% were one-to-four units, 7% were two-to-four family units, 8% were multifamily (five or more family units), and 4% were mobile homes. The median age of the housing stock was 61 years, making housing older than the state median age of 54 years. This indicates a potential need for home improvement loans for rehabilitation of the assessment area's housing stock, which is a need also echoed by community contacts.

Data show that the price of housing in the assessment area was more affordable than in the Commonwealth overall. The 2015 ACS data indicates that the median housing value in the Johnstown, PA assessment area was \$87,051, which was significantly below the median housing value in Pennsylvania (\$166,000). Data shows a disparity in housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in low-income tracts was \$40,368, and this modestly increased to \$45,122 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$86,581, and \$124,474, respectively).

Finally, median gross rent (rent plus utilities) in the assessment area was significantly less expensive in the assessment area than in Pennsylvania. Median gross rent in the Johnstown, PA assessment area was \$566, well below the median gross rent in Pennsylvania of \$840. Within the Johnstown, PA assessment area, 39% of renters spent more than 30% of their income on rent, which is a lower figure than in Pennsylvania as a whole (46%).

Borrower Income Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS data revealed that there were 36,531 families in the assessment area. Of the total families in the assessment area, 20% were low-income, 19% were moderate-income, 21% were middle-income, and 40% were upper-income. In the Johnstown, PA assessment area, 10% of families were below the poverty level, compared to 9% in the Commonwealth overall.

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

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2017	\$60,300	\$30,150	\$30,150 - \$48,239	\$48,240 - \$72,359	\$72,360 or more
2018	\$64,200	\$32,100	\$32,100 - \$51,359	\$51,360 - \$77,039	\$77,040 or more
2019	\$63,800	\$31,900	\$31,900 - \$51,039	\$51,040 - \$76,559	\$76,560 or more
2020	\$62,700	\$31,350	\$31,350 - \$50,159	\$50,160 - \$75,239	\$75,240 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2017, there were 4,833 businesses in the assessment area. Of these businesses, 2% were located in low-income census tracts, and 19% were in moderate-income census tracts. The majority of businesses were located in middle-income census tracts (49%), and upper-income census tracts (30%). Business demographic data also revealed that of the 4,833 businesses located in the assessment area in 2017, 88% were small businesses with gross annual revenues of \$1 million or less.

In 2018, there were 5,160 businesses in the assessment area, though geographic distribution remained consistent. More specifically, 2% of businesses were in low-income tracts, and 19% were in moderate-income tracts. The majority of businesses were located in middle- (49%) and upper-income census tracts (30%). Business demographic data also revealed that of the 5,160 businesses located in the assessment area in 2018, 88% were small businesses with gross annual revenues of \$1 million or less.

In 2019, there were 5,111 businesses in the assessment area. As in previous years, of these businesses, 2% were in low-income tracts, and over 18% were in moderate-income tracts. The majority of businesses were located in middle- (50%) and upper-income census tracts (30%). Of the 5,111 businesses located in the assessment area in 2018, 88% were small businesses with gross annual revenues of \$1 million or less.

Finally, in 2020, there were 5,027 businesses in the assessment area. Of these businesses, 2% were located in low-income tracts, and over 18% were in moderate-income tracts. The majority of businesses were located in middle- (50%) and upper-income census tracts (29%). Business demographic data also revealed that of the 5,027 businesses located in the assessment area in 2018, 89% were small businesses with gross annual revenues of \$1 million or less.

The 2017, 2018, 2019 and 2020 assessment area demographics used to evaluate AmeriServ's CRA performance in the Johnstown, PA assessment area are detailed in the tables on the following pages.

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AmeriServ Financial Bank Johnstown, PA Assessment Area Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.8	670	1.8	208	31.0	7,127	19.5
Moderate-income	10	23.8	5,601	15.3	1,338	23.9	7,077	19.4
Middle-income	21	50.0	20,747	56.8	1,718	8.3	7,600	20.8
Upper-income	9	21.4	9,513	26.1	496	5.2	14,727	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	36,531	100.0	3,760	10.3	36,531	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	1,643	583	1.4	35.5	570	34.7	490	29.8
Moderate-income	13,186	5,636	13.3	42.7	4,992	37.9	2,558	19.4
Middle-income	34,568	25,174	59.3	72.8	6,077	17.6	3,317	9.6
Upper-income	16,016	11,047	26.0	69.0	3,386	21.1	1,583	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,413	42,440	100.0	64.9	15,025	23.0	7,948	12.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	82	1.7	68	1.6	14	2.9	0	0.0
Moderate-income	933	19.3	789	18.6	131	27.5	13	11.2
Middle-income	2,386	49.4	2,120	50.0	192	40.4	74	63.8
Upper-income	1,432	29.6	1,264	29.8	139	29.2	29	25.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,833	100.0	4,241	100.0	476	100.0	116	100.0
Percentage of Total Businesses:				87.8		9.8		2.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	3.7	4	3.8	0	0.0	0	0.0
Middle-income	66	61.7	64	61.6	2	66.7	0	0.0
Upper-income	37	34.6	36	34.6	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	107	100.0	104	100.0	3	100.0	0	0.0
Percentage of Total Farms:				97.2		2.8		0.0

Information based on 2015 ACS Data and 2017 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank Johnstown, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.8	670	1.8	208	31.0	7,127	19.5
Moderate-income	10	23.8	5,601	15.3	1,338	23.9	7,077	19.4
Middle-income	21	50.0	20,747	56.9	1,718	8.3	7,600	20.8
Upper-income	9	21.4	9,513	26.0	496	5.2	14,727	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	36,531	100.0	3,760	10.3	36,531	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	1,643	583	1.4	35.5	570	34.7	490	29.8
Moderate-income	13,186	5,636	13.3	42.7	4,992	37.9	2,558	19.4
Middle-income	34,568	25,174	59.3	72.8	6,077	17.6	3,317	9.6
Upper-income	16,016	11,047	26.0	69.0	3,386	21.1	1,583	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,413	42,440	100.0	64.9	15,025	23.0	7,948	12.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	108	2.1	93	2.0	15	3.1	0	0.0
Moderate-income	954	18.5	809	17.7	130	27.0	15	12.5
Middle-income	2,551	49.4	2,278	50.1	196	40.6	77	64.2
Upper-income	1,547	30.0	1,378	30.2	141	29.3	28	23.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,160	100.0	4,558	100.0	482	100.0	120	100.0
	Percentage of Total Businesses:			88.3		9.3		2.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	2.6	3	2.7	0	0.0	0	0.0
Middle-income	73	62.9	71	62.8	2	66.7	0	0.0
Upper-income	40	34.5	39	34.5	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	116	100.0	113	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			97.4		2.6		0.0

Information based on 2015 ACS Data and 2018 Dun & Bradstreet Information

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AmeriServ Financial Bank Johnstown, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.8	670	1.8	208	31.0	7,127	19.5
Moderate-income	10	23.8	5,601	15.3	1,338	23.9	7,077	19.4
Middle-income	21	50.0	20,747	56.9	1,718	8.3	7,600	20.8
Upper-income	9	21.4	9,513	26.0	496	5.2	14,727	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	36,531	100.0	3,760	10.3	36,531	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	1,643	583	1.4	35.5	570	34.7	490	29.8
Moderate-income	13,186	5,636	13.3	42.7	4,992	37.9	2,558	19.4
Middle-income	34,568	25,174	59.3	72.8	6,077	17.6	3,317	9.6
Upper-income	16,016	11,047	26.0	69.0	3,386	21.1	1,583	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,413	42,440	100.0	64.9	15,025	23.0	7,948	12.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	109	2.1	93	2.1	16	3.4	0	0.0
Moderate-income	947	18.5	802	17.8	126	26.9	19	15.0
Middle-income	2,537	49.7	2,271	50.2	187	39.8	79	62.2
Upper-income	1,518	29.7	1,349	29.9	140	29.9	29	22.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,111	100.0	4,515	100.0	469	100.0	127	100.0
	Percentage of Total Businesses:			88.3		9.2		2.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	3.4	4	3.5	0	0.0	0	0.0
Middle-income	73	61.9	71	61.7	2	66.7	0	0.0
Upper-income	41	34.7	40	34.8	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	118	100.0	115	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			97.5		2.5		0.0

Information based on 2015 ACS Data and 2019 Dun & Bradstreet Information

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AmeriServ Financial Bank Johnstown, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.8	670	1.8	208	31.0	7,127	19.5
Moderate-income	10	23.8	5,601	15.3	1,338	23.9	7,077	19.4
Middle-income	21	50.0	20,747	56.9	1,718	8.3	7,600	20.8
Upper-income	9	21.4	9,513	26.0	496	5.2	14,727	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	36,531	100.0	3,760	10.3	36,531	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	1,643	583	1.4	35.5	570	34.7	490	29.8
Moderate-income	13,186	5,636	13.3	42.7	4,992	37.9	2,558	19.4
Middle-income	34,568	25,174	59.3	72.8	6,077	17.6	3,317	9.6
Upper-income	16,016	11,047	26.0	69.0	3,386	21.1	1,583	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,413	42,440	100.0	64.9	15,025	23.0	7,948	12.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	104	2.1	89	2.0	15	3.3	0	0.0
Moderate-income	926	18.4	790	17.8	117	25.6	19	15.7
Middle-income	2,520	50.1	2,259	50.7	187	40.9	74	61.2
Upper-income	1,477	29.4	1,311	29.5	138	30.2	28	23.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,027	100.0	4,449	100.0	457	100.0	121	100.0
	Percentage of Total Businesses:			88.5		9.1		2.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	5	4.3	5	4.4	0	0.0	0	0.0
Middle-income	76	65.5	74	65.5	2	66.7	0	0.0
Upper-income	35	30.2	34	30.1	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	116	100.0	113	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			97.4		2.6		0.0

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in the Johnstown, PA assessment area.

Lending Activity

AmeriServ's lending levels in the Johnstown, PA assessment area reflect good responsiveness to assessment area credit needs. During the evaluation period, lending activity in the assessment area represented 37% of the bank's overall lending by number of loans, and 16% by total dollar volume. During the evaluation period, AmeriServ made 289 HMDA loans totaling \$31.8 million, and 167 CRA small business loans to small businesses, totaling \$11.5 million in the bank's Johnstown, PA assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance. Further, due to overall loan volumes in the Johnstown, PA assessment area, small business loans are given more weight in determining the bank's overall borrower distribution of loans, followed by HMDA loans.

Small Business Lending

An analysis of AmeriServ's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Johnstown, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2017 Dun & Bradstreet business data, there were 4,833 businesses operating in the assessment area in 2017, with 88% designated as small businesses. According to 2018 Dun & Bradstreet business data, there were 5,160 businesses operating in the assessment area in 2018, with 88% designated as small businesses. According to 2019 Dun & Bradstreet business data, there were 5,111 businesses operating in the assessment area in 2019, with 88% designated as small businesses. Finally, according to 2020 Dun & Bradstreet business data, there were 5,027 businesses operating in the assessment area in 2020, with 89% designated as small businesses.

In 2017, the bank's borrower distribution of small business loans was good. In 2017, AmeriServ originated 48 small business loans in the assessment area, aggregating \$8.6 million. Of these loans, 63% (30 loans) were originated to small businesses. The bank's lending to small businesses exceeded the aggregate lending level of 48% to small businesses by all lenders in the assessment area, but was below the proxy of 88% of small businesses in the assessment area.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2017, 50% of AmeriServ's small business loans in the assessment area were extended in an amount of \$100 thousand or less. Aggregate lending data for 2017 shows that 89% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2018, the bank's borrower distribution of small business loans was adequate. In 2018, AmeriServ originated 50 small business loans in the assessment area, aggregating \$6.3 million. Of these loans, 42% (21 loans) were originated to small businesses. The bank's lending to small businesses was slightly below the aggregate lending level of 44% and well below the proxy of 88% of small businesses in the assessment area.

In 2018, 62% of AmeriServ's small business loans were extended in an amount of \$100 thousand or less. Aggregate lenders made 90% of small business loans in an amount of \$100 thousand or less.

In 2019, the bank's borrower distribution of small business loans was adequate. In 2019, AmeriServ originated 36 small business loans, aggregating \$5.3 million, within the assessment area. Of these, 47% were made to small businesses (17 loans), which matched aggregate lending of 47%, but trailed the proxy of 88% of small businesses in the assessment area.

In 2019, 75% of the bank's small business loans were made in an amount of \$100 thousand or less, while aggregate lenders made 91% of small business loans in an amount of \$100 thousand or less. Finally, in 2020, the bank's borrower distribution of small business loans was adequate. In 2020, AmeriServ originated 229 small business loans, aggregating \$17 million, within the assessment area. Of these loans, 43% of loans were to small businesses (99 loans). This was slightly greater than the market aggregate of 35%, but below the proxy of 89% of small businesses in the assessment area.

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In 2020, 83% of AmeriServ’s small business loans were made in an amount of \$100 thousand or less, which was similar to aggregate lenders, who made 85% of loans in an amount of \$100 thousand or less.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. Since credit card loans are generally made in smaller amounts, this can skew aggregate small business data. As noted previously, amongst the top small business lenders in the assessment area are national lenders with large credit card portfolios. In fact, the top ten CRA reporters in the assessment area in 2017, 2018, 2019, and 2020 included many large credit card lenders, and together these credit card lenders controlled the majority of the CRA small business market. This is taken into account when drawing conclusions about the bank’s small business lending.

Home-Mortgage Lending

AmeriServ’s distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 20% of families in the assessment area were low-income, 21% were moderate-income, 19% were middle-income, and 40% were upper-income. According to the 2015 ACS, 39% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following tables compare AmeriServ’s home-mortgage lending to aggregate home-mortgage lending levels, using the percentage of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate 2017 lending data, relies on 2015 ACS data to estimate demand for home-mortgage credit among both low- and moderate-income families. The remaining three tables, used to evaluate 2018, 2019 and 2020 lending, rely on 2015 ACS data along with updated HMDA data, following the requirements of Regulation C.

AmeriServ Financial Bank Johnstown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	19.5	14.7	11.4
Moderate	19.4	20.6	18.9
Middle	20.8	20.5	23.9
Upper	40.3	37.3	31.5
Unknown	0.0	6.9	14.3
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Johnstown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	19.5	11.1	11.7
Moderate	19.4	11.1	19.8
Middle	20.8	28.9	23.5
Upper	40.3	26.7	33.7
Unknown	0.0	22.2	11.3
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	19.5	12.9	10.2
Moderate	19.4	21.0	19.6
Middle	20.8	25.7	22.1
Upper	40.3	32.3	35.6
Unknown	0.0	8.1	12.5
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	19.5	3.8	7.0
Moderate	19.4	15.0	16.7
Middle	20.8	17.4	20.1
Upper	40.3	57.5	40.7
Unknown	0.0	6.3	15.5
Total	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, AmeriServ's lending to low-income borrowers was adequate.

AmeriServ's lending in 2017 to low-income borrowers was good. Of AmeriServ's 102 HMDA loans, 15 (15%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 11%. By product type, AmeriServ made 11% of home purchase loans, and 29% of home improvement loans to low-income borrowers.

The bank made no refinance or multifamily loans to low-income borrowers. For comparison, aggregate lenders made 11% of home purchase loans, 8% of refinance loans, 18% of home improvement loans, and no multifamily loans to low-income borrowers in 2017.

AmeriServ's lending in 2018 to low-income borrowers was adequate. Of AmeriServ's 45 HMDA loans, five (11%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 12%. By product type, AmeriServ made 10% of home purchase loans, 33% of refinance loans, and no home improvement, multifamily or loans with purpose "not applicable" to low-income borrowers. Aggregate lenders made 13% of home purchase loans, 11% of refinance loans, 13% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers.

AmeriServ's lending in 2019 to low-income borrowers was good. Of AmeriServ's 62 HMDA loans, eight (13%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 10%. By product type, AmeriServ made 15% of home purchase loans, and no refinance, home improvement, multifamily, or loans with purpose "not applicable" to low-income borrowers. Aggregate lenders made 12% of home purchase loans, 8% of refinance loans, 9% of home improvement loans, 1% of loans with purpose "not applicable," and no multifamily loans to low-income borrowers in 2019.

Finally, AmeriServ's lending in 2020 to low-income borrowers was poor. Of AmeriServ's 80 HMDA loans, three (4%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 7%. By product type, AmeriServ made 8% of home purchase loans, and no refinance, home improvement, multifamily, or loans with purpose "not applicable" to low-income borrowers. By comparison, aggregate lenders made 12% of home purchase loans, 4% of refinance loans, 8% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, AmeriServ's lending to moderate-income borrowers was adequate.

AmeriServ's lending in 2017 to moderate-income borrowers was good. Of AmeriServ's 102 HMDA loans, 21 (21%) were made to moderate-income borrowers, just exceeding the proxy of 19%, and aggregate lending to moderate-income borrowers of 19%. By product type, AmeriServ made 21% of home purchase loans, 7% of its refinance loans, 29% of home improvement loans, and no multifamily loans to moderate-income borrowers. By comparison, aggregate lenders made 19% of home purchase loans, 15% of refinance loans, 22% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

AmeriServ's lending in 2018 to moderate-income borrowers was poor. Of AmeriServ's 45 HMDA loans, five (11%) were made to moderate-income borrowers, falling well below the proxy of 19%, and aggregate lending to moderate-income borrowers of 20%. By product type, AmeriServ made 13% of home purchase loans, and no refinance, home improvement, multifamily, or loans with purpose "not applicable" to moderate-income borrowers.

Aggregate lenders made 22% of home purchase loans, 21% of refinance loans, 17% of home improvement loans, 7% of multifamily loans, and no loans with purpose “not applicable” to moderate-income borrowers.

AmeriServ’s HMDA lending in 2019 to moderate-income borrowers was good. Of AmeriServ’s 62 HMDA loans, 13 (21%) were made to moderate-income borrowers, just exceeding the proxy of 19%, and aggregate lending to moderate-income borrowers of 20%. By product type, AmeriServ made 22% of home purchase loans, 14% of refinance loans, and no home improvement, multifamily, or loans with purpose “not applicable” to moderate-income borrowers. Aggregate lenders made 24% of home purchase loans, 17% of refinance loans, 17% of home improvement loans, 7% of multifamily loans, and no loans with purpose “not applicable” to moderate-income borrowers.

AmeriServ’s lending in 2020 to moderate-income borrowers was adequate. Of AmeriServ’s 80 HMDA loans, 12 (15%) were made to moderate-income borrowers, compared to a proxy of 19%, and aggregate lending to moderate-income borrowers of 17%. By product type, AmeriServ made 23% of home purchase loans, 8% of refinance loans, and no home improvement, multifamily, or loans with purpose “not applicable” to moderate-income borrowers. Comparatively, aggregate lenders made 24% of home purchase loans, 12% of refinance loans, 16% of home improvement loans, and no multifamily, or loans with purpose “not applicable” to moderate-income borrowers in 2020.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the assessment area, including in low- and moderate-income census tracts. As mentioned earlier, small business loans were given the greatest amount of consideration in determining this conclusion in the Johnstown, PA assessment area, because of loan volume, followed by HMDA loans. Further, due to the demographics of the assessment area, more weight was given to the bank’s lending in moderate-income census tracts.

Small Business Lending

The geographic distribution of AmeriServ’s small business loans reflects excellent penetration throughout the assessment area, in the context of the assessment area’s demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to Dun & Bradstreet data in 2017, there were 4,833 businesses in the assessment area. Of these businesses, 2% were in low-income tracts, and 19% were in moderate-income tracts. The majority of businesses were located in middle- (49%) and upper-income (30%) tracts. Very little change in the geographic distribution of small businesses was evident in the other three data years.

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In 2018, there were 5,160 businesses in the assessment area. Of these businesses, 2% were located in low-income tracts, and 19% were in moderate-income tracts. The majority of businesses were located in middle- (49%) and upper-income (30%) tracts.

In 2019, there were 5,111 businesses in the assessment area. Of these businesses, 2% were in low-income tracts, and over 18% were in moderate-income tracts. The majority of businesses were located in middle- (50%) and upper-income (30%) tracts.

In 2020, there were 5,027 businesses in the assessment area. Of these businesses, 2% were in low-income tracts, and over 18% were in moderate-income tracts. The majority of businesses were located in middle- (50%) and upper-income (29%) tracts.

The tables below present AmeriServ’s small business geographic distribution in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the four years evaluated.

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	1.7	2.1	1.7
Moderate	19.3	14.6	13.7
Middle	49.4	39.5	50.3
Upper	29.6	43.8	33.4
Unknown	0.0	0.0	0.9
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	2.1	2.0	1.7
Moderate	18.5	22.0	15.6
Middle	49.4	50.0	51.5
Upper	30.0	26.0	30.3
Unknown	0.0	0.0	0.9
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	2.1	0.0	1.7
Moderate	18.5	27.8	14.2
Middle	49.7	41.6	51.5
Upper	29.7	30.6	32.0
Unknown	0.0	0.0	0.6
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	2.1	2.6	1.8
Moderate	18.4	15.7	14.2
Middle	50.1	49.4	50.4
Upper	29.4	32.3	33.5
Unknown	0.0	0.0	0.1
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, the bank’s small business lending in low-income tracts was considered good. Because of the demographics of the Johnstown, PA assessment area, less weight was given to lending in low-income census tracts, in determining the overall geographic distribution of small business loans. More specifically, the assessment area has only two low-income census tracts, and business demographics show that only 2% of businesses were located in those tracts in all four years being evaluated.

AmeriServ’s lending in low-income census tracts in 2017 was good. Of AmeriServ’s 48 CRA small business loans originated in the assessment area in 2017, one loan (2%) was made in a low-income census tract. The bank’s lending was consistent with both the proxy and the aggregate lending level, both of which were 2%.

AmeriServ’s lending in low-income census tracts in 2018 was good. Of AmeriServ’s 50 CRA small business loans originated in the assessment area in 2018, one loan (2%) was made in a low-income census tract. Again, the bank’s lending was consistent with both the proxy and the aggregate lending level, both of which were 2%.

AmeriServ's lending in low-income census tracts in 2019 was adequate. Of AmeriServ's 36 CRA small business loans originated in the assessment area in 2019, none were made in low-income census tracts, which trailed both the proxy and the aggregate lending level of 2%.

AmeriServ's lending in low-income census tracts in 2020 was good. Of AmeriServ's 229 CRA small business loans originated in the assessment area in 2020, the bank made six loans (3%) in low-income census tracts. The bank's lending was above both the proxy and the aggregate lending level of 2%.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's small business lending in moderate-income tracts was considered excellent. In assessing the overall geographic distribution in the Johnstown, PA assessment area, more weight was given to lending in moderate-income census tracts, as explained previously.

AmeriServ's lending in moderate-income census tracts in 2017 was good. Of AmeriServ's 48 CRA small business loans originated in the assessment area in 2017, seven loans (15%) were made in moderate-income census tracts. The bank's lending was below the proxy of 19%, but above the aggregate lending level of 14%.

AmeriServ's lending in moderate-income census tracts in 2018 was excellent. Of AmeriServ's 50 CRA small business loans originated in the assessment area in 2018, 11 loans (22%) were made in moderate-income census tracts. The bank's lending was above both the proxy of 19%, and the aggregate lending level of 16%.

AmeriServ's lending in moderate-income census tracts in 2019 was excellent. Of AmeriServ's 36 CRA small business loans originated in the assessment area in 2019, 10 loans (28%) were made in moderate-income census tracts. The bank's lending was above both the proxy of 19%, and the aggregate lending level of 14%.

AmeriServ's lending in moderate-income census tracts in 2020 was good. Of AmeriServ's 229 CRA small business loans originated in the assessment area in 2020, 36 loans (16%) were made in moderate-income census tracts. The bank's lending was below the proxy of 18%, but greater than the aggregate lending level of 14%.

Home-Mortgage Lending

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

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According to the 2015 ACS data, 1% of the assessment area’s owner-occupied housing was located in low-income tracts and 13% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (59%, and 26%, respectively).

The tables below present the geographic distribution of AmeriServ’s HMDA lending from 2017 through 2020, in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area. The first table, used for 2017 lending, relies on the 2015 ACS data. The remaining three tables, for 2018 through 2020 data, rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	1.4	0.0	0.8
Moderate	13.3	3.9	7.9
Middle	59.3	54.9	58.3
Upper	26.0	41.2	33.0
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	1.4	0.0	0.5
Moderate	13.3	8.9	7.7
Middle	59.3	48.9	57.5
Upper	26.0	42.2	34.3
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	1.4	0.0	0.6
Moderate	13.3	8.1	7.1
Middle	59.3	56.4	57.3
Upper	26.0	35.5	35.0
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

AmeriServ Financial Bank Johnstown, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	1.4	0.0	0.2
Moderate	13.3	2.5	5.1
Middle	59.3	58.7	57.0
Upper	26.0	38.8	37.7
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, AmeriServ’s overall HMDA lending in low-income tracts was considered poor, though very little weight was given to lending in low-income tracts, given the demographics of the assessment area. More specifically, the Johnstown assessment area has only two low-income census tracts, where only 1% of owner-occupied housing is located.

AmeriServ’s lending in low-income census tracts in 2017 was poor. Of AmeriServ’s 102 HMDA loans originated in the assessment area in 2017, none were made in low-income census tracts. The bank’s lending was below both the proxy of 1% and the aggregate lending level of 1%. Aggregate lenders made just under 1% of home purchase loans, less than 1% of refinance loans, 1% of home improvement loans, and no multifamily loans in low-income census tracts in 2017.

AmeriServ’s lending in low-income census tracts in 2018 was poor. Of AmeriServ’s 45 HMDA loans originated in the assessment area in 2018, none were made in low-income census tracts. The bank’s lending was below both the proxy of 1% and the aggregate lending level of less than 1%. Aggregate lenders made less than 1% of home purchase, refinance, and home improvement loans, 3% of loans with purpose “not applicable,” and no multifamily loans in low-income census tracts in 2018.

AmeriServ's lending in low-income census tracts in 2019 was poor. Of AmeriServ's 62 HMDA loans originated in the assessment area in 2019, none were made in low-income census tracts. The bank's lending was below both the proxy of 1% and the aggregate lending level of just below 1%. Aggregate lenders made less than 1% of home purchase, refinance, and home improvement loans, 7% of multifamily loans, and 3% of loans with purpose "not applicable" in low-income census tracts.

Finally, AmeriServ's lending in low-income census tracts in 2020 was poor. Of AmeriServ's 80 HMDA loans originated in the assessment area in 2020, none were made in low-income census tracts. The bank's lending was below both the proxy of 1% and the aggregate lending level of less than 1%. Aggregate lenders made less than 1% of home purchase and refinance loans, 2% of loans with purpose "not applicable," and no home improvement or multifamily loans in low-income census tracts in 2020.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was considered adequate. In assessing the overall geographic distribution in the Johnstown, PA assessment area, more weight was provided to lending in moderate-income tracts, given the demographics of the assessment area, as explained previously.

