

# **PUBLIC DISCLOSURE**

January 10, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Buckeye Community Bank  
RSSD #286306

105 Sheffield Center  
Lorain, Ohio 44055

Federal Reserve Bank of Cleveland

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

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

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

**Buckeye Community Bank** (Buckeye) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

The major factors and criteria contributing to this rating include:

- Buckeye's net loan-to-deposit ratio (NLTD) is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of Buckeye's loans are originated inside the AA;
- An excellent geographic distribution of loans occurs throughout the AA;
- A reasonable distribution to businesses of different sizes; and a poor borrower distribution among individuals of different income levels, including low- and moderate-income (LMI);
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

## SCOPE OF EXAMINATION

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

The following data was reviewed:

- Buckeye's 20-quarter average NLTD ratio
- The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 amended HMDA Disclosure Act (HMDA) to add new data points. These changes were effective January 1, 2018, and they included the reporting of home equity loans for certain institutions, the addition of new loan purposes, and changes to the definitions of some existing fields. Due to the breadth of these changes, HMDA-reportable loans originated or purchased on or after January 1, 2018, are separated from loans made before that date. These changes did not have a significant impact on Buckeye's HMDA reporting.
- The CFPB changed the closed-end HMDA reporting threshold from 25 to 100 originated closed-end mortgage loans in each of the two prior calendar years, effective as of July 1, 2020. Because Buckeye did not meet the increased threshold, the bank is no longer a HMDA reporter and did not report HMDA data for 2020 and 2021. As a result, HMDA-

reportable loans were analyzed from January 1, 2016, through December 31, 2019.

- HMDA-reportable loans consist of home purchase, refinance, and home improvement loans. Due to limited loan volumes, these loans were combined in 2016, 2017, 2018, and 2019 to conduct a meaningful analysis. Multi-family loans were not considered separately in this evaluation.
- Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA was used as a comparison in evaluating Buckeye's lending performance.
- Small business loans were analyzed from July 1, 2020, through June 30, 2021.
- Buckeye facilitated loans through the U.S. government's Paycheck Protection Program (PPP) to help small businesses impacted by the COVID-19 emergency. These loans made during the small business evaluation period are considered in this evaluation.
- Based on the total loan volume by number and dollar amount and the bank's business focus, small business lending received the most weight, followed by HMDA-reportable lending.
- Geographic distribution received slightly more weight than borrower distribution, because the percentage of LMI geographies is greater than the percentage of LMI families across the AA.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.

### DESCRIPTION OF INSTITUTION

Buckeye is an intrastate community bank headquartered in Lorain, Ohio. The bank's characteristics include:

- Buckeye is a wholly owned subsidiary of Buckeye Bancshares, Inc. Buckeye accounted for 100.0% of the holding company's consolidated assets.
- Buckeye has total assets of \$210.8 million and total deposits of \$181.1 million as of September 30, 2021.
- Buckeye has only one location, its main office with a cash-dispensing ATM, in moderate-income tract.
- Buckeye has neither opened nor closed any branches since the previous evaluation.
- Buckeye is primarily a commercial lender that makes accommodation loans to their business customers (e.g., mortgage, consumer, and home equity loans).

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- Buckeye originates loans under the U.S. Small Business Administration's (SBA) lending program that provides financing to qualified small businesses.
- Buckeye's loan portfolio composition is shown in the table below.

<b>Composition of Loan Portfolio as of September 30, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	10,199	6.6
Farmland	21	0.0
1-4 Family Residential Real Estate	13,537	8.8
Multifamily Residential Real Estate	5,607	3.6
Non-Farm Non-Residential Real Estate	75,046	48.8
Agricultural	0	0.0
Commercial and Industrial	49,245	32.0
Consumer	151	0.1
Other	17	0.0
<b>Gross Loans</b>	<b>153,823</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

Buckeye was rated Satisfactory under the CRA at its February 6, 2017, performance evaluation.

