

# **PUBLIC DISCLOSURE**

February 28, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Susser Bank  
RSSD # 965789  
100 Crescent Court, Suite 575  
Dallas, Texas 75201

Federal Reserve Bank of Dallas  
2200 North Pearl Street  
Dallas, Texas 75201

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

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**

The Lending Test is rated: **Satisfactory**

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

Susser Bank, Dallas, Texas (the bank) is rated **Satisfactory**. The bank's Community Reinvestment Act (CRA) rating is based on the following conclusions with respect to the performance criteria under the Lending Test and the Community Development (CD) Test set forth in the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions*:

- The bank's average net loan-to-deposit ratio (NLTD) for the most recent 17 quarters is more than reasonable given the bank's size, financial condition, and the credit needs of the assessment areas (AAs).
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Dallas (Reserve Bank) received any CRA-related complaints since the previous evaluation; however, the Reserve Bank received a comment letter since the prior evaluation.
- CD activity reflects excellent responsiveness to needs of the bank's AAs.

## SCOPE OF THE EVALUATION

Examiner utilized the FFIEC's *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as the credit needs and demographic and economic characteristics of the bank's three delineated AAs: Dallas-Fort Worth, Texas Metropolitan AA (DFW Metropolitan AA), Austin, Texas Metropolitan AA (Austin Metropolitan AA), and San Antonio, Texas Metropolitan AA (San Antonio Metropolitan AA). The DFW Metropolitan AA received a full-scope review, as this AA contains approximately 62.1 percent of the bank's lending activity by number of loans, 93.6 percent of the total deposits, and 71.4 percent of total branches. The Austin Metropolitan AA and the San Antonio Metropolitan AA received a limited-scope review; as such, lending and CD activity performance in these AAs received limited weight when evaluating the bank's CRA performance. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio;
- A statistically derived sample of the bank's main loan product, commercial loans, which consist of 89 small business loans selected from a universe of 158 loans originated between January 1, 2021, and December 31, 2021;
- The universe of residential real estate lending activity reported by the bank on its 2018, 2019, and 2020 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers, which totaled 3,769 loan/applications;

- Responsiveness to the CD needs of the bank’s AAs, which includes participation in the Small Business Administration’s Paycheck Protection Program (PPP) lending in response to the COVID-19 pandemic; and
- Information provided by community leaders at small business and affordable housing organizations serving the DFW Metropolitan AA, which was used to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and local economic conditions.

### DESCRIPTION OF INSTITUTION

Susser Bank, a community bank headquartered in Dallas, Texas, of approximately \$1.3 billion in total assets as of September 30, 2021, is characterized as:

- A wholly owned subsidiary of Susser Bank Holdings Corporation, which purchased controlling interest in BancAffiliated, the parent holding company of Affiliated Bank, on July 2, 2018.
- A commercial lender given that commercial loans account for 78.7 percent of the bank’s loan portfolio.
- An intrastate bank that operates five locations in the DFW Metropolitan AA, one branch in the Austin Metropolitan AA, and one branch in the San Antonio Metropolitan AA, as well as a full-service ATM at each location, with the exception of the San Antonio Branch.

The following table reflects the bank’s loan portfolio mix:

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Residential Real Estate	181,896	19.4
Commercial	737,610	78.7
Agricultural	6,491	0.7
Consumer	4,774	0.5
Other	6,166	0.7
Gross Loans	936,937	
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The Office of the Comptroller of Currency rated the bank’s CRA performance as **Satisfactory** at its May 22, 2017, performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of the communities the bank serves.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS<sup>1</sup>

### LENDING TEST

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of the bank’s performance in the DFW Metropolitan AA (full-scope review) and a brief discussion of its performance in the Austin Metropolitan AA and the San Antonio Metropolitan AA (limited-scope review).

The bank’s overall performance under the Lending Test is **Satisfactory**, as the institution reasonably meets the credit needs of its AAs by extending the majority of its lending inside its delineated AAs and through a more than reasonable NLTD ratio. The bank exhibits a reasonable distribution of loans to borrowers of different income levels and businesses different revenue sizes as well as exhibiting a reasonable geographic dispersion of loans to borrowers and businesses in LMI geographies. Small business loans are given more weight in assessing the bank’s performance, as commercial lending represents the largest product by number of originations and dollar volume of the bank’s loan portfolio mix.

### Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending considering performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC) insured institutions. Examiners selected three similarly situated institutions based on asset size, product offerings, and AAs served. The bank’s 17-quarter NLTD ratio of 104.1 percent is more than reasonable and above the range of NLTD ratios of the similarly situated banks, which is between 59.6 percent and 88.6 percent. The bank’s NLTD reflects its willingness to extend credit.

**Table 2**  
**Comparative NLTD Ratios July 1, 2017 – September 30, 2021**

Institution	Location	Asset Size \$(000)	17-Quarter Average NLTD Ratio (%)
Susser Bank	Dallas, Texas	1,303,363	104.1
Similarly Situated Institutions			
First State Bank	Gainesville, Texas	1,520,246	59.6
United Texas Bank	Dallas, Texas	1,280,766	78.4
Vantage Bank Texas	San Antonio, Texas	2,970,209	88.6

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. The bank originated a majority of loans, by number and dollar volume, inside the AAs, as reflected in the table below.

<sup>1</sup> The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the AA apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to AAs.

**Table 3**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Improvement	3	75.0	838	87.2	1	25.0	123	12.8
Home Purchase Conventional	1,380	75.7	416,201	79.3	443	24.3	108,952	20.7
Home Purchase – FHA	214	56.3	53,494	67.6	166	43.7	25,655	32.4
Home Purchase – VA	124	68.1	41,109	74.7	58	31.9	13,912	25.3
Multi-Family Housing	1	33.3	925	38.7	2	66.7	1,463	61.3
Other Purpose Closed-End	31	77.5	9,757	86.9	9	22.5	1,477	13.1
Refinancing	906	67.8	279,699	71.0	431	32.2	113,999	29.0
<b>Total HMDA</b>	<b>2,659</b>	<b>70.5</b>	<b>802,023</b>	<b>75.1</b>	<b>1,110</b>	<b>29.5</b>	<b>265,581</b>	<b>24.9</b>
<b>Total Small Business</b>	<b>67</b>	<b>75.3</b>	<b>17,615</b>	<b>71.9</b>	<b>22</b>	<b>24.7</b>	<b>6,873</b>	<b>28.1</b>
<b>TOTAL LOANS</b>	<b>2,726</b>	<b>70.7</b>	<b>819,638</b>	<b>75.1</b>	<b>1,132</b>	<b>29.3</b>	<b>272,454</b>	<b>24.9</b>

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

The remaining analysis is based on the loans extended inside of the bank’s AAs.

### Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and adequate dispersion throughout the AAs. No conspicuous gaps or anomalies were noted in the lending patterns of the institution. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criterion section for the full-scope review AA.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criterion section for the full-scope review AA.

### Response to Complaints

The bank’s record of taking action, if warranted, in response to written complaints about its performance in helping to meet the credit needs in its AAs is appropriate. The Reserve Bank received a CRA comment letter from the Southern Dallas Progress Community Development Corporation (Southern Dallas Progress) regarding the bank’s lending and CD performance in Southern Dallas. A detailed discussion regarding the comment letter is presented in the Conclusions with Respect to Performance Criterion section for the full-scope review AA.

