

PUBLIC DISCLOSURE

November 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

One Community Bank
RSSD# 247140

733 North Main Street
Oregon, Wisconsin 53575

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

PERFORMANCE EVALUATION 2

SCOPE OF EXAMINATION 2

DESCRIPTION OF INSTITUTION..... 4

DESCRIPTION OF ASSESSMENT AREA..... 5

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA 7

 LENDING TEST 7

 COMMUNITY DEVELOPMENT TEST..... 8

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 9

MADISON, WISCONSIN MSA #31540- FULL REVIEW..... 10

 DESCRIPTION OF INSTITUTION’S OPERATIONS IN MADISON, WISCONSIN MSA #31540 10

 CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MADISON, WISCONSIN MSA #31540
 16

WISCONSIN NON-MSA – FULL REVIEW 27

 DESCRIPTION OF INSTITUTION’S OPERATIONS IN WISCONSIN NON-MSA 27

 CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN NON-MSA..... 32

APPENDIX A – MAP OF ASSESSMENT AREAS 41

APPENDIX B – 2020 LENDING TABLES 42

APPENDIX C – SCOPE OF EXAMINATION 49

APPENDIX D – GLOSSARY 50

INSTITUTION'S CRA RATING

One Community Bank is rated: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

One Community Bank is meeting the credit needs of its assessment area based on an analysis of lending and community development activities. One Community Bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. A majority of loans are originated in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area and loan distribution reflects reasonable penetration among borrowers of different income levels, including low- and moderate-income, and businesses of different revenue sizes. Neither One Community Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

The bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment areas through community development donations, qualified investments, and community development services. This performance is appropriate considering the bank's capacity as well as the need and availability of such opportunities within the bank's assessment areas.

SCOPE OF EXAMINATION

One Community Bank's CRA performance was evaluated using the Intermediate Small Institution Examination Procedures issued by the Federal Institutions Examination Council (FFIEC). The evaluation was performed within the context of information about the institution and its assessment areas, including the bank's asset size, financial condition, competition, and economic and demographic characteristics.

The bank maintains two delineated assessment areas: Madison, Wisconsin Metropolitan Statistical Assessment Area (MSA) #31540 (Madison, WI MSA) and Wisconsin Non-Metropolitan Statistical Area (Non-MSA) (Wisconsin Non-MSA). A full scope evaluation was conducted for both assessment areas based on the bank's deposit market share, branch concentration, and volume of lending. The bank's Madison, WI MSA assessment area carried greater weight in the analysis due to branch concentration and volume of lending within this assessment area.

Loan products reviewed include Home Mortgage Disclosure Act (HMDA)-reportable loans and a sample of small business loans. These products are considered the bank's primary business lines based on volume by number and dollar amount. The bank's level of community development activity was also evaluated.

Performance within the designated assessment areas was evaluated using intermediate-small bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 17-quarter average loan-to-deposit ratio ending September 30, 2022 was calculated for the bank and compared to a sample of local competitors.
- ***Lending in the Assessment Area*** – The bank’s HMDA-reportable loans originated from January 1, 2020 to December 31, 2021, and a sample of small business loans originated from January 1, 2021 to December 31, 2021, were reviewed to determine the percentage of loans originated within the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank’s HMDA-reportable loans originated from January 1, 2020 to December 31, 2021, and a sample of small business loans originated from January 1, 2021 to December 31, 2021 were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income.
- ***Lending to Borrowers of Different Income and to Businesses of Different Sizes*** – The bank’s HMDA-reportable loans originated from January 1, 2020 to December 31, 2021, and a sample of small business loans originated from January 1, 2021 to December 31, 2021, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses with different revenue sizes.
- ***Response to Substantiated Complaints*** – Complaints were reviewed to determine if any were related to the bank’s record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness.
- ***Community Development Activities*** – The bank’s responsiveness to community development needs through community development donations, qualified investments, and community development services, from October 16, 2018 through November 28, 2022, were reviewed considering the capacity, need, and availability of such opportunities within the assessment area.

In addition, four community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment area. The following types of organizations were contacted: economic development and affordable housing.

DESCRIPTION OF INSTITUTION

One Community Bank is a wholly owned subsidiary of Bosshard Financial Group, a multiple bank holding company, headquartered in La Crosse, Wisconsin. The bank's main office is located in Oregon, Wisconsin and the bank operates eight additional full-service branches and one drive-up location. In addition, the bank maintains eight full-service interactive teller machines (ITMs) and four cash-only automated teller machines (ATMs) all within the bank's assessment area. On September 1, 2018, just prior to the previous evaluation, the bank merged with its sister bank Grand Marsh State Bank located in Grand Marsh, Wisconsin, acquiring three branches in the Wisconsin Non-MSA assessment area (Adams and Marquette County). Although the merger occurred prior to the previous evaluation, this is the first evaluation with the current assessment area delineation. Further, on February 20, 2020, the bank merged with McFarland State Bank located in McFarland, Wisconsin. Although this merger did not result in any assessment area changes, it did expand the bank's presence in Dane County, adding five branches in the Madison, WI MSA.

According to the Uniform Bank Performance Report (UBPR), the bank reported total assets of \$1.8 billion as of September 30, 2022. One Community Bank is primarily a commercial lender, representing 81.6 percent of total loans, it also offers residential real estate, agricultural, and consumer loan products. The bank offers a full range of traditional deposit and credit products to meet the banking needs of its assessment areas. In response to the COVID-19 pandemic, the bank participated in the government-sponsored loan program, the Small Business Administration's (SBA) Payment Protection Program (PPP), and the growth within the commercial lending portfolio can be partially attributed to this program alongside the recent mergers.

According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, One Community Bank ranked sixth out of 38 FDIC-insured financial institutions operating within the assessment areas. The bank held roughly \$1.4 billion in deposits, representing a market share of 5.7 percent. The financial institutions with the largest percentage of the deposit market share are BMO Harris Bank National Association (N.A.) at 15.2 percent, U.S. Bank N.A. (10.8 percent), and Associated Bank N.A. (8.2 percent). Details of the allocation of the bank's loan portfolio are provided in the following table.

Composition of Loan Portfolio as of September 30, 2022		
Type	Dollar Volume (\$ in 000s)	% of Portfolio
Commercial	1,253,283	81.6
Residential Real Estate	261,859	17.0
Agricultural	16,549	1.1
Other	3,512	0.2
Consumer	1,712	0.1
Total	1,536,915	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on October 15, 2018.

DESCRIPTION OF ASSESSMENT AREA

One Community Bank delineates two non-contiguous assessment areas in the state of Wisconsin. The Madison, Wisconsin MSA #31540 (Madison, WI MSA) includes Dane County in its entirety and the Wisconsin Non-MSA is comprised of Adams and Marquette Counties in their entireties. The combined assessment area includes a total of 119 census tracts and is comprised of four low-income, 19 moderate-income, 61 middle-income, 29 upper-income, and six unknown-income census tracts. The unknown-income tracts include a portion of the University of Wisconsin, municipality land, Lake Mendota, Lake Monona, and adjacent coast lines. Additionally, according to the FFIEC, as of 2021 there are five middle-income census tracts in Marquette County designated as underserved, due to their remote rural location.

As noted previously, the bank's delineated assessment area changed just prior to the previous evaluation, with the addition of the Wisconsin Non-MSA assessment area. As a result of the Grand Marsh State Bank merger, the bank expanded its assessment area to include Adams and Marquette Counties, delineating the Wisconsin Non-MSA assessment area. While the bank's merger with McFarland State Bank did not change the assessment area delineation, it did expand its presence within the Madison, WI MSA with the addition of five branch offices. During 2021, the bank closed one location (located in an upper-income census tract) within the Madison, WI MSA. The bank's current branch network is comprised of nine full-service branches and one drive-thru only location across the bank's combined assessment area. In addition, the bank maintains two standalone ATMs, two ATMs at branch locations, and eight ITMs at branch locations.

The bank's low-income census tracts are home to 3,503 families, representing 2.7 percent of all families in the assessment area. The bank's moderate-income census tracts are home to 14,102 families, representing 10.7 percent of all families in the assessment area. A total of 247,795 total housing units are located in the combined assessment area, of which 7,961 (3.2 percent) are located in low-income census tracts and 34,587 (14.0 percent) are located in moderate-income census tracts. Within the low-income census tracts 12.7 percent are owner-occupied while 36.0 percent are owner-occupied within moderate-income census tracts. This indicates there are sufficient opportunities for home ownership within these tracts.

A total of 28,224 businesses are located in the combined assessment area, of which 605 (2.1 percent) and 3,779 (13.4 percent) are located in low- and moderate-income census tracts, respectively. Businesses with gross annual revenues less than \$1 million represent 90.5 percent of total businesses, evidencing numerous opportunities for small business lending in the combined assessment area. Additional assessment area demographic information is provided in the following table.

Assessment Area: 2021 Combined AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.4	3,503	2.7	902	25.7	25,229	19.2
Moderate-income	19	16.0	14,102	10.7	2,332	16.5	22,406	17.0
Middle-income	61	51.3	75,835	57.7	4,421	5.8	30,019	22.8
Upper-income	29	24.4	37,733	28.7	920	2.4	53,809	40.9
Unknown-income	6	5.0	290	0.2	135	46.6	0	0.0
Total Assessment Area	119	100.0	131,463	100.0	8,710	6.6	131,463	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	7,961	1,011	0.8	12.7	6,648	83.5	302	3.8
Moderate-income	34,587	12,461	9.3	36.0	18,297	52.9	3,829	11.1
Middle-income	137,872	80,496	59.9	58.4	41,673	30.2	15,703	11.4
Upper-income	62,219	40,365	30.0	64.9	19,570	31.5	2,284	3.7
Unknown-income	5,156	20	0.0	0.4	4,691	91.0	445	8.6
Total Assessment Area	247,795	134,353	100.0	54.2	90,879	36.7	22,563	9.1
	Total Businesses Tract		Businesses by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	605	2.1	537	2.1	63	2.7	5	1.6
Moderate-income	3,779	13.4	3,331	13.0	419	17.7	29	9.1
Middle-income	14,406	51.0	13,141	51.5	1,109	46.8	156	49.1
Upper-income	8,930	31.6	8,068	31.6	737	31.1	125	39.3
Unknown-income	504	1.8	461	1.8	40	1.7	3	0.9
Total Assessment Area	28,224	100.0	25,538	100.0	2,368	100.0	318	100.0
	Percentage of Total Businesses:			90.5		8.4		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	4	0.4	4	0.4	0	0.0	0	0.0
Moderate-income	36	3.6	33	3.4	3	9.7	0	0.0
Middle-income	640	63.7	625	64.2	15	48.4	0	0.0
Upper-income	323	32.1	310	31.8	13	41.9	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	1,005	100.0	974	100.0	31	100.0	0	0.0
	Percentage of Total Farms:			96.9		3.1		0.0

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

One Community Bank's performance relative to the lending test is Satisfactory. Overall, the bank is meeting the credit needs of its assessment areas based on an analysis of the bank's lending activities. The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. A majority of home mortgage and small business loans were originated in the assessment area. Further, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area, and lending activities reflect reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses of different revenue sizes. Finally, no CRA-related complaints were received by One Community Bank nor this Reserve Bank since the previous evaluation.