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

#### **DESCRIPTION OF ASSESSMENT AREA**

Buckeye's AA consists of portions of the Cleveland-Elyria OH MSA #17460. The bank's delineated CRA AA consists of the entirety of Lorain County and excludes Cuyahoga, Geauga, Lake, and Medina counties. See Appendix A for AA maps and Appendix B for additional demographic data.

- Due to the use of 2015 U.S. Census American Community Survey (ACS) data instead of 2010 Census data in 2017, the AA was comprised of the following income-tract designations during this evaluation period:

Census Tract Designations		
Income Tract Level	2016	2017 - 2021
Low	8	11
Moderate	18	18
Middle	32	30
Upper	15	14
Unknown	1	1
<b>Total</b>	<b>74</b>	<b>74</b>

- Buckeye's AA has not changed since the previous evaluation.
- According to the June 30, 2021, Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report, Buckeye ranked 10<sup>th</sup> amongst 16 institutions operating in the AA with a 3.3% deposit market share. The Huntington National Bank holds the largest share of deposits in the market at 31.1%, followed by Northwest Bank at 15.8% and Fifth Third Bank, National Association at 12.5%. Buckeye ranked 21<sup>st</sup> amongst 34 institutions with a 0.2% deposit market share in the MSA. Buckeye competes with multiple large national financial institutions and other community banks in this market.
- The 2019 HMDA Peer Market data indicates that Buckeye ranked 59<sup>th</sup> out of 307 HMDA reporters in the MSA and originated 15 loans. By comparison, first-ranked The Huntington National Bank originated 1,363 loans, second-ranked Third Federal Savings and Loan originated 922 loans, and third-ranked Fifth Third Bank National Association originated 710 loans.
- A community contact was used in the evaluation to provide additional information regarding credit needs and give context to demographic and economic conditions of the local community. The contact was with a small business development corporation (SBDC). The contact stated that despite the uncertainty surrounding the COVID-19 pandemic, several downtown revitalization projects have been completed, which includes a newly renovated hotel, a mixed-use commercial and retail space overlooking the Black River, and infrastructure improvements. Project partners expect at least 50 permanent jobs to be created because of these projects. Recently, Carvana, the online auto retailer, agreed to locate its new 200,000 square-foot facility in Lorain County. This is a \$23 million investment, which is expected to produce 400 new jobs and generate an additional \$13 million in payroll for the county. The contact emphasized all these projects happened because local and regional partners worked together to ensure success. The contact stated that one company in Lorain County was approved for a large dollar PPP loan between \$5 - \$10 million from a local large financial institution, allowing them to retain 500 jobs during the height of the pandemic; in addition, numerous small businesses throughout Lorain County received small dollar PPP loans from area banks.

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The contact indicated that local banks are involved in the community and were helpful during the height of the pandemic by facilitating PPP loans. The contact stated that small dollar loans are always beneficial for small businesses to help them meet credit needs due to unexpected expenses or income short falls, especially during the COVID-19 emergency. Lastly, there are opportunities for banks to continue to offer referrals to SBDCs, support overall operating expenses, sponsor specific training initiatives, serve on advisory boards, or provide business counseling services to small businesses.

Population Change			
Assessment Area: Cleveland-Elyria, OH MSA #17460			
Area	2015 Population	2020 Population	Percent Change
Lorain County	303,152	312,172	3.0
Cleveland-Elyria, OH MSA	2,064,483	2,043,807	-1.0
Ohio	11,575,977	11,693,217	1.0

Source: 2011-2015 U.S. Census Bureau: American Community Survey  
U.S. Census Bureau Vintage 2020 Population Estimates for the United States and States

- While the MSA experienced a modest decline in population, Lorain County experienced a 3.0% increase between 2015 and 2020.
- 76.1% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 14.3% of the population in the AA was age 65 and over, compared to 14.1% in Ohio. As a result, the AA has a working-age population commensurate with Ohio's.
- 7.3% of the AA's population resides in low-income tracts compared to 19.9% that reside in moderate-income tracts.
- Lorain is the largest city in Lorain County and the 10<sup>th</sup> largest city in Ohio with a population of 63,597 according to 2020 U.S. Census data. Lorain's population decreased by 0.8% since 2010.