**COMMUNITY DEVELOPMENT TEST**

The CD Test evaluates the bank’s responsiveness to the needs of its AAs through the extension of qualified loans, donations, and services and the acquisition of qualified investments, considering the bank’s capacity and the availability of such opportunities in the bank’s AAs. The bank’s overall CD performance demonstrates excellent responsiveness to the AAs’ needs. The bank has applied its CD resources strategically to meet the substance of community needs in its AAs primarily through revitalization and stabilization. The bank originated a significant amount of PPP loans in response to the COVID-19 pandemic. The table below reflects the bank’s qualified CD activity originated in its delineated AAs.

**Table 4**

<b>Community Development Activity Assessment Area: All AAs</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	2	578	0	0	6	16	6	16	3
<b>Community Services</b>	0	0	0	0	49	160	49	160	51
<b>Economic Development</b>	2	5,034	1	531	5	5	6	536	0
<b>Revitalization &amp; Stabilization</b>	587	67,576	0	0	0	0	0	0	0
<b>Totals</b>	<b>591</b>	<b>73,188</b>	<b>1</b>	<b>531</b>	<b>60</b>	<b>181</b>	<b>61</b>	<b>712</b>	<b>54</b>

As the bank is determined to have been responsive to the credit needs and opportunities in its delineated AAs, additional activity benefiting a broader statewide or regional area was also given consideration. Therefore, the bank’s CD activity includes 211 qualified CD loans, totaling approximately \$32 million.

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

Compliance with the substantive provisions of anti-discrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN DALLAS-FORT WORTH, TEXAS METROPOLITAN ASSESSMENT AREA**

The bank’s DFW Metropolitan AA consists of the entirety of the Dallas and Tarrant counties, which comprise portions of the Dallas-Plano-Irving, TX Metropolitan Division (MD) and Fort Worth-Arlington-Grapevine, TX MD (refer to Appendix A for an AA map and Appendix B for additional demographic data).

- At the prior performance evaluation, the bank considered the entire Fort Worth-Arlington-Grapevine, TX MD and Dallas-Plano-Irving, TX MD as its AA.
- Current AA represents the counties where the bank’s branches are located.
- According to the 2015 American Community Survey (ACS), the AA consists of 886 census tracts: 154 low-income census tracts (17.4 percent), 279 moderate-income census tracts (31.5 percent), 223 middle-income census tracts (25.2 percent), 224 upper-income census tracts (25.3 percent), and six census tracts with unknown income (0.7 percent).
- According to the June 30, 2021, FDIC Market Share Report, 142 federally insured depository institutions operate 1,004 branches within the AA, holding deposits of \$359.2 billion. The bank ranked 26<sup>th</sup> in deposit market share, with \$1.0 billion or 0.3 percent of total deposits. Deposit market leaders in the AA are Bank of America, National Association (34.0 percent); JPMorgan Chase Bank National Association (26.5 percent); and Texas Capital Bank, National Association (6.1 percent).
- To augment the evaluation, interviews with a leader at a small business organization and an affordable housing organization were conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The small business contact identified technical assistance, capital funding, micro-loans, and tailored loan programs as the main needs for small businesses in the AA. The affordable housing contact highlighted a need for banks to partner with local small nonprofit organizations that assist LMI families with funds to secure affordable housing. The contact also indicated the need for banks in the AA to provide financial literacy and credit counseling to LMI individuals.

**Table 5**

<b>Dallas-Fort Worth Metropolitan Population Change</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Dallas-Fort Worth Metropolitan AA	4,177,173	4,399,529	5.3
Dallas County, TX	2,368,139	2,485,003	4.9
Tarrant County, TX	1,809,034	1,914,526	5.8
Dallas-Plano-Irving, TX MD	4,230,520	4,519,004	6.8
Fort Worth-Arlington-Grapevine, TX MD	2,136,022	2,252,637	5.5
Texas	25,145,561	26,538,614	5.5
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			



- According to the United States Census Bureau, the percentage of AA population change was greater than Dallas County but less than Tarrant County, the MDs, and the state of Texas.
- The city of Dallas, Texas serves as the county seat for Dallas County. The city of Fort Worth, Texas serves as the county seat for Tarrant County.

**Table 6**

<b>Dallas-Fort Worth Metropolitan Median Family Income Change</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Dallas-Fort Worth Metropolitan AA	\$64,213	\$62,041	-3.4
Dallas County, TX	\$58,639	\$55,897	-4.7
Tarrant County, TX	\$71,164	\$69,896	-1.8
Dallas-Plano-Irving, TX MD	\$73,150	\$71,149	-2.7
Fort Worth-Arlington-Grapevine, TX MD	\$70,756	\$69,339	-2.0
Texas	\$63,314	\$62,717	-0.9

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- There are approximately 1,042,796 families in the AA. By family income, approximately 27.7 percent of these families are classified as low-income, 17.7 percent are moderate-income, 18.2 percent are middle-income, and 36.4 percent are upper-income families.
- Of the families in the AA, 14.0 percent are living below poverty, which is slightly higher than the family poverty rate for the state of Texas, at 13.5 percent.
- Income level designations, as indicated above, reflected a decrease in the AA median family income. The percentage change was higher than the MDs and the state of Texas. Dallas County experienced the highest decrease in median family income, with a 4.7 decrease.

**Table 7**

<b>Dallas-Fort Worth Metropolitan Housing Cost Burden</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Dallas-Fort Worth Metropolitan AA	80.1	42.6	43.3	64.3	37.0	21.4
Dallas County, TX	79.4	38.6	43.3	63.3	34.7	23.1
Tarrant County, TX	81.5	49.3	43.3	65.9	40.3	19.4
Dallas-Plano-Irving, TX MD	80.5	44.5	42.4	64.6	39.2	20.9
Fort Worth-Arlington-Grapevine, TX MD	80.8	48.4	42.8	64.5	38.6	19.1
Texas	77.5	46.7	42.4	59.1	33.8	19.4

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

- In 2021, the AA contained 1,697,698 housing units with a median age of 39 years. The AA median housing value of \$137,082 is slightly above the state of Texas’ median housing value of \$136,000.
- The AA’s housing affordability is similar to the affordability in the state of Texas.
- Owner-occupied units in the AA comprises 50.8 percent of the housing stock, with rental and vacant properties representing 40.8 percent and 8.4 percent respectively. Of the owner-occupied housing units, 7.7 percent are located in low-income census tracts, 26.4 percent are in moderate-income census tracts, 29.8 are in middle-income census tracts, 35.9 percent are in upper-income census tracts, and 0.1 percent are in unknown income census tracts.

**Table 8**

<b>Dallas-Fort Worth Metropolitan Unemployment Rates</b>					
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Dallas-Fort Worth Metropolitan AA	4.0	3.9	3.7	3.4	7.5
Dallas County, TX	4.0	3.9	3.8	3.5	7.7
Tarrant County, TX	4.0	3.7	3.5	3.3	7.3
Dallas-Plano-Irving, TX MD	3.8	3.7	3.6	3.3	7.0
Fort Worth-Arlington-Grapevine, TX MD	4.0	3.7	3.5	3.3	7.2
Texas	4.6	4.3	3.9	3.5	7.6

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

- The most common industries in the AA are government entities, health care and social assistance, retail trade, professional and technical services, and food services.
- Major employers in the AA are Wal-Mart, American Airlines, and Texas Health Resources.
- According to 2021 Dun & Bradstreet (D&B) data, 263,385 businesses operated in the AA, of which 241,756 or 91.8 percent reported annual revenues of less than \$1 million.
- In 2020, unemployment rates increased significantly primarily due to the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rates in the AA, counties, MDs, and the state of Texas were low.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA**

Lending activity reflects reasonable responsiveness to AA credit needs. The geographic distribution of loans reflects reasonable dispersion throughout the AA among borrowers and businesses located in various census tracts. The bank’s lending reflects reasonable penetration among borrowers of different income levels and business of different revenue sizes. The bank’s core business focus is commercial lending, with commercial loans comprising 78.7 percent of the loan portfolio; therefore, small business loans were given greater weight when evaluating the bank’s performance. While analyses were conducted for the entire review period, the bank’s performance is considered consistent with data provided for the most recent two-year period.