AmeriServ's lending in moderate-income census tracts in 2017 was adequate. Of AmeriServ's 102 HMDA loans originated in the assessment area in 2017, four loans (4%) were made in moderate-income census tracts. The bank's lending was below both the proxy of 13% and the aggregate lending level of 8%. By product type, the bank made 2% of home purchase loans, 10% of home improvement loans, and no refinance or multifamily loans in moderate-income tracts. Aggregate lenders made 9% of home purchase, 6% of refinance loans, 8% of home improvement loans, and no multifamily loans in moderate-income tracts in 2017.

AmeriServ's lending in moderate-income census tracts in 2018 was good. Of AmeriServ's 45 HMDA loans originated in the assessment area in 2018, four loans (9%) were made in moderate-income census tracts. The bank's lending was below the proxy of 13%, but above the aggregate lending level of 8%. By product type, the bank made 8% of home purchase loans, 100% of home improvement loans, and no refinance, multifamily, or loans with purpose "not applicable" in moderate-income tracts. Aggregate lenders made 7% of home purchase, 7% of refinance loans, 7% of home improvement loans, 13% of multifamily loans, and 22% of loans with purpose "not applicable" in moderate-income tracts. The bank made no multifamily loans in moderate-income tracts in 2018.

AmeriServ's lending in moderate-income census tracts in 2019 was good. Of AmeriServ's 62 HMDA loans originated in the assessment area in 2019, five loans (8%) were made in moderate-income census tracts. The bank's lending was below the proxy of 13% but above the aggregate lending level of 7%. By product type, the bank made 7% of home purchase loans, 100% of multifamily loans, and no refinance, home improvement, or loans with purpose "not applicable" in moderate-income tracts.

Aggregate lenders made 8% of home purchase, 4% of refinance loans, 7% of home improvement loans, 20% of multifamily loans, and 20% of loans with purpose “not applicable” in moderate-income tracts.

Finally, AmeriServ’s lending in moderate-income census tracts in 2020 was poor. Of AmeriServ’s 80 HMDA loans originated in the assessment area in 2020, two loans (3%) were made in moderate-income census tracts. The bank’s lending was below both the proxy of 13% and the aggregate lending level of 5%. By product type, both of the bank’s loans made in moderate-income tracts (5%) were home purchase loans. Aggregate lenders made 7% of home purchase, 3% of refinance loans, 6% of home improvement loans, 29% of multifamily loans, and 12% of loans with purpose “not applicable” in moderate-income tracts in 2020.

Responsiveness to Credit Needs

AmeriServ exhibits a good record of servicing the credit needs of low- and moderate-income borrowers and very small businesses, consistent with safe and sound banking practices. As indicated previously, community contacts identified blight as the largest concern in the area, and emphasized the needs for quality affordable housing, mortgages for low- and moderate-income borrowers, and a variety of community services for low- and moderate-income individuals. In addition to responsiveness through its retail lending, as described below, AmeriServ has addressed affordable housing needs through the use of flexible lending programs that address the home-mortgage credit needs of low- and moderate-income individuals and families. Further, the bank supported revitalization and stabilization efforts, as discussed below in the community development section.

Innovative and/or Flexible Lending Practices

AmeriServ makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs. The home-mortgage credit needs of low- and moderate-income individuals and families can often be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Johnstown, PA assessment area, AmeriServ participated in loan programs for first-time homebuyers through the FHA, VA, and FHLB of Pittsburgh’s FFD program.

During the evaluation period, the bank originated 13 FHA loans in the assessment area totaling \$1.1 million, and five VA loans in the assessment area totaling \$712 thousand. In addition, the bank made three FHLB of Pittsburgh FFD grants, each in the amount of \$5,000, distributed to first-time homebuyers in the assessment area during the current exam period.

Community Development Lending

AmeriServ makes a relatively high level of community development loans in the Johnstown, PA assessment area. During the current evaluation period, which included the timeframe between April 18, 2017, through January 10, 2022, the bank reported 14 qualified community development loans aggregating nearly \$9.6 million.

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This represents an increase in the number of community development loans reported at the previous CRA evaluation (four), though the amount of the loans remained relatively similar to the amount at the previous evaluation (\$9.1 million). Nearly 48% of the bank’s total community development loans were made within the Johnstown, PA assessment area.

Of the bank’s 14 community development loans in the assessment area, three loans for \$175 thousand (2%) supported economic development, ten loans aggregating over \$9 million (98%) supported efforts to revitalize and stabilize low- and moderate-income areas, and one loan totaling over \$12 thousand (less than 1%) supported community services in the assessment area.

Though the bank made 296 Paycheck Protection Plan (PPP) loans totaling nearly \$21 million in this assessment area, none qualified as community development loans⁷.

The following table includes the bank’s community development loans in the Johnstown, PA assessment area, by community development purpose.

AmeriServ Financial Bank Johnstown, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	10	9,401	3	175	13	9,576
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	1	13	0	0	0	0	1	13
TOTAL	0	0	1	13	10	9,401	3	175	14	9,589

INVESTMENT TEST

The investment test evaluates a financial institution’s level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

⁷ PPP loans that qualify as community development loans are defined as loans with amounts over \$1 million that are located in low- or moderate-income census tracts.

Volume of Investment and Grant Activity

AmeriServ has a significant level of qualified community development investments and grants, occasionally in a leadership position. In total, the bank’s 26 qualified investments and donations in the Johnstown, PA assessment area totaled just under \$2.9 million. This represents an increase of 21% from the \$2.4 million in total investments and donations in the assessment area at the previous evaluation. The bank’s investments, grants, and donations in the Johnstown, PA assessment area represented nearly 65% of the bank’s total investments, grants, and donations.

The bank invested in two large mortgage-backed securities supporting affordable housing in the amount of almost \$1.9 million (65%) in the assessment area. The bank also had the following investments in the assessment area: \$945 thousand (33%) in general obligation bonds for the Johnstown School District, a district that primarily serves disadvantaged students according to free-and reduced-lunch statistics from the National Center for Education Statistics; and a total investment of \$15 thousand (less than 1%) in EverFi, to provide financial literacy programming in the Johnstown School District.

The bank also made a total of \$19 thousand (less than 1%) in donations to local organizations that provide community development services in the assessment area. Finally, the bank made in-kind donations totaling \$27 thousand (1%) in the assessment area. The in-kind donation included donation of computers, furniture, IT equipment and time to operationalize the Flood City Academy, a computer lab for students in the Johnstown School District who do not have home internet access.

The following table presents the investment and grant activity for the Johnstown, PA assessment area.

AmeriServ Financial Bank Johnstown, PA Assessment Area Qualified Development Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	2	1,860	5	15	0	0	2	945	9	2,820
Donations	0	0	16	19	0	0	0	0	16	19
In-Kind Donations	0	0	1	27	0	0	0	0	1	27
TOTAL	2	1,860	22	61	1	0	2	945	26	2,866

Responsiveness to Credit and Community Development Needs

AmeriServ exhibits excellent responsiveness to credit and community development needs of the assessment area. As noted in the table above, a large portion of the bank’s investments supported affordable housing in the assessment area, a pronounced community need as indicated through community contact interviews. Additionally, two large investments supported efforts to revitalize and/or stabilize the assessment area, an additional need noted during community contact interviews.

Finally, the bank’s leadership and involvement in establishing the Flood City Academy during the COVID-19 pandemic for students in the Johnstown Area School District who did not have access to computers or an internet connection, demonstrates excellent responsiveness to community needs in the assessment area.

Community Development Initiatives

AmeriServ makes occasional use of innovative and/or complex investments to support community development initiatives. In the Johnstown, PA assessment area, the bank’s in-kind donation to stand up the Flood City Academy was considered to be a particularly innovative investment activity.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution’s branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, the bank operated eight full-service and one limited-service bank branch in the Johnstown, PA assessment area. Although no branches were located in low-income census tracts, two of the nine branches (22%) were located in moderate-income census tracts in the assessment area.

The following table details the location of the bank’s branches in the Johnstown, PA assessment area with comparison to the 2015 ACS population demographics.

AmeriServ Financial Bank Johnstown, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent Population
Low	0	0.0	2,473	1.8
Moderate	2	22.2	22,941	16.5
Middle	6	66.7	76,836	55.1
Upper	1	11.1	37,131	26.6
Unknown Income	0	0.0	0	0.0
Totals	9	100.0	139,381	100.0

All of the bank's branches in the Johnstown, PA assessment area have ATMs available, which provide electronic access to banking services. To supplement traditional banking services, AmeriServ provides alternative delivery systems that include online banking services, telephone banking services, and remote deposit capture. Customers are able to pay bills, open accounts, and apply for loans using the bank's online website at <https://www.ameriserv.com/>.

Changes in Branch Locations

AmeriServ's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

Within the Johnstown, PA assessment area, the bank closed one branch during the evaluation period. The closed branch was located in an upper-income census tract.⁸ No branches were opened in the assessment area since the previous evaluation.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. Seven of the nine branches in the assessment area (78%) offer standard hours from Monday through Thursday, and feature extended hours on Friday. Two branches, one of which is in a moderate-income census tract, do not offer extended hours on Friday⁹. Additionally, five of the bank's nine branches (56%) offer Saturday hours. Of the four branches without Saturday hours, two are located in moderate-income tracts, and two in middle-income tracts.¹⁰

Bank Products

Though the bank does not offer a free checking product, it does offer a free business checking account which has no service fees or daily balance requirement. The account offers up to 250 free transactions, along with telephone, online and mobile banking, and a free VISA Business Check Card. The free business checking account allows very small businesses access to low-cost banking services. Also of note, the bank offered COVID-19 Pandemic Relief, and took steps throughout the pandemic to address the needs of customers who were impacted. All customers including individuals, small businesses, and small farms were offered payment relief in the form of complete deferral of payments or interest only payments, based on need or anticipation of need.

⁸The bank closed one branch in an upper-income tract (Galleria Mall branch located at 500 Galleria Drive, Johnstown, PA 15904), on September 30, 2017.

⁹The following two branches do not have extended Friday hours: Downtown Johnstown Office (moderate-income), located at 216 Franklin Street, Johnstown, PA 15901; and East Hills Drive-Up (middle-income), located at 1213 Scalp Avenue, Johnstown, PA 15904.

¹⁰The following branches do not offer Saturday banking hours: Carrolltown Office (middle-income), located at 101 S. Main Street, Carrolltown, PA 15722; East Hills Drive-Up (middle-income), located at 1213 Scalp Avenue, Johnstown, PA 15904; Eighth Ward Office (moderate-income), located at 1059 Franklin Street, Johnstown, PA 15905; and Downtown Johnstown Office (moderate-income), located at 216 Franklin Street, Johnstown, PA 15901.

Community Development Services

AmeriServ provides an adequate level of community development services in this assessment area. Over the evaluation period, bank employees provided community development services, providing technical assistance to community development organizations, and serving on the boards of such organizations. Some examples include:

- The bank president is involved in two organizations that support economic development through the financing of small businesses, and one organization focused on revitalization / stabilization of the Johnstown, PA assessment area. Notably, the president serves on the board of Johnstown Area Regional Industries (JARI), a nonprofit community development organization working to establish and grow businesses in Cambria and Somerset Counties, and Vision 2025, which works to revitalize / stabilize the greater Johnstown area; and
- Two AmeriServ information technology employees worked to set up the Flood City Academy in October 2020, so that children in the Johnstown Area School District without computers or internet access could attend classes virtually and have access to free meals at the end of the day during the COVID-19 pandemic.

PITTSBURGH, PA ASSESSMENT AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

AmeriServ's Pittsburgh, PA assessment area consists of the entirety of Allegheny and Westmoreland Counties in the Pittsburgh, PA MSA. These two counties represent two of the seven counties that comprise the Pittsburgh, PA MSA in the Commonwealth of Pennsylvania.

Of the bank's total loans, 23% by total number, and 41% by total dollar can be attributed to this assessment area. As mentioned previously, AmeriServ operates three branches, or 17% of its total branches, in the assessment area, which hold over \$182 million in deposits, or nearly 16% of the bank's total deposits as of September 30, 2021.

AmeriServ's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to the 2015 ACS data, the Pittsburgh, PA assessment area consisted of 502 census tracts, 52 of which were low-income (over 10%), 111 of which were moderate-income (22%), 203 of which were middle-income (40%), and 122 of which were upper-income (24%). There were 14 census tracts with an unknown income (3%). About half of the assessment area's low-income tracts were located in the city of Pittsburgh, PA. The remaining low-income tracts in Allegheny County were located on the outskirts of Pittsburgh, in and around the towns of New Kensington, Braddock and North Braddock, East Pittsburgh, Duquesne, McKeesport, Rankin, and Wilksburg. In Westmoreland County, low-income tracts were located in St. Clair and Fairfield. With regard to the location of middle-income tracts, 42 of the assessment area's 111 moderate-income tracts were located in the city of Pittsburgh, with many additional moderate-income tracts in Allegheny County, PA on the outskirts of Pittsburgh in the towns of Blawnox, Bridgewater, Verona, Sharpsburg, Springdale, Harwick, Coraopolis, Annbridge, Freedom, and Vanport. There were 27 moderate-income tracts in Westmoreland County, PA, in towns such as St. Clair, Fairfield, Derry, Cook, Donegal, Scottdale, Hempfield, Adamsburg, and Irwin.

A map of the Pittsburgh, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, 40 institutions operated 520 offices in Allegheny and Westmoreland Counties, which held nearly \$196 billion total deposits. AmeriServ ranked twenty-fifth in the market with less than 1% market share. PNC Bank, N.A. led the market with a 44% market share, followed by The Bank of New York Mellon with 18% of the market, and BNY Mellon, N.A. with 12% market share.

AmeriServ reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2017 data, there were 524 HMDA reporters in the assessment area, who originated or purchased 41,800 loans in the Pittsburgh, PA assessment area. AmeriServ ranked one hundred and seventh with less than 1% of the HMDA market. Wells Fargo ranked first with 10% of the HMDA market, followed by Dollar Bank (9%), and PNC Bank, N.A. (7%).

According to the 2018 data, there were 519 HMDA reporters in the assessment area, who originated or purchased 48,831 loans in the Pittsburgh, PA assessment area. AmeriServ ranked ninety-ninth with less than 1% of the HMDA market. PNC Bank, N.A. again led the market with 11% market share, followed by Dollar Bank (7%), and Wells Fargo Bank, N.A. (just under 7%).

According to the 2019 data, there were 544 HMDA reporters in the assessment area, who originated or purchased 53,131 loans in the assessment area. AmeriServ ranked eighty-second with less than 1% of the HMDA market. PNC Bank, N.A. ranked first with 10% of the HMDA market, followed by Dollar Bank (7%), and Citizens Bank, N.A. (just under 7%).

Finally, according to the 2020 data, there were 596 HMDA reporters in the assessment area, who originated or purchased 69,281 loans in assessment area. AmeriServ tied for eighty-sixth in the market with less than 1% of the HMDA market. PNC Bank, N.A. ranked first with 8% of the HMDA market, followed by Wells Fargo, N.A (7%), and Dollar Bank, FSB (6%).

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to the 2017 data, there were 119 CRA small business and small farm reporters in the assessment area, who originated or purchased 32,033 loans in the Pittsburgh, PA assessment area. AmeriServ tied for forty-sixth in the market with less than 1% of the CRA market. PNC Bank, N.A. ranked first with 30% of the market, followed by American Express Bank, FSB (17%), and Capital One Bank USA, N.A. (7%).

According to the 2018 data, there were 124 CRA small business reporters in the assessment area, who originated or purchased 31,369 loans in the assessment area. AmeriServ tied for forty-first in the market with less than 1% of the CRA market. PNC Bank, N.A. led the market with 22% market share, followed by American Express, NB (18%), and Chase Bank USA, N.A. (10%).

According to the 2019 data, there were 133 CRA small business reporters in the assessment area, who originated or purchased 31,902 loans in the Pittsburgh, PA MSA assessment area. AmeriServ ranked forty-ninth in the market with less than 1% of the CRA market. PNC Bank, N.A. ranked first with 19% of the market, followed by American Express, NB (19%), and JP Morgan Chase Bank, N.A. (14%).

Finally, according to the 2020 data, there were 176 CRA small business reporters in the assessment area, who originated or purchased 38,801 loans in the Pittsburgh, PA MSA assessment area. AmeriServ ranked twenty-ninth in the market with less than 1% of the CRA market. PNC Bank, N.A. led the market with 19% market share, followed by American Express, NB (11%), and First National Bank of Pennsylvania (9%).

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators and regional banks. More specifically, in 2020, PNC Bank, N.A., American Express Bank, NB, First National Bank of Pennsylvania, Citizens Bank, N.A., and First Commonwealth Bank were the top five small business and small farm reporters, collectively holding 53% of the small business market share in the assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local organizations, which provided perspective on credit needs of the Pittsburgh, PA assessment area. One interview was held with an agency focused on affordable housing, and the other was with an agency that focused on economic development. These contacts identified a need for financial education in the assessment area, as well as the repair and rehabilitation of housing stock. Contacts indicated that more mortgage products specifically tailored to the needs of low- and moderate-income borrowers were needed, as well as a need for small business financing, including working capital, startup financing, and microbusiness financing.

Economic Characteristics

The bank's Pittsburgh, PA assessment area is located in the southeastern portion of Pennsylvania, near the Appalachian Mountains. The bank's Pittsburgh, PA assessment area includes the entirety of two of the Pittsburgh MSA's seven counties: Allegheny and Westmoreland. Per the 2015 ACS, the Pittsburgh, PA assessment area had a population of 1,592,396. Pittsburgh, situated at the intersection of the Allegheny, Monongahela, and Ohio Rivers, is the largest city in the assessment area, and second largest city in the Commonwealth of Pennsylvania.

According to the Moody's Analytics September 2021 Precis report, the Pittsburgh, PA MSA's economy is in a recovery mode, largely fueled by the technology, education, and healthcare sectors. A number of major technology companies have a presence in the city including Google, Uber, Facebook, and Amazon. Local universities such as the University of Pittsburgh and Carnegie Mellon University are part of the technology sector's rapid growth. Additionally, there is a strong demand for healthcare accompanied by robust competition between several of the region's largest healthcare providers.

The strengths of the MSA include renowned education and healthcare institutions, a relatively lower cost of living compared with other large cities in the Northeast, low employment volatility, and a skilled and well-educated workforce. Weaknesses include an aging population, coupled with weak migration trends, along with older infrastructure.

The largest employment sector in the Pittsburgh, PA MSA is education and health services, which accounts for 23% of all jobs. Professional and business services represent 16% of total employment, followed by government and retail trade, each accounting for 10% of employment. In the assessment area, UPMC Health System is the largest employer, followed by Highmark Inc., the University of Pittsburgh, The PNC Financial Services Group, Inc., Wal-Mart Stores, Inc., and Giant Eagle, Inc.

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During the evaluation period, seasonally unadjusted unemployment rates in the Pittsburgh, PA assessment area approximated those in the Commonwealth, but were higher than nationwide levels. Within the assessment area, unemployment rates were higher in Westmoreland County than those in Allegheny County. Area unemployment rates for years 2017 through 2020, as reported by the Bureau of Labor Statistics, are presented in the table below.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)				
Location	% 2017 Annual	% 2018 Annual	% 2019 Annual	% 2020 Annual
Westmoreland County	5.3	4.6	4.6	9.1
Allegheny County	4.8	4.2	4.2	9.0
Pittsburgh, PA MSA	5.1	4.4	4.4	9.2
Pennsylvania	5.0	4.5	4.5	9.1
United States	4.4	3.9	3.7	8.1
Unemployment data is from the Bureau of Labor Statistics				

Housing

According to 2015 ACS data, the Pittsburgh, PA assessment area contained 757,931 housing units, approximately 61% of which were owner-occupied, 29% of which were rental units, and just over 10% of which were vacant. The overall occupancy rate in the assessment area (61%) was equal to that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such tracts. According to 2015 ACS data, 3% of owner-occupied housing was located in low-income tracts, and 16% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-and upper-income tracts (47%, and 34%, respectively).

Of the total existing housing units, 74% were single family units, almost 9% were two-to-four family units, 15% were multifamily (five or more units), and 2% were mobile homes. The median age of the housing stock was 61 years, making housing older than the state median age of 54 years, indicating a potential need for home improvement loans for rehabilitation of the assessment area’s housing stock, which was also a need echoed by community contacts.

Data show that the price of housing in the assessment area was more affordable than in the Commonwealth overall. The 2015 ACS data indicates that the median housing value in the Pittsburgh, PA assessment area was \$132,024, which was below the median housing value in Pennsylvania (\$166,000). Data shows a disparity in housing values in low- and moderate-income tracts compared to those in middle-and upper-income tracts. The median housing value in low-income tracts was \$49,904, and this increased to \$77,948 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$118,111, and \$200,616, respectively).

Finally, median gross rent (rent plus utilities) in the assessment area was less expensive in the assessment area than in Pennsylvania. Median gross rent in the Pittsburgh, PA assessment area was \$757, which was less than the median gross rent in Pennsylvania of \$840. Within the Pittsburgh, PA assessment area, 43% of renters spent more than 30% of their income on rent, which is a lower figure than in Pennsylvania as a whole (46%).

Borrower Income Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS data revealed that there were 406,203 families in the assessment area. Of the total families in the assessment area, 21% were low-income, 17% were moderate-income, 20% were middle-income, and 42% were upper-income. In the Pittsburgh, PA assessment area, 8% of families were below the poverty level, compared to 9% in the Commonwealth overall.

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

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2017	\$72,200	\$36,100	\$36,100 - \$57,759	\$57,760 - \$86,639	\$86,640 or more
2018	\$75,500	\$37,750	\$37,750 - \$60,399	\$60,400 - \$90,599	\$90,600 or more
2019	\$79,300	\$39,650	\$39,650 - \$63,439	\$63,440 - \$95,159	\$95,160 or more
2020	\$82,300	\$41,150	\$41,150 - \$65,839	\$65,840 - \$98,759	\$98,760 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. Dun & Bradstreet reports business demographics annually. According to business data provided by Dun & Bradstreet in 2017, there were 69,343 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (40%) and upper-income (40%) tracts. Business demographic data also revealed that of the 69,343 businesses located in the assessment area in 2017, 88% were small businesses with gross annual revenues of \$1 million or less.

In 2018, there were 78,444 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts. Business demographic data also revealed that of the 78,444 businesses located in the assessment area in 2018, 89% were small businesses with gross annual revenues of \$1 million or less.

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In 2019, there were 78,164 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts. Business demographic data also revealed that of the 78,164 businesses located in the assessment area in 2019, 89% were small businesses with gross annual revenues of \$1 million or less.

Finally, in 2020, there were 78,980 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts. Business demographic data also revealed that of the 78,980 businesses located in the assessment area in 2020, 90% were small businesses with gross annual revenues of \$1 million or less.

Assessment area demographics used in evaluating AmeriServ's performance under the CRA in the Pittsburgh, PA assessment area in 2017, 2018, 2019, and 2020 are detailed in the tables on the following pages.

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.4	21,512	5.3	7,749	36.0	84,358	20.8
Moderate-income	111	22.1	69,983	17.2	11,115	15.9	68,659	16.9
Middle-income	203	40.4	183,151	45.1	11,312	6.2	81,608	20.1
Upper-income	122	24.3	131,419	32.4	4,087	3.1	171,578	42.2
Unknown-income	14	2.8	138	0.0	63	45.7	0	0.0
Total Assessment Area	502	100.0	406,203	100.0	34,326	8.5	406,203	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	54,150	15,466	3.4	28.6	26,989	49.8	11,695	21.6
Moderate-income	155,573	72,542	15.8	46.6	60,096	38.6	22,935	14.7
Middle-income	335,487	215,960	47.0	64.4	89,812	26.8	29,715	8.9
Upper-income	211,319	155,094	33.8	73.4	43,626	20.6	12,599	6.0
Unknown-income	1,402	112	0.0	8.0	1,010	72.0	280	20.0
Total Assessment Area	757,931	459,174	100.0	60.6	221,533	29.2	77,224	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,263	4.7	2,817	4.6	403	5.4	43	5.0
Moderate-income	10,170	14.7	8,997	14.7	1,034	13.8	139	16.2
Middle-income	28,030	40.4	24,871	40.8	2,800	37.4	359	41.9
Upper-income	27,308	39.4	23,918	39.2	3,079	41.2	311	36.4
Unknown-income	572	0.8	403	0.7	165	2.2	4	0.5
Total Assessment Area	69,343	100.0	61,006	100.0	7,481	100.0	856	100.0
	Percentage of Total Businesses:			88.0		10.8		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	6	1.5	6	1.6	0	0.0	0	0.0
Moderate-income	65	16.5	63	16.5	2	18.2	0	0.0
Middle-income	197	50.1	190	49.7	7	63.6	0	0.0
Upper-income	124	31.6	122	31.9	2	18.2	0	0.0
Unknown-income	1	0.3	1	0.3	0	0.0	0	0.0
Total Assessment Area	393	100.0	382	100.0	11	100.0	0	0.0
	Percentage of Total Farms:			97.2		2.8		0.0

Information based on 2015 ACS Data and 2017 Dun & Bradstreet Information

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.4	21,512	5.3	7,749	36.0	84,358	20.8
Moderate-income	111	22.1	69,983	17.2	11,115	15.9	68,659	16.9
Middle-income	203	40.4	183,151	45.1	11,312	6.2	81,608	20.1
Upper-income	122	24.3	131,419	32.4	4,087	3.1	171,578	42.2
Unknown-income	14	2.8	138	0.0	63	45.7	0	0.0
Total Assessment Area	502	100.0	406,203	100.0	34,326	8.5	406,203	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	54,150	15,466	3.4	28.6	26,989	49.8	11,695	21.6
Moderate-income	155,573	72,542	15.8	46.6	60,096	38.6	22,935	14.7
Middle-income	335,487	215,960	47.0	64.4	89,812	26.8	29,715	8.9
Upper-income	211,319	155,094	33.8	73.4	43,626	20.6	12,599	6.0
Unknown-income	1,402	112	0.0	8.0	1,010	72.0	280	20.0
Total Assessment Area	757,931	459,174	100.0	60.6	221,533	29.2	77,224	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,822	4.9	3,371	4.8	395	5.2	56	5.4
Moderate-income	11,452	14.6	10,297	14.7	1,000	13.3	155	15.0
Middle-income	31,856	40.6	28,565	40.9	2,854	37.9	437	42.3
Upper-income	30,620	39.0	27,126	38.9	3,116	41.4	378	36.6
Unknown-income	694	0.9	522	0.7	165	2.2	7	0.7
Total Assessment Area	78,444	100.0	69,881	100.0	7,530	100.0	1,033	100.0
	Percentage of Total Businesses:			89.1			9.6	1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	10	2.2	10	2.3	0	0.0	0	0.0
Moderate-income	73	16.1	71	16.1	2	18.2	0	0.0
Middle-income	229	50.6	222	50.2	7	63.6	0	0.0
Upper-income	141	31.1	139	31.4	2	18.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	453	100.0	442	100.0	11	100.0	0	0.0
	Percentage of Total Farms:			97.6			2.4	0.0