Loan-to-Deposit Ratio

One Community Bank had a reasonable loan-to-deposit ratio (considering seasonal variations) given the bank's size, financial condition, and the credit needs of its assessment areas. As of September 30, 2022, the bank's 17-quarter average LTD was 103.5 percent, which was above all of the local competitors. The bank's LTD is a decrease from the previous evaluation, where the average LTD ratio over 17-quarters was 109.1 percent. The following table compares the bank's LTD ratio to its local competitors.

Comparative Loan-to-Deposit Ratios as of September 30, 2022	
Institution	17-Quarter Average (%)
One Community Bank	103.5
Peer Avg – Local	84.5
Monona Bank	98.0
State Bank of Cross Plains	88.5
Incredible Bank	87.8
Peoples State Bank	86.9
Waukesha State Bank	77.4
Blackhawk Bank	68.1

Assessment Area Concentration

One Community Bank originated a majority of its loans in the bank's assessment area. The bank originated 79.6 percent of its total loans by number and 82.1 percent by dollar inside the assessment area during the review period. The bank originated 79.2 percent by number and 82.1 percent by dollar of its HMDA-reportable loans inside its assessment areas. Further, the bank originated 86.7 percent by number and 82.4 percent by dollar of its small business loans inside its assessment areas. Ultimately, the percentage of HMDA-reportable and small business originations

within the assessment area indicates the bank is actively serving the credit needs of the community.

The following table summarizes the bank’s lending inside and outside its assessment area for HMDA-reportable loans from January 1, 2020 to December 31, 2021 and a sample of small business loans from January 1, 2021 to December 31, 2021.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	16	84.2	3,713	92.3	3	15.8	311	7.7
Home Purchase - Conventional	438	71.1	129,607	74.1	178	28.9	45,283	25.9
Multi-Family Housing	31	75.6	74,369	91.5	10	24.4	6,910	8.5
Refinancing	1,193	82.7	311,905	83.7	249	17.3	60,936	16.3
Total HMDA related	1,678	79.2	519,595	82.1	440	20.8	113,440	17.9
Small Business related	85	86.7	23,627	82.4	13	13.3	5,036	17.6
Total Loans	1,763	79.6	543,221	82.1	453	20.4	118,476	17.9

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

Geographic and Borrower Distribution

The geographic distribution of HMDA-reportable and small business loans reflects reasonable dispersion throughout the assessment areas. The bank’s distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes is reasonable given the demographics of the bank’s assessment areas. Additional information regarding the bank’s geographic and borrower distribution is found within the respective assessment area sections below.

Response to Complaints

Neither One Community Bank nor this Reserve Bank have received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

The bank’s performance relative to the community development test is Satisfactory. The bank’s community development performance demonstrates adequate responsiveness to the needs of the assessment area through qualified investments and donations and community development services, as appropriate, considering the bank’s capacity and the availability of such opportunities

for community development in the bank’s assessment area.

Lending, Investment, and Services Activities

During the evaluation period, the bank did not originate any community development loans. Although the bank originated no community development loans, their investment and service activities were sufficient considering the bank’s capacity and the availability of such opportunities within the bank’s assessment area. This is the bank’s first evaluation under the FFIEC’s Intermediate Small Institution Examination Procedures which includes the Community Development Test.

One Community Bank made 17 qualified investments totaling nearly \$10.9 million. During the evaluation period the bank provided 13 qualified donations totaling \$61,280 to organizations which primarily focus on community services tailored to meet the needs of low-and moderate-income individuals and households in the bank’s assessment areas.

One Community Bank provided 172 community development services hours to 12 different organizations. A majority of the service hours were dedicated to organizations with a community service focus, in addition to one organization with an economic development focus. Through these service hours, these organizations received assistance with financial planning while also providing essential services to programs that support low- and moderate-income individuals. Lastly, bank employees served as valuable resources and provided financial expertise while serving as board or committee members for a majority of these organizations.

Additional information with respect to the bank’s community development activities is found within the individual assessment area discussions.

Community Development Activities October 16, 2018 – November 28, 2022								
Assessment Area	Loans		Investments		Donations		Services	
	#	\$	#	\$	#	\$	#	Hours
Full Review								
Madison, WI MSA #31540	0	0	15	10,096,000	10	46,280	9	157.5
Wisconsin Non-MSA	0	0	2	768,000	3	15,000	3	14.5
Total Qualified	0	0	17	10,864,000	13	61,280	12	172

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

MADISON, WISCONSIN MSA #31540– FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank’s performance in the Madison, Wisconsin MSA assessment area. The scope is consistent with the scope of examination described within the institution summary. For further information, refer to the “Scope of Examination” section for details.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN MADISON, WISCONSIN MSA #31540

The Madison, WI MSA consists of Dane County in its entirety. Although the assessment area has not changed since the previous evaluation, the bank has expanded their presence as a result of the merger with McFarland State Bank adding an additional five branches within Dane County. Based on 2021 FFIEC Census Data, the census tract composition includes four low-income, 17 moderate-income, 51 middle-income, 29 upper-income, and six unknown-income census tracts. The unknown-income census tracts include a portion of the University of Wisconsin, municipality land, Lake Mendota, Lake Monona, and adjacent coast lines. There are no underserved or distressed middle-income census tracts located in the assessment area.

Within the assessment area, the bank operates its main office, located in Oregon, Wisconsin along with five full-service branches and one drive-up only location in the cities of McFarland, Middleton, Stoughton, Sun Prairie, and Waunakee. The bank also operates eight ITMs and four cash-only ATMs throughout the assessment area. All branches are located in middle- or upper-income census tracts. As mentioned previously, changes to the branch network in the assessment area include a branch closure in an upper-income census tract (Oregon, Wisconsin) on September 1, 2021 and a branch relocation (Middleton, Wisconsin) on January 15, 2022, also within an upper-income census tract.

According to the June 30, 2021, FDIC Deposit Market Share Report, One Community Bank ranked eighth among 35 FDIC-insured financial institutions operating in the Madison, WI MSA assessment area. The bank held \$1.1 billion in deposits inside of the market, representing 5.0 percent of the market share. The top three leaders in market share include BMO Harris Bank, N.A. (15.5 percent), U.S Bank, N.A. (10.3 percent), and Associated Bank, N.A. (7.7 percent). The 35 banks competing for deposits and loans including One Community Bank have 144 total offices in the assessment area. Although the institution operates in a moderately competitive banking environment, the bank’s performance demonstrates an ability to maintain a strong presence in the assessment area among institutions of similar asset size.

In 2021, One Community Bank ranked 10th among 436 HMDA-reporters, originating 672 HMDA - reportable loans in the assessment area. By comparison, the first ranked institution, Summit Credit Union, originated 8,278 HMDA-reportable loans and the second ranked institution, University of Wisconsin Credit originated 7,964 HMDA-reportable loans.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix B for 2020 demographic information.

Assessment Area: 2021 Madison, WI MSA 31540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.7	3,503	2.9	902	25.7	23,277	19.1
Moderate-income	17	15.9	12,701	10.4	2,158	17.0	20,324	16.6
Middle-income	51	47.7	67,951	55.6	3,793	5.6	27,661	22.6
Upper-income	29	27.1	37,733	30.9	920	2.4	50,916	41.7
Unknown-income	6	5.6	290	0.2	135	46.6	0	0.0
Total Assessment Area	107	100.0	122,178	100.0	7,908	6.5	122,178	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	7,961	1,011	0.8	12.7	6,648	83.5	302	3.8
Moderate-income	29,999	10,735	8.8	35.8	17,668	58.9	1,596	5.3
Middle-income	115,168	70,546	57.5	61.3	39,860	34.6	4,762	4.1
Upper-income	62,219	40,365	32.9	64.9	19,570	31.5	2,284	3.7
Unknown-income	5,156	20	0.0	0.4	4,691	91.0	445	8.6
Total Assessment Area	220,503	122,677	100.0	55.6	88,437	40.1	9,389	4.3
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	605	2.3	537	2.2	63	2.8	5	1.8
Moderate-income	3,530	13.1	3,104	12.8	403	17.6	23	8.2
Middle-income	13,314	49.5	12,144	49.9	1,045	45.7	125	44.5
Upper-income	8,930	33.2	8,068	33.2	737	32.2	125	44.5
Unknown-income	504	1.9	461	1.9	40	1.7	3	1.1
Total Assessment Area	26,883	100.0	24,314	100.0	2,288	100.0	281	100.0
	Percentage of Total Businesses:		90.4		8.5		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	0.5	4	0.5	0	0.0	0	0.0
Moderate-income	22	2.6	21	2.5	1	5.3	0	0.0
Middle-income	494	58.5	489	59.2	5	26.3	0	0.0
Upper-income	323	38.2	310	37.5	13	68.4	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	845	100.0	826	100.0	19	100.0	0	0.0
	Percentage of Total Farms:		97.8		2.2		0.0	

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Population Change

The following table presents the population trends for the assessment area, the Madison, WI MSA in its entirety, and the state of Wisconsin from 2010 to 2015. According to 2015 U.S. Census Bureau demographic data, the assessment area experienced an increase in population of 4.5 percent from 2010 to 2015. This outpaced the rate of growth for both the state of Wisconsin (1.0 percent) and the Madison, WI MSA (3.7 percent). According to a community representative, Dane County has experienced a growth in population as the area has been attractive for former residents to return along with new residents relocating from coastal cities as a result of the pandemic. Additionally, the representative stated that due to Dane County being the hub of the state’s government alongside a major university, younger residents continue to migrate towards the area which has attributed to the increase in population within the assessment area.

Population Change			
Area	2010 Population	2015 Population	Percent Change
Assessment Area	488,073	510,198	4.5
Madison, WI MSA	605,435	627,618	3.7
State of Wisconsin	5,686,986	5,742,117	1.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

Income Characteristics

According to 2021 FFIEC Census Data, the assessment area is comprised of 122,178 families, of which 19.1 percent are designated as low-income, 16.6 percent are moderate-income, 22.6 percent are middle-income, and 41.7 percent are upper-income. Further, 6.5 percent of the families residing within the assessment area live below the poverty line, slightly below the state of Wisconsin’s poverty rate of 8.6 percent.

The following table compares the median family income (MFI) for the assessment area, the Madison, WI MSA in its entirety, and the state of Wisconsin. According to the 2011-2015 Census Bureau data, MFI in the assessment area declined 4.1 percent from 2010 to 2015. Similarly, both the Madison, WI MSA and the state of Wisconsin experienced a decline in MFI from 2010 to 2015 of 2.7 percent and 3.6 percent, respectively. According to a community representative, many entry level positions, and certain industries have remained stagnant in terms of wage growth within the assessment area as well as for the state of Wisconsin.

Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	88,200	84,619	-4.1
Madison, WI MSA	83,561	81,321	-2.7
State of Wisconsin	70,639	68,064	-3.6

*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.*

Housing Characteristics

There are a total of 220,503 housing units in the assessment area. The majority of housing units are owner-occupied at 55.6 percent, rental units comprise 40.1 percent, while 4.3 percent are vacant units. Comparatively, the Madison, WI MSA in its entirety, is consistent with the owner-occupied units, at 57.8 percent, slightly below the percentage of rental units at 36.7 percent, and consistent with the percentage of vacant units, at 5.5 percent. However, both the median housing value (\$230,775) and the median gross rent (\$924) in the assessment area exceed the median housing value (\$219,197) and the median gross rent (\$902) in the entire MSA.

The following table presents housing cost burden for individuals within the assessment area, the Madison, WI MSA, and the state of Wisconsin for 2021. The cost burden is a measure of affordability via a comparative analysis of homeowners and renters of different income levels that spend 30.0 percent or more of their income on housing costs. As evidenced in the following table, low-income individuals are impacted at a higher rate than moderate-income individuals as both homeowners and renters. In the assessment area renters experience the highest cost burden, all renters (43.8 percent), and especially for low-income renters (82.6 percent). Similarly, low-income homeowners experienced a high-cost burden at 72.3 percent.

Although community representatives stated the assessment area has a large rental market, likely due to the presence of the University of Wisconsin, these rental units are considered to be luxury apartments and marketed towards college students. Additionally, given the luxury apartment pricing, many students seek rental opportunities in off campus locations which increases rental competition among students and local citizens, and ultimately results in rental rate increases. A community representative did indicate that there is a recent surge of workforce housing to offset the student housing in the area but noted the challenges of bringing affordable housing to the area with the number of individuals renting in the market.

Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	82.6%	31.9%	43.8%	72.3%	42.6%	18.5%
Madison, WI MSA	80.5%	31.0%	42.3%	72.4%	40.7%	18.8%
Wisconsin	76.3%	30.8%	40.3%	69.0%	35.4%	19.2%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

Employment Characteristics

The following table presents the unemployment trends for the assessment area, the Madison, WI MSA in its entirety, and the state of Wisconsin from 2017 to 2021. Unemployment trends across all areas remained stable until 2020, when overall rates increased. In 2021, the assessment area saw unemployment rates of 2.8 percent, a decrease from the prior year when it averaged 4.8 percent due to the results of the COVID-19 pandemic. This decrease was similar to the state of Wisconsin, which experienced unemployment declines from 6.3 percent in 2020 to 3.8 percent in 2021. Overall, the assessment area experiences unemployment at a similar rate as the state of Wisconsin.

A community representative confirmed that unemployment rates were heavily impacted by the COVID-19 pandemic. The community representative stated that Madison is still in the process of returning to pre-pandemic levels. The representative stated with university and government staff still working remotely it has created challenges for many local small businesses. Small businesses are experiencing sustainability challenges as they have experienced low sales since foot traffic has significantly declined. Further, a community representative indicated that although various industries within the area offer a variety of wages, many businesses' entry level wages tend to be lower and are not attractive to local residents.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	2.4	2.2	2.3	4.8	2.8
Madison, WI MSA	2.5	2.3	2.4	5.0	2.9
Wisconsin	3.3	3.0	3.2	6.3	3.8

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

Industry Characteristics

With Madison serving as the state capital, the government sector represents a large percentage of the assessment area's workforce. The assessment area also has a large percentage of education employees due to the presence of local universities. Additionally, there is a large number of retail and healthcare employers throughout the assessment area. A community representatives noted

that employment and business conditions for all industries have remained relatively stable despite extreme challenges due to the COVID-19 pandemic. A representative stated that the technology and healthcare sectors have more competitive wages, while non-profits are service positions have lower entry wages.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. Both representatives provided information on affordable housing, employment, and economic development needs within the assessment area as well as providing information regarding the impacts to the economy due to the COVID-19 pandemic. Community representatives indicated the population is greatly impacted by the influx of younger individuals attending the university. Additionally, a representative stated there are challenges with accessing affordable housing for many local renters, due to the current stock being marketed as luxury and targeted to the university student population. A representative also discussed the challenges for small businesses due to lower foot traffic in Madison following the COVID-19 pandemic.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MADISON, WISCONSIN MSA #31540

LENDING TEST

One Community Bank demonstrates reasonable geographic distribution of loans given the bank's assessment area. An analysis of the geographic distribution of HMDA-reportable and a sample of small business loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly low- and moderate-income census tracts.

In 2021, the bank originated HMDA-reportable loans in 80.4 percent of the census tracts in the assessment area, including within one low-income census tract and within eleven moderate-income census tracts. In 2021, small business loans were originated in 36 of 107 census tracts, in which small business loans were originated in only two moderate-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps. A detailed discussion of HMDA-reportable and small business lending in relation to census demographics is provided below. Due to the limited number of small business loans within the sample reviewed, HMDA-reportable lending received greater weight within the analysis.

Specific to HMDA-reportable lending, due to limited or no lending activity of home improvement, multi-family, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans, only home purchase and refinance loans will be discussed.

HMDA – Reportable Loans

The geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. In 2021, One Community Bank originated 0.3 percent of its total HMDA-reportable loans in low-income census tracts in the assessment area by number, which was comparable to the aggregate of lenders by number and the percentage of owner-occupied units located within those geographies both at 0.8 percent. The bank originated 3.3 percent of HMDA-reportable loans in moderate-income tracts by number, which was below the aggregate of lenders (8.2 percent) and the percentage of owner-occupied units located within those geographies (8.8 percent). The majority (54.6 percent) of the bank's HMDA-reportable loans were originated in middle-income census tracts, which was consistent with both the aggregate (55.5 percent) and the percentage of owner-occupied units located within those geographies (57.5 percent). The bank originated 41.5 percent of HMDA-reportable loans in upper-income census tracts, which was greater than the aggregate and the percentage of owner-occupied units located within those geographies at 35.4 and 32.9 percent, respectively. Finally, the bank originated 0.3 percent of HMDA-reportable loans in unknown-income census tracts, consistent with the aggregate of 0.1 percent.

The banks distribution of HMDA-reportable lending across geographies of different income levels in 2020 was consistent with the distribution of loans in 2021.

Home Purchase Loans

In 2021, the bank's home purchase loans represented 34.4 percent of the bank's total HMDA-reportable loans in the Madison, WI MSA assessment area. One Community Bank originated 0.4 percent of its home purchase loans in low-income census tracts, consistent with both the aggregate of lenders and the percentage of owner-occupied units, at 0.8 percent. The bank originated 3.9 percent of its home purchase loans in moderate-income census tracts. The bank's performance was below both the aggregate of lenders and the percentage of owner-occupied units within moderate-income tracts at 9.0 percent and 8.8 percent, respectively. The majority of the bank's home purchase loans were originated in middle-income census tracts at 57.1 percent, consistent with both the aggregate at 55.8 percent and the 57.5 percent of owner-occupied units. Lastly, the bank originated 38.5 percent of its home purchase loans in upper-income census tracts. This was above both the aggregate lender rate at 34.4 percent and the 32.9 percent of owner-occupied units in upper-income census tracts.

Refinance Loans

In 2021, refinance loans represented a majority of the bank's total HMDA-reportable loans (60.9 percent) in the Madison, WI MSA assessment area. The bank originated 0.2 percent of its refinance loans in low-income census tracts, consistent with the aggregate lender rate (0.7 percent) and the percent of owner-occupied units (0.8 percent). One Community Bank originated 2.7 percent of its refinance loans in moderate-income census tracts. The bank's performance was below both the

aggregate of lender rate of 7.7 percent and the 8.8 percent of owner-occupied units located in moderate-income census tracts. The majority of the bank's refinance loans were originated in middle-income census tracts at 52.8 percent, consistent with the aggregate lender rate of 55.5 percent and below the 57.5 percent of owner-occupied units in middle-income tracts. The bank originated 44.0 percent of its refinance loans in upper-income census tracts, which exceeded both the aggregate lender rate of 36.0 percent and the 32.9 percent of owner-occupied units in upper-income census tracts. Lastly, the bank originated 0.2 percent of refinance loans in an unknown-income census tract, consistent with the aggregate lender rate of 0.1 percent.

The following table summarizes the bank's 2021 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2020 geographic distribution lending tables.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Madison, WI MSA 31540								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	1	0.4	0.8	145	0.2	0.6	0.8
	Moderate	9	3.9	9.0	2,216	2.9	7.0	8.8
	Middle	132	57.1	55.8	40,726	53.5	52.5	57.5
	Upper	89	38.5	34.4	33,033	43.4	39.9	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	231	100.0	100.0	76,119	100.0	100.0	100.0
Refinance	Low	1	0.2	0.7	194	0.2	0.5	0.8
	Moderate	11	2.7	7.7	2,618	2.4	5.9	8.8
	Middle	216	52.8	55.5	51,143	47.5	51.2	57.5
	Upper	180	44.0	36.0	53,607	49.8	42.3	32.9
	Unknown	1	0.2	0.1	129	0.1	0.2	0.0
	Total	409	100.0	100.0	107,689	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.7	0	0.0	0.4	0.8
	Moderate	0	0.0	8.3	0	0.0	6.9	8.8
	Middle	7	50.0	54.3	1,248	44.8	50.4	57.5
	Upper	7	50.0	36.7	1,535	55.2	42.2	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	14	100.0	100.0	2,783	100.0	100.0	100.0
Multi-Family	Low	0	0.0	4.8	0	0.0	1.6	7.3
	Moderate	2	11.1	18.9	3,216	7.1	30.9	19.9
	Middle	12	66.7	43.0	36,376	80.1	29.4	42.6
	Upper	3	16.7	26.8	4,664	10.3	35.0	23.9
	Unknown	1	5.6	6.6	1,152	2.5	3.2	6.4
	Total	18	100.0	100.0	45,408	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.7	0	0.0	0.5	0.8
	Moderate	0	0.0	8.4	0	0.0	6.6	8.8
	Middle	0	0.0	56.4	0	0.0	52.6	57.5
	Upper	0	0.0	34.5	0	0.0	40.2	32.9
	Unknown	0	0.0	0.0	0	0.0	0.1	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	1.4	0	0.0	0.5	0.8
	Moderate	0	0.0	6.6	0	0.0	4.8	8.8
	Middle	0	0.0	56.1	0	0.0	52.3	57.5
	Upper	0	0.0	35.8	0	0.0	42.4	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.8
	Moderate	0	0.0	13.3	0	0.0	9.3	8.8
	Middle	0	0.0	68.9	0	0.0	69.9	57.5
	Upper	0	0.0	17.8	0	0.0	20.7	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	2	0.3	0.8	338	0.1	0.6	0.8
	Moderate	22	3.3	8.2	8,050	3.5	8.5	8.8
	Middle	367	54.6	55.5	129,492	55.8	49.8	57.5
	Upper	279	41.5	35.4	92,838	40.0	40.8	32.9
	Unknown	2	0.3	0.1	1,280	0.6	0.4	0.0
	Total	672	100.0	100.0	231,999	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the assessment area. Within the sample of small business loans reviewed, One Community Bank originated 79 small business loans within the assessment area in 2021. The bank did not originate any small business loans in low-income census tracts; however, there was limited opportunity within these tracts, as only 2.3 percentage of total businesses are located in those geographies. The bank's lending volume in moderate-income census tracts at 3.8 percent was below the percentage of total businesses located in moderate-income census tracts at 13.1 percent. A majority of the bank's small business loans (68.4 percent) were originated in middle-income census tracts, significantly above the percentage of total businesses located in those geographies at 49.5 percent. In addition, the bank originated 26.6 percent of its small business loans in upper-income census tracts, below the percentage of total businesses located in those geographies at 33.2 percent. Finally, the bank originated 1.3 percent of its small business loans in unknown-income census tracts, consistent with the percentage of total businesses located in those geographies at 1.9 percent.