## Geographic Distribution of Loans

The geographic distribution of home mortgage lending and small business lending was compared to available demographic and aggregate lending data. The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. Generally, the bank extended loans in proximity to its branches, and no conspicuous lending patterns were noted. Home improvement and multi-family lending was not considered in the evaluation of the bank's performance due to limited volume, which would not render a meaningful analysis.

### *Residential Real Estate (HMDA) Lending*

The geographic distribution of home mortgage lending is reasonable. Several factors account for the bank's limited lending in LMI census tracts compared to aggregate HMDA lenders and AA demographics, including a limited availability of owner-occupied housing units in these census tracts. Owner-occupied housing units account for 38.3 percent of units in LMI census tracts in the AA while rental units account for more than half of housing units. Furthermore, the DFW Metropolitan AA is one of the busiest markets in apartment building among large United States metropolitan areas. Additionally, the housing lending market in the AA is also highly competitive, with many large national and regional financial institutions competing for loans.

#### *Home Purchase Lending*

The geographic distribution of home purchase lending is reasonable. In 2019 and 2020, the bank's home purchase lending fell below the AA demographics in low-income census tracts. Aggregate HMDA lenders outperformed the bank and performed better than the AA demographics in low-income census tracts. In 2019 and 2020 the bank's home purchase lending fell significantly below the AA demographics in moderate-income census tracts. Aggregate HMDA lenders performed significantly better than the bank and slightly exceed the AA demographics in moderate-income tracts. While the bank's performance was below aggregate HMDA lenders and the AA demographics, this performance is reasonable considering the limited availability of homes available for purchase in LMI census tracts, the competitive HMDA lending market in which the bank operates, and the fact that rental housing is more readily available in LMI census tracts. The bank's HMDA lending represents 0.2 percent of the HMDA market share in 2019 and 2020 while the leading HMDA lenders in market represented 8.0 percent and 6.0 percent, respectively. The bank's performance, while limited, demonstrates willingness to originate home purchase loans to borrowers in LMI census tracts.

#### *Home Refinance Lending*

The bank's geographic distribution of home refinance lending is reasonable. In 2019 and 2020, the bank's performance fell below the performance of aggregate HMDA lenders. The performance of the bank and aggregate HMDA lenders trailed the AA demographic of owner-occupied housing units in low-income census tracts (5.1 percent) and moderate-income census tracts (19.3 percent). The bank's performance is reasonable when considering the potentially limited demand for refinance loans in LMI tracts, the highly competitive HMDA lending market, and the percentage of loans originated by the bank in this competitive market. The bank's performance, while limited, demonstrates willingness to originate home refinance loans to borrowers residing in LMI census tracts.

Table 9

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Dallas-Fort Worth Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	12	2.0	6.2	3,495	2.0	4.3	10	2.3	6.3	2,004	1.5	4.5	5.1
Moderate	57	9.7	20.8	10,393	6.1	15.0	38	8.6	20.4	7,478	5.5	15.1	19.3
Middle	209	35.6	31.8	53,428	31.2	26.6	184	41.8	32.3	49,614	36.6	27.0	32.4
Upper	309	52.6	40.9	103,796	60.7	53.8	207	47.0	40.6	76,461	56.4	53.0	43.2
Unknown	0	0.0	0.3	0	0.0	0.3	1	0.2	0.4	110	0.1	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>587</b>	<b>100.0</b>	<b>100.0</b>	<b>171,112</b>	<b>100.0</b>	<b>100.0</b>	<b>440</b>	<b>100.0</b>	<b>100.0</b>	<b>135,667</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	3	2.2	3.7	1,276	3.6	2.8	7	1.4	3.4	1,601	1.0	2.9	5.1
Moderate	15	11.2	17.5	1,653	4.6	10.8	23	4.6	13.7	4,608	2.9	9.3	19.3
Middle	37	27.6	30.6	8,426	23.5	22.9	126	25.1	28.6	33,546	21.1	22.4	32.4
Upper	79	59.0	48.1	24,504	68.3	63.4	346	68.9	54.2	119,058	75.0	65.2	43.2
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>134</b>	<b>100.0</b>	<b>100.0</b>	<b>35,859</b>	<b>100.0</b>	<b>100.0</b>	<b>502</b>	<b>100.0</b>	<b>100.0</b>	<b>158,813</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.6	0	0.0	3.4	0	0.0	3.3	0	0.0	2.3	5.1
Moderate	0	0.0	17.8	0	0.0	13.4	0	0.0	14.1	0	0.0	10.1	19.3
Middle	1	50.0	28.6	40	10.4	24.1	0	0.0	26.5	0	0.0	21.9	32.4
Upper	1	50.0	49.0	345	89.6	58.9	0	0.0	55.9	0	0.0	65.4	43.2
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	26.0	0	0.0	20.6	0	0.0	26.9	0	0.0	24.2	22.3
Moderate	0	0.0	35.3	0	0.0	26.0	0	0.0	40.1	0	0.0	33.0	27.9
Middle	0	0.0	19.7	0	0.0	24.5	1	100.0	19.7	925	100.0	22.7	26.4
Upper	0	0.0	19.0	0	0.0	29.0	0	0.0	13.2	0	0.0	20.2	22.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>925</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	16	2.2	5.4	4,865	2.3	5.8	17	1.8	4.8	3,605	1.2	5.0	5.1
Moderate	74	10.1	19.9	12,298	5.9	15.3	62	6.6	17.5	12,214	4.1	13.6	19.3
Middle	255	34.7	31.4	63,038	30.2	25.2	311	32.9	30.5	84,085	28.3	24.5	32.4
Upper	390	53.1	43.1	128,755	61.6	53.5	554	58.6	47.0	197,519	66.4	56.6	43.2
Unknown	0	0.0	0.2	0	0.0	0.2	1	0.1	0.2	110	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>735</b>	<b>100.0</b>	<b>100.0</b>	<b>208,956</b>	<b>100.0</b>	<b>100.0</b>	<b>945</b>	<b>100.0</b>	<b>100.0</b>	<b>297,533</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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

Note: Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.  
Percentages may not total 100.0 percent due to rounding.

### Small Business Lending

The bank’s geographic distribution of small business loans is reasonable. As illustrated in the table below, the bank’s performance in the low-income census tracts was slightly below the percentage of small businesses located such geographies. The bank’s performance in moderate-income census tracts was also slightly below the AA demographic of 24.8 percent of small businesses located in moderate-income census tracts. Based on this performance the bank’s small business lending is responsive to the needs of small businesses located LMI geographies and reflects favorably when considering the bank’s deposit market share in the AA is less than one percent.