Information based on 2015 ACS Data and 2018 Dun & Bradstreet Information

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.4	21,512	5.3	7,749	36.0	84,358	20.8
Moderate-income	111	22.1	69,983	17.2	11,115	15.9	68,659	16.9
Middle-income	203	40.4	183,151	45.1	11,312	6.2	81,608	20.1
Upper-income	122	24.3	131,419	32.4	4,087	3.1	171,578	42.2
Unknown-income	14	2.8	138	0.0	63	45.7	0	0.0
Total Assessment Area	502	100.0	406,203	100.0	34,326	8.5	406,203	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	54,150	15,466	3.4	28.6	26,989	49.8	11,695	21.6
Moderate-income	155,573	72,542	15.8	46.6	60,096	38.6	22,935	14.7
Middle-income	335,487	215,960	47.0	64.4	89,812	26.8	29,715	8.9
Upper-income	211,319	155,094	33.8	73.4	43,626	20.6	12,599	6.0
Unknown-income	1,402	112	0.0	8.0	1,010	72.0	280	20.0
Total Assessment Area	757,931	459,174	100.0	60.6	221,533	29.2	77,224	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,820	4.9	3,389	4.9	374	5.1	57	5.5
Moderate-income	11,527	14.7	10,374	14.9	1,002	13.7	151	14.7
Middle-income	31,758	40.7	28,553	40.8	2,765	37.6	440	42.8
Upper-income	30,346	38.8	26,928	38.6	3,044	41.5	374	36.3
Unknown-income	713	0.9	551	0.8	155	2.1	7	0.7
Total Assessment Area	78,164	100.0	69,795	100.0	7,340	100.0	1,029	100.0
	Percentage of Total Businesses:			89.3			9.4	1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	12	2.5	12	2.6	0	0.0	0	0.0
Moderate-income	77	16.3	75	16.2	2	20.0	0	0.0
Middle-income	232	49.1	226	48.8	6	60.0	0	0.0
Upper-income	152	32.1	150	32.4	2	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	473	100.0	463	100.0	10	100.0	0	0.0
	Percentage of Total Farms:			97.9			2.1	0.0

Information based on 2015 ACS Data and 2019 Dun & Bradstreet Information

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.4	21,512	5.3	7,749	36.0	84,358	20.8
Moderate-income	111	22.1	69,983	17.2	11,115	15.9	68,659	16.9
Middle-income	203	40.4	183,151	45.1	11,312	6.2	81,608	20.1
Upper-income	122	24.3	131,419	32.4	4,087	3.1	171,578	42.2
Unknown-income	14	2.8	138	0.0	63	45.7	0	0.0
Total Assessment Area	502	100.0	406,203	100.0	34,326	8.5	406,203	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	54,150	15,466	3.4	28.6	26,989	49.8	11,695	21.6
Moderate-income	155,573	72,542	15.8	46.6	60,096	38.6	22,935	14.7
Middle-income	335,487	215,960	47.0	64.4	89,812	26.8	29,715	8.9
Upper-income	211,319	155,094	33.8	73.4	43,626	20.6	12,599	6.0
Unknown-income	1,402	112	0.0	8.0	1,010	72.0	280	20.0
Total Assessment Area	757,931	459,174	100.0	60.6	221,533	29.2	77,224	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,916	5.0	3,486	4.9	373	5.2	57	5.5
Moderate-income	11,670	14.8	10,542	14.9	967	13.5	161	15.6
Middle-income	32,124	40.6	28,970	40.9	2,705	37.9	449	43.5
Upper-income	30,538	38.7	27,234	38.5	2,947	41.3	357	34.6
Unknown-income	732	0.9	574	0.8	151	2.1	7	0.7
Total Assessment Area	78,980	100.0	70,806	100.0	7,143	100.0	1,031	100.0
	Percentage of Total Businesses:			89.7			9.0	1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	8	1.7	8	1.8	0	0.0	0	0.0
Moderate-income	80	17.2	78	17.2	2	18.2	0	0.0
Middle-income	231	49.8	224	49.4	7	63.6	0	0.0
Upper-income	145	31.3	143	31.6	2	18.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	464	100.0	453	100.0	11	100.0	0	0.0
	Percentage of Total Farms:			97.6			2.4	0.0

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in the Pittsburgh, PA assessment area.

Lending Activity

AmeriServ's lending levels in the Pittsburgh, PA assessment area reflect good responsiveness to assessment area credit needs. During the evaluation period, lending activity in the assessment area represented 23% of the bank's overall lending by number of loans, and 41% by total dollar volume. During the evaluation period, AmeriServ made 215 HMDA loans totaling \$96.3 million, and 164 CRA small business loans, totaling \$40.6 million in the bank's Pittsburgh, PA assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance. Further, due to overall loan volumes, HMDA loans are given more weight in determining the bank's overall borrower distribution of loans, followed by small business loans.

Home-Mortgage Lending

AmeriServ's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate.

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For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentage of low- and moderate-income individuals and families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 21% were low-income, 17% were moderate-income, 20% were middle-income, and 42% were upper-income. According to the ACS, 38% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following tables compare AmeriServ’s home-mortgage lending to aggregate home-mortgage lending levels, using the percentage of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate 2017 lending data, relies on 2015 ACS data to estimate demand for home-mortgage credit among both low- and moderate-income families. The remaining three tables, used to evaluate 2018, 2019 and 2020 lending, rely on 2015 ACS data along with updated HMDA data, following the requirements of Regulation C.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	20.8	0.0	8.7
Moderate	16.9	22.2	18.5
Middle	20.1	25.9	21.5
Upper	42.2	37.1	38.7
Unknown	0.0	14.8	12.6
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	20.8	5.1	9.2
Moderate	16.9	15.4	19.5
Middle	20.1	17.9	21.3
Upper	42.2	17.9	39.4
Unknown	0.0	43.7	10.6
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	20.8	8.5	9.2
Moderate	16.9	8.5	19.3
Middle	20.1	16.9	21.3
Upper	42.2	37.3	38.0
Unknown	0.0	28.8	12.2
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	20.8	2.2	7.5
Moderate	16.9	5.6	16.5
Middle	20.1	17.7	20.8
Upper	42.2	58.9	42.0
Unknown	0.0	15.6	13.2
Total	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, AmeriServ’s lending to low-income borrowers was poor.

AmeriServ’s lending in 2017 to low-income borrowers was poor. Of AmeriServ’s 27 HMDA loans, none were made to low-income borrowers, compared to a proxy of 21%, and aggregate lending to low-income borrowers of 9%. Aggregate lenders made 8% of home purchase loans, 9% of refinance loans, 11% of home improvement loans, and no multifamily loans to low-income borrowers.

AmeriServ’s lending in 2018 to low-income borrowers was poor. Of AmeriServ’s 39 HMDA loans, two (5%) were made to low-income borrowers. The bank’s lending was below both the proxy of 21%, and aggregate lending to low-income borrowers of 9%. By product type, both of the bank’s loans to low-income borrowers were home purchase loans (10%). Aggregate lenders made 8% of home purchase loans, 11% of refinance loans, 9% of home improvement loans, less than 1% of multifamily loans and loans with purpose “not applicable” to low-income borrowers in 2018.

AmeriServ's lending in 2019 to low-income borrowers was adequate. Of AmeriServ's 59 HMDA loans, five (9%) were made to low-income borrowers, compared to a proxy of 21%, and aggregate lending to low-income borrowers of 9%. By product type, AmeriServ made 10% of home purchase loans, and 9% of refinance loans to low-income borrowers. The bank made no home improvement, multifamily, or loans with purpose "not applicable" to low-income borrowers. For comparison, aggregate lenders made 9% of home purchase, 9% of refinance, 10% of home improvement, and less than 1% of multifamily loans and loans with purpose "not applicable" to low-income borrowers.

Finally, AmeriServ's lending in 2020 to low-income borrowers was poor. Of AmeriServ's 90 HMDA loans, two (2%) were made to low-income borrowers, compared to a proxy of 21%, and aggregate lending to low-income borrowers of 8%. By product type, AmeriServ made 3% of home purchase loans (one loan), and 2% of refinance loans (one loan) to low-income borrowers. The bank made no home improvement, multifamily loans, or loans with purpose "not applicable" to low-income borrowers in 2020. For comparison, aggregate lenders made 11% of home purchase loans, 5% of refinance loans, 9% of home improvement loans, and less than 1% of multifamily loans and loans with purpose "not applicable" to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, AmeriServ's lending to moderate-income borrowers was adequate.

AmeriServ's lending in 2017 to moderate-income borrowers was excellent. Of AmeriServ's 27 HMDA loans, six (22%) were made to moderate-income borrowers, which exceeded proxy of 17%, and aggregate lending to moderate-income borrowers of 19%. All six of the bank's loans to moderate-income borrowers were home purchase loans (30%). By comparison, aggregate lenders made 20% of home purchase loans, 16% of refinance loans, 18% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

AmeriServ's lending in 2018 to moderate-income borrowers was adequate. Of AmeriServ's 39 HMDA loans, six (15%) were made to moderate-income borrowers. This slightly trailed the proxy of 17%, and aggregate lending to moderate-income borrowers of 20%. By product type, all of the bank's loans to moderate-income borrowers were home purchase loans (29%). For comparison purposes, aggregate lenders made 21% of home purchase loans, 19% of refinance loans, 17% of home improvement loans, and less than 1% of multifamily loans and loans with purpose "not applicable" to moderate-income borrowers in 2018.

AmeriServ's lending in 2019 to moderate-income borrowers was poor. Of AmeriServ's 59 HMDA loans, five (9%) were made to moderate-income borrowers, compared to a proxy of 17%, and aggregate lending to moderate-income borrowers of 19%. By product type, all of AmeriServ's loans to moderate-income borrowers were home purchase loans (13%). Aggregate lenders made 22% of home purchase loans, 17% of refinance loans, 18% of home improvement loans, and less than 1% of multifamily loans and loans with purpose "not applicable" to moderate-income borrowers in 2019.

Finally, AmeriServ's lending in 2020 to moderate-income borrowers was poor. Of AmeriServ's 90 HMDA loans, five (6%) were made to moderate-income borrowers, compared to proxy of 17%, and aggregate lending to moderate-income borrowers of 17%. By product type, AmeriServ made 7% of home purchase loans, 6% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" to moderate-income borrowers. Aggregate lenders made 23% of home purchase loans, 13% of refinance loans, 16% of home improvement loans, less than 1% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2020.

Small Business Lending

An analysis of AmeriServ's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Pittsburgh, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to the 2017, Dun & Bradstreet business data, there were 69,343 businesses operating in the assessment area in 2017, with 88% designated as small businesses. According to the 2018, Dun & Bradstreet business data, there were 78,444 businesses operating in the assessment area in 2018, with 89% designated as small businesses. According to the 2019, Dun & Bradstreet business data, there were 78,164 businesses operating in the assessment area in 2019, with 89% designated as small businesses. Finally, according to the 2020, Dun & Bradstreet business data, there were 78,980 businesses operating in the assessment area in 2020, with 90% designated as small businesses.

In 2017, the bank's borrower distribution of small business loans was adequate. In 2017, AmeriServ originated 24 small business loans in the assessment area, aggregating \$8.5 million. Of these loans, 46% were originated to small businesses. The bank's lending to small businesses trailed both the aggregate lending level of 51% to small businesses by all lenders in the assessment area, and the proxy of 88% of small businesses in the assessment area.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2017, 21% of the bank's small business loans in the assessment area were extended in an amount of \$100 thousand or less. Aggregate lending data for 2017 shows that 93% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2018, the bank's borrower distribution of small business loans was adequate. In 2018, AmeriServ originated 29 small business loans in the assessment area, aggregating \$9.9 million. Of these loans, 41 were originated to small businesses. The bank's lending to small businesses was slightly below the aggregate lending level of 46% to small businesses by all lenders in the assessment area, and was below the proxy of 89% of small businesses in the assessment area.

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In 2018, 21% of AmeriServ's small business loans in the assessment area were extended in an amount of \$100 thousand or less, while aggregate lenders extended 92% of small business loans in those amounts.

In 2019, the bank's borrower distribution of small business loans was good. In 2019, AmeriServ originated 20 small business loans, aggregating \$6.8 million, within the assessment area. 55% of these loans were to small businesses, which exceeded the market aggregate of 46%, but remained below the proxy of 89% of small businesses in the assessment area.

In 2019, only 9% of the bank's small business loans were extended in an amount of \$100 thousand or less, compared to 92% for aggregate lenders.

In 2020, the bank's borrower distribution of small business loans was poor. In 2020, AmeriServ originated 91 small business loans, aggregating \$15.3 million, within the assessment area. Of these loans, 28% of loans were to small businesses. The bank's lending performance trailed both aggregate lending of 43%, and the proxy of 90% of small businesses in the assessment area.

In 2020, 58% of the bank's small business loans were originated in an amount of \$100 thousand or less, compared to a level of 84% for aggregate lenders.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. Since credit card loans are generally made in smaller amounts, this can skew aggregate small business data. As noted previously, amongst the top small business lenders in the assessment area are national lenders with large credit card portfolios. In fact, the top five CRA reporters in the assessment area in 2017, 2018, 2019, and 2020 included many large credit card lenders, and together these credit card lenders controlled well over half of the CRA small business market. This is taken into account when drawing conclusions about the bank's small business lending.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among census tracts within the assessment area. Overall, the geographic distribution of loans reflects excellent penetration throughout the Pittsburgh, PA assessment area, including in low- and moderate-income census tracts. As mentioned earlier, HMDA loans were given the greatest amount of consideration in determining this conclusion, because of loan volume, followed by small business loans.

Home-Mortgage Lending

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

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According to the 2015 ACS data, 3% of owner-occupied housing was located in low-income tracts, and 16% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-and upper-income tracts (47%, and 34%, respectively).

The tables below present the geographic distribution of AmeriServ’s HMDA lending, in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area. The first table, used for 2017 lending, relies on the 2015 ACS data. The remaining three tables, for 2018 through 2020 data, rely on 2015 ACS data, along with updated HMDA data, which follows Regulation C updated requirements.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	3.4	7.4	1.9
Moderate	15.8	29.6	13.1
Middle	47.0	29.7	46.2
Upper	33.8	33.3	38.8
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	3.4	15.4	1.8
Moderate	15.8	15.4	12.9
Middle	47.0	46.1	45.0
Upper	33.8	23.1	40.3
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	3.4	6.8	1.8
Moderate	15.8	22.0	12.9
Middle	47.0	39.0	44.5
Upper	33.8	32.2	40.8
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	3.4	3.3	1.3
Moderate	15.8	6.7	10.6
Middle	47.0	48.9	42.3
Upper	33.8	41.1	45.8
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, AmeriServ’s overall HMDA lending in low-income tracts was excellent.

AmeriServ’s lending in low-income census tracts in 2017 was excellent. Of AmeriServ’s 27 HMDA loans originated in the assessment area in 2017, two (7%) were made in low-income census tracts. The bank’s lending was above both the proxy of 3% and the aggregate lending level of 2%. By product type, the bank made 5% of home purchase loans (one loan), and 50% of multifamily loans (one loan) in low-income tracts. The bank made no refinance, or home improvement loans in low-income tracts. Aggregate lenders made 2% of home purchase loans, 2% of refinance loans, and 3% of home improvement loans, and 7% of multifamily loans in low-income census tracts in 2017.

AmeriServ’s lending in low-income census tracts in 2018 was excellent. Of AmeriServ’s 39 HMDA loans originated in the assessment area in 2018, six (15%) were made in low-income census tracts. The bank’s lending was well above both the proxy of 3% and the aggregate lending level of 2%. By product type, the bank 10% of home purchase, 40% of multifamily loans, and no refinance, home improvement loans, or loans with purpose “not applicable” in low-income census tracts in 2018.

Aggregate lenders made 2% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 11% of multifamily loans, and 3% of loans with purpose “not applicable” in low-income census tracts.

AmeriServ’s lending in low-income census tracts in 2019 was excellent. Of AmeriServ’s 59 HMDA loans originated in the assessment area in 2019, four (7%) were made in low-income census tracts. The bank’s lending was above both the proxy of 3% and the aggregate lending level of 2%. By product type, the bank made 5% of home purchase loans, 22% of multifamily loans, and no refinance, home improvement, or loans with purpose “not applicable” in low-income census tracts in 2019. Aggregate lenders made 2% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 11% of multifamily loans, and 3% of loans with purpose “not applicable” in low-income census tracts, in 2019.

AmeriServ’s lending in low-income census tracts in 2020 was good. Of AmeriServ’s 90 HMDA loans originated in the assessment area in 2020, three (3%) were made in low-income census tracts. The bank’s lending matched the proxy of 3%, and exceeded the aggregate lending level of 1%. By product type, all three of the bank’s loans in low-income census tracts were multifamily loans (23%). Aggregate lenders made 2% of home purchase loans, 1% of refinance loans, 1% of home improvement loans, 10% of multifamily loans, and 2% of loans with purpose “not applicable” in low-income census tracts in 2020.

Lending in Moderate-Income Census Tracts

For the period under review, the bank’s HMDA lending in moderate-income tracts was considered good.

AmeriServ’s lending in moderate-income census tracts in 2017 was excellent. Of AmeriServ’s 27 HMDA loans originated in the assessment area in 2017, eight loans (30%) were made in moderate-income census tracts. The bank’s lending was significantly above both the proxy of 16% and the aggregate lending level of 13%. By product type, the bank made 25% of home purchase loans, 40% of refinance loans, 50% of multifamily loans, and no home improvement loans in moderate-income tracts. Aggregate lenders made 13% of home purchase, 12% of refinance loans, 15% of home improvement loans, and 41% of multifamily loans in moderate-income tracts.

AmeriServ’s lending in moderate-income census tracts in 2018 was good. Of AmeriServ’s 39 HMDA loans originated in the assessment area in 2018, six loans (15%) were made in moderate-income census tracts. The bank’s lending approximated the proxy of 16% and was above the aggregate lending level of 13%. By product type, the bank made 14% of home purchase loans, and 30% of multifamily loans in moderate-income tracts. The bank made no refinance, home improvement, or loans with purpose “not applicable” in moderate-income census tracts in 2018. In comparison, aggregate lenders made 14% of home purchase, 12% of refinance loans, 12% of home improvement loans, 39% of multifamily loans, and 20% of loans with purpose “not applicable” in moderate-income tracts.

AmeriServ's lending in moderate-income census tracts in 2019 was excellent. Of AmeriServ's 59 HMDA loans originated in the assessment area in 2019, 13 loans (22%) were made in moderate-income census tracts. The bank's lending exceeded both the proxy of 16% and the aggregate lending level of 13%. By product type, the bank made 26% of home purchase loans, 9% of refinance loans, 22% of multifamily loans, and no home improvement or loans with purpose "not applicable" in moderate-income tracts. Aggregate lenders made 14% of home purchase loans, 11% of refinance loans, 12 of home improvement loans, 32% of multifamily loans, and 21 of loans with purpose "not applicable" in moderate-income tracts.

AmeriServ's lending in moderate-income census tracts in 2020 was poor. Of AmeriServ's 90 HMDA loans originated in the assessment area in 2020, six loans (7%) were made in moderate-income census tracts. The bank's lending was below both the proxy of 16% and the aggregate lending level of 11%. By product type, the bank made 3% of home purchase loans, 4% of refinance loans, 23% of multifamily loans, and no home improvement or loans with purpose "not applicable" in moderate-income tracts. In comparison, aggregate lenders made 13% of home purchase loans, 8% of refinance loans, 11% of home improvement loans, 37% of multifamily loans, and 21% of loans with purpose "not applicable" in moderate-income tracts.

Small Business Lending

The geographic distribution of AmeriServ's small business loans reflects excellent penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to Dun & Bradstreet data in 2017, there were 69,343 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (40%) and upper-income (40%) tracts. Very little change in the geographic distribution of small businesses was evident in the three other data years.

In 2018, there were 78,444 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts.

In 2019, there were 78,164 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts.

Finally, in 2020, there were 78,980 businesses in the assessment area. Of these businesses, 5% were in low-income tracts, and 15% were in moderate-income tracts. The majority of businesses were located in middle-income (41%) and upper-income (39%) tracts.

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The tables below present AmeriServ’s small business geographic distribution in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the four years evaluated.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	4.7	8.3	4.0
Moderate	14.7	16.7	14.5
Middle	40.4	33.3	40.0
Upper	39.4	37.5	40.4
Unknown	0.8	4.2	1.1
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	4.9	3.4	4.2
Moderate	14.6	20.7	14.9
Middle	40.6	44.9	39.3
Upper	39.0	31.0	40.4
Unknown	0.9	0.0	1.2
Total	100.0	100.0	100.0

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	4.9	15.0	4.1
Moderate	14.7	20.0	15.0
Middle	40.7	30.0	39.8
Upper	38.8	35.0	39.8
Unknown	0.9	0.0	1.3
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Pittsburgh, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	5.0	2.2	4.0
Moderate	14.8	24.2	14.4
Middle	40.6	49.4	40.0
Upper	38.7	24.2	40.9
Unknown	0.9	0.0	0.7
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, the bank’s small business lending in low-income tracts was good.

AmeriServ’s lending in low-income census tracts in 2017 was excellent. Of AmeriServ’s 24 CRA small business loans originated in the assessment area in 2017, two loans (8%) were made in low-income census tracts. The bank’s lending was above both the proxy of 5% and the aggregate lending level of 4%.

AmeriServ’s lending in low-income census tracts in 2018 was adequate. Of AmeriServ’s 29 CRA small business loans originated in the assessment area in 2018, one loan (3%) was made in a low-income census tract. The bank’s lending was below the proxy of 5% and the aggregate lending level of 4%.

AmeriServ’s lending in low-income census tracts in 2019 was excellent. Of AmeriServ’s 20 CRA small business loans originated in the assessment area in 2019, the bank made three loans (15%) in low-income census tracts. The bank’s lending was above both the proxy of 5% and the aggregate lending level of 4%.

AmeriServ’s lending in low-income census tracts in 2020 was adequate. Of AmeriServ’s 91 CRA small business loans originated in the assessment area in 2020, the bank made two loans (2%) in low-income census tracts. The bank’s lending was below both the proxy of 5% and the aggregate lending level of 4%.

Lending in Moderate-Income Census Tracts

For the period under review, the bank’s small business lending in moderate-income tracts was considered excellent.

AmeriServ’s lending in moderate-income census tracts in 2017 was excellent. Of AmeriServ’s 24 CRA small business loans originated in the assessment area in 2017, four loans (17%) were made in moderate-income census tracts. The bank’s lending was above both the proxy of 15%, and the aggregate lending level of just under 15%.

AmeriServ's lending in moderate-income census tracts in 2018 was excellent. Of AmeriServ's 29 CRA small business loans originated in the assessment area in 2018, six loans (21%) were made in moderate-income census tracts. The bank's lending was above both the proxy and the aggregate lending level, both of which were 15%.

AmeriServ's lending in moderate-income census tracts in 2019 was excellent. Of AmeriServ's 20 CRA small business loans originated in the assessment area in 2019, four loans (20%) were made in moderate-income census tracts. The bank's lending was above both the proxy and the aggregate lending level, both of which were 15%.

AmeriServ's lending in moderate-income census tracts in 2020 was excellent. Of AmeriServ's 91 CRA small business loans originated in the assessment area in 2020, 22 loans (24%) were made in moderate-income census tracts. The bank's lending was significantly above both the proxy of 15%, and the aggregate lending level of 14%.

Responsiveness to Credit Needs

AmeriServ exhibits a good record of servicing the credit needs of low- and moderate-income individuals and areas, and very small businesses, consistent with safe and sound banking practices. As indicated previously, community contacts identified a need to provide affordable housing and mortgage credit for low- and moderate-income borrowers, as well as small business financing. AmeriServ addressed affordable housing needs by adequately making retail HMDA loans to low- and moderate-income borrowers, and through the use of flexible lending programs, as discussed below. Notably, 77% of the bank's community development loans in the assessment area also addressed affordable housing needs.

Innovative and/or Flexible Lending Practices

AmeriServ makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs. The home-mortgage credit needs of low- and moderate-income individuals and families can often be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Pittsburgh, PA assessment area, AmeriServ participated in loan programs for first-time homebuyers through the FHA and FHLB of Pittsburgh's FFD program.

During the examination period, the bank originated nine FHA loans in the assessment area totaling nearly \$1.3 million. In addition, the bank made two FHLB of Pittsburgh FFD grants, each in the amount of \$5,000, to first-time homebuyers in the assessment area during the current exam period.

Community Development Lending

AmeriServ makes an adequate level of community development loans in the Pittsburgh, PA assessment area. During the current evaluation period, which included the timeframe between April 18, 2017 through January 10, 2022, the bank originated seven qualified community development loans aggregating \$6.4 million. At the last CRA evaluation, the bank made two community development loans totaling \$7.6 million. Almost 32% of the bank's total community development loans, by dollar volume, were made in the Pittsburgh, PA assessment area.

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Of the bank’s seven community development loans in the assessment area, there were five loans aggregating \$4.8 million (77%) that supported affordable housing efforts, and two loans aggregating nearly \$1.5 million (23%) that supported activities to revitalize and/or stabilize low- and moderate-income areas in the assessment area.

Though the bank made 124 PPP loans totaling over \$26 million in the assessment area, none qualified as a community development loan¹¹.

The following table includes the bank’s community development loans in the Pittsburgh, PA assessment area, by community development purpose.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)
2017	0	0	0	0	0	0	0	0	0	0
2018	2	1,400	0	0	0	0	2	1,488	4	2,888
2019	1	164	0	0	0	0	0	0	1	164
2020	1	309	0	0	0	0	0	0	1	309
2021	1	3,000	0	0	0	0	0	0	1	3,000
TOTAL	5	4,873	0	0	0	0	2	1,488	7	6,361

INVESTMENT TEST

The investment test evaluates a financial institution’s level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include a lawful investment, deposit, membership share or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as low satisfactory.

Volume of Investment and Grant Activity

AmeriServ has an adequate level of qualified community development investments and grants, rarely in a leadership position. In total, the bank’s 10 qualified community development investments, grants, and donations totaled \$1.5 million in the assessment area. This represents an increase from the \$1 million in total investments in the assessment area at the previous evaluation. The bank’s investments, grants, and donations in the Pittsburgh, PA assessment area represented just under 35% of the bank’s total investments, grants, and donations.

¹¹ PPP loans that qualify as community development loans are defined as loans with amounts over \$1 million that are located in low- or moderate-income census tracts.

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Of the total investments in the Pittsburgh, PA assessment area, four investments benefitted affordable housing initiatives totaling \$1.5 million (99%). The remaining \$14 thousand (1%) were in the form of five donations to community service and affordable housing organizations.

The following table presents the investment and grant activity for the Pittsburgh, PA assessment area.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	4	1,529	0	0	0	0	0	0	4	1,529
Donations	1	5	4	9	0	0	0	0	5	14
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	5	1,534	4	9	0	0	0	0	9	1,543

Responsiveness to Credit and Community Development Needs

AmeriServ exhibits good responsiveness to credit and community development needs of the assessment area. As noted in the table above, nearly all of the bank’s investments supported affordable housing in the assessment area, a pronounced community need as indicated through community contact interviews.