The following table presents the bank's geographic distribution of small business loans in 2021.

Geographic Distribution of Small Business Loans						
Assessment Area: 2021 Madison, WI MSA 31540						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	2.3
	Moderate	3	3.8	321	1.4	13.1
	Middle	54	68.4	16,400	72.2	49.5
	Upper	21	26.6	5,342	23.5	33.2
	Unknown	1	1.3	640	2.8	1.9
	Total	79	100.0	22,703	100.0	100.0
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

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

One Community Bank demonstrates a reasonable distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes that is reasonable given the demographics of the bank's assessment area.

Specific to HMDA-reportable lending, due to limited or no lending activity of home improvement, multi-family, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans, only home purchase and refinance loans will be discussed.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among borrowers of different income levels. In 2021, One Community Bank originated 6.4 percent by number of its total HMDA-reportable loans to low-income borrowers, which was comparable to the aggregate of lenders at 6.7 percent and significantly below the percentage of low-income families in the assessment area at 19.1 percent. The bank originated 17.1 percent of its HMDA-reportable loans to moderate-income borrowers, which was consistent to both the aggregate lender rate at 20.0 percent and the percentage of moderate-income families in the assessment area at 16.6 percent. The bank originated 22.2 percent of HMDA-reportable loans to middle-income borrowers, consistent with both the aggregate lender rate of 25.1 percent and the percentage of families designated as middle-income at 22.6 percent. The majority of the bank's HMDA-reportable loans were originated to upper-income borrowers (46.0 percent), which exceeded both the aggregate lender rate of 39.6 percent and the demographic of 41.7 percent. Further, 8.3 percent of the bank's HMDA-reportable loans were originated to borrowers of unknown income, consistent with the aggregate at 8.7 percent.

The bank's distribution of HMDA-reportable lending to borrowers of different income levels in 2020 was consistent with the distribution of HMDA-reportable loans in 2021. Please see Appendix B for 2020 lending tables.

Home Purchase Loans

In 2021, home purchase loans accounted for 34.4 percent of the bank's total HMDA-reportable loans in the Madison, WI MSA assessment area. One Community Bank originated 4.8 percent of its home purchase loans to low-income borrowers. The bank's performance was consistent with the aggregate lender rate of 6.5 percent and was significantly below the percentage of low-income families in the assessment area of 19.1 percent. The bank originated 16.9 percent of its home purchase loans to moderate-income borrowers, which was below the aggregate lender rate of 21.2 percent and consistent with the percent of moderate-income families in the assessment area of 16.6 percent. The bank originated 20.8 percent of home purchase loans to middle-income borrowers, which was below the aggregate lender rate of 24.8 percent and was consistent with the demographic at 22.6 percent. The bank originated the majority of its home purchase loans (49.4 percent) to upper-income borrowers. The bank's performance exceeded both the aggregate lender rate of 37.1 percent and the percent of upper-income families in the assessment area at 41.7 percent. Finally, the bank originated 8.2 percent of home purchase loans to borrowers with unknown income, comparable to the aggregate at 10.4 percent.

Refinance Loans

In 2021, refinance loans represented a majority of the bank's total HMDA-reportable loans (60.9 percent) in the Madison, WI MSA assessment area. In 2021, One Community Bank originated 7.6 percent of its refinance loans to low-income borrowers. The bank's performance is consistent with the aggregate lender rate at 7.0 percent and significantly below the percentage of low-income families located in the assessment area at 19.1 percent. The bank originated 17.4 percent of its refinance loans to moderate-income borrowers, which was consistent with both the aggregate at 20.4 percent and the percentage of moderate-income families in the assessment area at 16.6 percent. The bank originated 24.4 percent of its refinance loans to middle-income borrowers. The bank's performance was consistent with both the aggregate lender rate at 25.7 percent and the percentage of middle-income families in the assessment area at 22.6 percent. The bank originated the greatest percentage (46.2 percent) of its refinance loans to upper-income borrowers. The bank's performance was greater than both the aggregate lender rate at 38.7 percent and the percentage of upper-income families in the assessment area at 41.7 percent. Lastly, the bank originated 4.4 percent of refinance loans to borrowers with unknown income, this is below the aggregate rate of 8.2 percent.

The following table summarizes the bank's 2021 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2020 borrower distribution tables.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Madison, WI MSA 31540								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$(000s)	\$ %	\$ %			
Home Purchase	Low	11	4.8	6.5	2,057	2.7	3.6	19.1
	Moderate	39	16.9	21.2	9,095	11.9	16.3	16.6
	Middle	48	20.8	24.8	14,485	19.0	23.2	22.6
	Upper	114	49.4	37.1	44,295	58.2	46.5	41.7
	Unknown	19	8.2	10.4	6,188	8.1	10.3	0.0
	Total	231	100.0	100.0	76,119	100.0	100.0	100.0
Refinance	Low	31	7.6	7.0	4,292	4.0	4.0	19.1
	Moderate	71	17.4	20.4	13,104	12.2	15.3	16.6
	Middle	100	24.4	25.7	25,024	23.2	23.1	22.6
	Upper	189	46.2	38.7	57,723	53.6	47.5	41.7
	Unknown	18	4.4	8.2	7,546	7.0	10.1	0.0
	Total	409	100.0	100.0	107,689	100.0	100.0	100.0
Home Improvement	Low	1	7.1	4.9	280	10.1	3.9	19.1
	Moderate	5	35.7	15.0	831	29.9	13.9	16.6
	Middle	1	7.1	23.4	160	5.8	19.3	22.6
	Upper	6	42.9	54.2	1,397	50.2	60.6	41.7
	Unknown	1	7.1	2.5	114	4.1	2.4	0.0
	Total	14	100.0	100.0	2,783	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.4	0	0.0	0.1	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	22.6
	Upper	0	0.0	1.8	0	0.0	0.3	41.7
	Unknown	18	100.0	97.8	45,408	100.0	99.7	0.0
	Total	18	100.0	100.0	45,408	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	6.2	0	0.0	4.3	19.1
	Moderate	0	0.0	17.5	0	0.0	12.6	16.6
	Middle	0	0.0	25.4	0	0.0	21.6	22.6
	Upper	0	0.0	49.0	0	0.0	59.0	41.7
	Unknown	0	0.0	1.9	0	0.0	2.5	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	9.4	0	0.0	5.6	19.1
	Moderate	0	0.0	21.7	0	0.0	14.4	16.6
	Middle	0	0.0	22.6	0	0.0	17.6	22.6
	Upper	0	0.0	42.9	0	0.0	58.4	41.7
	Unknown	0	0.0	3.3	0	0.0	4.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	4.4	0	0.0	4.1	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	22.6
	Upper	0	0.0	2.2	0	0.0	2.9	41.7
	Unknown	0	0.0	93.3	0	0.0	93.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	43	6.4	6.7	6,629	2.9	3.5	19.1
	Moderate	115	17.1	20.0	23,030	9.9	14.3	16.6
	Middle	149	22.2	25.1	39,670	17.1	21.0	22.6
	Upper	309	46.0	39.6	103,415	44.6	43.5	41.7
	Unknown	56	8.3	8.7	59,256	25.5	17.7	0.0
	Total	672	100.0	100.0	231,999	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. A sample of small business loans originated in 2021 were reviewed, of which 63.3 percent by number were to businesses with gross revenues equal to or less than \$1 million. The bank’s performance was significantly below the presence of total small businesses operating in the assessment area at 90.4 percent. However, nearly 9.0 percent of the bank’s small business loans were made to businesses with an unknown revenue. During the COVID-19 pandemic, the bank participated in the Payment Protection Program (PPP) which assisted small businesses by originating forgivable loans. The PPP did not require the collection of revenue from the businesses. This demonstrates the bank’s willingness to meet the credit needs of small businesses within the assessment area. In addition, 34.0 percent of the bank’s loans originated to businesses with annual revenues of \$1 million or less, were in the amounts of \$100,000 or less. These loans are considered the most beneficial to small businesses, and further supports the bank’s willingness to meet the credit needs of small businesses.

The following table presents the borrower distribution of small business loans in 2021.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2021 Madison, WI MSA 31540							
Product Type		Bank & Demographic Comparison					
		2021		2021		Total Businesses %	
		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	50	63.3	13,649	60.1	90.4
		Over \$1 Million	22	27.8	7,654	33.7	8.5
		Unknown	7	8.9	1,401	6.2	1.0
		Total	79	100.0	22,703	100.0	100.0
	Loan Size	\$100,000 or Less	27	34.2	1,321	5.8	
		\$100,001 - \$250,000	18	22.8	3,038	13.4	
		\$250,001 - \$1 Million	34	43.0	18,344	80.8	
		Total	79	100.0	22,703	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	17	34.0	882	6.5	
		\$100,001 - \$250,000	13	26.0	2,080	15.2	
		\$250,001 - \$1 Million	20	40.0	10,688	78.3	
		Total	50	100.0	13,650	100.0	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

One Community Bank demonstrates adequate responsiveness to the community development needs of its assessment area through qualified investments, donations, and community development services, as appropriate, considering the bank's capacity as well as the need and the availability of such opportunities for community development in the bank's assessment area.

Notably, this is the bank's first evaluation as an Intermediate Small Bank, which is inclusive of the Community Development Test.

Lending, Investments, and Services Activities

Lending

One Community Bank did not originate any community development loans during the evaluation period. Although there is a lack of community development loans, the bank conducted sufficient investment and service activities considering the bank's capacity and the availability of such opportunities for community development within the bank's assessment area.

Investments

During the evaluation period, One Community Bank made 15 qualified investments totaling approximately \$10.1 million in the assessment area. The investments made include various housing grants primarily tailored to low- and moderate-income communities or families. Further, One Community Bank made ten qualified donations totaling \$46,280 in the assessment area. All donations were focused on providing vital community services to low- and moderate-income individuals and families.