**Table 10**

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Dallas-Fort Worth Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	5	8.9	1,024	7.1	9.8
Moderate	11	19.6	2,951	20.4	24.8
Middle	15	26.8	4,336	30.0	26.9
Upper	25	44.6	6,140	42.5	37.6
Unknown	0	0.0	0	0.0	0.8
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>56</b>	<b>100.0</b>	<b>14,451</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2021 FFIEC Census Data</i>					
<i>2021 Dun &amp; Bradstreet Data</i>					
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

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

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The bank’s lending activity reflects reasonable responsiveness to the credit needs of the AA. The borrower distribution of lending to borrowers of different income levels and businesses of different sizes is dispersed reasonably throughout the AA.

### Residential Real Estate (HMDA)Lending

The bank’s borrower distribution of home mortgage lending is reasonable despite falling below the demographic figure and the aggregate HMDA lenders as illustrated in the table below. Several factors may account for the limited level of lending, including LMI families’ difficulty in meeting underwriting criteria such as down payment requirements and closing costs, and limited availability of affordable housing in the AA. Furthermore, home affordability in the city of Dallas, particularly, is the lowest among major Texas metros. During the review period, 23.3 percent, and 16.5 percent of families in the AA are considered low-income and moderate-income families, respectively. Economic analysis from the Federal Reserve Bank of Dallas indicates that 52.0 percent and 63.0 percent of the new and existing homes sold in the third quarter of 2020 in Dallas and Fort Worth, respectively, were affordable for median-income families. With 40.8 percent of

the housing stock being rental properties, the availability of affordable housing for LMI families in the AA is limited. Additionally, the HMDA lending market in which the bank operates is highly competitive, as there are many large national and regional financial institutions competing for loans within a limited LMI borrower pool. The bank's HMDA lending represents 0.2 percent of the HMDA market share for both 2019 and 2020. The bank's performance, while limited, demonstrates willingness to originate home mortgage loans to LMI borrowers in the AA.

#### *Home Purchase Lending*

The bank's distribution of home purchase lending among borrowers of different income levels is reasonable despite falling below the demographics of the AA and aggregate HMDA lenders. In 2019 and 2020, the bank's home purchase lending fell below the AA demographics of low-income families. While aggregate lenders performed better than the bank, aggregate lending also fell below the demographic of low-income families. In 2019 and 2020, the bank's home purchase lending fell below the AA demographics of moderate-income families. Aggregate HMDA lenders in the AA outperformed the bank and performed similar to the AA demographic of moderate-income families. This performance is reasonable when considering the limited availability of affordable housing in the AA and the bank's small percentage of the overall HMDA market share.

#### *Home Refinance Lending*

The bank's borrower distribution of home refinance lending among borrowers of different income levels is reasonable. In 2019 and 2020, the bank's performance fell significantly below the performance of aggregate HMDA lenders. The performance of the bank and aggregate HMDA lenders trailed the AA demographic of LMI families. This performance is reasonable when considering the limited availability of affordable housing in the AA and the bank's small percentage of the overall HMDA market share.

**Table 11**

<b>Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	5	0.9	4.5	748	0.4	2.2	8	1.8	5.4	1,144	0.8	2.8	23.3
<b>Moderate</b>	65	11.1	18.8	12,585	7.4	12.1	67	15.2	21.3	14,218	10.5	14.4	16.5
<b>Middle</b>	124	21.1	22.5	29,726	17.4	18.2	101	23.0	23.7	25,654	18.9	20.2	18.2
<b>Upper</b>	358	61.0	39.8	118,280	69.1	53.8	252	57.3	39.4	92,084	67.9	52.0	42.0
<b>Unknown</b>	35	6.0	14.4	9,773	5.7	13.6	12	2.7	10.1	2,567	1.9	10.6	0.0
<b>Total</b>	587	100.0	100.0	171,112	100.0	100.0	440	100.0	100.0	135,667	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	0	0.0	5.9	0	0.0	2.6	7	1.4	3.4	953	0.6	1.5	23.3
<b>Moderate</b>	11	8.2	13.5	1,622	4.5	7.5	38	7.6	10.8	6,769	4.3	6.3	16.5
<b>Middle</b>	23	17.2	18.4	4,461	12.4	12.8	76	15.1	17.6	17,808	11.2	13.0	18.2
<b>Upper</b>	88	65.7	44.6	27,194	75.8	59.3	370	73.7	48.2	128,901	81.2	60.1	42.0
<b>Unknown</b>	12	9.0	17.6	2,582	7.2	17.8	11	2.2	20.0	4,382	2.8	19.0	0.0
<b>Total</b>	134	100.0	100.0	35,859	100.0	100.0	502	100.0	100.0	158,813	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	6.7	0	0.0	4.1	0	0.0	5.2	0	0.0	2.8	23.3
<b>Moderate</b>	0	0.0	14.4	0	0.0	10.1	0	0.0	13.2	0	0.0	9.0	16.5
<b>Middle</b>	0	0.0	18.7	0	0.0	14.6	0	0.0	18.2	0	0.0	13.7	18.2
<b>Upper</b>	1	50.0	55.8	345	89.6	64.8	0	0.0	59.7	0	0.0	69.2	42.0
<b>Unknown</b>	1	50.0	4.4	40	10.4	6.3	0	0.0	3.6	0	0.0	5.3	0.0
<b>Total</b>	2	100.0	100.0	385	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	5	0.7	4.9	748	0.4	2.3	15	1.6	4.2	2,097	0.7	2.1	23.3
<b>Moderate</b>	77	10.5	16.5	14,347	6.9	10.4	105	11.1	14.9	20,987	7.1	9.8	16.5
<b>Middle</b>	147	20.0	20.4	34,187	16.4	16.1	178	18.9	19.4	43,590	14.7	15.9	18.2
<b>Upper</b>	449	61.1	41.1	146,023	69.9	55.2	623	66.0	42.6	222,985	75.2	55.4	42.0
<b>Unknown</b>	57	7.8	17.0	13,651	6.5	16.0	23	2.4	18.8	6,949	2.3	16.7	0.0
<b>Total</b>	735	100.0	100.0	208,956	100.0	100.0	944	100.0	100.0	296,608	100.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table. Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

### Small Business Lending

The borrower distribution of small business lending is reasonable. The bank extended 51.8 percent by number volume and 36.6 percent by dollar volume to businesses with annual revenues of \$1 million or less, which is significantly below the 91.8 percent of businesses in the AA considered small per the 2021 D&B data. Given the high level of competition in the AA and the fact that the bank extended 46.4 percent of its small business loans in amounts of \$100,000 or less, the bank’s performance is considered responsive as small business owners usually require smaller dollar loan amounts. Moreover, the community contact noted the need for small business loans in the AA and the bank’s lending in the AA demonstrates a responsiveness and willingness to meeting the credit needs of the AA.