Borrower Income Levels										
Assessment Area: Cleveland-Elyria, OH MSA #17460										
FFIEC Estimated Median Family Income			Low		Moderate		Middle		Upper	
Year	\$	% Change	0	49.9%	50%	79.9%	80%	119.9%	120%	& above
2016	\$66,600		0	\$33,299	\$33,300	\$53,279	\$53,280	\$79,919	\$79,920	& above
2017	\$67,900	2.0	0	\$33,949	\$33,950	\$54,319	\$54,320	\$81,479	\$81,480	& above
2018	\$70,700	4.1	0	\$35,349	\$35,350	\$56,559	\$56,560	\$84,839	\$84,840	& above
2019	\$73,700	4.2	0	\$36,849	\$36,850	\$58,959	\$58,960	\$88,439	\$88,440	& above
2020	\$76,000	3.1	0	\$37,999	\$38,000	\$60,799	\$60,800	\$91,199	\$91,200	& above
2021	\$78,600	3.4	0	\$39,299	\$39,300	\$62,879	\$62,880	\$94,319	\$94,320	& above

Source: 2016-2021 FFIEC Census Data

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- During the evaluation period, the median family income (MFI) in the MSA increased each year. Overall, MFI increased a significant 18.0% during this timeframe, reflecting meaningful economic expansion.
- According to the U.S. Census data estimates, the 2010 MFI in the AA (\$62,082) is less than 1.0% smaller than the MFI in the MSA (\$62,627) and 4.0% larger than the MFI in Ohio (\$59,680).

Poverty Rates			
Assessment Area: Cleveland-Elyria, OH MSA #17460			
Area	2017	2018	2019
Lorain County	13.5	14.2	13.9
Ohio	13.9	13.8	13.0
United States	13.4	13.1	12.3

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

- Poverty rates for Lorain County were commensurate with poverty rates in Ohio during the evaluation period. While the county's poverty rate mirrored the poverty rate of the United States in 2017, poverty rates surpassed the nation's rates in 2018 and 2019.
- Of the 80,230 families in the AA, 38.9% are designated as LMI with 10.3% living below the poverty level and are comparable to Ohio's.
- Of the 114,479 households in the AA, 12.3% are below the poverty level and 2.9% receive public assistance.

Housing Cost Change										
Assessment Area: Cleveland-Elyria, OH MSA #17460										
Area	Median Housing Value					Median Gross Rent				
	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019	2010	2015	Percent Change - 2010 to 2015	2019	Percent Change - 2015 to 2019
Lorain County	\$147,400	\$137,400	-6.8	\$150,500	9.5	\$681	\$741	8.8	\$774	4.5
Cleveland-Elyria, OH MSA	\$149,576	\$138,894	-7.1	\$151,600	9.1	\$707	\$743	5.1	\$817	10.0
Ohio	\$136,400	\$129,900	-4.8	\$145,700	12.2	\$678	\$730	7.7	\$808	10.7

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



- Median housing values decreased from 2010-2015 but rebounded by 2019, representing a 2.1% net increase during this period. MFI increased more than median home prices, making housing more affordable across the AA during this period.
- Median gross rents across the AA increased by 13.7% from 2010-2019. The rise in median gross rents indicates the need for more affordable housing, and 56.1% of all renters in the AA live in low- and moderate-income tracts and have rental costs that are at least 30% of their income.
- There are 125,546 housing units in the AA, of which 67.7% are owner occupied, 23.5% are rental, and 8.8% are vacant. In low-income tracts within the AA, 3,546 (36.3%) are owner-occupied, 4,468 (45.7%) are rental, and 1,763 (18.0%) are vacant. In moderate-income tracts within the AA, 14,324 (50.1%) are owner-occupied, 10,830 (37.9%) are rental, and 3,440 (12.0%) are vacant. This demonstrates that housing stock in LMI tracts are more likely to be vacant than housing in other census tracts.
- With 32.3% of housing units being either rental or vacant across the AA, there may be limited opportunities to originate HMDA loans, particularly in LMI tracts.
- The median age of housing stock in the AA is 44 years old, and 23.1% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and for refinance or home improvement loans to remove lead-based paint that was commonly used on houses and apartments built before 1978.<sup>1</sup>