Community Development Initiatives

AmeriServ makes rare use of innovative and/or complex investments to support community development initiatives. In the Pittsburgh, PA assessment area, the vast majority of investment dollars were made through mortgage-backed securities and bonds, neither of which are particularly innovative or complex investment vehicles. The remaining investments were made through donations to community service and affordable housing organizations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution’s branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, the bank operated three full-service bank branches in the Pittsburgh, PA assessment area. Two of the three branches (67%) were located in moderate-income census tracts in the assessment area. The other branch (33%) was located in an upper-income census tract.

The following table details the location of the bank’s branches in the Pittsburgh, PA assessment area with comparison to the 2015 ACS population demographics.

AmeriServ Financial Bank Pittsburgh, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent Population
Low	0	0.0	97,362	6.1
Moderate	2	66.7	293,400	18.4
Middle	0	0.0	700,693	44.0
Upper	1	33.3	490,299	30.8
Unknown Income	0	0.0	10,642	0.7
Totals	3	100.0	1,592,396	100.0

Two of the three branches (67%) in the Pittsburgh, PA assessment area have ATMs available, which provide electronic access to banking services. The bank’s downtown Pittsburgh branch location which is in the U.S. Steelworkers office building, does not have an ATM. To supplement traditional banking services, AmeriServ provides alternative delivery systems that include online banking services, telephone banking services, and remote deposit capture. Customers are able to pay bills, open accounts, and apply for loans using the bank’s online website at <https://www.ameriserv.com/>.

Changes in Branch Locations

The bank did not open or close any branches within the Pittsburgh, PA assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. The two branches located in moderate-income census tracts offer standard hours on Monday through Thursday, and extended hours on Friday, while the branch located in an upper-income tract does not offer extended hours on Friday. Though the majority of branches in other assessment areas offer limited Saturday hours, as well, none of the branches in the Pittsburgh, PA assessment area have Saturday hours.

Bank Products

Though the bank does not offer a free checking product, it does offer a free business checking account, which has no service fees or daily balance requirement. The account offers up to 250 free transactions, along with telephone, online and mobile banking, and a free VISA Business Check Card. This free business checking account allows very small businesses access to low-cost banking services. Also of note, the bank offered COVID-19 Pandemic Relief, and took steps throughout the pandemic to address the needs of customers who were impacted. All customers including individuals, small businesses, and small farms were offered payment relief in the form of complete deferral of payments or interest only payments, based on need or anticipation of need.

Community Development Services

AmeriServ provides few, if any community development services in this assessment area. None of the bank's officers or employees provide community development services to local community and economic development organizations in the Pittsburgh, PA assessment area.

STATE COLLEGE, PA ASSESSMENT AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

AmeriServ's State College, PA assessment area consists of the entirety of Centre County, PA, which is coterminous with the State College, PA MSA, located in the center of the Commonwealth of Pennsylvania.

Of the bank's total loans, 26% by total number, and 31% by total dollar can be attributed to this assessment area. The vast majority of the bank's lending in the State College, PA assessment area was HMDA lending. The bank originated 373 HMDA loans aggregating \$96.7 million during the exam period. During the examination period, the bank only originated 45 CRA small business loans in the assessment area, aggregating \$5 million. Because of the bank's small volume of small business loans, this loan type was not analyzed in this assessment area, as volumes would not have been sufficient on which to draw meaningful conclusions. AmeriServ operates one branch (6%) in the assessment area, which holds \$42.8 million in deposits, or 4% of the bank's total deposits as of September 30, 2021.

AmeriServ's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to the 2015 ACS data, the State College, PA assessment area consisted of 31 census tracts, one of which was low-income (3%), six of which were moderate-income (19%), 12 of which were middle-income (39%), eight of which were upper-income (26%), and four of which had unknown income levels (13%). The assessment area's low-income census tract was located in the borough of State College.

Two of the bank's six moderate-income tracts are located in the borough of State College. The other four moderate-income tracts are located in Patton Township, Millheim, Rebersburg, and Bellefonte.

A map of the State College, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, 17 institutions operated 47 offices in the market, which held nearly \$4.6 billion total deposits in the market. PNC Bank, N.A. led the market with 25% of deposit market share, followed by First National Bank of Pennsylvania with 19% market share, and Citizens Bank, N.A. with 9% market share. AmeriServ ranked sixteenth in the market, with just under 1% of the deposit market.

AmeriServ reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2017 data, there were 210 HMDA reporters in the State College assessment area, who originated or purchased 3,019 loans in the assessment area. AmeriServ ranked tenth with almost 4% of the HMDA market. Northwest Bank was ranked first in the HMDA market with 7% of the total HMDA market share, followed by First National Bank of Pennsylvania (over 6%), and Wells Fargo Bank, N.A. (5%).

According to the 2018 data, there were 182 HMDA reporters in the assessment area, who originated or purchased 3,586 loans in the assessment area. AmeriServ ranked seventeenth with 2% of the HMDA market. First National Bank of Pennsylvania led the market with 7% of the HMDA market, followed by Northwest Bank (7%), and Jersey Shore State Bank (6%).

According to the 2019 data, there were 226 HMDA reporters in the assessment area, who originated or purchased 4,053 loans in the State College, PA assessment area. AmeriServ ranked thirteenth with 2% of the HMDA market. Northwest Bank ranked first in the assessment area with 9% market share, followed by Wells Fargo Bank, N.A. (7%), and Citizens Bank, N.A. (6%).

Finally, according to the 2020 data, there were 250 HMDA reporters in the assessment area, who originated or purchased 5,605 loans in the assessment area. AmeriServ ranked fourteenth in the market with 2% of the HMDA market. Northwest Bank once again led the market with 8% of HMDA loans, followed by Citizens Bank, N.A. (8%), Wells Fargo Bank, N.A. (7%).

Similarly, the institution reports its small business loans in the assessment area pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to the 2017 data, there were 59 CRA small business reporters in the assessment area, who originated or purchased 2,225 loans in the State College, PA assessment area. AmeriServ tied for twenty-eighth in the market with less than 1% of the CRA market. American Express Bank, FSB was the CRA market leader in 2017 with 16% of the small business market, followed by PNC Bank, N.A. (12%), and Synchrony Bank (8%).

According to the 2018 data, there were 61 CRA small business reporters in the assessment area, who originated or purchased 2,255 loans in the assessment area. AmeriServ made no small business loans in the assessment area in 2018. American Express Bank, FSB led the small business market with 16% market share, followed by Chase Bank USA, N.A. (11%), and PNC Bank, N.A. (10%).

According to the 2019 data, there were 61 CRA small business reporters in the assessment area, who originated or purchased 2,295 loans in the State College, PA assessment area. AmeriServ tied for twenty-eighth with less than 1% of the CRA market. American Express, NB ranked first with 16% of the CRA market share, followed by JP Morgan Chase Bank, N.A. (15%), and PNC Bank, N.A. (11%).

Finally, according to the 2020 data, there were 74 CRA small business reporters in the assessment area, who originated or purchased 2,731 loans in the assessment area. AmeriServ ranked twentieth in the market with 1% of the CRA market. First National Bank of Pennsylvania led the market with 14% market share, followed by Kish Bank (14%), and American Express, NB (10%).

To supplement economic, demographic, and performance data, interviews were conducted with three local organizations, which provided perspective on credit needs of the State College, PA assessment area. Two interviews were held with agencies focused on affordable housing, and the third was with an agency that focuses on providing community services to the area.

These contacts identified a need for affordable housing in the assessment area, including multi-unit housing. Further, contacts expressed needs for increased homeownership counseling, and education on general financial planning and budgeting. Finally, contacts indicated that they were in need of more bank partners to become involved with affordable housing projects within the assessment area.

Economic Characteristics

The bank's State College, PA assessment area is located in the center of the Commonwealth of Pennsylvania, and includes the entirety of Centre County, PA, which is coterminous with the State College, PA MSA. State College is the home of Pennsylvania State University (Penn State), the largest college in Pennsylvania. Per the 2015 ACS, the State College, PA assessment area had a population of 157,823.

According to Moody's Analytics January 2021 Precis Report, the State College MSA's economy is still in a recession, lagging other regional college towns, and the Commonwealth as a whole. Education, and healthcare have historically been strong drivers of the regional economy, and given that these industries are lagging as a result of COVID-19, the overall economy has been negatively affected. Retail trade and professional services have picked up some of the economy's slack, but until Penn State's operations normalize, analysts predict that the economy will suffer.

According to Moody's, the strengths of the MSA include a highly educated young population, high quality education and healthcare institutions, a relatively high quality of life, and the University's financial support for innovation and growth. Weaknesses include the area's overreliance on Penn State for jobs and consumer spending, a low per capita income, poor transportation linkages, and overvalued single-family housing.

Leading industries in the State College, PA MSA are government which accounts for 40% of all jobs, followed by education and health services, which accounts for 13% of all jobs, leisure and hospitality services and retail trade, which both account for 9% of total employment, and professional and business services, which represents 8% of total employment. In the assessment area, Penn State is the largest employer, followed by Mount Nittany Health, Weis Markets, Geisinger Health, and Wal-Mart, Inc.

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

During the evaluation period, the State College, PA assessment area experienced unemployment rates lower than both the Commonwealth of Pennsylvania, and the nation as a whole. Area unemployment rates for 2017, 2018, 2019, and 2020, as reported by the Bureau of Labor and Statistics, are presented in the table below.

AmeriServ Financial Bank State College, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)				
Location	% 2017 Annual	% 2018 Annual	% 2019 Annual	% 2020 Annual
Centre County	3.8	3.4	3.4	5.8
State College, PA MSA	3.8	3.4	3.4	5.8
Commonwealth of Pennsylvania	5.0	4.5	4.5	9.1
National	4.4	3.9	3.7	8.1
Unemployment data is from the Bureau of Labor Statistics				

HOUSING

According to 2015 ACS data, the State College, PA assessment area contained 64,489 housing units, approximately 54% of which were owner-occupied, 35% of which were rental units, and just over 11% of which were vacant. The overall occupancy rate in the assessment area (54%) was lower than that in the Commonwealth of Pennsylvania (61%), reflecting that the University drives the assessment area’s economy.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2015 ACS data, no owner-occupied housing was located in low-income tracts, and 16% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (52%, and 32%, respectively).

Of the total existing housing units, 66% were single-family units, almost 7% were two-to-four family units, 22% were multifamily (five or more family units), and nearly 6% were mobile homes. The median age of the housing stock was 45 years, making housing younger than the state median age of housing stock, at 54 years.

Data show that the price of housing in the assessment area was less affordable than in the Commonwealth overall, a sentiment also shared by community contacts. The 2015 ACS data indicates that the median housing value in the State College, PA assessment area was \$197,166, which was higher than the median housing value in Pennsylvania (\$166,000). Data shows a noteworthy disparity in housing values in moderate- and middle-income tracts compared to those in upper-income tracts. As indicated previously, there were no owner-occupied housing units in the assessment area’s low-income census tract. The median housing value in moderate-income tracts was \$167,852, and was \$167,702 in middle-income tracts. Comparatively, the median housing value in upper-income tracts was \$257,192.

Similarly, median gross rent (rent plus utilities) in the assessment area was more expensive in the assessment area than in Pennsylvania. Median gross rent in the State College, PA assessment area was \$901 which was more than the median gross rent in Pennsylvania of \$840. Within the State College, PA assessment area, 52% of renters spent more than 30% of their income on rent, which is a higher figure than in Pennsylvania as a whole (46%).

Borrower Income Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS data revealed that there were 32,532 families in the assessment area. Of the total families in the assessment area, 20% were low-income, nearly 19% were moderate-income, almost 22% were middle-income, and 40% were upper-income. In the State College, PA assessment area, 6% of families were below the poverty level, compared to 9% in the Commonwealth overall.

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

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2017	\$75,000	\$37,500	\$37,500 - \$59,999	\$60,000 - \$89,999	\$90,000 or more
2018	\$82,400	\$41,200	\$41,200 - \$65,919	\$65,920 - \$98,879	\$98,880 or more
2019	\$93,000	\$46,500	\$46,500 - \$74,399	\$74,400 - \$111,599	\$111,600 or more
2020	\$88,700	\$44,350	\$44,350 - \$70,959	\$70,960 - \$106,439	\$106,440 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2017, there were 5,457 businesses in the assessment area. Of these businesses, less than 1% were in low-income tracts, and 18% were in moderate-income tracts. The majority of businesses were located in middle- (42%) and upper-income (30%) tracts. An additional 10% of businesses were located in unknown-income census tracts. Business demographic data also revealed that of the 5,457 businesses located in the assessment area in 2017, 90% were small businesses with gross annual revenues of \$1 million or less.

In 2018, there were 6,053 businesses in the assessment area. Of these businesses, less than 1% were in low-income tracts, and 18% were in moderate-income tracts. The majority of businesses were located in middle- (40%) and upper-income (31%) tracts, while 11% were located in tracts with unknown income levels. Business demographic data also revealed that of the 6,053 businesses located in the assessment area in 2018, 91% were small businesses with gross annual revenues of \$1 million or less.

In 2019, there were 6,115 businesses in the assessment area. Of these businesses, less than 1% were in low-income tracts, and 18% were in moderate-income tracts. The majority of businesses were located in middle- (40%) and upper-income (31%) tracts, and 11% were located in tracts with unknown income. Business demographic data also revealed that of the 6,115 businesses located in the assessment area in 2019, 91% were small businesses with gross annual revenues of \$1 million or less.

Finally, in 2020, there were 6,093 businesses in the assessment area. Of these businesses, less than 1% were in low-income tracts, and 19% were in moderate-income tracts. The majority of businesses were located in middle- (40%) and upper-income (31%) tracts, and 10% were located in tracts with unknown income levels. Business demographic data also revealed that of the 6,093 businesses located in the assessment area in 2020, 91% were small businesses with gross annual revenues of \$1 million or less.

Assessment area demographics used in evaluating AmeriServ's performance under the CRA in the State College, PA assessment area in 2017, 2018, 2019, and 2020 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank State College, PA Assessment Area Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.6
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.3
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	38	0.7	37	0.8	1	0.2	0	0.0
Moderate-income	989	18.1	888	18.1	87	18.2	14	23.3
Middle-income	2,277	41.7	2,050	41.6	192	40.2	35	58.4
Upper-income	1,637	30.0	1,482	30.1	146	30.5	9	15.0
Unknown-income	516	9.5	462	9.4	52	10.9	2	3.3
Total Assessment Area	5,457	100.0	4,919	100.0	478	100.0	60	100.0
	Percentage of Total Businesses:			90.1	8.8		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	33	16.3	32	16.0	1	33.3	0	0.0
Middle-income	120	59.1	119	59.5	1	33.4	0	0.0
Upper-income	48	23.6	47	23.5	1	33.3	0	0.0
Unknown-income	2	1.0	2	1.0	0	0.0	0	0.0
Total Assessment Area	203	100.0	200	100.0	3	100.0	0	.0
	Percentage of Total Farms:			98.5	1.5		0.0	

Information based on 2015 ACS Data and 2017 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank State College, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.6
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.3
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8	0.1	8	0.1	0	0.0	0	0.0
Moderate-income	1,087	18.0	983	17.9	87	17.9	17	23.9
Middle-income	2,442	40.3	2,214	40.4	191	39.2	37	52.1
Upper-income	1,870	30.9	1,705	31.0	151	31.0	14	19.6
Unknown-income	646	10.7	585	10.6	58	11.9	3	4.2
Total Assessment Area	6,053	100.0	5,495	100.0	487	100.0	71	100.0
	Percentage of Total Businesses:			90.8		8.0		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	30	13.6	29	13.4	1	25.0	0	0.0
Middle-income	135	61.4	133	61.6	2	50.0	0	0.0
Upper-income	53	24.1	52	24.1	1	25.0	0	0.0
Unknown-income	2	0.9	2	0.9	0	0.0	0	0.0
Total Assessment Area	220	100.0	216	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			98.2		1.8		0.0

Information based on 2015 ACS Data and 2018 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank State College, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.6
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.3
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	8	0.1	8	0.1	0	0.0	0	0.0
Moderate-income	1,125	18.4	1,027	18.4	84	17.7	14	20.9
Middle-income	2,462	40.3	2,242	40.3	184	38.7	36	53.7
Upper-income	1,868	30.5	1,703	30.6	149	31.4	16	23.9
Unknown-income	652	10.7	593	10.6	58	12.2	1	1.5
Total Assessment Area	6,115	100.0	5,573	100.0	475	100.0	67	100.0
	Percentage of Total Businesses:			91.1		7.8		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	30	13.6	29	13.4	1	25.0	0	0.0
Middle-income	137	62.0	135	62.2	2	50.0	0	0.0
Upper-income	52	23.5	51	23.5	1	25.0	0	0.0
Unknown-income	2	0.9	2	0.9	0	0.0	0	0.0
Total Assessment Area	221	100.0	217	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			98.2		1.8		0.0

Information based on 2015 ACS Data and 2019 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank State College, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.6
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.3
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7	0.1	7	0.1	0	0.0	0	0.0
Moderate-income	1,133	18.6	1,037	18.6	83	18.0	13	18.8
Middle-income	2,448	40.2	2,233	40.2	178	38.4	37	53.7
Upper-income	1,873	30.7	1,714	30.8	143	31.0	16	23.2
Unknown-income	632	10.4	571	10.3	58	12.6	3	4.3
Total Assessment Area	6,093	100.0	5,562	100.0	462	100.0	69	100.0
	Percentage of Total Businesses:			91.3		7.6		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	27	12.2	26	12.0	1	25.0	0	0.0
Middle-income	139	62.9	137	63.1	2	50.0	0	0.0
Upper-income	52	23.5	51	23.5	1	25.0	0	0.0
Unknown-income	3	1.4	3	1.4	0	0.0	0	0.0
Total Assessment Area	221	100.0	217	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			98.2		1.8		0.0

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated low satisfactory in the State College, PA assessment area.

Lending Activity

AmeriServ's lending levels in the State College, PA assessment area reflect good responsiveness to assessment area credit needs. During the evaluation period, lending activity in the State College, PA assessment area represented 26% of loans by total number, and 31% by dollar volume. During the evaluation period, the bank originated 373 HMDA loans aggregating \$96.7 million, and 45 small business loans aggregating \$5 million.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance, due to the demographics of the State College, PA assessment area. Further, due to loan volume, HMDA loans were solely analyzed to determine the bank's overall borrower distribution of loans. As indicated previously, small business loans were not evaluated in the State College, PA assessment area because analysis of the very low volume of loans would not have yielded meaningful conclusions.

Home-Mortgage Lending

AmeriServ's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate.

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For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentage of low- and moderate-income families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, nearly 20% of the families in the assessment area were low-income, almost 19% were moderate-income, 22% were middle-income, and 40% were upper-income. According to 2015 ACS data, 38% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following tables compare AmeriServ’s home-mortgage lending to aggregate home-mortgage lending levels, using the percentage of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate 2017 lending, relies on 2015 ACS data to estimate demand for home-mortgage credit among both low- and moderate-income families. The remaining three tables, used to evaluate 2018, 2019 and 2020 lending, rely on 2015 ACS data, along with updated HMDA data, following the requirements under Regulation C.

AmeriServ Financial Bank State College, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	19.6	2.7	7.0
Moderate	18.5	17.1	15.8
Middle	21.6	22.5	23.0
Upper	40.3	56.8	42.5
Unknown	0.0	0.9	11.7
Total	100.0	100.0	100.0

AmeriServ Financial Bank State College, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	19.6	1.6	8.4
Moderate	18.5	28.1	18.8
Middle	21.6	18.7	24.7
Upper	40.3	50.0	40.2
Unknown	0.0	1.6	7.9
Total	100.0	100.0	100.0

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AmeriServ Financial Bank State College, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	19.6	7.5	10.6
Moderate	18.5	20.0	19.3
Middle	21.6	32.5	24.0
Upper	40.3	35.0	35.8
Unknown	0.0	5.0	10.3
Total	100.0	100.0	100.0

AmeriServ Financial Bank State College, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	19.6	1.7	6.7
Moderate	18.5	18.6	15.7
Middle	21.6	29.7	24.1
Upper	40.3	47.5	41.7
Unknown	0.0	2.5	11.8
Total	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, AmeriServ’s lending to low-income borrowers was poor.

AmeriServ’s lending in 2017 to low-income borrowers was poor. Of AmeriServ’s 111 HMDA loans originated in the assessment area in 2017, three (3%) were made to low-income borrowers, which significantly lagged the proxy of 20%, and aggregate lending to low-income borrowers of 7%. By product type, all of AmeriServ’s loans to low-income borrowers were home purchase loans (3%). For comparison, aggregate lenders made 5% of home purchase loans, 9% of refinance loans, 10% of home improvement loans, and no multifamily loans to low-income borrowers in 2017.

AmeriServ’s lending in 2018 to low-income borrowers was poor. Of AmeriServ’s 64 HMDA loans, only one loan (2%) was made to a low-income borrower, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 8%. By product type, AmeriServ’s single loan to a low-income borrower was a home purchase loan (2%). Aggregate lenders made 8% of home purchase loans, 10% of refinance loans, 8% of home improvement loans, and no multifamily or loans with purpose “not applicable” to low-income borrowers in 2018.

AmeriServ's lending in 2019 to low-income borrowers was adequate. Of AmeriServ's 80 HMDA loans, six (8%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 11%. By product type, all six of the bank's loans to low-income borrowers were home purchase loans (9%). For comparison, aggregate lenders made 10% of home purchase loans, 11% of refinance loans, 10% of home improvement loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers in 2019.

AmeriServ's lending in 2020 to low-income borrowers was poor. Of AmeriServ's 118 HMDA loans, only two (2%) were made to low-income borrowers, compared to a proxy of 20%, and aggregate lending to low-income borrowers of 7%. By product type, AmeriServ made 2% of home purchase loans (one loan), and 2% of refinance loans (one loan) to low-income borrowers. The bank made no home improvement, multifamily, or loans with purpose "not applicable" to low-income borrowers. Aggregate lenders made 9% of home purchase loans, 5% of refinance loans, 9% of home improvement loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

For the period under review, AmeriServ's lending to moderate-income borrowers was excellent.

AmeriServ's lending in 2017 to moderate-income borrowers was good. Of AmeriServ's 111 HMDA loans, 19 (17%) were made to moderate-income borrowers, compared to a proxy of 19%, and aggregate lending to moderate-income borrowers of 16%. By product type, all of AmeriServ's loans to moderate-income borrowers were home purchase loans (19%). For comparison, aggregate lenders made 16% of home purchase loans, 17% of refinance loans, 15% of home improvement loans, and no multifamily loans to moderate-income borrowers.

AmeriServ's lending in 2018 to moderate-income borrowers was excellent. Of AmeriServ's 64 HMDA loans, 18 (28%) were made to moderate-income borrowers, compared to a proxy of 19%, and aggregate lending to moderate-income borrowers of 19%. By product type, AmeriServ made 28% of home purchase loans, 33% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2018. Aggregate lenders made 19% of home purchase loans, 21% of refinance loans, 16% of home improvement loans, and 12% of multifamily loans, and 3% of loans with purpose "not applicable" to moderate-income borrowers in 2018.

AmeriServ's lending in 2019 to moderate-income borrowers was excellent. Of AmeriServ's 80 HMDA loans, 16 (20%) were made to moderate-income borrowers, which exceeded both proxy and aggregate lending to moderate-income borrowers (both 19%). By product type, AmeriServ made 17% of home purchase loans, 31% of refinance loans, and no home improvement loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. Aggregate lenders made 19% of home purchase loans, 19% of refinance loans, 22% of home improvement loans, 3% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2019.

Finally, AmeriServ’s lending in 2020 to moderate-income borrowers was excellent. Of AmeriServ’s 118 HMDA loans, 22 (19%) were made to moderate-income borrowers, matching the proxy of 19%, and exceeding aggregate lending to moderate-income borrowers of 16%. By product type, AmeriServ made 21% of home purchase loans, 17% of refinance loans, and no home improvement loans, multifamily loans, or loans with purpose “not applicable” to moderate-income borrowers. Aggregate lenders made 17% of home purchase loans, 15% of refinance loans, 19% of home improvement loans, and no multifamily loans or loans with purpose “not applicable” to moderate-income borrowers in 2020.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the State College, PA assessment area, including in low- and moderate-income census tracts. As mentioned earlier, small business loans were not evaluated in the State College, PA assessment area because analysis of the very low volume of loans would not have yielded meaningful conclusions. Therefore, the conclusion for the geographic distribution of lending is solely determined by the geographic distribution of HMDA loans.

Home-Mortgage Lending

AmeriServ’s distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts, is good.

As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 0% of owner-occupied housing was located in low-income tracts, and 16% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-and upper-income tracts (52%, and 32%, respectively). Lending in low-income census tracts was not considered in the geographic distribution analysis, since no owner-occupied housing units were located in the assessment area’s single low-income census tract.

The tables below present the geographic distribution of AmeriServ’s HMDA lending from 2017 through 2020, in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area. The first table, used for 2017 lending, relies on the 2015 ACS data. The other three tables used for 2018 through 2020 lending, rely on 2015 ACS data, along with updated HMDA data, which follows Regulation C updated requirements.

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AmeriServ Financial Bank State College, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2017	
		% AmeriServ Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	16.0	13.5	15.8
Middle	51.7	40.6	47.7
Upper	31.5	45.0	35.0
Unknown	0.8	0.9	1.5
Total	100.0	100.0	100.0

AmeriServ Financial Bank State College, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2018	
		% AmeriServ Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	16.0	15.6	17.3
Middle	51.7	37.5	47.9
Upper	31.5	43.8	33.7
Unknown	0.8	3.1	1.1
Total	100.0	100.0	100.0

AmeriServ Financial Bank State College, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	16.0	16.3	16.7
Middle	51.7	50.0	46.3
Upper	31.5	33.7	36.1
Unknown	0.8	0.0	0.9
Total	100.0	100.0	100.0

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AmeriServ Financial Bank State College, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	16.0	16.1	14.6
Middle	51.7	40.7	45.7
Upper	31.5	42.4	38.5
Unknown	0.8	0.8	1.2
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

Lending in low-income census tracts was not considered in the evaluation of geographic distribution in the State College, PA assessment area, as no owner-occupied housing units were located in the assessment area’s single low-income census tract.

Lending in Moderate-Income Census Tracts

For the period under review, the bank’s HMDA lending in moderate-income tracts was good.

AmeriServ’s lending in moderate-income census tracts in 2017 was adequate. Of AmeriServ’s 111 HMDA loans originated in the assessment area in 2017, 15 loans (14%) were made in moderate-income census tracts. The bank’s lending was below both the proxy and aggregate lending level, both of which were 16%. By product type, all of the bank’s loans in moderate-income tracts were home purchase loans (15%). Aggregate lenders made 15% of home purchase loans, 16% of refinance loans, 15% of home improvement loans, and 50% of multifamily loans in moderate-income tracts in 2017.