**Table 12**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Dallas-Fort Worth Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	29	51.8	5,296	36.6	91.8
<b>Over \$1 Million</b>	25	44.6	8,976	62.1	7.2
<b>Revenue Unknown</b>	2	3.6	179	1.2	1.1
<b>Total</b>	56	100.0	14,451	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	26	46.4	1,760	12.2	
<b>\$100,001 - \$250,000</b>	10	17.9	2,040	14.1	
<b>\$250,001 - \$1 Million</b>	20	35.7	10,651	73.7	
<b>Total</b>	56	100.0	14,451	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	19	65.5	1,269	24.0	
<b>\$100,001 - \$250,000</b>	4	13.8	902	17.0	
<b>\$250,001 - \$1 Million</b>	6	20.7	3,125	59.0	
<b>Total</b>	29	100.0	5,296	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

### Response to Complaints

The bank’s record of taking action, if warranted, in response to written complaints about its performance in helping to meet the credit needs in the DFW AA is appropriate. During the evaluation period, the Reserve Bank received a CRA comment letter from an organization operating in the AA. The organization expressed concerns with the bank’s lending and CD performance specifically in the southern portion of the city of Dallas, Texas. The comment letter asked that the bank increase mortgage lending in low-income census tracts, increase lending to small businesses with annual gross revenues of \$1 million or less, and increase CD activity in



Southern Dallas. In response to these concerns, bank management met with a representative of the organization to discuss the correspondence and how best the bank could support the program and community specifically in the southern portion of Dallas County. In response to the organization’s concern, the bank submitted applications for the Supplemental Nutrition Assistance Program, which is a federal program that provides food purchasing assistance for LMI families or individuals.

**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance demonstrates excellent responsiveness considering the bank’s capacity and the need and available opportunities. The bank has applied its CD resources strategically to meet the substance of community needs, primarily through revitalization and stabilization in the DFW Metropolitan AA. The bank originated 496 PPP loans within the AA, which reflects favorably upon the bank’s responsiveness in meeting the needs of small businesses during the COVID-19 pandemic.

**Table 13**

<b>Community Development Activity Assessment Area: DFW Metropolitan AA</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	2	578	0	0	4	14	4	14	3
<b>Community Services</b>	0	0	0	0	43	153	43	153	51
<b>Economic Development</b>	2	5,034	1	531	4	3	5	534	0
<b>Revitalization and Stabilization</b>	499	62,256	0	0	0	0	0	0	0
<b>Totals</b>	<b>503</b>	<b>67,868</b>	<b>1</b>	<b>531</b>	<b>51</b>	<b>170</b>	<b>52</b>	<b>701</b>	<b>54</b>

**AUSTIN METROPOLITAN ASSESSMENT AREA**  
(Limited-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE AUSTIN METROPOLITAN ASSESSMENT AREA**

The bank has one branch within the AA. As of June 30, 2021, the bank had \$71.4 million deposits in the AA representing a market share of 0.1 percent and 6.0 percent of the bank's total deposits. Given the bank's limited lending activity in the AA, a limited-scope review was conducted. Moreover, the bank's performance in this AA carried limited weight when rating the overall bank's performance in meeting the credit and CD needs of the communities it serves.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE AUSTIN METROPOLITAN ASSESSMENT AREA**

The bank's lending and CD performance in the area is consistent with the institution's overall performance.

**SAN ANTONIO METROPOLITAN ASSESSMENT AREA**  
(Limited-Scope Review)

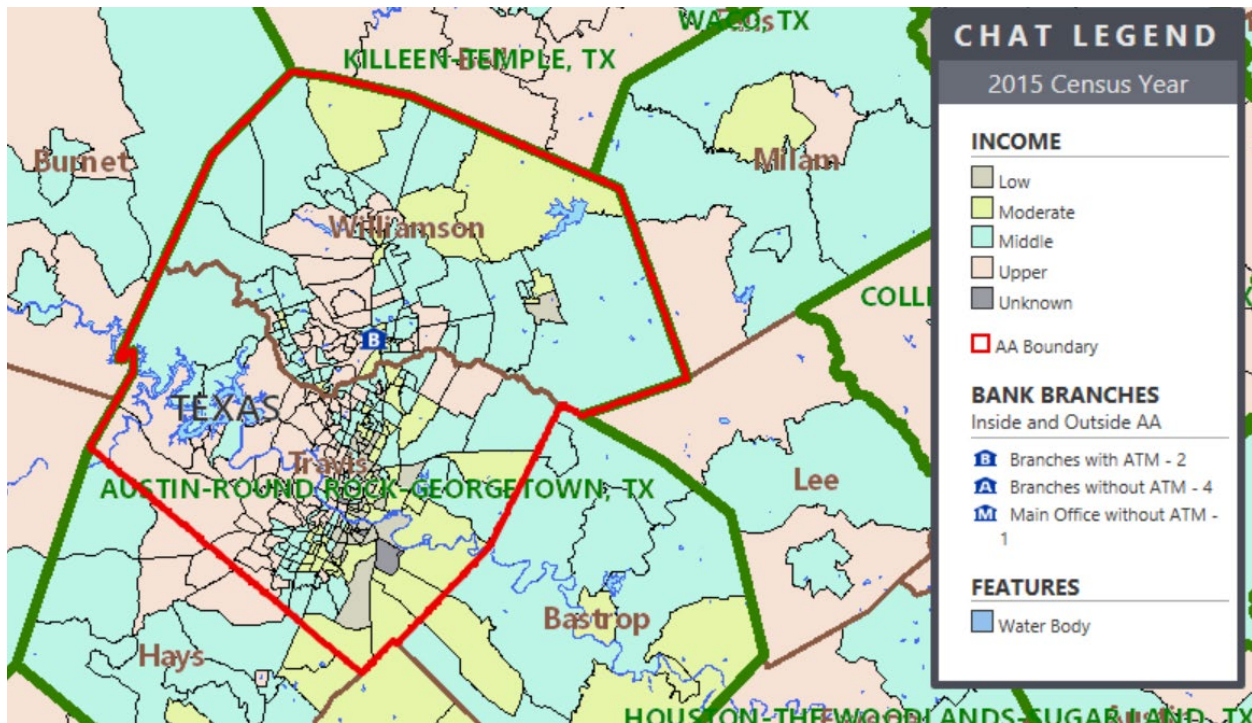
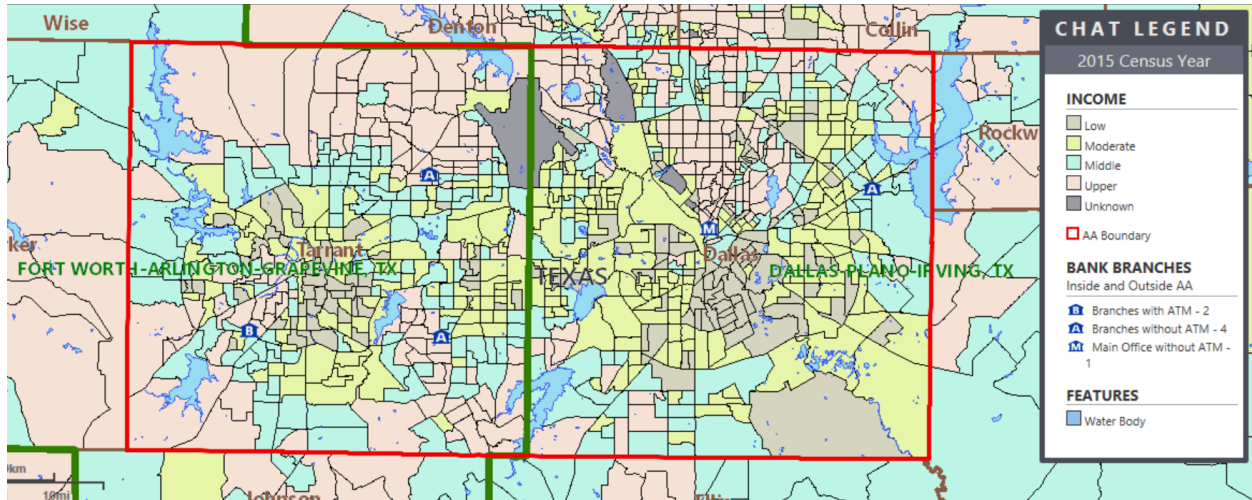
**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN ANTONIO METROPOLITAN ASSESSMENT AREA**