Housing Cost Burden						
Assessment Area: Cleveland-Elyria, OH MSA #17460						
Area	Cost Burden – Owners			Cost Burden – Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Lorain County	61%	32%	17%	74%	34%	45%
Cleveland-Elyria, OH MSA	66%	36%	20%	73%	35%	43%
Ohio	63%	32%	18%	73%	31%	41%

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

- Within the AA, 61.0% of low-income homeowners are cost-burdened, defined as having housing costs on average that are 30.0% or more of household income. In contrast, within the AA, only 32.0% of moderate-income homeowners are cost burdened.

<sup>1</sup> Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning

- This trend applies across Ohio, where low-income homeowners are more cost-burdened than moderate-income homeowners.
- A substantially higher percentage of low-income renters are cost-burdened across the AA and Ohio compared to moderate-income renters.
- The data shows that cost burden disproportionately affects low-income home purchasers and renters.
- Cost-burdened renters may have a difficult time saving enough monies to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Unemployment Rates					
Assessment Area: Cleveland-Elyria, OH MSA #17460					
Area	2016	2017	2018	2019	2020
Lorain County	6.0%	6.1%	5.0%	4.4%	9.9%
Cleveland-Elyria, OH MSA	5.4%	5.6%	4.7%	4.1%	9.7%
Ohio	5.0%	5.0%	4.5%	4.2%	8.1%

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- While 2016-2019 unemployment rates decreased across the AA, 2020 unemployment rates increased substantially in response to the COVID-19 pandemic. The average unemployment rate for the AA increased from 4.4% in 2019 to 9.9% in 2020.
- The unemployment rates across the AA were higher than unemployment rates in Ohio during this period.
- According to the U.S. Census Bureau, across the AA:<sup>2</sup>
  - Of persons at least 25 years of age, 24.9% have at least a bachelor's degree and 89.7% have at least graduated high school, which is comparable to 28.3% with a bachelor's degree and 90.4% that at least graduated high school across Ohio.
  - Of the households, 80.2% have at least a broadband internet connection, which is often critical for remote work during the COVID-19 pandemic.
  - Of persons 65 years of age or younger, 7.6% do not have health insurance. The lack of health insurance limits financial security in the event of a catastrophic illness.
- According to Ohio Office of Research:<sup>3</sup>
  - Lorain County is most impacted by the industries of trade, transportation, and utilities; manufacturing; education and health services; retail trade, local government; and leisure and hospitality. Major employers include but are not limited to Camaco

<sup>2</sup> [www.census.gov/quickfacts/fact/table/loraincountyohio/PST045221](http://www.census.gov/quickfacts/fact/table/loraincountyohio/PST045221)

<sup>3</sup> [www.development.oh.gov>reports\\_countytrends\\_map](http://www.development.oh.gov>reports_countytrends_map)

LLC (manufacturing), Elyria City Schools, EMH Regional healthcare System, Ford Motor Company, Invacare Corporation (manufacturing), Lorain City Schools, Lorain County government, Mercy Health, Oberlin College, Ridge Tool Manufacturing, State of Ohio, and US Steel Corporation/Lorain Tubular (manufacturing). The average weekly wage for the private sector is \$811, which indicates that employed persons could afford the median rent of \$774.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