AmeriServ’s lending in moderate-income census tracts in 2018 was good. Of AmeriServ’s 64 HMDA loans originated in the assessment area in 2018, 10 loans (16%) were made in moderate-income census tracts. The bank’s lending matched the proxy of 16%, but was below the aggregate lending level of 17%. By product type, all of the bank’s loans made in moderate-income tracts were home purchase loans (17%). Aggregate lenders made 18% of home purchase loans, 17% of refinance loans, 14% of home improvement loans, 56% of multifamily loans and 14% of loans with purpose “not applicable” in moderate-income tracts.

AmeriServ’s lending in moderate-income census tracts in 2019 was good. Of AmeriServ’s 80 HMDA loans originated in the assessment area in 2019, 13 loans (16%) were made in moderate-income census tracts. The bank’s lending matched the proxy of 16%, and was just below the aggregate lending level of 17%. By product type, the bank made 17% of home purchase loans, 13% of refinance loans, and no home improvement, multifamily, or loans with purpose “not applicable” in moderate-income tracts. By comparison, aggregate lenders made 17% of home purchase loans, 15% of refinance loans, 15% of home improvement loans, 54% of multifamily loans, and 29% of loans with purpose “not applicable” in moderate-income tracts in 2019.

AmeriServ's lending in moderate-income census tracts in 2020 was good. Of AmeriServ's 118 HMDA loans originated in the assessment area in 2020, 19 loans (16%) were made in moderate-income census tracts. The bank's lending matched the proxy of 16% and exceeded the aggregate lending level of 15%. By product type, the bank made 19% of home purchase loans, 14% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" in moderate-income tracts. Aggregate lenders made 18% of home purchase loans, 12% of refinance loans, 16% of home improvement loans, 50% of multifamily loans, and 8% of loans with purpose "not applicable" in moderate-income tracts.

Responsiveness to Credit Needs

AmeriServ exhibits a good record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. As indicated previously, community contacts identified a need for affordable housing and mortgage credit for first-time homebuyers. In addition to responsiveness through its retail lending, AmeriServ has addressed affordable housing needs through the use of flexible lending programs that address the home-mortgage credit needs of low- and moderate-income individuals and families.

Innovative and/or Flexible Lending Practices

AmeriServ makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs. The home-mortgage credit needs of low- and moderate-income individuals and families can often be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the State College, PA assessment area, AmeriServ participates in loan programs for first-time homebuyers through the FHA, VA, and FHLB of Pittsburgh's FFD program.

The bank originated 15 FHA loans in the assessment area totaling nearly \$3.1 million. Additionally, the bank originated 12 VA loans in the assessment area totaling almost \$4.2 million. Finally, the bank made one FHLB of Pittsburgh FFD grant in the amount of \$5,000, which was distributed to a first-time homebuyer.

Community Development Lending

AmeriServ makes an adequate level of community development loans in the assessment area. During the current evaluation period, which included the timeframe between April 18, 2017 through January 10, 2022, the bank reported one qualified community development loan in the assessment area totaling just under \$4.1 million. At the previous CRA evaluation, the bank made one community development loan in the assessment area totaling \$2 million. Of the bank's total community development loans, 20% were made in the State College, PA assessment area.

The bank's single community development loan provided community services for low- and moderate-income individuals by supporting the establishment of a free medical clinic in the State College, PA assessment area.

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Though the bank made 81 PPP loans totaling nearly \$7.8 million in the assessment area, none qualified as community development loans¹².

The following table includes the bank’s community development loans in the State College, PA assessment area, by community development purpose.

AmeriServ Financial Bank State College, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	1	4,075	0	0	0	0	1	4,075
TOTAL	0	0	1	4,075	0	0	0	0	1	4,075

INVESTMENT TEST

The investment test evaluates a financial institution’s level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as needs to improve.

Volume of Investment and Grant Activity

AmeriServ has a poor level of qualified community development investments and grants. In total, the bank made one donation totaling \$5 thousand to support community services targeted to low- and moderate-income individuals and neighborhoods in the assessment area. The bank’s level of investment activity declined considerably from the previous evaluation, when three investments totaled \$176 thousand. The bank’s qualified investments in the State College, PA assessment are comprised less than 1% of the bank’s total investments, grants, and donations.

The following table presents the investment and grant activity for the State College, PA assessment area.

¹² PPP loans that qualify as community development loans are defined as loans with amounts over \$1 million that are located in low- or moderate-income census tracts.

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AmeriServ Financial Bank State College, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	0	0	0	0	0	0	0	0	0	0
Donations	0	0	1	5	0	0	0	0	1	5
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	1	5	0	0	0	0	1	5

Responsiveness to Credit and Community Development Needs

AmeriServ exhibits poor responsiveness to credit and community development needs of the assessment area. As noted in the table above, the bank’s single \$5 thousand donation supported community services targeted to low- and moderate-income individuals in the assessment area. Given the very low dollar volume of investment made in the State College, PA assessment area, responsiveness is considered to be poor.

Community Development Initiatives

AmeriServ makes no use of innovative and/or complex investments to support community development initiatives. In the State College, PA assessment area, the bank made one donation, which was neither innovative nor complex.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution’s branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, the bank operated one full-service bank branch in the State College, PA assessment area. The bank’s only State College, PA branch was located in a moderate-income census tract.

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The following table details the location of the bank's branch in the State College, PA assessment area with comparison to the 2015 ACS population demographics.

AmeriServ Financial Bank State College, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent Population
Low	0	0.0	5,247	3.3
Moderate	1	100.0	32,975	21.0
Middle	0	0.0	64,128	40.6
Upper	0	0.0	36,184	22.9
Unknown Income	0	0.0	19,289	12.2
Totals	1	100.0	157,823	100.0

The bank's branch in the State College, PA assessment area has an ATM available, which provides electronic access to banking services. To supplement traditional banking services, AmeriServ provides alternative delivery systems that include online banking services, telephone banking services, and remote deposit capture. Customers are able to pay bills, open accounts, and apply for loans using the bank's online website at <https://www.ameriserv.com/>.

Changes in Branch Locations

The bank did not open or close any branches within the State College, PA assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. The bank's branch offers standard hours Monday through Thursday, has extended evening hours on Friday, and offers limited Saturday hours, as the majority of the branches in other assessment areas do.

Bank Products

Though the bank does not offer a free checking product, it does offer a free business checking account, which has no service fee or daily balance requirement. The account offers up to 250 free transactions, along with telephone, online and mobile banking, and a free VISA Business Check Card. This free business checking account allows very small businesses access to low-cost banking services. Also, of note, the bank offered COVID-19 Pandemic Relief, and took steps throughout the pandemic to address the needs of customers who were impacted. All customers including individuals, small businesses, and small farms were offered payment relief in the form of complete deferral of payments or interest only payments, based on need or anticipation of need.

Community Development Services

AmeriServ provides few, if any community development services in this assessment area.

None of the bank's officers or employees provide community development services to local community and economic development organizations in the State College, PA assessment area.

SOMERSET COUNTY, PA ASSESSMENT AREA LIMITED-SCOPE REVIEW

A limited scope review of the bank’s performance in the Somerset County, PA assessment area was conducted. During the evaluation period, lending activity in this assessment area represented nearly 10% of the bank’s overall lending by number of loans, and over 5% by dollar amount. The bank operated four branches in the assessment area (22% of the bank’s total branches). The four branches hold \$146 million in deposits, or 13% of the bank’s total deposits as of September 30, 2021. For purposes of assessing the institution’s performance in the Commonwealth of Pennsylvania, the least amount of weight was given to this limited-scope assessment area. Far greater weight was given to the bank’s performance in the full-scope assessment areas, where the majority of the bank’s operations are located.

The bank’s performance in the Somerset County, PA assessment area is consistent with its performance in the bank’s full-scope review assessment areas in Pennsylvania, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the Appendices. Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Somerset County, PA Assessment Area	Consistent	Below	Consistent

DESCRIPTION OF INSTITUTION’S OPERATIONS

AmeriServ’s Somerset County, PA assessment area consists of the entirety of Somerset County, PA, which is coterminous with the Somerset, PA Micropolitan Statistical Area. The Somerset, PA assessment area is a portion of the Johnstown-Somerset, PA Combined Statistical Area, which AmeriServ takes in its entirety. Compared to the bank’s other assessment areas, the Somerset County, PA assessment area is considerably more rural, and far less densely populated.

According to 2015 ACS data, the assessment area consisted of 21 census tracts, none of which were designated as low-income, one of which was moderate-income (5%), 20 of which were middle-income (95%), and none of which were upper-income. ACS data from 2015 also indicated that the assessment area had a population of 76,617, making it the least populous assessment area of AmeriServ’s footprint. Ninety-seven percent of the assessment area’s population resided within its middle-income census tracts.

A map of the Somerset, PA assessment area using 2015 ACS data is available in Appendix F.

AmeriServ’s performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC’s Deposit Market Share Report, as of June 30, 2021, there were eight depository institutions operating in Somerset County. These institutions maintained a total of 25 branches holding nearly \$1.6 billion in deposits. AmeriServ ranked fourth with just over 9% of the retail deposit market. Somerset Trust Company had the strongest presence in the market, ranking first, with almost 47% of the market, followed by First National Bank of Pennsylvania, with nearly 21% of the market, and First Commonwealth Bank, with nearly 10%.

AmeriServ was a minor player in the assessment area's HMDA market, holding only about 1% of the market in 2017, 2018, 2019, and 2020. In 2017, a total of 139 HMDA reporters originated or purchased a total of 1,490 HMDA loans. AmeriServ ranked eleventh in the HMDA market with just over 1% of loans. Somerset Trust Company led the market with 20% of loans, followed by First National Bank of Pennsylvania (11%), and Wells Fargo Bank, N.A. (9%).

In 2018, a total of 149 HMDA reporters originated or purchased a total of 1,727 HMDA loans. AmeriServ tied for twenty-third in the market with less than 1% of loans. Again, Somerset Trust Company led the market with 21% of loans, followed by First Commonwealth Bank (11%), and First National Bank of Pennsylvania (11%).

In 2019, a total of 145 HMDA reporters originated or purchased a total of 1,736 HMDA loans. AmeriServ tied for thirteenth in the market with less than 1% of loans. Somerset Trust Company led the market with 22% of loans, followed by First Commonwealth Bank (12%), and First National Bank of Pennsylvania (9%).

Finally, in 2020, a total of 165 HMDA reporters originated or purchased a total of 2,232 HMDA loans. AmeriServ tied for thirteenth in the HMDA market with 1% of loans. Somerset Trust Company led the market with 24% of the market, followed by First Commonwealth Bank (11%), and First National Bank of Pennsylvania (8%).

AmeriServ was also a minor player in the CRA small business market, holding just 1% of the market in 2017, 2018, and 2019, with an increase to nearly 2% of the market in 2020. In 2017, a total of 57 reporters originated or purchased a total of 1,392 small business loans. AmeriServ ranked fifteenth with just over 1% of the market. Somerset Trust Company ranked first with 23% of the market, followed by American Express Bank, FSB (10%), and PNC Bank, N.A. (7%).

In 2018, a total of 56 small business reporters originated or purchased a total of 1,357 loans. AmeriServ ranked nineteenth, with 1% of the market. Somerset Trust Company again ranked first with 23% of the market, followed by American Express, NB (9%), and Chase Bank USA, N.A. (7%).

In 2019, a total of 56 small business reporters originated or purchased a total of 1,404 loans. AmeriServ tied for sixteenth, with 1% of the market. Somerset Trust Company led the market with 22% of small business loans, followed by American Express, NB (11%), and JP Morgan Chase Bank, N.A. (9%).

Finally, in 2020, a total of 60 small business reporters originated or purchased a total of 1,839 loans. AmeriServ tied for eighth, with 2% of the market. As in prior reporting years, Somerset Trust Company ranked first with nearly 40% of the market, followed by First National Bank of Pennsylvania (10%), and 1st Summit Bank (7%).

According to the Pennsylvania Department of Labor & Industry's Center for Workforce Information & Analysis, leading industries in the assessment area include healthcare and social assistance (18%), manufacturing (12%), retail trade (11%) and accommodation and food services and public administration (both 10% of employment). The leading employers in the assessment area are state government, Seven Springs Mountain Resort, Inc., Somerset Hospital, CCS Medical Center at Windber, and DeVilbiss Healthcare, LLC.

An interview was conducted with a community development representative to provide perspective on the credit needs in the Somerset County, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, who represented an organization focused on community redevelopment and reinvestment, the assessment area is facing a population decline that is impacting the community's ability to obtain community development block grant funding for necessary water and sewage infrastructure upgrades. In addition to infrastructure concerns, dilapidated housing is a concern, as many homes are in need of repair, and are not in compliance with safety codes. A prominent credit need identified by the contact was bank involvement in home rehabilitation projects. The contact also noted a great need for community services, due to the low incomes and the rural nature of a portion of Somerset County, PA.

Tables showing the assessment area demographics of the Somerset County, PA assessment area in 2017, 2018, 2019, and 2020 are contained on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
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AmeriServ Financial Bank Somerset County, PA Assessment Area Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,916	19.1
Moderate-income	1	4.8	472	2.3	138	29.2	4,055	19.7
Middle-income	20	95.2	20,071	97.7	1,707	8.5	4,529	22.0
Upper-income	0	0.0	0	0.0	0	0.0	8,043	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	20,543	100.0	1,845	9.0	20,543	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,205	293	1.3	24.3	670	55.6	242	20.1
Middle-income	36,799	22,995	98.7	62.5	5,661	15.4	8,143	22.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	38,004	23,288	100.0	61.3	6,331	16.7	8,385	22.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	204	6.9	180	6.8	23	8.5	1	1.3
Middle-income	2,773	93.1	2,449	93.2	248	91.5	76	98.7
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,977	100.0	2,629	100.0	271	100.0	77	100.0
	Percentage of Total Businesses:			88.3			9.1	2.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	174	100.0	171	100.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	174	100.0	171	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			98.3			1.7	0.0

Information based on 2015 ACS Data and 2017 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank Somerset County, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,916	19.1
Moderate-income	1	4.8	472	2.3	138	29.2	4,055	19.7
Middle-income	20	95.2	20,071	97.7	1,707	8.5	4,529	22.0
Upper-income	0	0.0	0	0.0	0	0.0	8,043	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	20,543	100.0	1,845	9.0	20,543	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,205	293	1.3	24.3	670	55.6	242	20.1
Middle-income	36,799	22,995	98.7	62.5	5,661	15.4	8,143	22.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	38,004	23,288	100.0	61.3	6,331	16.7	8,385	22.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	227	7.2	203	7.3	22	7.9	2	2.4
Middle-income	2,935	92.8	2,595	92.7	258	92.1	82	97.6
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,162	100.0	2,798	100.0	280	100.0	84	100.0
	Percentage of Total Businesses:			88.5		8.9		2.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	168	100.0	165	100.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	168	100.0	165	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			98.2		1.8		0.0

Information based on 2015ACS Data and 2018 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank Somerset County, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,916	19.1
Moderate-income	1	4.8	472	2.3	138	29.2	4,055	19.7
Middle-income	20	95.2	20,071	97.7	1,707	8.5	4,529	22.0
Upper-income	0	0.0	0	0.0	0	0.0	8,043	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	20,543	100.0	1,845	9.0	20,543	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,205	293	1.3	24.3	670	55.6	242	20.1
Middle-income	36,799	22,995	98.7	62.5	5,661	15.4	8,143	22.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	38,004	23,288	100.0	61.3	6,331	16.7	8,385	22.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	236	7.6	212	7.7	22	8.2	2	2.5
Middle-income	2,877	92.4	2,555	92.3	245	91.8	77	97.5
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,113	100.0	2,767	100.0	267	100.0	79	100.0
	Percentage of Total Businesses:		88.9		8.6		2.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	162	100.0	158	100.0	4	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	162	100.0	158	100.0	4	100.0	0	0.0
	Percentage of Total Farms:		97.5		2.5		0.0	

Information based on 2015ACS Data and 2019 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

AmeriServ Financial Bank Somerset County, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,916	19.1
Moderate-income	1	4.8	472	2.3	138	29.2	4,055	19.7
Middle-income	20	95.2	20,071	97.7	1,707	8.5	4,529	22.0
Upper-income	0	0.0	0	0.0	0	0.0	8,043	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	20,543	100.0	1,845	9.0	20,543	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,205	293	1.3	24.3	670	55.6	242	20.1
Middle-income	36,799	22,995	98.7	62.5	5,661	15.4	8,143	22.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	38,004	23,288	100.0	61.3	6,331	16.7	8,385	22.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	215	7.0	192	7.0	21	8.1	2	2.6
Middle-income	2,877	93.0	2,564	93.0	238	91.9	75	97.4
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,092	100.0	2,756	100.0	259	100.0	77	100.0
	Percentage of Total Businesses:			89.1		8.4		2.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	158	100.0	154	100.0	4	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	158	100.0	154	100.0	4	100.0	0	0.0
	Percentage of Total Farms:			97.5		2.5		0.0

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in this assessment area is consistent with the lending levels in the full-scope assessment areas in the Commonwealth, below the performance level with respect to investments, and consistent with the performance level with community development services in full-scope areas in Pennsylvania.

LENDING TEST

The bank's lending in this assessment area is consistent with the bank's lending levels in the full-scope review assessment areas in the Commonwealth of Pennsylvania.

Due to the number and dollar volume of loans in the Somerset County, PA assessment area, home-mortgage loans and small business loans were weighted equally in determining conclusions for borrower and geographic distribution of lending. Though the bank made more small business loans than home-mortgage loans by number (90 and 67, respectively), dollar volumes of these loan types were very close (both around \$9 million).

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

In 2017, AmeriServ originated 19 HMDA loans in the Somerset County, PA assessment area, aggregating just under \$1.2 million. The bank's borrower distribution of HMDA loans to low-income borrowers (32%) far exceeded both proxy (19%) and aggregate lending performance (7%). On the other hand, borrower distribution of HMDA loans to moderate-income borrowers (5%) fell behind both proxy (20%) and aggregate (16%) totals. With respect to geographic distribution of HMDA loans, the assessment area did not contain any low-income census tracts throughout the evaluation period and therefore, the geographic distribution of loans was only evaluated for moderate-income tracts. In 2017, AmeriServ's geographic distribution of HMDA loans fell behind both the proxy of owner-occupied housing and aggregate lending levels in moderate-income census tracts. AmeriServ did not make any loans in moderate-income census tracts in the Somerset County, PA assessment area, while aggregate lenders made 2% of loans in such tracts, and the proxy measured 1%.

In 2018, AmeriServ originated 9 HMDA loans in the Somerset County, PA assessment area, aggregating almost \$1.5 million. The bank did not make any loans to low- or moderate-income borrowers. This performance falls below the proxy and aggregate lending levels for both low-income (19% and 8%, respectively) and moderate-income borrowers (20% and 18%, respectively). Similarly, in 2018, AmeriServ's geographic distribution of HMDA loans fell behind both the proxy and aggregate lending levels in moderate-income census tracts. AmeriServ made no HMDA loans in moderate-income tracts compared to the proxy of owner-occupied units within such tracts (1%) and aggregate lending (2%).

In 2019, AmeriServ originated 15 HMDA loans in the Somerset County, PA assessment area, aggregating \$2.7 million. The bank did not make any HMDA loans to low-income borrowers, which was below both the proxy (19%) and aggregate lending levels (8%). However, the bank's borrower distribution of HMDA loans to moderate-income buyers was 27%, which exceeded both proxy (20%) and aggregate lending levels (18%). From a geographic distribution perspective, the bank's performance trailed proxy and aggregate lending. In 2019, the bank did not make any loans in the assessment area's moderate-income census tract, which trailed both the proxy and aggregate lending levels (both 1%).

Finally, in 2020, AmeriServ originated 24 HMDA loans in the Somerset County, PA assessment area, aggregating \$3.7 million. The bank's borrower distribution of HMDA loans to low-income borrowers (4%) fell behind both the proxy (19%) and aggregate lending levels (6%). However, the bank's borrower distribution of loans to moderate-income borrowers (21%) exceeded both the proxy (20%) and aggregate lending levels (15%). As in prior years, the bank did not make any loans in moderate-income tracts, falling below the geographic distribution of the proxy and aggregate lending levels in those areas (both 1%).

Small Business Lending

In 2017, AmeriServ originated 16 small business loans, aggregating \$2.2 million, within the Somerset County, PA assessment area. The bank's borrower distribution of small business loans trailed both proxy and aggregate performance in 2017. Of the bank's 16 loans, 31% were originated to small businesses, which was below both the aggregate lending level of 52% to small businesses by all lenders in the assessment area, and the proxy of 88%. From a geographic perspective, the bank's lending was also below proxy and aggregate lending. In 2017, there were no low-income census tracts in the assessment area to evaluate, and therefore, geographic distribution is based on performance in moderate-income census tracts. None of the bank's 2017 small business loans were originated in the Somerset County, PA assessment area's single moderate-income census tract. This performance fell below the proxy and aggregate lending levels (both 7%).

In 2018, AmeriServ originated 15 small business loans, aggregating \$1.8 million, within the assessment area. Of these loans, 53% were originated to small businesses, which just exceeded the aggregate lending level of 50%, but fell below the proxy of 89%. In 2018, the bank's geographic distribution of small business loans exceeded both proxy and aggregate levels. More specifically, two of the bank's small business loans were originated in the moderate-income census tract (13%), which exceeded both proxy (7%) and aggregate lending levels (7%).

In 2019, AmeriServ originated 15 small business loans, aggregating just under \$1.2 million, within the assessment area. Of these loans, 40% were originated to small businesses, which fell below both the aggregate lending level (54%) and the proxy (89%). In 2019, none of the bank's small business loans were originated in the assessment area's moderate-income census tract, falling below the performance of both the proxy (8%) and aggregate lending levels (5%).

LARGE INSTITUTION PERFORMANCE EVALUATION
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Finally, in 2020, AmeriServ originated 44 small business loans, aggregating \$3.7 million, within the Somerset County, PA assessment area. Of these loans, 36% were originated to small businesses, which just exceeded the aggregate lending level (34%) but fell below the proxy (89%). In 2020, the bank’s geographic distribution of small business loans outperformed both proxy and aggregate lending levels. Five of the bank’s small business loans were originated in the Somerset, PA assessment area’s moderate-income census tract (11%), exceeding both the proxy (7%) and aggregate lending levels (7%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed previously, AmeriServ offers alternative mortgage products by participating in loan programs for first-time homebuyers through the FHA, VA, and FHLB of Pittsburgh. During the evaluation period, the bank originated two FHA loans in the assessment area, totaling \$184 thousand, and two VA loans in the assessment area, totaling \$344 thousand.

Further, AmeriServ made one community development loan, which provided community services to low- and moderate-income individuals and totaled just under \$13 thousand. This is an increase from the previous evaluation period, when the bank made no community development loans within the Somerset County, PA assessment area. Of the bank’s overall community development lending, less than 1% by dollar amount was within the Somerset County, PA assessment area.

Though the bank made 62 PPP loans totaling just over \$6.1 million in the assessment area, none qualified as community development loans.¹³

The following table includes the bank’s community development loans in the limited-scope Somerset County, PA assessment area, by community development purpose.

AmeriServ Financial Bank Somerset County, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	1	13	0	0	0	0	1	13
TOTAL	0	0	1	13	0	0	0	0	1	13

¹³ PPP loans that qualify as community development loans are defined as loans with amounts over \$1 million that are located in low- or moderate-income census tracts.

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

INVESTMENT TEST

The bank’s investment performance in the Somerset County, PA assessment area is below the bank’s investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments, grants, and donations for the Somerset County, PA assessment area totaled just over \$5 thousand. This total is made up of two donations which provided community services to low- and moderate-income individuals. The bank’s qualified investments in the Somerset County, PA assessment area account for less than 1% of AmeriServ’s total qualified investments. Investments in this assessment area were significantly less than the levels in the Johnstown, PA and Pittsburgh, PA assessment areas, and matched the level in the State College, PA assessment area.

The two qualifying donations exhibit adequate responsiveness to credit and community development needs in the Somerset County, PA assessment area, as they both provided community services to low- and moderate-income individuals, which was a need noted by a community contact.

The following table presents investment and grant activity for the Somerset County, PA assessment area.

AmeriServ Financial Bank Somerset County, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	0	0	0	0	0	0	0	0	0	0
Donations	0	0	2	5	0	0	0	0	2	5
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	2	5	0	0	0	0	2	5

SERVICE TEST

The bank’s service performance in the Somerset County, PA assessment area is consistent with the bank’s service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LARGE INSTITUTION PERFORMANCE EVALUATION
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Retail banking services are offered through the four branches in the assessment area, and products, services, and hours are consistent with those offered in the full-scope areas. All four of the branches (100%) were in middle-income areas. During the evaluation period, the bank opened one branch in the assessment area¹⁴ and added, and then consolidated, another branch into an existing AmeriServ branch.¹⁵ Both of the branches added during the evaluation period resulted from AmeriServ's acquisition of two Riverview Bank branch locations.

In addition to retail services, the bank's president serves on the board of directors of an organization that provides community services to the Somerset County, PA assessment area.

¹⁴In May 2021, AmeriServ opened a branch located at 135 Center Street, Meyersdale, PA 15552. The branch is located in a middle-income census tract.

¹⁵In May 2021, AmeriServ acquired a branch located at 509 N. Center Avenue, Somerset, PA 15501. This branch was subsequently consolidated, with operations moving into the bank's existing branch at 108 W. Main Street, Somerset, PA 15501, less than a half mile away.

STATE OF MARYLAND / HAGERSTOWN, MD
ASSESSMENT AREA
FULL-SCOPE REVIEW

STATE RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	Needs to Improve
Service	Low Satisfactory
Overall	Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers of different income levels and business customers of different sizes in the assessment area;
- The geographic distribution of loans reflects adequate dispersion throughout the assessment area;
- The bank made few if any qualified community development loans in the assessment area;
- The bank makes a poor level of qualified investments and grants in the Hagerstown, MD assessment area; and
- The bank provides few, if any community development services.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Hagerstown, MD assessment area, which was evaluated using full-scope review procedures. The bank operates just one branch in the assessment area. The Hagerstown, MD assessment area, which consists of a portion of Washington County, MD, was added to the bank's assessment areas upon the opening of a branch in Hagerstown, MD on November 19, 2018. Consequently, AmeriServ's CRA performance in Maryland was evaluated for the period from November 19, 2018 through January 10, 2022.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included CRA small business loans. Due to low loan volumes (only eight HMDA loans were made during the review period), HMDA loans were not included in the lending analysis, as they would not be sufficient to provide a meaningful analysis, and would not have had a significant effect on the bank's overall performance in the Hagerstown, MD assessment area. However, data on HMDA loans is included in Appendix D, for contextual purposes.