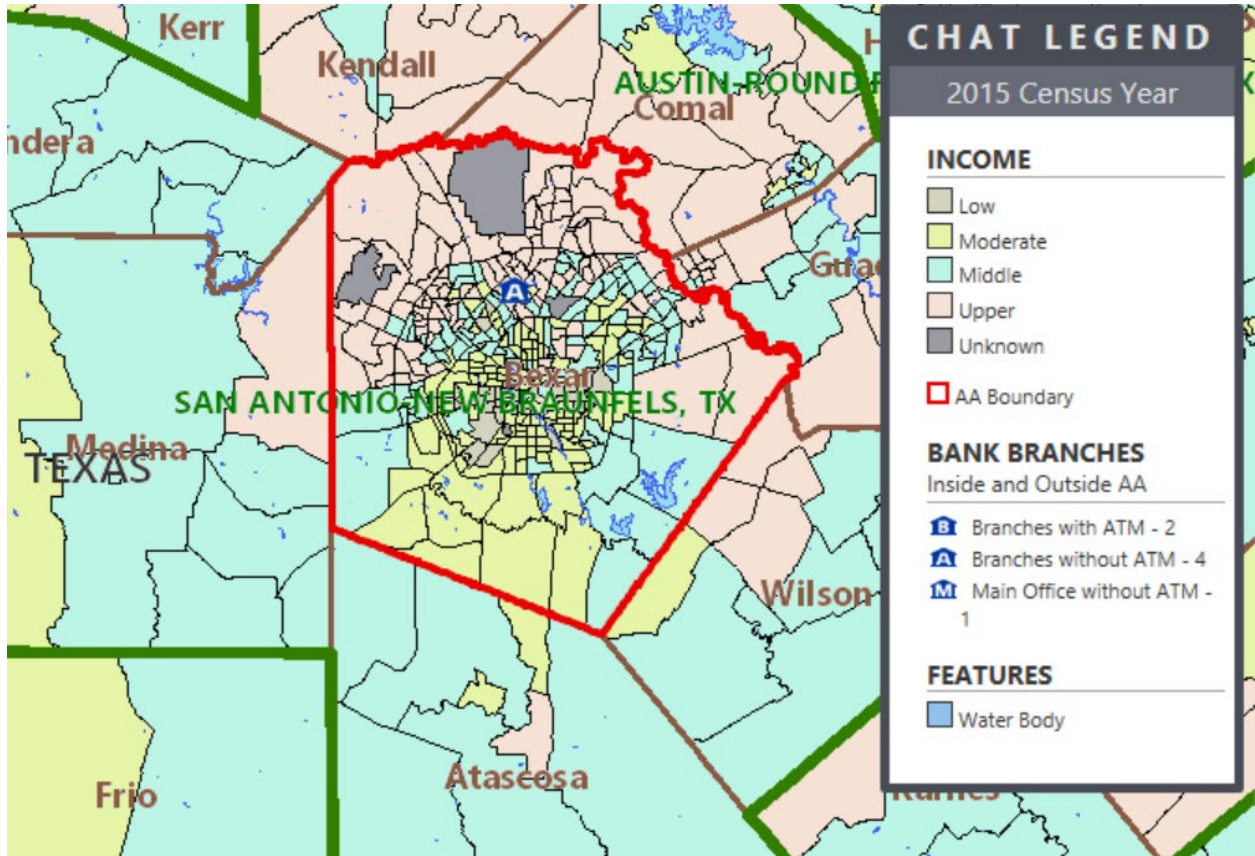
The bank has one branch within the AA, which opened on August 2, 2021. Given the bank's limited lending in the AA and the brief time the branch has been in service, the bank's performance in this AA carried the least weight when rating overall performance in meeting the credit and CD needs of the communities served.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SAN ANTONIO METROPOLITAN ASSESSMENT AREA**

The bank's lending and CD performance in the area is consistent with the institution's overall performance.

APPENDIX A – MAP OF THE ASSESSMENT AREAS





**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table 14**

2021 Dallas-Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	154	17.4	140,533	13.5	48,579	34.6	288,637	27.7
Moderate	279	31.5	312,898	30.0	60,473	19.3	184,751	17.7
Middle	223	25.2	289,478	27.8	25,652	8.9	190,046	18.2
Upper	224	25.3	299,270	28.7	10,889	3.6	379,362	36.4
Unknown	6	0.7	617	0.1	79	12.8	0	0.0
<b>Total AA</b>	<b>886</b>	<b>100.0</b>	<b>1,042,796</b>	<b>100.0</b>	<b>145,672</b>	<b>14.0</b>	<b>1,042,796</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	261,889	66,639	7.7	25.4	159,330	60.8	35,920	13.7
Moderate	507,466	227,902	26.4	44.9	234,447	46.2	45,117	8.9
Middle	463,034	257,001	29.8	55.5	175,017	37.8	31,016	6.7
Upper	462,932	309,506	35.9	66.9	123,070	26.6	30,356	6.6
Unknown	2,377	918	0.1	38.6	1,186	49.9	273	11.5
<b>Total AA</b>	<b>1,697,698</b>	<b>861,966</b>	<b>100.0</b>	<b>50.8</b>	<b>693,050</b>	<b>40.8</b>	<b>142,682</b>	<b>8.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	25,899	9.8	23,412	9.7	2,292	12.2	195	7.0
Moderate	65,272	24.8	59,381	24.6	5,436	28.8	455	16.3
Middle	70,973	26.9	65,720	27.2	4,635	24.6	618	22.2
Upper	99,111	37.6	91,708	37.9	5,922	31.4	1,481	53.2
Unknown	2,130	0.8	1,535	0.6	560	3.0	35	1.3
<b>Total AA</b>	<b>263,385</b>	<b>100.0</b>	<b>241,756</b>	<b>100.0</b>	<b>18,845</b>	<b>100.0</b>	<b>2,784</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>7.2</b>		<b>1.1</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	85	5.3	81	5.1	4	17.4	0	0.0
Moderate	256	16.0	253	16.1	3	13.0	0	0.0
Middle	387	24.2	383	24.3	4	17.4	0	0.0
Upper	865	54.1	853	54.1	11	47.8	1	100.0
Unknown	7	0.4	6	0.4	1	4.3	0	0.0
<b>Total AA</b>	<b>1,600</b>	<b>100.0</b>	<b>1,576</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.5</b>		<b>1.4</b>		<b>0.1</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES

Table 15

2021 Austin Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	11.4	31,879	8.8	10,391	32.6	80,058	22.1
Moderate	61	19.9	61,300	16.9	10,378	16.9	58,783	16.2
Middle	109	35.5	133,878	37.0	8,757	6.5	70,901	19.6
Upper	96	31.3	133,405	36.9	3,529	2.6	152,076	42.0
Unknown	6	2.0	1,356	0.4	723	53.3	0	0.0
<b>Total AA</b>	<b>307</b>	<b>100.0</b>	<b>361,818</b>	<b>100.0</b>	<b>33,778</b>	<b>9.3</b>	<b>361,818</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	70,447	14,466	4.4	20.5	49,572	70.4	6,409	9.1
Moderate	111,296	49,968	15.0	44.9	53,337	47.9	7,991	7.2
Middle	233,702	125,580	37.8	53.7	92,054	39.4	16,068	6.9
Upper	214,242	141,494	42.6	66.0	57,791	27.0	14,957	7.0
Unknown	6,623	712	0.2	10.8	5,039	76.1	872	13.2
<b>Total AA</b>	<b>636,310</b>	<b>332,220</b>	<b>100.0</b>	<b>52.2</b>	<b>257,793</b>	<b>40.5</b>	<b>46,297</b>	<b>7.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,697	7.0	6,994	6.8	636	9.8	67	4.4
Moderate	13,935	12.6	12,907	12.6	898	13.8	130	8.5
Middle	35,340	32.1	32,871	32.2	2,070	31.9	399	26.0
Upper	51,874	47.1	48,239	47.2	2,765	42.6	870	56.6
Unknown	1,379	1.3	1,186	1.2	123	1.9	70	4.6
<b>Total AA</b>	<b>110,225</b>	<b>100.0</b>	<b>102,197</b>	<b>100.0</b>	<b>6,492</b>	<b>100.0</b>	<b>1,536</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.7</b>		<b>5.9</b>		<b>1.4</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	41	3.6	38	3.3	3	27.3	0	0.0
Moderate	151	13.1	146	12.8	5	45.5	0	0.0
Middle	403	34.9	403	35.3	0	0.0	0	0.0
Upper	554	48.0	552	48.3	2	18.2	0	0.0
Unknown	5	0.4	4	0.3	1	9.1	0	0.0
<b>Total AA</b>	<b>1,154</b>	<b>100.0</b>	<b>1,143</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.0</b>		<b>1.0</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table 16**

Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	5	8.5	4.2	1,815	10.3	4.0	3.8
Moderate	5	8.5	13.1	948	5.4	10.1	18.1
Middle	29	49.2	42.7	7,663	43.7	36.5	40.3
Upper	19	32.2	39.6	6,872	39.2	49.2	37.6
Unknown	1	1.7	0.3	242	1.4	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>17,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	3.9	0	0.0	3.2	3.8
Moderate	2	10.5	14.0	537	10.7	9.5	18.1
Middle	12	63.2	39.7	2,820	56.3	31.9	40.3
Upper	5	26.3	42.0	1,655	33.0	55.1	37.6
Unknown	0	0.0	0.3	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>5,012</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.1	0	0.0	2.5	3.8
Moderate	0	0.0	10.3	0	0.0	8.0	18.1
Middle	1	100.0	36.2	453	100.0	30.4	40.3
Upper	0	0.0	50.3	0	0.0	59.0	37.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>453</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	19.7	0	0.0	17.4	22.0
Moderate	0	0.0	19.1	0	0.0	12.8	18.8
Middle	0	0.0	34.2	0	0.0	41.8	33.4
Upper	0	0.0	23.7	0	0.0	26.0	23.2
Unknown	0	0.0	3.3	0	0.0	2.1	2.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	5	6.2	4.1	1,815	7.7	5.3	3.8
Moderate	7	8.6	13.3	1,485	6.3	10.3	18.1
Middle	44	54.3	41.8	11,465	48.7	36.2	40.3
Upper	24	29.6	40.5	8,527	36.2	47.7	37.6
Unknown	1	1.2	0.3	242	1.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>23,534</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table. Percentages may not total 100.0 percent due to rounding.							



Table 17

Distribution of 2018 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Austin Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
<b>Home Purchase Loans</b>							
Low	2	3.4	2.5	567	3.2	1.3	22.5
Moderate	5	8.5	14.3	1,166	6.6	9.8	16.9
Middle	14	23.7	22.2	3,898	22.2	19.0	19.8
Upper	30	50.8	47.8	9,727	55.5	58.1	40.8
Unknown	8	13.6	13.1	2,182	12.4	11.8	0.0
<b>Total</b>	<b>59</b>	<b>100.0</b>	<b>100.0</b>	<b>17,540</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	2	10.5	6.9	210	4.2	3.7	22.5
Moderate	2	10.5	16.8	410	8.2	10.7	16.9
Middle	3	15.8	22.3	879	17.5	17.2	19.8
Upper	9	47.4	43.0	2,884	57.5	57.2	40.8
Unknown	3	15.8	11.1	629	12.5	11.3	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>5,012</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.7	0	0.0	2.8	22.5
Moderate	0	0.0	10.7	0	0.0	8.2	16.9
Middle	0	0.0	21.5	0	0.0	16.5	19.8
Upper	1	100.0	60.5	453	100.0	65.4	40.8
Unknown	0	0.0	3.7	0	0.0	7.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>453</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	4	4.9	3.5	777	3.3	1.7	22.5
Moderate	7	8.6	14.4	1,576	6.7	9.8	16.9
Middle	17	21.0	21.8	4,777	20.3	18.3	19.8
Upper	42	51.9	46.8	13,593	57.8	57.7	40.8
Unknown	11	13.6	13.5	2,811	11.9	12.5	0.0
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>100.0</b>	<b>23,534</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table. Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Table 18

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Austin Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	4.2	3.7	974	4.3	3.5	2	3.3	4.4	662	3.2	4.0	3.8
Moderate	8	11.3	13.2	1,745	7.8	10.5	9	14.8	12.6	2,330	11.3	10.0	18.1
Middle	41	57.7	43.4	11,166	49.8	36.8	19	31.1	45.4	4,977	24.1	38.8	40.3
Upper	19	26.8	39.4	8,515	38.0	49.0	31	50.8	37.5	12,668	61.4	47.0	37.6
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	71	100.0	100.0	22,400	100.0	100.0	61	100.0	100.0	20,637	100.0	100.0	100.0
<b>Refinance Loans</b>													
Low	1	3.2	3.8	420	5.1	3.4	1	1.4	3.3	359	1.5	3.1	3.8
Moderate	4	12.9	11.6	697	8.5	8.2	4	5.4	9.9	760	3.1	7.8	18.1
Middle	14	45.2	37.5	3,298	40.1	30.5	30	40.5	35.7	8,943	37.0	30.0	40.3
Upper	12	38.7	46.9	3,802	46.3	57.6	39	52.7	51.0	14,139	58.4	59.0	37.6
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	8,217	100.0	100.0	74	100.0	100.0	24,201	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
Low	0	0.0	3.1	0	0.0	3.1	0	0.0	3.7	0	0.0	4.4	3.8
Moderate	0	0.0	10.2	0	0.0	8.4	0	0.0	8.3	0	0.0	6.5	18.1
Middle	0	0.0	33.9	0	0.0	26.3	0	0.0	31.4	0	0.0	25.6	40.3
Upper	0	0.0	52.6	0	0.0	62.0	0	0.0	56.5	0	0.0	63.4	37.6
Unknown	0	0.0	0.1	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	25.3	0	0.0	17.2	0	0.0	17.0	0	0.0	17.0	22.0
Moderate	0	0.0	24.1	0	0.0	21.2	0	0.0	24.1	0	0.0	18.1	18.8
Middle	0	0.0	22.8	0	0.0	26.4	0	0.0	39.0	0	0.0	39.2	33.4
Upper	0	0.0	25.3	0	0.0	27.8	0	0.0	18.4	0	0.0	25.5	23.2
Unknown	0	0.0	2.5	0	0.0	7.4	0	0.0	1.4	0	0.0	0.2	2.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	4	3.9	3.8	1,394	4.6	4.7	3	2.2	3.8	1,021	2.3	4.1	3.8
Moderate	12	11.8	12.7	2,442	8.0	10.8	13	9.6	11.3	3,090	6.9	9.3	18.1
Middle	55	53.9	41.4	14,464	47.2	34.0	49	36.3	40.0	13,920	31.0	34.3	40.3
Upper	31	30.4	41.9	12,317	40.2	49.5	70	51.9	44.7	26,807	59.8	52.1	37.6
Unknown	0	0.0	0.2	0	0.0	0.9	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	102	100.0	100.0	30,617	100.0	100.0	135	100.0	100.0	44,838	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