Services

During the evaluation period, bank staff provided 157.5 community development service hours. Of the total number of service hours, a majority (133.5 hours) were dedicated to organizations with a community service focus. Bank staff were impacted by the results of the COVID-19 pandemic which hindered their abilities to provide service activities in-person.

The following table presents the bank's community development activities during the evaluation period for the assessment area.

Summary of CD Activities										
Madison, Wisconsin MSA #31540										
October 16, 2018 – November 28, 2022										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	0	0	0	0	0	0	0	0	0	0
Investment	12	9,300,000	2	600,000	0	0	1	200,000	15	10,100,000
Donations	0	0	0	0	0	0	10	46,280	10	46,280
Services	0	0	1	24	0	0	8	133.5	9	157.5

WISCONSIN NON-MSA – FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Wisconsin Non-MSA assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WISCONSIN NON-MSA

One Community Bank's Wisconsin Non-MSA assessment area consists of Adams and Marquette Counties in their entireties. This is the bank's first evaluation of the Wisconsin Non-MSA assessment area, which was added just prior to the previous evaluation as a result of the Grand Marsh State Bank merger. The Wisconsin Non-MSA assessment area is comprised of 12 total census tracts. Based on 2021 FFIEC Census data, the census tract composition includes two moderate-income and ten middle-income census tracts. There are no low-income or upper-income census tracts located in the assessment area. However, five of the middle-income census tracts in Marquette County, are designated as underserved, due to their remote rural nature.

Within the assessment area, the bank operates three full-service branches. One branch is located in a moderate-income census tract in Adams County and the other two branches are located in middle-income census tracts one in each Adams County and Marquette County. All three locations were added to the assessment area since the previous evaluation due to the merger with Grand Marsh State Bank. There are no ATMs within this assessment area.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, One Community Bank ranked first among eight FDIC-insured financial institutions operating in Adams and Marquette Counties. The bank held \$136.2 million in deposits inside the market, representing 25.3 percent of the total deposit market share in the assessment area. For comparison, BMO Harris Bank N.A. ranked second with 21.8 percent of the market share and \$117.2 million in deposits and National Exchange Bank and Trust ranked third with 16.6 percent of the market share and \$89.3 million in deposits. The eight institutions in the assessment area competing for deposits and loans including One Community Bank operate 14 offices throughout the assessment area.

In 2021, One Community Bank ranked 10th among 252 HMDA-reporters, originating 59 HMDA-reportable loans in the assessment area. By comparison, the first ranked institution, Summit Credit Union, originated 323 HMDA-reportable loans, the second ranked institution, U.S. Bank N.A., originated 124 HMDA-reportable loans, and the third ranked institution, Rocket Mortgage, LLC originated 115 HMDA-reportable loans.

Additional assessment area demographic information is provided in the following table. Please

refer to Appendix B for 2020 demographic information.

Assessment Area: 2021 WI Non MSA								
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	1,952	21.0
Moderate-income	2	16.7	1,401	15.1	174	12.4	2,082	22.4
Middle-income	10	83.3	7,884	84.9	628	8.0	2,358	25.4
Upper-income	0	0.0	0	0.0	0	0.0	2,893	31.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12	100.0	9,285	100.0	802	8.6	9,285	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	4,588	1,726	14.8	37.6	629	13.7	2,233	48.7
Middle-income	22,704	9,950	85.2	43.8	1,813	8.0	10,941	48.2
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	27,292	11,676	100.0	42.8	2,442	8.9	13,174	48.3
	Total Businesses 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	249	18.6	227	18.5	16	20.0	6	16.2
Middle-income	1,092	81.4	997	81.5	64	80.0	31	83.8
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,341	100.0	1,224	100.0	80	100.0	37	100.0
	Percentage of Total Businesses:			91.3		6.0		2.8
	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	14	8.8	12	8.1	2	16.7	0	0.0
Middle-income	146	91.3	136	91.9	10	83.3	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	160	100.0	148	100.0	12	100.0	0	0.0
	Percentage of Total Farms:			92.5		7.5		0.0
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Population Characteristics

The following table presents the population trends for the assessment area, the counties that makeup the assessment area, the entire Wisconsin Non-MSA, and the state of Wisconsin from 2010 to 2015. According to the 2015 U.S. Census Bureau demographic data, the assessment area’s population is 35,591, a slight decline in population of 1.9 percent from 2010. Both counties which comprise the assessment area saw similar declines in population of 2.0 percent in Adams County and 1.7 percent in Marquette County. Overall, the state of Wisconsin saw a decline in population of 1.0 percent. According to a community representative, the population has remained relatively stable over the years, with Adams County maintaining an older population when compared to other communities. Further, a community representative described the assessment area as a retirement community in which the only influx of population is seen for retirees downsizing or moving closer to the Wisconsin Dells.

Population Change			
Area	2010 Population	2015 Population	Percent Change
Assessment Area	36,279	35,591	-1.9
Adams County, WI	20,875	20,451	-2.0
Marquette County, WI	15,404	15,140	-1.7
Wisconsin Non-MSA	1,479,319	1,476,482	-0.2
State of Wisconsin	5,686,986	5,742,117	1.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau American Community Survey</i>			

Income Characteristics

According to the 2021 FFIEC Census Data, the assessment area is comprised of 9,285 families, of which 21.0 percent are designated as low-income, 22.4 percent are moderate-income, 25.4 percent are middle-income, and 31.2 percent are upper income. Approximately 8.6 percent of families residing within the assessment area live below the poverty line, consistent with the state of Wisconsin’s poverty rate of 8.6 percent.

The following table compares the median family income (MFI) for the assessment area, counties that comprise the assessment area, the entire Wisconsin Non-MSA, and the state of Wisconsin. According to the 2011-2015 Census Bureau data, the MFI in the assessment area experienced a decrease of less than 1.0 percent. The decrease is driven by the 3.9 percent decline in Marquette County’s MFI, which is consistent with the 3.6 percent decline for the state of Wisconsin, while Adams County saw an increase in MFI of 4.0 percent. A community representative stated that there are not many industries located in Marquette County and the jobs available are entry level to shift-supervisory positions making higher wages scarce. The representative stated wages have not kept up with rising costs which has strained on families residing within the assessment area.

Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Assessment Area	\$53,864	\$53,519	-0.6%
Adams County, WI	\$49,897	\$51,884	4.0%
Marquette County, WI	\$58,159	\$55,906	-3.9%
Wisconsin Non-MSA	\$60,559	\$60,742	0.3%
Wisconsin	\$70,639	\$68,064	-3.6%

*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.*

Housing Characteristics

There are a total of 27,292 housing units in the assessment area. The greatest percentage of housing units are vacant at 48.3 percent, 42.8 percent are owner-occupied, while only 9.0 percent are rental units. The percentage of vacant units (48.3 percent) is significantly higher than the percentage of vacant units within the state of Wisconsin at 13.0 percent.

The following table presents the recent housing cost burden for individuals within the assessment area, counties that comprise the assessment area, the entire Wisconsin Non-MSA, and the state of Wisconsin. The housing cost burden is a measure of affordability via a comparative analysis of homeowners and renters of different income levels that spend 30.0 percent or more of their income on housing costs. As evidenced by the following table, low-income individuals are generally impacted at a higher rate than moderate-income individuals as both renters and owners. In the state of Wisconsin, the proportion of households that meet the cost burden criteria for all renters, regardless of income level, at 40.3 percent, exceeds the percentage for all renters in the assessment area at 34.1 percent. However, when comparing cost burden for all homeowners, the state of Wisconsin is the lowest, at 19.2 percent. When comparing the counties that comprise the bank's assessment area, Marquette County trends at a lower proportion of both renters and owners that meet the cost burden criteria, with 30.4 percent and 25.6 percent, respectively.

As community representatives stated the population in the assessment area is aging, which they believe has had an impact on the housing units in the assessment area. A community representative stated that many of these residents have moved into senior living communities, which has created a high volume of vacant units. In recent years, the inquires and demand for affordable housing has increased. While there is volume of single-family units, the community representatives stated there is still a need for affordable housing, specifically rental units.

Housing Cost Burden						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	62.3%	27.0%	34.1%	66.9%	34.1%	26.0%
Adams County, WI	61.5%	28.8%	37.2%	65.9%	32.9%	26.2%
Marquette County, WI	63.7%	25.1%	30.4%	68.5%	35.9%	25.6%
Wisconsin Non-MSA	69.7%	28.0%	35.5%	65.5%	32.1%	19.9%
Wisconsin	76.3%	30.8%	40.3%	69.0%	35.4%	19.2%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

Employment Characteristics

The following table presents the unemployment trends for the assessment area, the individual counties that comprise the assessment area, the entirety of the Wisconsin Non-MSA, and the state of Wisconsin from 2017 to 2021. Both of the counties within the assessment area, as well as the state of Wisconsin, had stable unemployment rates leading up to 2020, when overall rates increased during this period. In 2021, the assessment area saw unemployment rates of 5.3 percent, a decline from the prior year when it averaged 8.2 percent due to the results of the COVID-19 pandemic. Adams County has consistently trended with the highest unemployment rate, most recently at 6.2 percent, while the state of Wisconsin consistently trended with the lowest unemployment rates, most recently at 3.8 percent. Overall, in 2021, the counties making up the assessment area experience higher unemployment rates when compared to the state of Wisconsin’s rate of 3.8 percent.

According to a community representative, the assessment area lacks access to many major industries making quality employment a consistent challenge for the assessment area. A representative noted while the assessment area hasn’t been subject to any major business closures, unemployment rates have struggled to return to pre-pandemic levels. Specifically, in Marquette County, a representative stated it is difficult and rare to find additional employment or side jobs.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	4.4	4.1	4.3	8.2	5.3
Adams County, WI	5.0	4.7	4.8	9.6	6.2
Marquette County, WI	3.8	3.5	3.7	6.7	4.4
Wisconsin Non-MSA	3.5	3.2	3.4	6.4	3.9
Wisconsin	3.3	3.0	3.2	6.3	3.8

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

Industry Characteristics

According to the U.S Bureau of Labor Statistics, the assessment area contains a diverse employment base and is most heavily impacted by local government, manufacturing, and accommodation and food services. A community representative stated the assessment area would benefit from the manufacturing industry having a larger presence, which would assist in the stabilization of the workforce and provide additional employment opportunities.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on affordable housing, employment, and economic development needs within the assessment area. Representatives acknowledged the assessment area faced challenges, prior to the COVID-19 pandemic; however, these challenges have increased. A representative stated that inflation is placing a strain on many families, impacting the cost of food and everyday essentials, and the employment opportunities are unable to offer wages above the cost of living. A representative reinforced the need for a larger manufacturing base and managerial positions to offer employment opportunities and increased wages.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN NON-MSA

LENDING TEST

Geographic Distribution of Loans

One Community Bank demonstrates excellent geographic distribution of loans given the bank's assessment area. An analysis of the geographic distribution of HMDA-reportable and a sample of small business loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly moderate-income census tracts (given there are no low-income census tracts in the assessment area). As of 2021, the bank's assessment area consists of two moderate-income and 10 middle-income census tracts. Five of the middle-income census tracts in Marquette County are designated as underserved given their remote rural nature. Due to the limited number of small business loans within the sample reviewed, HMDA-reportable lending received greater weight within the analysis.