For purposes of assessing AmeriServ's overall CRA performance, very little weight was given to the bank's performance in the state of Maryland, as the overwhelming majority of the bank's operations are located in the four Pennsylvania assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

AmeriServ's Hagerstown, MD assessment area consists of a substantial majority of Washington County, MD which is part of the larger Hagerstown-Martinsburg, MD-WV MSA, which includes Washington County, MD, and Berkeley and Morgan Counties, WV. The bank's Hagerstown assessment area includes 26 of the 32 census tracts in Washington County, MD including and surrounding the city of Hagerstown, MD. An analysis determined that the bank's partial assessment area does not arbitrarily exclude any majority-minority or low- and moderate-income census tracts in the Hagerstown, MD MSA, and therefore complies with the requirements of the CRA.

For the purposes of assessing AmeriServ's overall CRA performance, very little weight was given to performance in the Hagerstown, MD assessment area compared to the bank's performance in its three full-scope Pennsylvania assessment areas. AmeriServ operates only one branch in this assessment area (6%), which holds less than \$20 million in deposits (2%). In total, loans made in the Hagerstown, MD assessment area accounted for 2% of the bank's total loans by both number and dollar amount.

AmeriServ's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

2015 ACS Data

According to 2015 ACS data, the assessment area consisted of 26 census tracts, two of which were designated as low-income census tracts (8%), seven of which were moderate-income tracts (27%), ten of which were middle-income tracts (39%), six of which were upper-income tracts (23%), and one of which had an unknown income level (4%). Per 2015 ACS data, the Hagerstown, MD assessment area had a population of 122,580. Just under 5% of the population resided in low-income tracts, and nearly 22% resided in moderate-income tracts.

2018 OMB Data

Metropolitan areas tend to grow over time as populations increase and expand into nearby areas. To track such demographic movements, the Census Bureau conducts a comprehensive Census every ten years, ongoing surveys based on statistical sampling every year in between, and a substantial release of ACS data and population estimates every five years. The surveys are for minor, periodic adjustments. As a result, the Office of Management and Budget (OMB) revised the delineations of MSAs to reflect the results from ACS and Census Bureau population estimates for 2015. These changes were released in September 2018, and became effective on January 1, 2019. With OMB changes, Frederick and Montgomery Counties in Maryland were reclassified to form a new Metropolitan Division, namely the Frederick-Rockville, MD MSA.

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These changes to metropolitan area boundaries resulted in a change in income-level designation and housing demographics, which ultimately affected tracts within the bank’s Hagerstown, MD assessment area. For evaluation purposes, the revised MSA boundaries apply to the analysis of loan data beginning in 2019.

The new boundaries show a slight shift in assessment area demographics. Of the 26 census tracts in the assessment area, two were designated as low-income tracts (8%), six were moderate-income tracts (23%), eleven were middle-income tracts (42%), six were upper-income tracts (23%), and one had an unknown income level (4%). Using 2018 OMB data, the assessment area’s population still measured 122,850, with 5% of the population residing in low-income tracts. However, the percentage of the population residing in moderate-income tracts decreased from 22% using 2015 ACS data to 19% using 2018 OMB data.

A table detailing the census tract changes follows.

AmeriServ Financial Bank Hagerstown, MD Assessment Area Census Tract Distribution				
Tract Income Categories	2015 ACS Data		2018 OMB Data	
	#	%	#	%
Low	2	7.7	2	7.7
Moderate	7	26.9	6	23.1
Middle	10	38.5	11	42.3
Upper	6	23.1	6	23.1
Unknown	1	3.8	1	3.8
Total	26	100.0	26	100.0

A map of the Hagerstown, MD assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC’s Deposit Market Share Report as of June 30, 2021, 11 institutions operate 36 offices in the assessment area, which hold almost \$2.9 billion total deposits in the market.¹⁶ AmeriServ was ranked eleventh in total deposits with less than 1% market share. Truist Bank led the market with 25% market share, followed by Fulton Bank, N.A., with 21% market share, and Manufacturers and Traders Trust Company with 15% market share.

AmeriServ reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. Though HMDA-reportable loans were not included in the analysis of the bank’s performance due to low volume, market share information is included below for contextual purposes for the years that AmeriServ operated in this market. According to 2019 HMDA aggregate data, there were 270 HMDA reporters in the assessment area, who originated or purchased a total of 4,108 HMDA loans in the Hagerstown, MD assessment area. AmeriServ tied for fifty-second, with less than 1% of the HMDA market. Pennymac Loan Services, LLC led the market with nearly 6% of the HMDA market, followed by Quicken Loans, LLC with nearly 5%, and Wells Fargo Bank, N.A. with approximately 4%.

¹⁶ FDIC Deposits Market Share Report as of June 30, 2021, including the bank’s partial Washington County, MD assessment area, which includes the whole municipalities of Hagerstown, Smithsburg, and Williamsport, which is a portion of the Hagerstown-Martinsburg, MD-WV MSA.

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According to the 2020 HMDA aggregate data, there were 310 HMDA reporters in the assessment area, which originated or purchased a total of 5,992 HMDA loans. AmeriServ tied for sixty-third, with less than 1% of the total HMDA market. Quicken Loans, LLC ranked first with 8% of the market, followed by Pennymac Loan Services, LLC with 5%, and U.S. Bank, N.A. with just under 5%.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually, and is presented below for the two years that AmeriServ operated in the market. According to 2019 data, there were 67 small business reporters in the assessment area, originating or purchasing 2,310 small business loans. AmeriServ tied for twenty-sixth with less than 1% of the market. American Express Bank, NB ranked first with 19% of the market, followed by JPMorgan Chase Bank, N.A. with approximately 11%, and Branch Banking and Trust Company with 9%.

According to 2020 data, there were 74 small business reporters in the assessment area, originating or purchasing 2,486 small business loans. AmeriServ tied for twenty-second, with less than 1% of the market. American Express Bank, NB ranked first with 16% of the market, followed by Manufacturers and Traders Trust Company with 9%, and Fulton Bank, N.A. with 8%.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators. More specifically, in 2020, American Express Bank, NB, Manufacturers and Traders Trust Company, Fulton Bank, N.A., Truist Bank, CNB Bank, Inc. First United Corporation, Synchrony Bank, PNC Bank, N.A., United Bank, and Capital One Bank USA, N.A. were the top ten small business reporters, collectively holding 69% of the market share in the Hagerstown, MD assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Hagerstown, MD assessment area. One interview was held with an organization focused on small business development, and the other was with an agency that supports the business community and economic development and growth in the region. These contacts identified small business financing, including startup financing, and microbusiness financing as critical credit needs in the assessment area. Lastly, both contacts agreed that there is a pronounced community need for banks to lend their expertise by partnering with organizations that provide credit counseling, and small business training programs.

Economic Characteristics

The bank's Hagerstown, MD assessment area is situated in north central Maryland, within the larger Hagerstown-Martinsburg, MD-WV MSA. The Hagerstown, MD assessment area had a population of 122,850 according to both the 2015 ACS update and 2018 OMB data.

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The Hagerstown, MD MSA’s economy is in recovery mode as the city is making its way out of the COVID-19 recession, according to the September 2021 Moody’s Analytics Precis Report. Though employment recovery has slowed, and the economy has experienced losses in professional and business services, logistics, including transportation and warehousing, has boosted the economy and is expected to continue to lend support to the area economy. Additionally, the housing sector is a bright spot in the economy, with single-family permits measuring the highest they have been since 2006.

According to Moody’s, strengths of the Hagerstown, MD MSA include the area’s proximity to Washington DC and Baltimore, which supports a large commuter workforce, its prime location at interstate crossroads, which has led it to be an expanding logistics hub, and a robust population growth. On the other hand, weaknesses in the region include low educational attainment, and overall reliance on the manufacturing and retail sectors, which caps long-term employment growth.

Leading industries in the Hagerstown, MD MSA include government (17%), education and health services (16%), retail trade (13%), and professional and business services, transportation and utilities, and manufacturing (all over 9%). Leading employers in the MSA include Meritus Health, Citicorp Credit Services, Inc., First Data Corporation, Volvo Powertrain, North America, and FedEx Corporation.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. The unemployment rates throughout the assessment area have decreased as economic conditions have improved from 2017 through 2019, while peaking in 2020 as a result of the COVID-19 pandemic. As depicted in the table, the unemployment rates in the bank’s assessment area do exceed rates in the larger MSA, and the State of Maryland, and the United States as a whole, with the exception of rates in 2020, which were below the nationwide unemployment rate.

AmeriServ Financial Bank Hagerstown, MD Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)				
Location	% 2017 Annual	% 2018 Annual	% 2019 Annual	% 2020 Annual
Washington County	4.5	4.1	3.7	6.8
Hagerstown-Martinsburg, MD-WV MSA	4.1	4.0	3.7	6.5
Maryland	4.0	3.6	3.4	6.7
United States	4.4	3.9	3.7	8.1
Unemployment data is from the Bureau of Labor Statistics				

Housing

2015 ACS Data

According to 2015 ACS data, the Hagerstown, MD assessment area contained 49,975 housing units, 56% of which were owner-occupied, 36% of which were rental units, and 8% of which were vacant. The overall occupancy rate in the assessment area (56%) was slightly less than that in the State of Maryland (60%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2015 ACS data, 2% of owner-occupied housing was located in low-income tracts, and 17% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (46% and 35%, respectively).

Of the total existing housing units, 75% were single-family units, over 6% were two-to-four family units, 15% were multifamily units, and 3% were mobile homes. The median age of the housing stock was 49 years, making it older than that in the State of Maryland, where the median housing age was 39 years.

Data shows that the price of housing in the assessment area was significantly less expensive than in the State overall. The 2015 ACS data indicates that the median housing value in the Hagerstown, MD assessment area was \$194,200, which was appreciably lower than the median housing value in Maryland (\$286,900). Data also reveals a noteworthy disparity in housing values in low- and moderate-income tracts, compared with values in middle- and upper-income tracts. The median housing value in low-income tracts was \$128,093 and increased to \$145,668 in moderate-income tracts. Housing values were considerably higher in middle- and upper-income tracts (\$197,608 and \$239,121, respectively).

Similarly, median gross rent (rent plus utilities) in the assessment area was less expensive in the assessment area than in the State of Maryland as a whole. Median gross rent in the Hagerstown, MD assessment area was \$865, which compared favorably to a statewide median gross rent of \$1,230. Within the Hagerstown, MD assessment area, 43% of renters spend more than 30% of their income on rent, in contrast to nearly 49% in the State of Maryland.

2018 OMB Data

Housing units in the assessment area did not change based on the 2018 OMB shifts. According to 2018 OMB data, the Hagerstown, MD assessment area contained 49,975 housing units, 56% of which were owner-occupied, 36% of which were rental units, and 8% of which were vacant units. The overall owner-occupancy rate in the assessment area (56%) remained below that in the State of Maryland (60%).

A slight shift was seen in the geographic distribution of owner-occupied units in the assessment area, as the result of the 2018 OMB changes. According to 2018 OMB data, 2% of owner-occupied housing was located in low-income tracts, and 13% was located in moderate-income tracts. The majority of owner-occupied housing remained in middle-income (49%) and upper-income tracts (35%).

Of the total housing units, 75% were single family units, over 6% were two-to-four family units, 15% were multifamily units, and 3% were mobile homes. No change was noted in the age of housing. The median age of the housing stock in the assessment area was 49 years, making it older than the housing stock in the State of Maryland, at 39 years.

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2018 OMB data shows that the price of housing remained less expensive in the assessment area (\$194,200) than in the State of Maryland (\$286,900). Data reveals that the significant disparity in median housing values still exists between low- and moderate-income tracts, compared to values in middle- and upper-income tracts. More specifically, the median housing value was \$128,093 in low-income tracts, and \$143,526 in moderate-income tracts. Housing values were significantly higher in middle- and upper-income tracts (\$192,805 and \$239,121, respectively).

Median gross rent (rent plus utilities) remained less expensive in the assessment area than in the State as a whole. Median gross rent in the Hagerstown, MD assessment area was \$865, compared to a measure of \$1,230 for the State. Within the assessment area, 43% of renters spend more than 30% of their income on rent, compared to 49% in the State of Maryland.

Borrower Income Data

2015 ACS Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. Using 2015 ACS data, of the 30,352 total families in the assessment area, 22% were designated as low-income, 16% were moderate-income, 22% were middle-income, and 40% were upper-income. In the assessment area, 11% of families were living below the poverty level, compared to 7% in the State overall.

2018 OMB Data

According to 2018 OMB data, of the 30,352 families in the assessment area, 21% were low-income, 16% were moderate-income, 22% were middle-income, and the remaining 41% were upper-income. No changes were noted in the percentage of families living below the poverty level. More specifically, 11% of assessment area families were living below the poverty level, comparing negatively to the percentage of families living below the poverty level statewide (7%).

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC. The assessment area’s median family incomes for 2017 through 2020 are listed in the table below, categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or greater)
2017	\$69,100	\$34,550	\$34,550 - \$55,279	\$55,280 - \$82,919	\$82,920 or more
2018	\$70,200	\$35,100	\$35,100 - \$56,159	\$56,160 - \$84,239	\$84,240 or more
2019	\$69,900	\$34,950	\$34,950 - \$55,919	\$55,920 - \$83,879	\$83,880 or more
2020	\$73,000	\$36,500	\$36,500 - \$58,399	\$58,400 - \$87,599	\$87,600 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts.

2015 ACS Data

According to business data provided by Dun & Bradstreet in 2017, there were 4,093 businesses located in the Hagerstown, MD assessment area. Of these businesses, 9% were located in low-income census tracts, and 19% were located in moderate-income tracts. The vast majority of businesses were located in middle-income census tracts (43%) and upper-income tracts (29%). Business demographic data also revealed that of the 4,093 businesses located in the assessment area, 87% were small businesses with gross annual revenues of \$1 million or less.

Using 2018 Dun & Bradstreet data, there were 4,861 businesses in the Hagerstown, MD assessment area in 2018. Of these 9% were located in low-income tracts, and 19% in moderate-income tracts. Again, the majority of businesses were located in middle-income (44%) and upper-income census tracts (almost 29%). Of the 4,861 businesses in the assessment area, 89% were small businesses with gross annual revenues of \$1 million or less.

2018 OMB Data

According to 2019 Dun & Bradstreet data, 4,868 businesses operated in the assessment area. Of these, 9% of businesses were located in low-income census tracts, and 14% were in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (48%) and upper-income census tracts (29%). Business demographic data also revealed that of the 4,868 businesses located in the assessment area in 2019, 89% were small businesses with gross annual revenues of \$1 million or less.

Finally, according to 2020 Dun & Bradstreet data, 4,918 businesses operated in the assessment area. Of these, 9% of businesses were located in low-income census tracts, and 14% were in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (49%) and upper-income census tracts (28%). Business demographic data also revealed that of the 4,918 businesses located in the assessment area in 2020, 90% were small businesses with gross annual revenues of \$1 million or less.

The demographics used to evaluate AmeriServ's performance under the CRA in the Hagerstown, MD assessment area are detailed in the tables on the following pages.

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AmeriServ Financial Bank Hagerstown-Martinsburg MD Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	7.7	1,203	4.0	466	38.7	6,641	21.9
Moderate-income	7	26.9	6,500	21.4	1,472	22.6	4,930	16.2
Middle-income	10	38.5	13,839	45.6	1,034	7.5	6,675	22.0
Upper-income	6	23.1	8,810	29	298	3.4	12,106	39.9
Unknown-income	1	3.8	0	0.0	0	0	0	0
Total Assessment Area	26	100.0	30,352	100.0	3,270	10.8	30,352	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	2,567	577	2.1	22.5	1,559	60.7	431	16.8
Moderate-income	12,320	4,664	16.8	37.9	6,496	52.7	1,160	9.4
Middle-income	21,978	12,716	45.8	57.9	7,747	35.2	1,515	6.9
Upper-income	13,110	9,817	35.3	74.9	2,430	18.5	863	6.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,975	27,774	100.0	55.6	18,232	36.5	3,969	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	386	9.4	314	8.8	66	13.5	6	13.6
Moderate-income	763	18.6	641	18	110	22.5	12	27.3
Middle-income	1,763	43.1	1,536	43.1	214	43.8	13	29.5
Upper-income	1,179	28.7	1,069	30	98	20	12	27.3
Unknown-income	2	0.0	0	0.0	1	0.2	1	2.3
Total Assessment Area	4,093	100.0	3,560	100.0	489	100.0	44	100.0
	Percentage of Total Businesses:			87.0		11.9		1.1

2017 FFIEC Census Data and 2017 D&B Information

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AmeriServ Financial Bank Hagerstown-Martinsburg MD Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	7.7	1,203	4	466	38.7	6,641	21.9
Moderate-income	7	26.9	6,500	21.4	1,472	22.6	4,930	16.2
Middle-income	10	38.5	13,839	45.6	1,034	7.5	6,675	22
Upper-income	6	23.1	8,810	29	298	3.4	12,106	39.9
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	30,352	100.0	3,270	10.8	30,352	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	2,567	577	2.1	22.5	1,559	60.7	431	16.8
Moderate-income	12,320	4,664	16.8	37.9	6,496	52.7	1,160	9.4
Middle-income	21,978	12,716	45.8	57.9	7,747	35.2	1,515	6.9
Upper-income	13,110	9,817	35.3	74.9	2,430	18.5	863	6.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,975	27,774	100.0	55.6	18,232	36.5	3,969	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	426	8.8	356	8.2	65	13.2	5	9.3
Moderate-income	913	18.8	789	18.3	109	22.2	15	27.8
Middle-income	2,128	43.8	1,887	43.8	222	45.2	19	35.1
Upper-income	1,392	28.6	1,284	29.7	94	19.1	14	25.9
Unknown-income	2	0.0	0	0.0	1	0.2	1	1.9
Total Assessment Area	4,861	100.0	4,316	100.0	491	100.0	54	100.0
	Percentage of Total Businesses:			88.8		10.1		1.1

2018 FFIEC Census Data and 2018 D&B Information

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AmeriServ Financial Bank Hagerstown, MD Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	7.7	1,203	4.0	466	38.7	6,431	21.2
Moderate-income	6	23.1	5,646	18.6	1,406	24.9	4,855	16.0
Middle-income	11	42.3	14,693	48.4	1,100	7.5	6,654	21.9
Upper-income	6	23.1	8,810	29.0	298	3.4	12,412	40.9
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	30,352	100.0	3,270	10.8	30,352	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	2,567	577	2.1	22.5	1,559	60.7	431	16.8
Moderate-income	10,670	3,686	13.3	34.5	5,907	55.4	1,077	10.1
Middle-income	23,628	13,694	49.3	58.0	8,336	35.3	1,598	6.8
Upper-income	13,110	9,817	35.3	74.9	2,430	18.5	863	6.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,975	27,774	100.0	55.6	18,232	36.5	3,969	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	443	9.1	373	8.6	64	13.4	6	16.2
Moderate-income	688	14.1	618	14.2	64	13.4	6	16.2
Middle-income	2,336	48.1	2,055	47.2	267	56.0	14	37.9
Upper-income	1,399	28.7	1,307	30.0	81	17.0	11	29.7
Unknown-income	2	0.0	1	0.0	1	0.2	0	0.0
Total Assessment Area	4,868	100.0	4,354	100.0	477	100.0	37	100.0
	Percentage of Total Businesses:		89.4		9.8		0.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3	1.9	3	1.9	0	0.0	0	0.0
Moderate-income	1	0.6	1	0.6	0	0.0	0	0.0
Middle-income	61	37.6	61	37.6	0	0.0	0	0.0
Upper-income	97	59.9	97	59.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	162	100.0	162	100.0	0	0.0	0	0.0
	Percentage of Total Farms:		100.0		0.0		0.0	

Information based on 2018 OMB Data and 2019 Dun & Bradstreet Information

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AmeriServ Financial Bank Hagerstown, MD Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	7.7	1,203	4.0	466	38.7	6,431	21.2
Moderate-income	6	23.1	5,646	18.6	1,406	24.9	4,855	16.0
Middle-income	11	42.3	14,693	48.4	1,100	7.5	6,654	21.9
Upper-income	6	23.1	8,810	29.0	298	3.4	12,412	40.9
Unknown-income	1	3.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	26	100.0	30,352	100.0	3,270	10.8	30,352	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
	#	#	%	%	#	%	#	%
Low-income	2,567	577	2.1	22.5	1,559	60.7	431	16.8
Moderate-income	10,670	3,686	13.3	34.5	5,907	55.4	1,077	10.1
Middle-income	23,628	13,694	49.3	58.0	8,336	35.3	1,598	6.8
Upper-income	13,110	9,817	35.3	74.9	2,430	18.5	863	6.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,975	27,774	100.0	55.6	18,232	36.5	3,969	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	447	9.1	379	8.6	61	13.4	7	17.5
Moderate-income	689	14.0	623	14.1	60	13.2	6	15.0
Middle-income	2,394	48.7	2,128	48.1	253	55.8	13	32.5
Upper-income	1,386	28.2	1,293	29.2	79	17.4	14	35.0
Unknown-income	2	0.0	1	0.0	1	0.2	0	0.0
Total Assessment Area	4,918	100.0	4,424	100.0	454	100.0	40	100.0
	Percentage of Total Businesses:			90.0		9.2		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3	1.9	3	1.9	0	0.0	0	0.0
Moderate-income	1	0.6	1	0.6	0	0.0	0	0.0
Middle-income	60	37.3	60	37.3	0	0.0	0	0.0
Upper-income	97	60.2	97	60.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	161	100.0	161	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

Information based on 2018 OMB Data and 2020 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated low satisfactory in Hagerstown, MD assessment area. It is noted that because the bank just entered the assessment area in late 2018, very little lending took place during the evaluation period.

Lending Activity

AmeriServ's lending levels in the Hagerstown, MD assessment area reflect poor responsiveness to assessment area credit needs. This conclusion takes into consideration that the bank just recently entered into the Hagerstown, MD market, after opening its first branch within the assessment area in November 2018. During the evaluation period, lending activity in the Hagerstown, MD assessment area represented only 2% of overall lending, both by number and dollar volume. AmeriServ made eight HMDA loans totaling \$1.8 million, and 20 small business loans totaling \$5.3 million in the assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance. Additionally, as noted previously, due to loan volume, HMDA loans were not evaluated in the Hagerstown, MD assessment area, because the analysis of the very low number of loans would not have yielded meaningful conclusions. As a result, the bank's borrower distribution in the assessment area was determined solely through analysis of CRA small business loans. Finally, given that the bank entered the assessment area in late 2018, results are based on the bank's lending in 2019 and 2020, only.

Small Business Lending

An analysis of AmeriServ's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further analyzed to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Hagerstown, MD assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2019 Dun & Bradstreet business data, there were 4,868 businesses operating in the assessment area in 2019, with 89% designated as small businesses. According to 2020 Dun & Bradstreet business data, there were 4,918 businesses operating in the assessment area in 2020, with 90% designated as small businesses.

In 2019, the bank's borrower distribution of small business loans was excellent. In 2019, the bank originated four CRA small business loans in the assessment area totaling \$1.7 million. All four (100%) of these loans were to small businesses, which was greater than the proxy of small businesses in the assessment area (89%), and the aggregate lending level (44%).

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2019, 25% of the bank's small business loans in the assessment area were extended in an amount of \$100 thousand or less. Aggregate lending data for 2019 shows that 94% of all small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2020, the bank's borrower distribution of small business loans was adequate. In 2020, AmeriServ originated nine small business loans, aggregating \$381 thousand, within the assessment area. Of these loans, two loans (22%) were to small businesses. This performance was below the proxy of 90% of small businesses in the assessment area, and the market aggregate of 36%.

In 2020, 100% of AmeriServ's small business loans in the assessment area were extended in an amount of \$100 thousand or less. Aggregate lending data shows that 87% of all small business loans made in the assessment area were made in an amount of \$100 thousand or less.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. Since credit card loans are generally made in smaller amounts, this can skew aggregate small business data. As noted previously, the top ten CRA reporters in the assessment area in 2019, and 2020 included many large credit card lenders, and together these credit card lenders controlled the majority of the CRA small business market. This is taken into account when drawing conclusions about the bank's small business lending.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among census tracts within the assessment area. Overall, the geographic distribution of loans reflects adequate penetration throughout the Hagerstown, MD assessment area, including in low- and moderate-income census tracts.

As mentioned earlier, HMDA loans were not evaluated in the Hagerstown, MD assessment area, because analysis of the very low volume of loans would not have yielded meaningful conclusions. Therefore, the conclusion for geographic distribution of lending is solely determined by the geographic distribution of small business loans. Finally, given that the bank entered the assessment area in November 2018, results are based on lending in 2019 and 2020, only.

Small Business Lending

The geographic distribution of AmeriServ’s small business loans reflects adequate penetration throughout the assessment area, in the context of the assessment area’s demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to 2019 Dun & Bradstreet data, 4,868 businesses operated in the assessment area. Of these, 9% of businesses in the assessment area were located in low-income census tracts, and 14% were located in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (48%) and upper-income census tracts (29%).

According to 2020 Dun & Bradstreet data, 4,918 businesses operated in the assessment area. Of these, 9% of businesses in the assessment area were located in low-income census tracts, and 14% were located in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (49%) and upper-income census tracts (28%).

The tables below present AmeriServ’s small business geographic distribution in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the two years evaluated (2019 and 2020).

AmeriServ Financial Bank Hagerstown, MD Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2018 OMB Data)	Aggregate Comparison	
		2019	
		% AmeriServ Lending	% Aggregate Lending
Low	9.1	0.0	7.3
Moderate	14.1	0.0	15.9
Middle	48.1	75.0	48.8
Upper	28.7	25.0	28.0
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

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AmeriServ Financial Bank Hagerstown, MD Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2018 OMB Data)	Aggregate Comparison	
		2020	
		% AmeriServ Lending	% Aggregate Lending
Low	9.1	0.0	8.6
Moderate	14.0	33.3	12.8
Middle	48.7	66.7	50.4
Upper	28.2	0.0	28.2
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, the bank’s small business lending in low-income tracts was poor.

AmeriServ’s lending in low-income census tracts in 2019 was poor. Of AmeriServ’s four CRA small business loans originated in the assessment area in 2019, none were made in low-income census tracts. The bank’s lending was below both the proxy of 9% and the aggregate lending level of 7%.

AmeriServ’s lending in low-income census tracts in 2020 was poor. Of AmeriServ’s nine CRA small business loans originated in the assessment area in 2020, none were made in low-income census tracts. The bank’s lending was below both the proxy of 9% and the aggregate lending level, which was just under 9%.

Lending in Moderate-Income Census Tracts

For the period under review, the bank’s small business lending in moderate-income tracts was good.

AmeriServ’s lending in moderate-income census tracts in 2019 was poor. Of AmeriServ’s four CRA small business loans originated in the assessment area in 2019, none were made in moderate-income census tracts. The bank’s lending was below both the proxy of 14%, and the aggregate lending level of 16%.

AmeriServ’s lending in moderate-income census tracts in 2020 was excellent. Of AmeriServ’s nine CRA small business loans originated in the assessment area in 2020, three loans (33%) were made in moderate-income census tracts. The bank’s lending was above both the proxy of 14%, and the aggregate lending level of 13%.