Table 19

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Austin Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	3	4.2	3.5	510	2.3	1.8	3	4.9	3.9	656	3.2	2.0	22.5
Moderate	9	12.7	17.7	1,701	7.6	12.3	7	11.5	18.5	1,769	8.6	12.7	16.9
Middle	11	15.5	23.2	2,841	12.7	20.2	18	29.5	22.1	5,515	26.7	19.2	19.8
Upper	35	49.3	43.3	13,019	58.1	53.7	31	50.8	45.7	12,124	58.7	54.9	40.8
Unknown	13	18.3	12.2	4,329	19.3	11.9	2	3.3	9.8	573	2.8	11.2	0.0
<b>Total</b>	<b>71</b>	<b>100.0</b>	<b>100.0</b>	<b>22,400</b>	<b>100.0</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>100.0</b>	<b>20,637</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	5.0	0	0.0	2.4	3	4.1	2.6	527	2.2	1.3	22.5
Moderate	6	19.4	13.6	1,234	15.0	8.2	8	10.8	11.2	1,580	6.5	7.5	16.9
Middle	9	29.0	20.5	2,064	25.1	16.1	11	14.9	19.3	2,949	12.2	16.2	19.8
Upper	15	48.4	45.1	4,660	56.7	56.6	52	70.3	49.2	19,145	79.1	57.1	40.8
Unknown	1	3.2	15.9	259	3.2	16.7	0	0.0	17.8	0	0.0	17.9	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>8,217</b>	<b>100.0</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>24,201</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.3	0	0.0	3.1	0	0.0	3.8	0	0.0	2.4	22.5
Moderate	0	0.0	14.1	0	0.0	8.9	0	0.0	12.0	0	0.0	8.1	16.9
Middle	0	0.0	19.8	0	0.0	14.6	0	0.0	17.7	0	0.0	15.2	19.8
Upper	0	0.0	58.8	0	0.0	70.1	0	0.0	65.1	0	0.0	71.9	40.8
Unknown	0	0.0	2.0	0	0.0	3.2	0	0.0	1.4	0	0.0	2.4	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	3	2.9	4.0	510	1.7	2.0	6	4.4	3.2	1,183	2.6	1.7	22.5
Moderate	15	14.7	16.2	2,935	9.6	11.0	15	11.1	14.2	3,349	7.5	9.8	16.9
Middle	20	19.6	22.0	4,905	16.0	18.7	29	21.5	20.0	8,464	18.9	17.3	19.8
Upper	50	49.0	43.9	17,679	57.7	54.6	83	61.5	47.1	31,269	69.7	55.8	40.8
Unknown	14	13.7	13.8	4,588	15.0	13.7	2	1.5	15.5	573	1.3	15.4	0.0
<b>Total</b>	<b>102</b>	<b>100.0</b>	<b>100.0</b>	<b>30,617</b>	<b>100.0</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>100.0</b>	<b>44,838</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

**Table 20**

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Austin Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	7.0
Moderate	0	0.0	0	0.0	12.6
Middle	4	44.4	494	23.4	32.1
Upper	5	55.6	1,620	76.6	47.1
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>2,114</b>	<b>100.0</b>	<b>100.0</b>

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

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

**Table 21**

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Austin Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	3	33.3	1,214	57.4	92.7
<b>Over \$1 Million</b>	4	44.4	760	36.0	5.9
<b>Revenue Unknown</b>	2	22.2	140	6.6	1.4
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>2,114</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	3	33.3	150	7.1	
<b>\$100,001 - \$250,000</b>	4	44.4	664	31.4	
<b>\$250,001 - \$1 Million</b>	2	22.2	1,300	61.5	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>2,114</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	2	66.7	414	34.1	
<b>\$250,001 - \$1 Million</b>	1	33.3	800	65.9	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>1,214</b>	<b>100.0</b>	

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

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

**Table 22**

2021 San Antonio Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	33	9.0	28,586	6.8	10,764	37.7	101,106	24.1
Moderate	131	35.8	135,059	32.2	28,860	21.4	74,103	17.7
Middle	92	25.1	114,454	27.3	12,516	10.9	80,739	19.3
Upper	106	29.0	141,184	33.7	5,711	4.0	163,347	39.0
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>366</b>	<b>100.0</b>	<b>419,295</b>	<b>100.0</b>	<b>57,851</b>	<b>13.8</b>	<b>419,295</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.3	40.0	22,334	46.7	6,379	13.3
Moderate	229,217	100,677	27.8	43.9	105,396	46.0	23,144	10.1
Middle	188,524	99,497	27.5	52.8	73,994	39.2	15,033	8.0
Upper	209,621	142,544	39.4	68.0	55,256	26.4	11,821	5.6
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>675,208</b>	<b>361,851</b>	<b>100.0</b>	<b>53.6</b>	<b>256,980</b>	<b>38.1</b>	<b>56,377</b>	<b>8.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,198	5.1	3,709	4.8	465	9.2	24	3.2
Moderate	19,624	23.7	18,203	23.7	1,310	25.9	111	14.9
Middle	23,161	28.0	21,412	27.8	1,586	31.3	163	21.8
Upper	35,549	43.0	33,440	43.5	1,663	32.8	446	59.7
Unknown	193	0.2	147	0.2	43	0.8	3	0.4
<b>Total AA</b>	<b>82,725</b>	<b>100.0</b>	<b>76,911</b>	<b>100.0</b>	<b>5,067</b>	<b>100.0</b>	<b>747</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.0</b>		<b>6.1</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	1.7	12	1.6	1	12.5	0	0.0
Moderate	108	13.8	107	13.8	1	12.5	0	0.0
Middle	204	26.1	202	26.1	2	25.0	0	0.0
Upper	456	58.4	452	58.5	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>781</b>	<b>100.0</b>	<b>773</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.0</b>		<b>1.0</b>		<b>0.0</b>
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table 23**

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: San Antonio Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	1	50.0	50	4.8	5.1
Moderate	0	0.0	0	0.0	23.7
Middle	0	0.0	0	0.0	28.0
Upper	1	50.0	1,000	95.2	43.0
Unknown	0	0.0	0	0.0	0.2
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>1,050</b>	<b>100.0</b>	<b>100.0</b>

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

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

**Table 24**

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: San Antonio Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	2	100.0	1,050	100.0	93.0
<b>Over \$1 Million</b>	0	0.0	0	0.0	6.1
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.9
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>1,050</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	1	50.0	50	4.8	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	50.0	1,000	95.2	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>1,050</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	1	50.0	50	4.8	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	50.0	1,000	95.2	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>1,050</b>	<b>100.0</b>	

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

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

## APPENDIX D – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.