In 2021, the bank originated HMDA-reportable loans in 91.7 percent of the census tracts in the assessment area, including both moderate-income census tracts and within nine of the ten middle-income census tracts. Within the sample of small business loans reviewed, the bank originated loans within three of the 12 census tracts within the assessment area, which includes one of the two moderate-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps. A detailed discussion of HMDA-reportable and small business lending in relation to census demographics is provided below.

Specific to HMDA-reportable lending, due to limited or no lending activity of home improvement, multi-family, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans, only home purchase and refinance loans will be discussed.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the assessment area. In 2021, One Community Bank originated 28.8 percent of its total HMDA-reportable loans in moderate-income census tracts in the assessment area, which significantly exceeds both the aggregate of lenders (13.4 percent) and the percentage of owner-occupied units (14.8 percent) located in moderate-income census tracts. Although, the bank originated the majority of its HMDA-reportable loans, 71.2 percent, in middle-income tracts, their performance was significantly below both the aggregate of lenders (86.6 percent) and the percentage of owner-occupied units located in middle-income census tracts (85.2 percent).

The banks distribution of HMDA-reportable lending across geographies of different income levels in 2020 was consistent with the distribution of loans in 2021.

Home Purchase Loans

In 2021, home purchase loans represented 22.0 percent of the bank's total HMDA-reportable loans in the Wisconsin Non-MSA assessment area. One Community Bank originated 38.5 percent of its home purchase loans in moderate-income census tracts, significantly exceeding both the aggregate lender rate of 15.8 percent and the percentage of owner-occupied units located in the moderate-income tracts of 14.8 percent. Although, the majority of the bank's home purchase loans were originated in middle-income census tracts at 61.5 percent, this was significantly below the aggregate lender rate and the percent of owner-occupied units at 84.1 percent and 85.2 percent, respectively.

Refinance Loans

In 2021, refinance loans represented 76.3 percent of the bank's total HMDA-reportable loans in the Wisconsin Non-MSA assessment area. One Community Bank originated 24.4 percent of its refinance loans in moderate-income census tracts. The bank's performance significantly exceeds the aggregate lender rate of 12.1 percent and the percentage of owner-occupied units within moderate-income tracts of 14.8 percent. The majority of the bank's refinance loans were originated in middle-income census tracts at 75.6 percent, significantly below the aggregate lender rate at 87.8 percent and the 85.2 percent of owner-occupied units within middle-income census tracts.

The following table summarizes the bank's 2021 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2020 geographic distribution lending tables.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 WI Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	5	38.5	15.8	666	36.9	11.9	14.8
	Middle	8	61.5	84.1	1,138	63.1	88.1	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.1	0.0
	Total	13	100.0	100.0	1,803	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	11	24.4	12.1	1,404	28.3	11.2	14.8
	Middle	34	75.6	87.8	3,560	71.7	88.7	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.1	0.0
	Total	45	100.0	100.0	4,964	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.5	0	0.0	8.2	14.8
	Middle	0	0.0	90.5	0	0.0	91.8	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	1	100.0	30.0	280	100.0	23.3	33.8
	Middle	0	0.0	70.0	0	0.0	76.7	66.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	280	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.3	0	0.0	11.4	14.8
	Middle	0	0.0	91.7	0	0.0	88.6	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.1	0	0.0	6.9	14.8
	Middle	0	0.0	90.9	0	0.0	93.1	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	50.0	0	0.0	39.8	14.8
	Middle	0	0.0	50.0	0	0.0	60.2	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	17	28.8	13.4	2,350	33.3	11.7	14.8
	Middle	42	71.2	86.6	4,698	66.7	88.3	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.1	0.0
	Total	59	100.0	100.0	7,047	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. However, the small business loan sample only consisted of six loans, therefore less weight was given to the small business analysis in the overall geographic distribution rating. The bank’s lending volume in moderate-income census tracts at 66.7 percent significantly exceeded the percentage of total businesses located in moderate-income census tracts at 18.6 percent. The bank’s lending volume in middle-income census tracts at 33.3 percent was significantly below the percentage of total businesses located in middle-income census tracts at 81.4 percent.

The following table presents the bank’s geographic distribution of small business loans in 2021.

Geographic Distribution of Small Business Loans						
Assessment Area: 2021 WI Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	4	66.7	698	75.6	18.6
	Middle	2	33.3	225	24.4	81.4
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	6	100.0	923	100.0	100.0
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

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

One Community Bank demonstrates a reasonable distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes that is reasonable given the demographics of the bank’s assessment area.

Specific to HMDA-reportable lending, due to limited or no lending activity of home improvement, multi-family, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans, only home purchase and refinance loans will be discussed.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among individuals of different income levels. In 2021, One Community Bank originated 16.9 percent of its total HMDA-reportable loans to low-income borrowers, which was significantly above the

aggregate lender rate of 6.3 percent but below the percentage of low-income families in the assessment area at 21.0 percent. The bank originated 25.4 percent of its HMDA-reportable loans to moderate-income borrowers, which was above the aggregate lender rate of 18.0 percent and consistent with the percentage of moderate-income families in the assessment area at 22.4 percent. The bank originated 16.9 percent of HMDA-reportable loans to middle-income borrowers, below both the aggregate lender rate of 21.7 percent and the percentage of families designated as middle-income at 25.4 percent. The greatest percentage of the bank's HMDA-reportable loans were originated to upper-income borrowers (33.9 percent), which was below the aggregate (43.4 percent) and consistent with the percentage of upper-income families in the assessment area at 31.2 percent. Further, 6.8 percent of the bank's HMDA-reportable loans were originated to borrowers of unknown income, below the aggregate lender rate of 10.6 percent.

The bank's distribution of HMDA-reportable lending to borrowers of different income levels in 2020 was consistent with the distribution of HMDA-reportable loans in 2021. Please see Appendix B for 2020 lending tables.

Home Purchase Loans

In 2021, home purchase loans accounted for 22.0 percent of the bank's total HMDA-reportable loans in the Wisconsin Non-MSA assessment area. One Community Bank originated 15.4 percent of its home purchase loans to low-income borrowers. The bank's performance exceeded the aggregate's performance at 5.6 percent and was below the percentage of low-income families located in the assessment area at 21.0 percent. The bank originated 23.1 percent of its home purchase loans to moderate-income borrowers. The bank's performance was above the aggregate lender rate (19.3 percent) and comparable to the percentage of moderate-income families in the assessment area at 22.4 percent. The bank originated 15.4 percent of its home purchase loans to middle-income borrowers, below both the aggregate lender rate and the demographic at 19.2 percent and 25.4 percent, respectively. The bank originated the greatest percentage (38.5 percent) of its home purchase loans to upper-income borrowers. The bank's performance was below the aggregate at 45.4 percent and exceeded the percentage of upper-income families in the assessment area at 31.2 percent. Lastly, the bank originated 7.7 percent of its home purchase loans to borrowers with unknown income, comparable to the aggregate at 10.5 percent.

Refinance Loans

In 2021, refinance loans accounted for 76.3 percent of the bank's total HMDA-reportable loans in the Wisconsin Non-MSA assessment area. One Community Bank originated 17.8 percent of its refinance loans to low-income borrowers. The bank's performance is significantly above the aggregate lender rate of 6.4 percent, and below the percentage of low-income families located in the assessment area at 21.0 percent. The bank originated 26.7 percent of its refinance loans to moderate-income borrowers, which was above both the aggregate lender rate of 17.4 percent and the percentage of moderate-income families in the assessment area at 22.4 percent. The bank originated 17.8 percent of its refinance loans to middle-income borrowers. The bank's performance

was below both the aggregate at 23.0 percent and the percentage of middle-income families in the assessment area at 25.4 percent. The bank originated the greatest percentage of its refinance loans to upper-income borrowers (33.3 percent). The bank's performance was below the aggregate lender rate (42.4 percent) and consistent with the percentage of upper-income families in the assessment area at 31.2 percent. Lastly, the bank originated 4.4 percent of refinance loans to borrowers with unknown income, below the aggregate lender rate of 10.8 percent.

The following table summarizes the bank's 2021 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2020 borrower distribution tables.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2021 WI Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	15.4	5.6	121	6.7	2.5	21.0
	Moderate	3	23.1	19.3	285	15.8	13.2	22.4
	Middle	2	15.4	19.2	320	17.7	18.5	25.4
	Upper	5	38.5	45.4	854	47.3	54.3	31.2
	Unknown	1	7.7	10.5	224	12.4	11.4	0.0
	Total		13	100.0	100.0	1,803	100.0	100.0
Refinance	Low	8	17.8	6.4	622	12.5	3.6	21.0
	Moderate	12	26.7	17.4	1,241	25.0	12.4	22.4
	Middle	8	17.8	23.0	826	16.6	20.6	25.4
	Upper	15	33.3	42.4	1,794	36.1	51.4	31.2
	Unknown	2	4.4	10.8	482	9.7	11.9	0.0
	Total		45	100.0	100.0	4,964	100.0	100.0
Home Improvement	Low	0	0.0	7.6	0	0.0	6.5	21.0
	Moderate	0	0.0	18.1	0	0.0	14.5	22.4
	Middle	0	0.0	26.7	0	0.0	26.9	25.4
	Upper	0	0.0	46.7	0	0.0	50.6	31.2
	Unknown	0	0.0	1.0	0	0.0	1.5	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	10.0	0	0.0	2.5	31.2
	Unknown	1	100.0	90.0	280	100.0	97.5	0.0
	Total		1	100.0	100.0	280	100.0	100.0
Other Purpose LOC	Low	0	0.0	6.0	0	0.0	5.8	21.0
	Moderate	0	0.0	16.7	0	0.0	10.7	22.4
	Middle	0	0.0	25.0	0	0.0	24.4	25.4
	Upper	0	0.0	51.2	0	0.0	57.6	31.2
	Unknown	0	0.0	1.2	0	0.0	1.6	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	15.9	0	0.0	12.3	21.0
	Moderate	0	0.0	22.7	0	0.0	13.0	22.4
	Middle	0	0.0	22.7	0	0.0	16.3	25.4
	Upper	0	0.0	36.4	0	0.0	55.1	31.2
	Unknown	0	0.0	2.3	0	0.0	3.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	7.1	0	0.0	5.3	21.0
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	31.2
	Unknown	0	0.0	92.9	0	0.0	94.7	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	10	16.9	6.3	743	10.5	3.3	21.0
	Moderate	15	25.4	18.0	1,526	21.7	12.5	22.4
	Middle	10	16.9	21.7	1,145	16.3	19.5	25.4
	Upper	20	33.9	43.4	2,647	37.6	51.9	31.2
	Unknown	4	6.8	10.6	986	14.0	12.8	0.0
	Total		59	100.0	100.0	7,047	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. A sample of small business loans originated in 2021 were reviewed, of which 66.7 percent by number were to businesses with gross revenues equal to or less than \$1 million. Although, this was below the gross revenue composition of small businesses in the assessment area, at 91.3 percent, the sample size consisted of only six loans, with the majority (four) being originated to businesses with annual revenues of \$1 million or less. In addition, 25.0 percent of those loans were in amounts of \$100,000 or less and to businesses with gross revenues equal to or less than \$1 million, which are considered most beneficial to small businesses, indicating the bank’s willingness to meet the credit needs of small businesses.