Responsiveness to Credit Needs

AmeriServ exhibits a poor record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. Despite entering the assessment area when it opened a branch in late 2018, the bank made no community development loans during the current exam period, nor did it use innovative or flexible lending products in this assessment area. Finally, very little retail lending took place during its two years in the market.

Innovative and/or Flexible Lending Practices

AmeriServ makes no use of innovative and/or flexible practices in serving the Hagerstown, MD assessment area credit needs. Though the bank offers both FHA and VA loans and provides grants through FHLB of Pittsburgh's FFD program, none of these products were utilized in the Hagerstown, MD assessment area.

Community Development Lending

AmeriServ makes few, if any, community development loans in the assessment area. The bank made no qualified community development loans in the Hagerstown, MD assessment area during the current exam period.

Though the bank made 13 PPP loans totaling over \$500 thousand in the assessment area, none qualified as community development loans.¹⁷

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as needs to improve.

Volume of Investment and Grant Activity

AmeriServ has a poor level of qualified community development investments and grants. During the exam period, the bank made four donations totaling \$5 thousand to support community services targeted to low- and moderate-income individuals in the assessment area. The bank's qualified investments in the Hagerstown, MD assessment area comprised less than 1% of total investments, grants and donations.

¹⁷ PPP loans that qualify as community development loans are defined as loans with amounts over \$1 million that are located in low- or moderate-income census tracts.

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The following table presents the investment and grant activity for the Hagerstown, MD assessment area.

AmeriServ Financial Bank Hagerstown, MD Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	0	0	0	0	0	0	0	0	0	0
Donations	0	0	4	5	0	0	0	0	4	5
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	4	5	0	0	0	0	4	5

Responsiveness to Credit and Community Development Needs

AmeriServ exhibits adequate responsiveness to credit and community development needs of the assessment area. The bank’s four donations supported community services in the Hagerstown, MD assessment area.

Community Development Initiatives

AmeriServ makes no use of innovative and/or complex investments to support community development initiatives. During the exam period, the bank made four donations, which were neither innovative nor complex.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution’s branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the Hagerstown, MD assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the evaluation period, AmeriServ operated one branch in the Hagerstown, MD assessment area, which was located in a middle-income census tract. By comparison, 45% of the assessment area’s population was located in middle-income census tracts, using 2018 OMB data.

The following table details the location of the bank’s branch with comparison to 2018 OMB data.

AmeriServ Financial Bank Hagerstown, MD Assessment Area Retail Branch Distribution 2018 OMB Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent Population
Low	0	0.0	5,623	4.6
Moderate	0	0.0	23,250	18.9
Middle	1	100.0	55,042	44.8
Upper	0	0.0	32,530	26.5
Unknown Income	0	0.0	6,405	5.2
Totals	1	100.0	122,850	100.0

The bank’s branch in the Hagerstown, MD assessment area has an ATM, which provides electronic access to banking services. To supplement traditional banking services, AmeriServ provides alternative delivery systems that include online banking services, telephone banking services, and remote deposit capture. Customers are able to pay bills, open accounts, and apply for loans using the bank’s online website at: <https://www.ameriserv.com/>.

Changes in Branch Locations

AmeriServ’s record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. The bank entered the assessment area when it opened its single branch in the Hagerstown, MD assessment area in a middle-income tract on November 19, 2018, which made AmeriServ an interstate bank.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. The bank’s single branch offers standard hours Monday through Thursday, offers extended evening hours on Friday, and offers limited Saturday hours, as the majority of branches in other assessment areas do.

Bank Products

Though the bank does not offer a free checking product, it does offer a free business checking account, which has no service fee or daily balance requirement. The account offers up to 250 free transactions, along with telephone, online and mobile banking, and a free VISA Business Check Card. This free business checking account allows very small businesses access to low-cost banking services. Also of note, the bank offered COVID-19 Pandemic Relief, and took steps throughout the pandemic to address the needs of customers who were impacted. All customers including individuals, small businesses, and small farms were offered payment relief in the form of complete deferral of payments or interest only payments, based on need or anticipation of need.

Community Development Services

AmeriServ provides few, if any community development services in this assessment area. In the assessment area, one bank officer serves on the board of the Community Foundation of Washington County, which provides services to low- and moderate-income individuals in the Hagerstown, MD assessment area.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
04/18/17 – 01/10/22			
Financial Institution		Products Reviewed	
AmeriServ Financial Bank		HMDA	
		Small Business	
Affiliates	Affiliate Relationship	Products Reviewed	
N/A	N/A	N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited¹⁸	Other Information
Johnstown, PA Assessment Area	Full-Scope	N/A	
Pittsburgh, PA Assessment Area	Full-Scope	N/A	
State College, PA Assessment Area	Full-Scope	N/A	CRA small business lending not included in analysis due to low volume. No geographic distribution for HMDA loans in low-income tracts due to demographics.
Somerset, PA Assessment Area	Limited-Scope	N/A	No geographic distribution analysis in low-income census tracts due to demographics.
Hagerstown, MD Assessment Area	Full-Scope	N/A	Because the bank added this assessment area in November 2018, only 2019 and 2020 lending data are included in the analysis. HMDA lending not included in analysis due to low volume.

¹⁸No branch visits were performed in accordance with the scoping process for this evaluation. The institution’s CRA Public File was reviewed electronically.

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CRA APPENDIX B: SUMMARY OF STATE RATINGS

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	-	-	-	Satisfactory
Johnstown, PA Assessment Area	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Pittsburgh, PA Assessment Area	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State College, PA Assessment Area	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve
Somerset County, PA Assessment Area	Consistent	Below	Consistent	Consistent
State of Maryland	-	-	-	Needs to Improve
Hagerstown, MD Assessment Area	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve

CRA APPENDIX C: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or assessment area.

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

Community development: All Agencies have adopted the following language.

- (1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
- (2) Community services targeted to low- or moderate-income individuals;
- (3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less;
- (4) Activities that revitalize or stabilize—
 - (i) Low-or moderate-income geographies;
 - (ii) Designated disaster areas; or
 - (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on—
 - A. Rates of poverty, unemployment, and population loss; or
 - B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or

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

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

Full-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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

Limited-scope review: Performance under the lending, investment, and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in loans to small businesses as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in loans to small farms as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2017 HMDA LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	6	11.3	333	6.1
Moderate	1	1.9	32	0.6	11	20.8	702	12.9
Middle	26	49.1	2,564	47.2	12	22.6	1,266	23.3
Upper	26	49.1	2,841	52.3	22	41.5	3,024	55.6
Unknown	0	0.0	0	0.0	2	3.8	112	2.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	53	100.0	5,437	100.0	53	100.0	5,437	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	6.7	79	3.0
Middle	8	53.3	999	38.1	4	26.7	548	20.9
Upper	7	46.7	1,620	61.9	9	60.0	1,877	71.7
Unknown	0	0.0	0	0.0	1	6.7	115	4.4
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	15	100.0	2,619	100.0	15	100.0	2,619	100.0
	Home Improvement							
Low	0	0.0	0	0.0	9	29.0	45	17.8
Moderate	3	9.7	9	3.6	9	29.0	51	20.2
Middle	21	67.7	209	82.6	5	16.1	40	15.8
Upper	7	22.6	35	13.8	7	22.6	58	22.9
Unknown	0	0.0	0	0.0	1	3.2	59	23.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	31	100.0	253	100.0	31	100.0	253	100.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	33.3	144	25.8	0	0.0	0	0.0
Upper	2	66.7	415	74.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	3	100.0	559	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	3	100.0	559	100.0	3	100.0	559	100.0
	HMDA Totals							
Low	0	0.0	0	0.0	15	14.7	378	4.3
Moderate	4	3.9	41	0.5	21	20.6	832	9.4
Middle	56	54.9	3,916	44.2	21	20.6	1,854	20.9
Upper	42	41.2	4,911	55.4	38	37.3	4,959	55.9
Unknown	0	0.0	0	0.0	7	6.9	845	9.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	102	100.0	8,868	100.0	102	100.0	8,868	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	4	10.3	169	4.1
Moderate	3	7.7	98	2.3	5	12.8	316	7.6
Middle	18	46.2	2,386	57.1	12	30.8	1,469	35.2
Upper	18	46.2	1,693	40.5	11	28.2	1,679	40.2
Unknown	0	0.0	0	0.0	7	17.9	544	13.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	39	100.0	4,178	100.0	39	100.0	4,178	100.0
	Refinance							
Low	0	0.0	0	0.0	1	33.3	45	11.7
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	66.7	235	61.0	1	33.3	190	49.4
Upper	1	33.3	150	39.0	1	33.3	150	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	3	100.0	385	100.0	3	100.0	385	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	100.0	26	100.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	26	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	26	100.0	1	100.0	26	100.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	250	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	250	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	250	100.0	2	100.0	250	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	5	11.1	214	4.4
Moderate	4	8.9	124	2.6	5	11.1	316	6.5
Middle	22	48.9	2,871	59.3	13	28.9	1,659	34.3
Upper	19	42.2	1,843	38.1	12	26.7	1,829	37.8
Unknown	0	0.0	0	0.0	10	22.2	820	17.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	45	100.0	4,839	100.0	45	100.0	4,839	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	8	14.8	436	8.7
Moderate	4	7.4	170	3.4	12	22.2	781	15.5
Middle	32	59.3	3,043	60.5	15	27.8	1,428	28.4
Upper	18	33.3	1,818	36.1	16	29.6	2,174	43.2
Unknown	0	0.0	0	0.0	3	5.6	213	4.2
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	54	100.0	5,031	100.0	54	100.0	5,031	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	14.3	124	14.7
Middle	3	42.9	355	42.0	1	14.3	180	21.3
Upper	4	57.1	490	58.0	4	57.1	459	54.4
Unknown	0	0.0	0	0.0	1	14.3	81	9.6
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	7	100.0	844	100.0	7	100.0	844	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	100.0	98	100.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	98	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	98	100.0	1	100.0	98	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	8	12.9	436	7.3
Moderate	5	8.1	268	4.5	13	21.0	905	15.2
Middle	35	56.5	3,398	56.9	16	25.8	1,608	26.9
Upper	22	35.5	2,308	38.6	20	32.3	2,634	44.1
Unknown	0	0.0	0	0.0	5	8.1	391	6.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	62	100.0	5,973	100.0	62	100.0	5,973	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	3	7.7	279	5.3
Moderate	2	5.1	147	2.8	9	23.1	732	14.0
Middle	23	59.0	2,547	48.7	8	20.5	773	14.8
Upper	14	35.9	2,542	48.5	17	43.6	3,332	63.6
Unknown	0	0.0	0	0.0	2	5.1	120	2.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	39	100.0	5,236	100.0	39	100.0	5,236	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	3	7.5	383	5.6
Middle	24	60.0	4,076	59.3	6	15.0	670	9.7
Upper	16	40.0	2,801	40.7	29	72.5	5,612	81.6
Unknown	0	0.0	0	0.0	2	5.0	212	3.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	40	100.0	6,877	100.0	40	100.0	6,877	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	1	100.0	10	100.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	10	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	10	100.0	1	100.0	10	100.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	3	3.8	279	2.3
Moderate	2	2.5	147	1.2	12	15.0	1,115	9.2
Middle	47	58.8	6,623	54.6	14	17.5	1,443	11.9
Upper	31	38.8	5,352	44.2	46	57.5	8,944	73.8
Unknown	0	0.0	0	0.0	5	6.3	341	2.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	80	100.0	12,122	100.0	80	100.0	12,122	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 HMDA LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	1	5.0	90	2.4	0	0.0	0	0.0
Moderate	5	25.0	499	13.3	6	30.0	618	16.4
Middle	7	35.0	946	25.2	4	20.0	948	25.2
Upper	7	35.0	2,223	59.2	8	40.0	2,041	54.3
Unknown	0	0.0	0	0.0	2	10.0	151	4.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	20	100.0	3,758	100.0	20	100.0	3,758	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	40.0	256	35.9	0	0.0	0	0.0
Middle	1	20.0	95	13.3	3	60.0	351	49.2
Upper	2	40.0	363	50.8	2	40.0	363	50.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	5	100.0	714	100.0	5	100.0	714	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	1	50.0	396	20.5	0	0.0	0	0.0
Moderate	1	50.0	1,538	79.5	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	1,934	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	1,934	100.0	2	100.0	1,934	100.0
	HMDA Totals							
Low	2	7.4	486	7.6	0	0.0	0	0.0
Moderate	8	29.6	2,293	35.8	6	22.2	618	9.6
Middle	8	29.6	1,041	16.3	7	25.9	1,299	20.3
Upper	9	33.3	2,586	40.4	10	37.0	2,404	37.5
Unknown	0	0.0	0	0.0	4	14.8	2,085	32.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	27	100.0	6,406	100.0	27	100.0	6,406	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	9.5	148	4.1	2	9.5	128	3.6
Moderate	3	14.3	256	7.1	6	28.6	712	19.8
Middle	9	42.9	1,221	34.0	4	19.0	615	17.1
Upper	7	33.3	1,964	54.7	6	28.6	1,858	51.8
Unknown	0	0.0	0	0.0	3	14.3	276	7.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	21	100.0	3,589	100.0	21	100.0	3,589	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	7	87.5	1,045	79.8	3	37.5	276	21.1
Upper	1	12.5	265	20.2	1	12.5	265	20.2
Unknown	0	0.0	0	0.0	4	50.0	769	58.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	8	100.0	1,310	100.0	8	100.0	1,310	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	4	40.0	2,566	24.2	0	0.0	0	0.0
Moderate	3	30.0	2,651	25.0	0	0.0	0	0.0
Middle	2	20.0	4,303	40.6	0	0.0	0	0.0
Upper	1	10.0	1,080	10.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	10	100.0	10,600	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	10	100.0	10,600	100.0	10	100.0	10,600	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	6	15.4	2,714	17.5	2	5.1	128	0.8
Moderate	6	15.4	2,907	18.8	6	15.4	712	4.6
Middle	18	46.2	6,568	42.4	7	17.9	891	5.7
Upper	9	23.1	3,309	21.4	7	17.9	2,123	13.7
Unknown	0	0.0	0	0.0	17	43.6	11,645	75.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	39	100.0	15,498	100.0	39	100.0	15,498	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	5.1	591	5.7	4	10.3	323	3.1
Moderate	10	25.6	2,107	20.2	5	12.8	663	6.4
Middle	14	35.9	2,258	21.7	9	23.1	1,434	13.8
Upper	13	33.3	5,452	52.4	14	35.9	4,869	46.8
Unknown	0	0.0	0	0.0	7	17.9	3,119	30.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	39	100.0	10,408	100.0	39	100.0	10,408	100.0
	Refinance							
Low	0	0.0	0	0.0	1	9.1	106	3.7
Moderate	1	9.1	107	3.7	0	0.0	0	0.0
Middle	7	63.6	2,272	78.4	1	9.1	221	7.6
Upper	3	27.3	518	17.9	6	54.5	1,328	45.8
Unknown	0	0.0	0	0.0	3	27.3	1,242	42.9
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	11	100.0	2,897	100.0	11	100.0	2,897	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	2	22.2	1,494	10.2	0	0.0	0	0.0
Moderate	2	22.2	1,158	7.9	0	0.0	0	0.0
Middle	2	22.2	2,535	17.4	0	0.0	0	0.0
Upper	3	33.3	9,395	64.4	2	22.2	2,579	17.7
Unknown	0	0.0	0	0.0	7	77.8	12,003	82.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	14,582	100.0	9	100.0	14,582	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	4	6.8	2,085	7.5	5	8.5	429	1.5
Moderate	13	22.0	3,372	12.1	5	8.5	663	2.4
Middle	23	39.0	7,066	25.3	10	16.9	1,655	5.9
Upper	19	32.2	15,365	55.1	22	37.3	8,776	31.5
Unknown	0	0.0	0	0.0	17	28.8	16,364	58.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	59	100.0	27,888	100.0	59	100.0	27,888	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	1	3.3	90	1.0
Moderate	1	3.3	91	1.0	2	6.7	356	3.9
Middle	15	50.0	4,570	49.6	5	16.7	826	9.0
Upper	14	46.7	4,553	49.4	22	73.3	7,942	86.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	30	100.0	9,214	100.0	30	100.0	9,214	100.0
	Refinance							
Low	0	0.0	0	0.0	1	2.1	69	0.6
Moderate	2	4.3	245	2.3	3	6.4	478	4.4
Middle	23	48.9	5,137	47.4	11	23.4	1,974	18.2
Upper	22	46.8	5,467	50.4	31	66.0	7,927	73.1
Unknown	0	0.0	0	0.0	1	2.1	400	3.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	47	100.0	10,848	100.0	47	100.0	10,848	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	3	23.1	5,790	21.9	0	0.0	0	0.0
Moderate	3	23.1	3,489	13.2	0	0.0	0	0.0
Middle	6	46.2	15,855	59.9	0	0.0	0	0.0
Upper	1	7.7	1,340	5.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	13	100.0	26,474	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	13	100.0	26,474	100.0	13	100.0	26,474	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	3	3.3	5,790	12.4	2	2.2	159	0.3
Moderate	6	6.7	3,825	8.2	5	5.6	834	1.8
Middle	44	48.9	25,562	54.9	16	17.8	2,800	6.0
Upper	37	41.1	11,359	24.4	53	58.9	15,869	34.1
Unknown	0	0.0	0	0.0	14	15.6	26,874	57.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	90	100.0	46,536	100.0	90	100.0	46,536	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	3	2.9	352	1.5
Moderate	15	14.7	2,999	12.9	19	18.6	3,232	14.0
Middle	44	43.1	9,628	41.6	23	22.5	4,441	19.2
Upper	42	41.2	10,321	44.6	57	55.9	15,138	65.4
Unknown	1	1.0	215	0.9	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	102	100.0	23,163	100.0	102	100.0	23,163	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	11.1	403	11.8	2	22.2	557	16.4
Upper	8	88.9	3,002	88.2	6	66.7	2,475	72.7
Unknown	0	0.0	0	0.0	1	11.1	373	11.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	3,405	100.0	9	100.0	3,405	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	3	2.7	352	1.3
Moderate	15	13.5	2,999	11.3	19	17.1	3,232	12.2
Middle	45	40.5	10,031	37.8	25	22.5	4,998	18.8
Upper	50	45.0	13,323	50.1	63	56.8	17,613	66.3
Unknown	1	0.9	215	0.8	1	0.9	373	1.4
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	111	100.0	26,568	100.0	111	100.0	26,568	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	1	1.7	85	0.6
Moderate	10	16.7	2,220	15.4	17	28.3	2,982	20.6
Middle	22	36.7	4,865	33.7	12	20.0	2,913	20.2
Upper	27	45.0	7,042	48.7	30	50.0	8,472	58.6
Unknown	1	1.7	324	2.2	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	60	100.0	14,452	100.0	60	100.0	14,452	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	33.3	190	23.6
Middle	2	66.7	380	47.3	0	0.0	0	0.0
Upper	1	33.3	424	52.7	2	66.7	614	76.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	3	100.0	804	100.0	3	100.0	804	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	1	100.0	6,124	100.0	1	100.0	6,124	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	6,124	100.0	1	100.0	6,124	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	1	1.6	85	0.4
Moderate	10	15.6	2,220	10.4	18	28.1	3,172	14.8
Middle	24	37.5	5,245	24.5	12	18.8	2,913	13.6
Upper	28	43.8	7,466	34.9	32	50.0	9,086	42.5
Unknown	2	3.1	6,448	30.2	1	1.6	6,124	28.6
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	64	100.0	21,379	100.0	64	100.0	21,379	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	6	9.4	716	4.9
Moderate	11	17.2	2,180	15.0	11	17.2	2,225	15.3
Middle	32	50.0	6,578	45.2	22	34.4	5,108	35.1
Upper	21	32.8	5,802	39.8	24	37.5	6,443	44.3
Unknown	0	0.0	0	0.0	1	1.6	68	0.5
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	64	100.0	14,560	100.0	64	100.0	14,560	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	12.5	340	9.1	5	31.3	897	24.1
Middle	8	50.0	1,914	51.4	4	25.0	880	23.6
Upper	6	37.5	1,472	39.5	4	25.0	1,323	35.5
Unknown	0	0.0	0	0.0	3	18.8	626	16.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	16	100.0	3,726	100.0	16	100.0	3,726	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	6	7.5	716	3.9
Moderate	13	16.3	2,520	13.8	16	20.0	3,122	17.1
Middle	40	50.0	8,492	46.4	26	32.5	5,988	32.7
Upper	27	33.8	7,273	39.8	28	35.0	7,766	42.5
Unknown	0	0.0	0	0.0	4	5.0	694	3.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	80	100.0	18,286	100.0	80	100.0	18,286	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	1	1.9	153	1.2
Moderate	10	18.9	1,880	14.3	11	20.8	1,884	14.4
Middle	17	32.1	3,267	24.9	17	32.1	4,335	33.0
Upper	25	47.2	7,734	58.9	24	45.3	6,757	51.5
Unknown	1	1.9	248	1.9	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	53	100.0	13,129	100.0	53	100.0	13,129	100.0
	Refinance							
Low	0	0.0	0	0.0	1	1.6	192	1.1
Moderate	9	14.1	2,328	13.5	11	17.2	2,333	13.5
Middle	30	46.9	8,154	47.2	18	28.1	4,273	24.8
Upper	25	39.1	6,776	39.3	32	50.0	9,878	57.2
Unknown	0	0.0	0	0.0	2	3.1	583	3.4
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	64	100.0	17,259	100.0	64	100.0	17,259	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	127	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	1	100.0	127	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	127	100.0	1	100.0	127	100.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	2	1.7	345	1.1
Moderate	19	16.1	4,208	13.8	22	18.6	4,217	13.8
Middle	48	40.7	11,548	37.8	35	29.7	8,608	28.2
Upper	50	42.4	14,510	47.6	56	47.5	16,634	54.5
Unknown	1	0.8	248	0.8	3	2.5	710	2.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	118	100.0	30,514	100.0	118	100.0	30,514	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	9	100.0	950	100.0	2	22.2	150	15.8
Upper	0	0.0	0	0.0	6	66.7	742	78.1
Unknown	0	0.0	0	0.0	1	11.1	58	6.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	950	100.0	9	100.0	950	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	171	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	100.0	171	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	171	100.0	1	100.0	171	100.0
	Home Improvement							
Low	0	0.0	0	0.0	6	66.7	40	60.6
Moderate	0	0.0	0	0.0	1	11.1	5	7.6
Middle	9	100.0	66	100.0	2	22.2	21	31.8
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	66	100.0	9	100.0	66	100.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	6	31.6	40	3.4
Moderate	0	0.0	0	0.0	1	5.3	5	0.4
Middle	19	100.0	1,187	100.0	4	21.1	171	14.4
Upper	0	0.0	0	0.0	7	36.8	913	76.9
Unknown	0	0.0	0	0.0	1	5.3	58	4.9
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	19	100.0	1,187	100.0	19	100.0	1,187	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	7	100.0	856	100.0	2	28.6	222	25.9
Upper	0	0.0	0	0.0	4	57.1	537	62.7
Unknown	0	0.0	0	0.0	1	14.3	97	11.3
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	7	100.0	856	100.0	7	100.0	856	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	603	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	50.0	150	24.9
Unknown	0	0.0	0	0.0	1	50.0	453	75.1
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	603	100.0	2	100.0	603	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	9	100.0	1,459	100.0	2	22.2	222	15.2
Upper	0	0.0	0	0.0	5	55.6	687	47.1
Unknown	0	0.0	0	0.0	2	22.2	550	37.7
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	1,459	100.0	9	100.0	1,459	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	4	44.4	358	25.0
Middle	9	100.0	1,431	100.0	2	22.2	227	15.8
Upper	0	0.0	0	0.0	3	33.3	846	59.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	9	100.0	1,431	100.0	9	100.0	1,431	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	6	100.0	1,256	100.0	1	16.7	173	13.7
Upper	0	0.0	0	0.0	4	66.7	633	50.4
Unknown	0	0.0	0	0.0	1	16.7	451	35.9
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	6	100.0	1,256	100.0	6	100.0	1,256	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	4	26.7	358	13.3
Middle	15	100.0	2,688	100.0	3	20.0	399	14.8
Upper	0	0.0	0	0.0	7	46.7	1,479	55.0
Unknown	0	0.0	0	0.0	1	6.7	451	16.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	15	100.0	2,688	100.0	15	100.0	2,688	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	1	10.0	122	9.0
Moderate	0	0.0	0	0.0	2	20.0	241	17.9
Middle	10	100.0	1,346	100.0	2	20.0	233	17.3
Upper	0	0.0	0	0.0	5	50.0	751	55.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	10	100.0	1,346	100.0	10	100.0	1,346	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	3	23.1	331	15.2
Middle	13	100.0	2,174	100.0	3	23.1	352	16.2
Upper	0	0.0	0	0.0	7	53.8	1,492	68.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	13	100.0	2,174	100.0	13	100.0	2,174	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	205	100.0	1	100.0	205	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	205	100.0	1	100.0	205	100.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	1	4.2	122	3.3
Moderate	0	0.0	0	0.0	5	20.8	571	15.3
Middle	24	100.0	3,725	100.0	6	25.0	789	21.2
Upper	0	0.0	0	0.0	12	50.0	2,243	60.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	24	100.0	3,725	100.0	24	100.0	3,725	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	400	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	400	100.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	400	100.0	2	100.0	400	100.0
	Refinance							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	617	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	50.0	470	76.2
Unknown	0	0.0	0	0.0	1	50.0	147	23.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	2	100.0	617	100.0	2	100.0	617	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	100.0	1,017	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	25.0	470	46.2
Unknown	0	0.0	0	0.0	3	75.0	547	53.8
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	4	100.0	1,017	100.0	4	100.0	1,017	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	100.0	256	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	100.0	256	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0	256	100.0	1	100.0	256	100.0
	Refinance							
Low	0	0.0	0	0.0	1	33.3	195	40.4
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	66.7	310	64.3	0	0.0	0	0.0
Upper	1	33.3	172	35.7	2	66.7	287	59.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	3	100.0	482	100.0	3	100.0	482	100.0
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Other Purpose LOC							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	0	0.0	0	0.0	1	25.0	195	26.4
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	3	75.0	566	76.7	0	0.0	0	0.0
Upper	1	25.0	172	23.3	3	75.0	543	73.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	4	100.0	738	100.0	4	100.0	738	100.0

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	1	2.1%	420	4.9%	0	0.0%	0	0.0%
Moderate	7	14.6%	337	3.9%	0	0.0%	0	0.0%
Middle	19	39.6%	3,195	37.2%	0	0.0%	0	0.0%
Upper	21	43.8%	4,636	54.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	48	100.0%	8,588	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	30	62.5%	4,725	55.0%	0	0.0%	0	0.0%
Over \$1 Million	16	33.3%	3,529	41.1%	0	0.0%	0	0.0%
Not Known	2	4.2%	334	3.9%	0	0.0%	0	0.0%
Total	48	100.0%	8,588	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	24	50.0%	862	10.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	15	31.3%	2,854	33.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	18.8%	4,872	56.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	48	100.0%	8,588	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	17	56.7%	661	14.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	8	26.7%	1,630	34.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	5	16.7%	2,434	51.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	4,725	100.0%	0	0.0%	0	0.0%