The following table presents the borrower distribution of small business loans in 2021.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2021 WI Non MSA							
Product Type		Bank & Demographic Comparison					
		2021		2021		Total Businesses %	
Revenue		Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	4	66.7	868	94.0	91.3
		Over \$1 Million	1	16.7	40	4.3	6.0
		Unknown	1	16.7	15	1.6	2.8
		Total	6	100.0	923	100.0	100.0
	Loan Size	\$100,000 or Less	3	50.0	151	16.4	
		\$100,001 - \$250,000	1	16.7	210	22.8	
		\$250,001 - \$1 Million	2	33.3	562	60.9	
		Total	6	100.0	923	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	25.0	96	11.1	
		\$100,001 - \$250,000	1	25.0	210	24.2	
		\$250,001 - \$1 Million	2	50.0	562	64.7	
		Total	4	100.0	868	100.0	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

One Community Bank demonstrates adequate responsiveness to the community development needs of its assessment area through qualified investments, donations, and community development services, as appropriate, considering the bank’s capacity as well as the need and the availability of such opportunities for community development in the bank’s assessment area.

Notably, this is the bank’s first evaluation as an Intermediate Small Bank which is inclusive of the Community Development Test.

Lending

One Community Bank did not originate any community development loans during the evaluation period. Although there is a lack of community development loans, the bank conducted sufficient investment and service activities considering the bank’s capacity and the availability of such opportunities for community development within the bank’s assessment area.

Investments

During the evaluation period, One Community Bank made two qualified investments totaling \$768,000 in the assessment area. The investments made include various housing grants primarily tailored to low- and moderate-income communities or families. Further, One Community Bank made three donations for \$15,000 in the assessment area. All donations were focused on providing vital community services to low- and moderate-income individuals and families.

Services

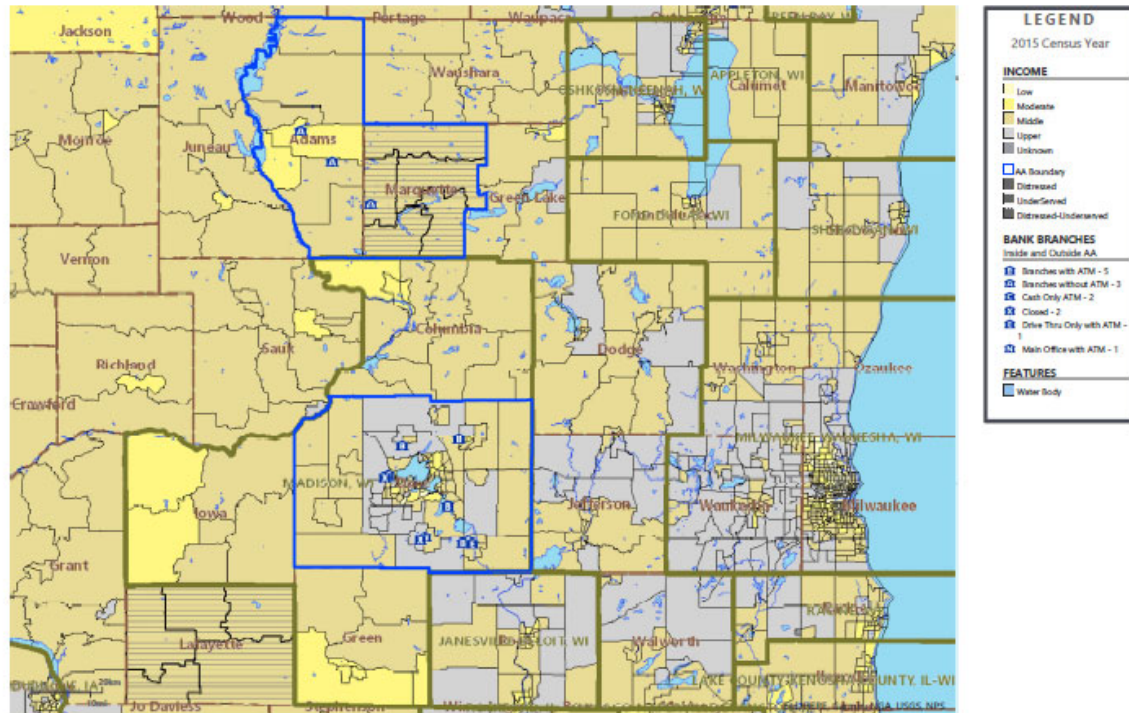
During the evaluation period, bank staff provided three community development financial services for approximately 14.5 hours during the bank’s first evaluation period under the community development test. Of the 14.5 community service hours, all were dedicated to organizations with a community service focus. Bank staff were impacted by the results of the COVID-19 pandemic which hindered their abilities to provide service activities in-person.

The following table presents the bank’s community development activities during the evaluation period for the assessment area.

Summary of CD Activities Wisconsin Non-MSA October 16, 2018 – November 28, 2022										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	0	0	0	0	0	0	0	0	0	0
Investment	2	768,000	0	0	0	0	0	0	2	768,000
Donations	0	0	0	0	0	0	3	15,000	3	15,000
Services	0	0	0	0	0	0	3	14.5	3	14.5

APPENDIX A – Map of Assessment Areas

One Community Bank 247140
Combined Assessment Area



APPENDIX B – 2020 Lending Tables

Assessment Area: 2020 Combined AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.4	3,503	2.7	902	25.7	25,229	19.2
Moderate-income	19	16.0	14,102	10.7	2,332	16.5	22,406	17.0
Middle-income	61	51.3	75,835	57.7	4,421	5.8	30,019	22.8
Upper-income	29	24.4	37,733	28.7	920	2.4	53,809	40.9
Unknown-income	6	5.0	290	0.2	135	46.6	0	0.0
Total Assessment Area	119	100.0	131,463	100.0	8,710	6.6	131,463	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,961	1,011	0.8	12.7	6,648	83.5	302	3.8
Moderate-income	34,587	12,461	9.3	36.0	18,297	52.9	3,829	11.1
Middle-income	137,872	80,496	59.9	58.4	41,673	30.2	15,703	11.4
Upper-income	62,219	40,365	30.0	64.9	19,570	31.5	2,284	3.7
Unknown-income	5,156	20	0.0	0.4	4,691	91.0	445	8.6
Total Assessment Area	247,795	134,353	100.0	54.2	90,879	36.7	22,563	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	608	2.1	533	2.1	71	2.9	4	1.3
Moderate-income	3,822	13.3	3,359	13.0	432	17.9	31	10.2
Middle-income	14,596	51.0	13,329	51.4	1,113	46.0	154	50.5
Upper-income	9,092	31.8	8,219	31.7	759	31.4	114	37.4
Unknown-income	518	1.8	472	1.8	44	1.8	2	0.7
Total Assessment Area	28,636	100.0	25,912	100.0	2,419	100.0	305	100.0
	Percentage of Total Businesses:			90.5		8.4		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	0.4	4	0.4	0	0.0	0	0.0
Moderate-income	36	3.5	32	3.2	4	13.8	0	0.0
Middle-income	661	63.8	647	64.3	14	48.3	0	0.0
Upper-income	333	32.1	322	32.0	11	37.9	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	1,036	100.0	1,007	100.0	29	100.0	0	0.0
	Percentage of Total Farms:			97.2		2.8		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Madison, WI MSA – Full Review

Assessment Area: 2020 Madison, WI MSA 31540								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.7	3,503	2.9	902	25.7	23,277	19.1
Moderate-income	17	15.9	12,701	10.4	2,158	17.0	20,324	16.6
Middle-income	51	47.7	67,951	55.6	3,793	5.6	27,661	22.6
Upper-income	29	27.1	37,733	30.9	920	2.4	50,916	41.7
Unknown-income	6	5.6	290	0.2	135	46.6	0	0.0
Total Assessment Area	107	100.0	122,178	100.0	7,908	6.5	122,178	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,961	1,011	0.8	12.7	6,648	83.5	302	3.8
Moderate-income	29,999	10,735	8.8	35.8	17,668	58.9	1,596	5.3
Middle-income	115,168	70,546	57.5	61.3	39,860	34.6	4,762	4.1
Upper-income	62,219	40,365	32.9	64.9	19,570	31.5	2,284	3.7
Unknown-income	5,156	20	0.0	0.4	4,691	91.0	445	8.6
Total Assessment Area	220,503	122,677	100.0	55.6	88,437	40.1	9,389	4.3
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	608	2.2	533	2.2	71	3.0	4	1.5
Moderate-income	3,573	13.1	3,131	12.7	417	17.9	25	9.3
Middle-income	13,500	49.5	12,333	50.0	1,044	44.7	123	45.9
Upper-income	9,092	33.3	8,219	33.3	759	32.5	114	42.5
Unknown-income	518	1.9	472	1.9	44	1.9	2	0.7
Total Assessment Area	27,291	100.0	24,688	100.0	2,335	100.0	268	100.0
Percentage of Total Businesses:				90.5		8.6		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	0.5	4	0.5	0	0.0	0	0.0
Moderate-income	22	2.5	20	2.3	2	10.5	0	0.0
Middle-income	513	58.7	507	59.3	6	31.6	0	0.0
Upper-income	333	38.1	322	37.7	11	57.9	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	874	100.0	855	100.0	19	100.0	0	0.0
Percentage of Total Farms:				97.8		2.2		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Madison, WI MSA 31540								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		Dollar		Agg	Agg	
		#	%	Bank	Bank			
		Bank	%	\$ (000s)	\$ %	\$ %		
Home Purchase	Low	1	0.6	0.8	236	0.5	0.5	0.8
	Moderate	11	6.4	7.8	2,494	5.2	6.0	8.8
	Middle	89	51.4	56.0	20,606	42.7	52.3	57.5
	Upper	72	41.6	35.3	24,925	51.6	41.2	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	173	100.0	100.0	48,261	100.0	100.0	100.0
Refinance	Low	1	0.1	0.5	202	0.1	0.3	0.8
	Moderate	21	3.0	6.7	4,424	2.3	5.1	8.8
	Middle	340	48.3	54.1	83,462	42.8	50.1	57.5
	Upper	342	48.6	38.7	107,064	54.9	44.4	32.9
	Unknown	0	0.0	0.0	0	0.0	0.1	0.0
	Total	704	100.0	100.0	195,152	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.9	0	0.0	0.6	0.8
	Moderate	1	50.0	8.5	881	94.7	7.8	8.8
	Middle	0	0.0	56.5	0	0.0	52.0	57.5
	Upper	1	50.0	34.2	50	5.3	39.5	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	2	100.0	100.0	931	100.0	100.0	100.0
Multi-Family	Low	0	0.0	4.5	0	0.0	2.3	7.3
	Moderate	1	9.1	17.1	2,573	9.0	10.8	19.9
	Middle	10	90.9	47.2	26,031	91.0	42.7	42.6
	Upper	0	0.0	25.6	0	0.0	36.2	23.9
	Unknown	0	0.0	5.5	0	0.0	8.1	6.4
	Total	11	100.0	100.0	28,604	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.7	0	0.0	0.4	0.8
	Moderate	0	0.0	8.4	0	0.0	6.9	8.8
	Middle	0	0.0	54.3	0	0.0	48.3	57.5
	Upper	0	0.0	36.6	0	0.0	44.4	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.4	0	0.0	0.2	0.8
	Moderate	0	0.0	9.6	0	0.0	6.8	8.8
	Middle	0	0.0	53.0	0	0.0	51.3	57.5
	Upper	0	0.0	37.0	0	0.0	41.7	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	5.9	0	0.0	4.1	0.8
	Moderate	0	0.0	9.5	0	0.0	6.2	8.8
	Middle	0	0.0	57.4	0	0.0	52.1	57.5
	Upper	0	0.0	27.2	0	0.0	37.5	32.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	2	0.2	0.6	438	0.2	0.5	0.8
	Moderate	34	3.8	7.2	10,372	3.8	5.9	8.8
	Middle	439	49.3	54.7	130,098	47.7	50.1	57.5
	Upper	415	46.6	37.5	132,039	48.4	42.8	32.9
	Unknown	0	0.0	0.1	0	0.0	0.7	0.0
	Total	890	100.0	100.0	272,947	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Madison, WI MSA 31540								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	14	8.1	7.2	2,581	5.3	4.1	19.1
	Moderate	34	19.7	22.6	7,576	15.7	17.5	16.6
	Middle	33	19.1	25.5	8,216	17.0	24.3	22.6
	Upper	80	46.2	36.9	26,858	55.7	46.2	41.7
	Unknown	12	6.9	7.7	3,029	6.3	8.0	0.0
	Total		173	100.0	100.0	48,261	100.0	100.0
Refinance	Low	37	5.3	5.1	5,684	2.9	2.8	19.1
	Moderate	114	16.2	18.1	23,396	12.0	13.4	16.6
	Middle	149	21.2	25.7	35,108	18.0	23.2	22.6
	Upper	350	49.7	42.7	114,985	58.9	50.9	41.7
	Unknown	54	7.7	8.4	15,980	8.2	9.8	0.0
	Total		704	100.0	100.0	195,152	100.0	100.0
Home Improvement	Low	1	50.0	4.9	881	94.7	4.3	19.1
	Moderate	0	0.0	16.4	0	0.0	12.6	16.6
	Middle	0	0.0	24.4	0	0.0	21.9	22.6
	Upper	1	50.0	52.2	50	5.3	58.7	41.7
	Unknown	0	0.0	2.0	0	0.0	2.5	0.0
	Total		2	100.0	100.0	931	100.0	100.0
Multi-Family	Low	0	0.0	0.5	0	0.0	0.1	19.1
	Moderate	0	0.0	0.5	0	0.0	0.0	16.6
	Middle	1	9.1	2.0	560	2.0	0.2	22.6
	Upper	0	0.0	0.5	0	0.0	0.0	41.7
	Unknown	10	90.9	96.5	28,044	98.0	99.7	0.0
	Total		11	100.0	100.0	28,604	100.0	100.0
Other Purpose LOC	Low	0	0.0	6.4	0	0.0	4.6	19.1
	Moderate	0	0.0	17.6	0	0.0	13.1	16.6
	Middle	0	0.0	26.8	0	0.0	22.7	22.6
	Upper	0	0.0	47.3	0	0.0	58.1	41.7
	Unknown	0	0.0	2.0	0	0.0	1.5	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	7.0	0	0.0	4.8	19.1
	Moderate	0	0.0	24.8	0	0.0	18.4	16.6
	Middle	0	0.0	22.2	0	0.0	16.2	22.6
	Upper	0	0.0	44.8	0	0.0	59.9	41.7
	Unknown	0	0.0	1.3	0	0.0	0.8	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	22.6
	Upper	0	0.0	1.2	0	0.0	1.2	41.7
	Unknown	0	0.0	98.8	0	0.0	98.8	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	52	5.8	5.6	9,146	3.4	2.9	19.1
	Moderate	148	16.6	18.9	30,972	11.3	13.4	16.6
	Middle	183	20.6	25.4	43,884	16.1	21.5	22.6
	Upper	431	48.4	41.7	141,893	52.0	45.8	41.7
	Unknown	76	8.5	8.3	47,053	17.2	16.3	0.0
	Total		890	100.0	100.0	272,947	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Wisconsin Non-MSA – Full Review

Assessment Area: 2020 WI Non MSA									
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	1,952	21.0	
Moderate-income	2	16.7	1,401	15.1	174	12.4	2,082	22.4	
Middle-income	10	83.3	7,884	84.9	628	8.0	2,358	25.4	
Upper-income	0	0.0	0	0.0	0	0.0	2,893	31.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	12	100.0	9,285	100.0	802	8.6	9,285	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	4,588	1,726	14.8	37.6	629	13.7	2,233	48.7	
Middle-income	22,704	9,950	85.2	43.8	1,813	8.0	10,941	48.2	
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	27,292	11,676	100.0	42.8	2,442	8.9	13,174	48.3	
	Total Businesses 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	249	18.5	228	18.6	15	17.9	6	16.2	
Middle-income	1,096	81.5	996	81.4	69	82.1	31	83.8	
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,345	100.0	1,224	100.0	84	100.0	37	100.0	
	Percentage of Total Businesses:			91.0		6.2		2.8	
	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	14	8.6	12	7.9	2	20.0	0	0.0	
Middle-income	148	91.4	140	92.1	8	80.0	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	152	100.0	10	100.0	0	0.0	
	Percentage of Total Farms:			93.8		6.2		0.0	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 WI Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	9	42.9	13.2	890	26.0	12.5	14.8
	Middle	12	57.1	86.8	2,534	74.0	87.5	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		21	100.0	100.0	3,424	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	14	40.0	12.6	1,278	31.2	11.7	14.8
	Middle	21	60.0	87.3	2,822	68.8	88.3	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.0	0.0
	Total		35	100.0	100.0	4,100	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	14.4	0	0.0	20.9	14.8
	Middle	0	0.0	85.6	0	0.0	79.1	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	33.8
	Middle	1	100.0	100.0	78	100.0	100.0	66.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	78	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.8	0	0.0	6.5	14.8
	Middle	0	0.0	92.2	0	0.0	93.5	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	3.8	0	0.0	10.0	14.8
	Middle	0	0.0	96.2	0	0.0	90.0	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	23.1	0	0.0	27.0	14.8
	Middle	0	0.0	76.9	0	0.0	73.0	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	23	40.4	12.8	2,168	28.5	12.2	14.8
	Middle	34	59.6	87.2	5,434	71.5	87.8	85.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		57	100.0	100.0	7,602	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 WI Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	2	9.5	5.7	85	2.5	2.9	21.0
	Moderate	3	14.3	17.9	411	12.0	13.0	22.4
	Middle	3	14.3	20.6	205	6.0	18.7	25.4
	Upper	10	47.6	48.3	2,038	59.5	56.9	31.2
	Unknown	3	14.3	7.5	684	20.0	8.6	0.0
	Total	21	100.0	100.0	3,424	100.0	100.0	100.0
Refinance	Low	5	14.3	4.3	305	7.4	2.2	21.0
	Moderate	8	22.9	15.6	735	17.9	11.7	22.4
	Middle	9	25.7	19.3	1,075	26.2	17.6	25.4
	Upper	11	31.4	46.7	1,591	38.8	53.0	31.2
	Unknown	2	5.7	14.1	395	9.6	15.5	0.0
	Total	35	100.0	100.0	4,100	100.0	100.0	100.0
Home Improvement	Low	0	0.0	14.4	0	0.0	11.7	21.0
	Moderate	0	0.0	13.3	0	0.0	11.9	22.4
	Middle	0	0.0	22.2	0	0.0	18.9	25.4
	Upper	0	0.0	45.6	0	0.0	45.6	31.2
	Unknown	0	0.0	4.4	0	0.0	12.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	25.0	0	0.0	15.3	31.2
	Unknown	1	100.0	75.0	78	100.0	84.7	0.0
	Total	1	100.0	100.0	78	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	7.8	0	0.0	7.9	21.0
	Moderate	0	0.0	7.8	0	0.0	6.2	22.4
	Middle	0	0.0	37.5	0	0.0	37.2	25.4
	Upper	0	0.0	43.8	0	0.0	42.7	31.2
	Unknown	0	0.0	3.1	0	0.0	6.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	15.4	0	0.0	3.4	21.0
	Moderate	0	0.0	26.9	0	0.0	21.1	22.4
	Middle	0	0.0	19.2	0	0.0	14.4	25.4
	Upper	0	0.0	38.5	0	0.0	61.1	31.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	31.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	7	12.3	5.4	390	5.1	2.6	21.0
	Moderate	11	19.3	16.0	1,146	15.1	12.0	22.4
	Middle	12	21.1	20.2	1,280	16.8	17.8	25.4
	Upper	21	36.8	46.4	3,629	47.7	53.5	31.2
	Unknown	6	10.5	12.1	1,157	15.2	14.0	0.0
	Total	57	100.0	100.0	7,602	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		Lending Test: HMDA-Reportable loans: January 1, 2020 to December 31, 2021 Small Business loans (sample): January 1, 2021 to December 31, 2021 Community Development Test: October 16, 2018 to November 28, 2022	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
One Community Bank			HMDA-Reportable Loans Small Business Loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None			
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Madison, WI MSA #35140 (Dane County)	Full scope review	N/A	N/A
Wisconsin Non-MSA (Adams and Marquette Counties)	Full scope review	N/A	N/A

APPENDIX D – Glossary

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.¹

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section

¹ Source: FFIEC press release dated October 19, 2011.

228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions 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. They 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.

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide nonmetropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and 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; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) 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, or population loss; or
- b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
 - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
 - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

Community Development Service: A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th

percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

- 1) Low-income – an 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 census tract;
- 2) Moderate-income – an 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 census tract;
- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an individual income that is at least 120 percent of the area median

income, or a median family income that is at least 120 percent in the case of a census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment, and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan production office: This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area: 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 single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or

more bordering states is called a multistate metropolitan statistical area.

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).