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	1	2.0%	150	2.4%	0	0.0%	0	0.0%
Moderate	11	22.0%	1,861	29.7%	0	0.0%	0	0.0%
Middle	25	50.0%	2,564	40.9%	3	100.0%	48	100.0%
Upper	13	26.0%	1,701	27.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	6,276	100.0%	3	100.0%	48	100.0%
	By Revenue							
Total \$1 Million or less	21	42.0%	1,977	31.5%	3	100.0%	48	100.0%
Over \$1 Million	27	54.0%	4,099	65.3%	0	0.0%	0	0.0%
Not Known	2	4.0%	200	3.2%	0	0.0%	0	0.0%
Total	50	100.0%	6,276	100.0%	3	100.0%	48	100.0%
	By Loan Size							
\$100,000 or less	31	62.0%	1,042	16.6%	3	100.0%	48	100.0%
\$100,001 - \$250,000	11	22.0%	1,897	30.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	16.0%	3,337	53.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	50	100.0%	6,276	100.0%	3	100.0%	48	100.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	16	76.2%	494	25.0%	3	100.0%	48	100.0%
\$100,001 - \$250,000	3	14.3%	613	31.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	9.5%	870	44.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	1,977	100.0%	3	100.0%	48	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	10	27.8%	2,849	53.4%	0	0.0%	0	0.0%
Middle	15	41.7%	1,924	36.1%	0	0.0%	0	0.0%
Upper	11	30.6%	560	10.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	5,333	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	17	47.2%	1,409	26.4%	0	0.0%	0	0.0%
Over \$1 Million	19	52.8%	3,924	73.6%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	5,333	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	27	75.0%	1,149	21.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	8.3%	439	8.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	16.7%	3,745	70.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	5,333	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	14	82.4%	636	45.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	5.9%	108	7.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	11.8%	665	47.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	1,409	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (JOHNSTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	6	2.6%	272	1.6%	0	0.0%	0	0.0%
Moderate	36	15.7%	3,730	21.9%	0	0.0%	0	0.0%
Middle	113	49.3%	8,052	47.3%	0	0.0%	0	0.0%
Upper	74	32.3%	4,980	29.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	229	100.0%	17,034	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	99	43.2%	3,430	20.1%	0	0.0%	0	0.0%
Over \$1 Million	41	17.9%	9,317	54.7%	0	0.0%	0	0.0%
Not Known	89	38.9%	4,287	25.2%	0	0.0%	0	0.0%
Total	229	100.0%	17,034	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	190	83.0%	5,321	31.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	22	9.6%	3,621	21.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	17	7.4%	8,092	47.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	229	100.0%	17,034	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	96	97.0%	2,440	71.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	2.0%	315	9.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	1	1.0%	675	19.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	99	100.0%	3,430	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	2	8.3%	237	2.8%	0	0.0%	0	0.0%
Moderate	4	16.7%	437	5.1%	0	0.0%	0	0.0%
Middle	8	33.3%	2,649	31.1%	0	0.0%	0	0.0%
Upper	9	37.5%	4,956	58.1%	0	0.0%	0	0.0%
Unknown	1	4.2%	250	2.9%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	8,529	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	11	45.8%	4,489	52.6%	0	0.0%	0	0.0%
Over \$1 Million	13	54.2%	4,040	47.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	8,529	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	5	20.8%	338	4.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	29.2%	1,225	14.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	50.0%	6,966	81.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	8,529	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	2	18.2%	78	1.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	27.3%	453	10.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	6	54.5%	3,958	88.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	4,489	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	1	3.4%	316	3.2%	0	0.0%	0	0.0%
Moderate	6	20.7%	1,941	19.6%	0	0.0%	0	0.0%
Middle	13	44.8%	3,774	38.0%	0	0.0%	0	0.0%
Upper	9	31.0%	3,895	39.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	9,926	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	12	41.4%	4,560	45.9%	0	0.0%	0	0.0%
Over \$1 Million	14	48.3%	3,971	40.0%	0	0.0%	0	0.0%
Not Known	3	10.3%	1,395	14.1%	0	0.0%	0	0.0%
Total	29	100.0%	9,926	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	6	20.7%	380	3.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	31.0%	1,654	16.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	14	48.3%	7,892	79.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	9,926	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	2	16.7%	120	2.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	25.0%	584	12.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	7	58.3%	3,856	84.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	4,560	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	3	15.0%	155	2.3%	0	0.0%	0	0.0%
Moderate	4	20.0%	1,640	24.0%	0	0.0%	0	0.0%
Middle	6	30.0%	2,331	34.1%	0	0.0%	0	0.0%
Upper	7	35.0%	2,700	39.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	6,826	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	11	55.0%	4,676	68.5%	0	0.0%	0	0.0%
Over \$1 Million	7	35.0%	1,812	26.5%	0	0.0%	0	0.0%
Not Known	2	10.0%	338	5.0%	0	0.0%	0	0.0%
Total	20	100.0%	6,826	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	5	25.0%	265	3.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	5	25.0%	888	13.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	10	50.0%	5,673	83.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	6,826	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	1	9.1%	10	0.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	27.3%	500	10.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	7	63.6%	4,166	89.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	4,676	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PITTSBURGH, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	2	2.2%	579	3.8%	0	0.0%	0	0.0%
Moderate	22	24.2%	2,673	17.5%	0	0.0%	0	0.0%
Middle	45	49.5%	7,803	51.0%	0	0.0%	0	0.0%
Upper	22	24.2%	4,243	27.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	15,298	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	25	27.5%	4,239	27.7%	0	0.0%	0	0.0%
Over \$1 Million	35	38.5%	8,233	53.8%	0	0.0%	0	0.0%
Not Known	31	34.1%	2,826	18.5%	0	0.0%	0	0.0%
Total	91	100.0%	15,298	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	53	58.2%	2,277	14.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	19	20.9%	2,960	19.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	20.9%	10,061	65.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	15,298	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	18	72.0%	621	14.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	8.0%	250	5.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	5	20.0%	3,368	79.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	4,239	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	914	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	914	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	2	66.7%	890	97.4%	0	0.0%	0	0.0%
Over \$1 Million	1	33.3%	24	2.6%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	914	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	1	33.3%	24	2.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	66.7%	890	97.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	914	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	100.0%	890	100.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	890	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

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

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	50	5.2%	0	0.0%	0	0.0%
Middle	2	50.0%	675	69.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	1	25.0%	240	24.9%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	965	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	3	75.0%	490	50.8%	0	0.0%	0	0.0%
Over \$1 Million	1	25.0%	475	49.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	965	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	1	25.0%	50	5.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	50.0%	440	45.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	25.0%	475	49.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	965	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	1	33.3%	50	10.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	66.7%	440	89.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	490	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	10.5%	671	21.2%	0	0.0%	0	0.0%
Middle	18	47.4%	1,938	61.3%	0	0.0%	0	0.0%
Upper	9	23.7%	164	5.2%	0	0.0%	0	0.0%
Unknown	7	18.4%	389	12.3%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	3,162	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	15	39.5%	557	17.6%	0	0.0%	0	0.0%
Over \$1 Million	8	21.1%	2,086	66.0%	0	0.0%	0	0.0%
Not Known	15	39.5%	519	16.4%	0	0.0%	0	0.0%
Total	38	100.0%	3,162	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	31	81.6%	872	27.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	10.5%	654	20.7%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	7.9%	1,636	51.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	3,162	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	14	93.3%	349	62.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	6.7%	208	37.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	557	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	16	100.0%	2,212	100.0%	1	100.0%	70	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,212	100.0%	1	100.0%	70	100.0%
	By Revenue							
Total \$1 Million or less	5	31.3%	247	11.2%	1	100.0%	70	100.0%
Over \$1 Million	11	68.8%	1,965	88.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,212	100.0%	1	100.0%	70	100.0%
	By Loan Size							
\$100,000 or less	13	81.3%	641	29.0%	1	100.0%	70	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	18.8%	1,571	71.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,212	100.0%	1	100.0%	70	100.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	5	100.0%	247	100.0%	1	100.0%	70	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	247	100.0%	1	100.0%	70	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	13.3%	74	4.0%	0	0.0%	0	0.0%
Middle	13	86.7%	1,774	96.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,848	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	8	53.3%	1,193	64.6%	0	0.0%	0	0.0%
Over \$1 Million	6	40.0%	530	28.7%	0	0.0%	0	0.0%
Not Known	1	6.7%	125	6.8%	0	0.0%	0	0.0%
Total	15	100.0%	1,848	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	11	73.3%	348	18.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	20.0%	500	27.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	6.7%	1,000	54.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,848	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	7	87.5%	193	16.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	1	12.5%	1,000	83.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	1,193	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	15	100.0%	1,162	100.0%	1	100.0%	200	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,162	100.0%	1	100.0%	200	100.0%
	By Revenue							
Total \$1 Million or less	6	40.0%	358	30.8%	1	100.0%	200	100.0%
Over \$1 Million	9	60.0%	804	69.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,162	100.0%	1	100.0%	200	100.0%
	By Loan Size							
\$100,000 or less	12	80.0%	412	35.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	20.0%	750	64.5%	1	100.0%	200	100.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	1,162	100.0%	1	100.0%	200	100.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	5	83.3%	108	30.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	16.7%	250	69.8%	1	100.0%	200	100.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	358	100.0%	1	100.0%	200	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
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2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (SOMERSET COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	11.4%	240	6.4%	0	0.0%	0	0.0%
Middle	39	88.6%	3,504	93.6%	1	100.0%	150	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	3,744	100.0%	1	100.0%	150	100.0%
	By Revenue							
Total \$1 Million or less	16	36.4%	2,138	57.1%	1	100.0%	150	100.0%
Over \$1 Million	8	18.2%	710	19.0%	0	0.0%	0	0.0%
Not Known	20	45.5%	896	23.9%	0	0.0%	0	0.0%
Total	44	100.0%	3,744	100.0%	1	100.0%	150	100.0%
	By Loan Size							
\$100,000 or less	35	79.5%	1,251	33.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	13.6%	904	24.1%	1	100.0%	150	100.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	6.8%	1,589	42.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	3,744	100.0%	1	100.0%	150	100.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	11	68.8%	249	11.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	12.5%	300	14.0%	1	100.0%	150	100.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	3	18.8%	1,589	74.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,138	100.0%	1	100.0%	150	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	1,105	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,105	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million	2	66.7%	327	29.6%	0	0.0%	0	0.0%
Not Known	1	33.3%	778	70.4%	0	0.0%	0	0.0%
Total	3	100.0%	1,105	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	66.7%	327	29.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	33.3%	778	70.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,105	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	100.0%	2,095	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	2,095	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	2	50.0%	1,395	66.6%	0	0.0%	0	0.0%
Over \$1 Million	2	50.0%	700	33.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	2,095	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	25.0%	200	9.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	75.0%	1,895	90.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	2,095	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	100.0%	1,395	100.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,395	100.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	75.0%	1,684	98.5%	0	0.0%	0	0.0%
Upper	1	25.0%	25	1.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,709	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	4	100.0%	1,709	100.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,709	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	1	25.0%	25	1.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	75.0%	1,684	98.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,709	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	1	25.0%	25	1.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	3	75.0%	1,684	98.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,709	100.0%	0	0.0%	0	0.0%

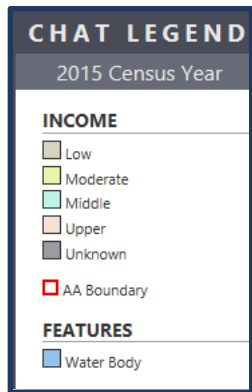
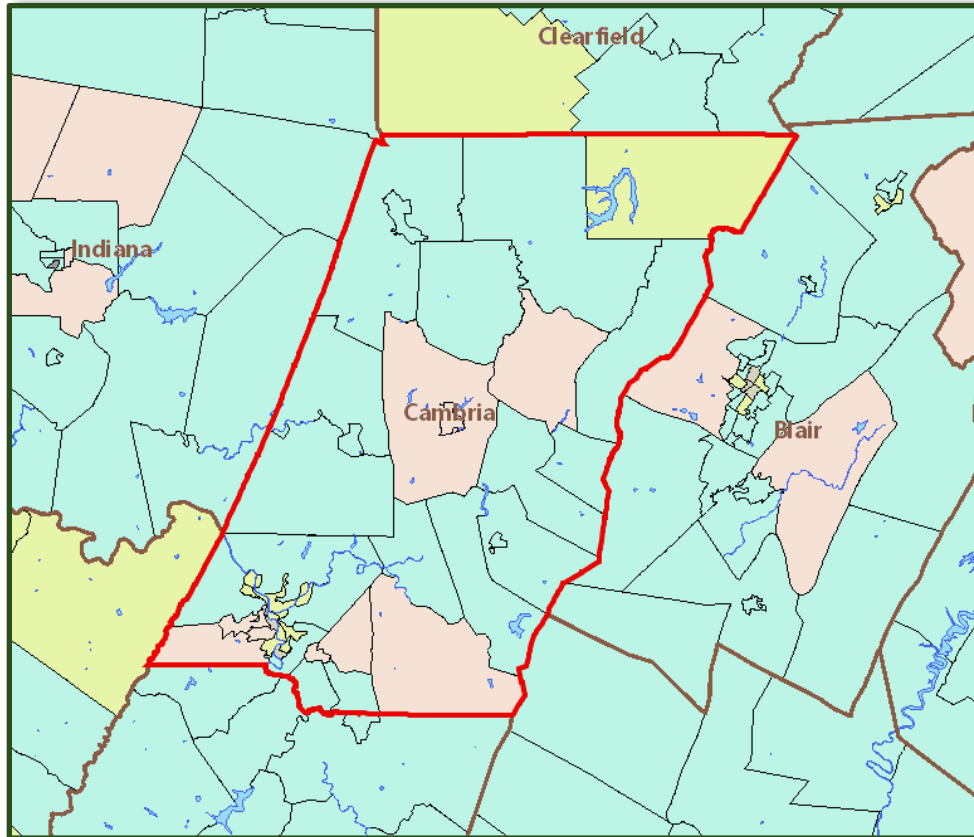
**LARGE INSTITUTION PERFORMANCE EVALUATION
JANUARY 2022**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

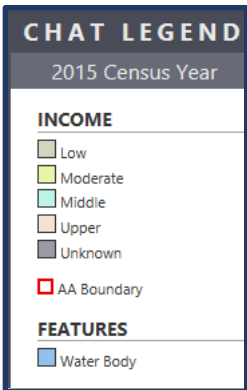
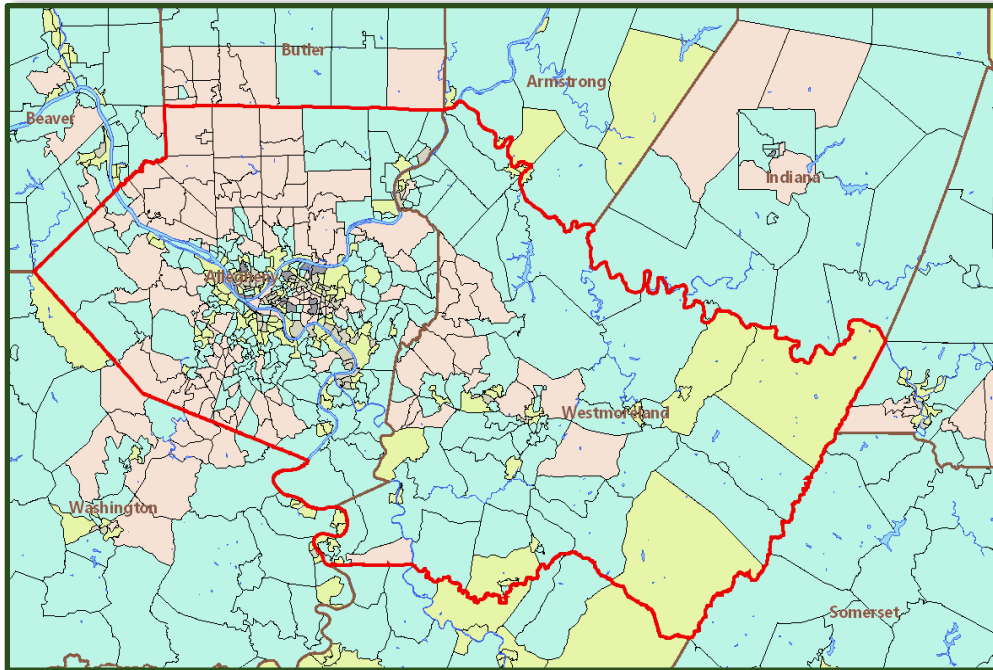
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	33.3%	76	19.9%	0	0.0%	0	0.0%
Middle	6	66.7%	305	80.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	381	100.0%	0	0.0%	0	0.0%
	By Revenue							
Total \$1 Million or less	2	22.2%	107	28.1%	0	0.0%	0	0.0%
Over \$1 Million	1	11.1%	80	21.0%	0	0.0%	0	0.0%
Not Known	6	66.7%	194	50.9%	0	0.0%	0	0.0%
Total	9	100.0%	381	100.0%	0	0.0%	0	0.0%
	By Loan Size							
\$100,000 or less	9	100.0%	381	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	381	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	2	100.0%	107	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	107	100.0%	0	0.0%	0	0.0%

CRA APPENDIX F: ASSESSMENT AREA MAPS

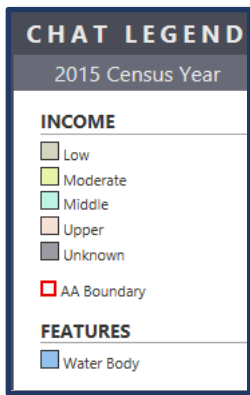
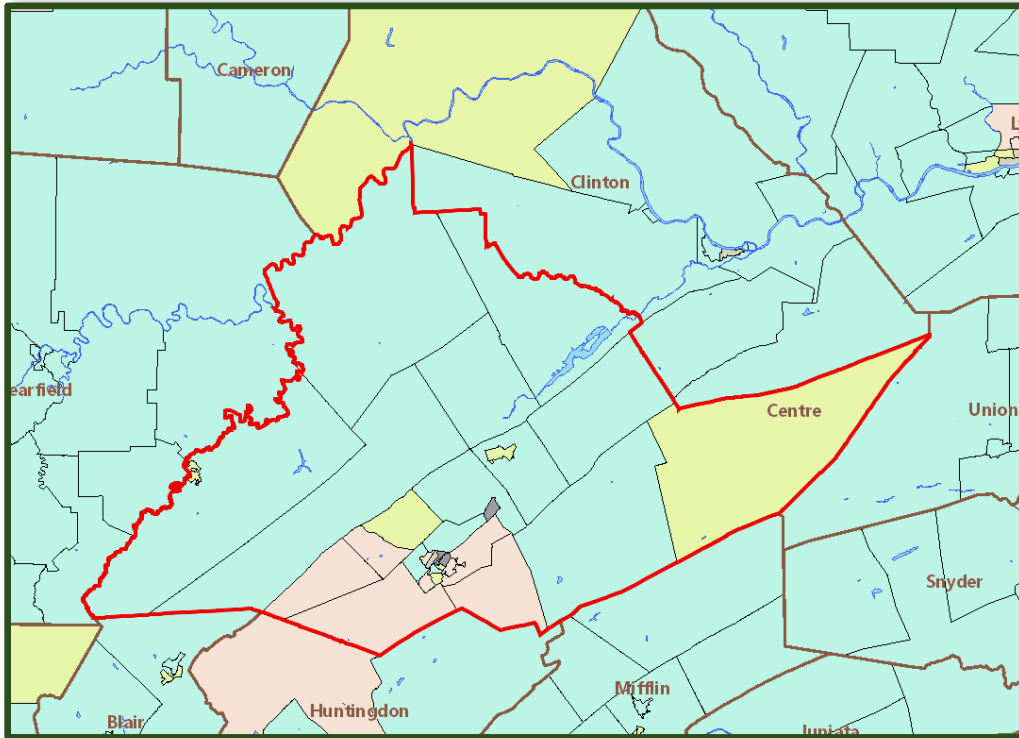
JOHNSTOWN, PA ASSESSMENT AREA (2015 ACS DATA)



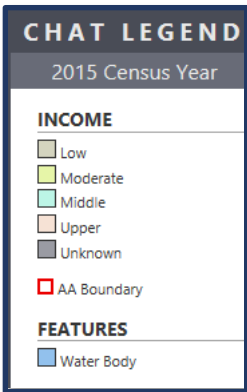
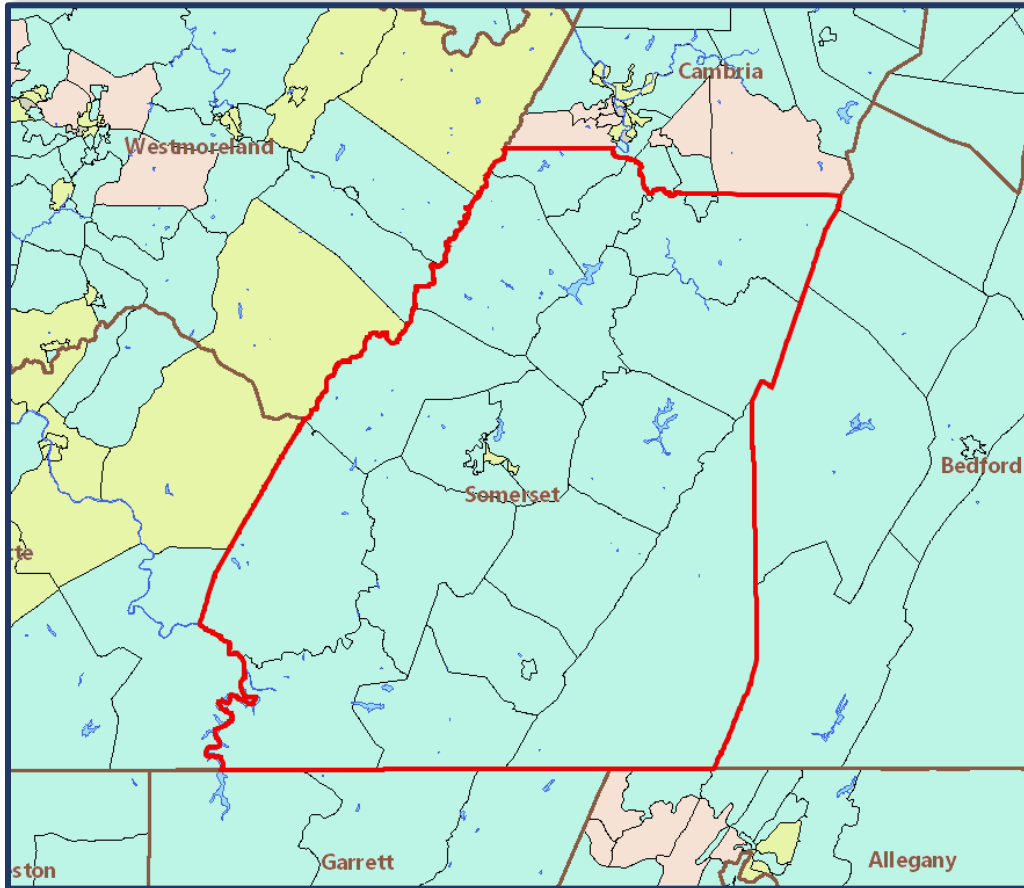
PITTSBURGH, PA ASSESSMENT AREA (2015 ACS DATA)



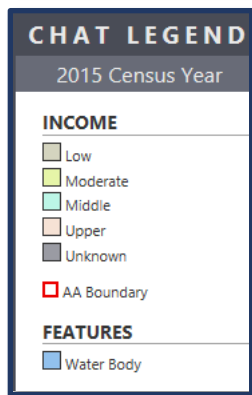
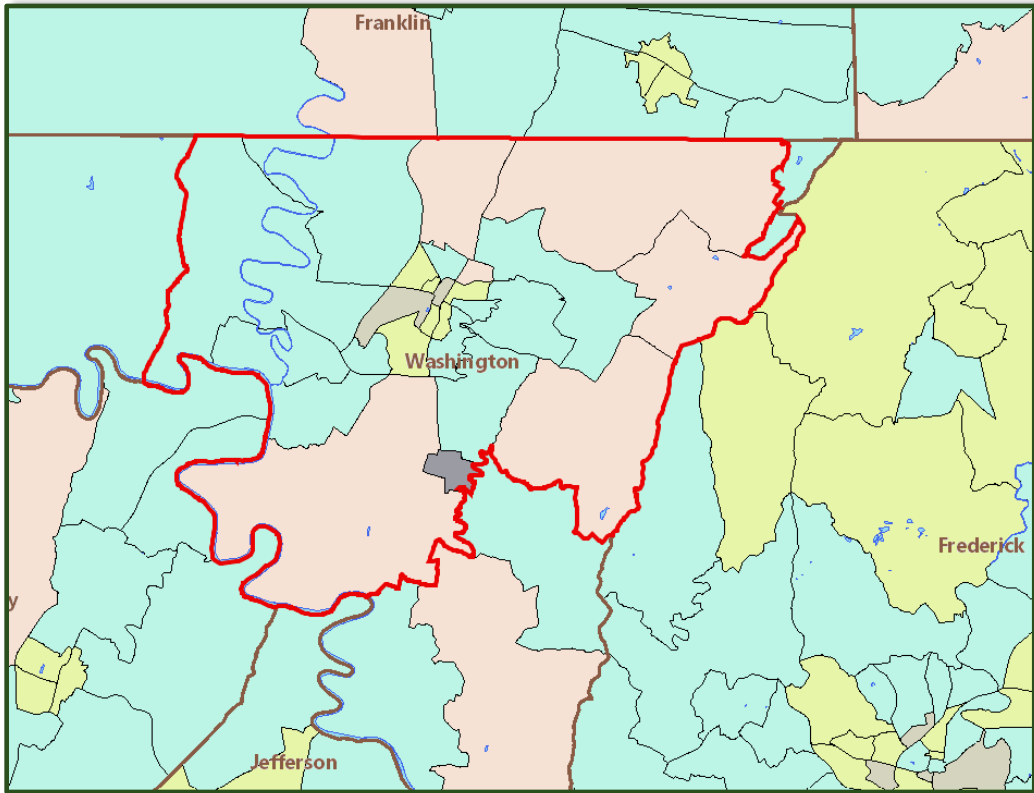
STATE COLLEGE, PA ASSESSMENT AREA (2015 ACS DATA)



SOMERSET COUNTY, PA ASSESSMENT AREA (2015 ACS DATA)



HAGERSTOWN, MD ASSESSMENT AREA (2015 ACS DATA)



HAGERSTOWN, MD ASSESSMENT AREA (2018 OMB DATA)