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

Loan-to-Deposit Ratios						
Buckeye Community Bank, Lorain, OH				The First National Bank of Bellevue, Bellevue, OH	Independence Bank, Independence, OH	Custom Peer Ratio
As of Date	Net Loans \$(000s)	Total Deposits \$(000s)	Bank Ratio	Peer 1 Ratio	Peer 2 Ratio	Custom Peer Ratio
September 30, 2021	151,238	181,130	83.5	61.5	63.0	62.2
June 30, 2021	148,978	188,670	79.0	69.5	68.5	69.0
March 31, 2021	143,809	195,739	73.5	68.4	73.6	71.0
December 31, 2020	144,908	188,700	76.8	74.0	74.3	74.1
September 30, 2020	153,060	180,755	84.7	78.2	77.0	77.6
June 30, 2020	155,210	177,208	87.6	82.8	76.1	79.5
March 31, 2020	140,889	154,859	91.0	85.0	77.1	81.1
December 31, 2019	138,854	148,410	93.6	92.4	74.1	83.3
September 30, 2019	134,536	148,174	90.8	87.2	77.6	82.4
June 30, 2019	133,324	142,559	93.5	97.3	66.0	81.7
March 31, 2019	133,099	144,593	92.1	90.0	62.3	76.2
December 31, 2018	135,561	146,333	92.6	97.4	67.4	82.4
September 30, 2018	133,338	143,835	92.7	93.8	66.8	80.3
June 30, 2018	135,257	148,943	90.8	95.4	64.0	79.7
March 31, 2018	135,113	144,117	93.8	86.6	63.4	75.0
December 31, 2017	133,825	151,683	88.2	94.2	61.8	78.0
September 30, 2017	135,031	149,272	90.5	85.6	61.9	73.8
June 30, 2017	130,437	148,167	88.0	96.2	60.0	78.1
March 31, 2017	130,710	142,956	91.4	91.4	56.2	73.8
December 31, 2016	127,325	143,700	88.6	93.8	62.1	78.0
Quarterly Loan-to-Deposit Ratio Average Since the Previous Evaluation			88.1	86.0	67.7	76.8

- Buckeye's NLTD ratio averaged 88.1%, which was above the custom peer group average of 76.8%. Bank management indicated there has been a large increase in deposits (latest six quarters), outpacing loan growth, due to direct payments to consumers and small

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businesses from various economic stimulus programs in response to the COVID-19 pandemic. This is a similar trend amongst other community banks. Therefore, Buckeye's NLTD ratio is reasonable given the bank's size, financial condition, and AA credit needs.

**Assessment Area Concentration**

Lending Inside and Outside the Assessment Areas – 2016 and 2017								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	1	100.0	130	100.0	0	0.0	0	0.0
Home Purchase – Conventional	21	50.0	3,563	42.4	21	50.0	4,847	57.6
Multi-Family Housing	4	66.7	2,588	73.5	2	33.3	934	26.5
Refinancing	19	57.6	4,298	60.9	14	42.4	2,763	39.1
<b>Total HMDA related</b>	<b>45</b>	<b>54.9</b>	<b>10,579</b>	<b>55.3</b>	<b>37</b>	<b>45.1</b>	<b>8,544</b>	<b>44.7</b>
<b>Total Loans</b>	<b>45</b>	<b>54.9</b>	<b>10,579</b>	<b>55.3</b>	<b>37</b>	<b>45.1</b>	<b>8,544</b>	<b>44.7</b>

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

- For the lending period of January 1, 2015, through December 31, 2016, 54.9% by volume and 55.3% by dollar amount of Buckeye's HMDA loans were made inside the AA.

Lending Inside and Outside the Assessment Areas – 1/1/2018-6/30/2021								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	14	45.2	2,987	43.1	17	54.8	3,936	56.9
Multi-Family Housing	4	100.0	1,162	100.0	0	0.0	0	0.0
Other Purpose Closed-End	1	33.3	100	14.8	2	66.7	575	85.2
Refinancing	18	78.3	2,715	78.8	5	21.7	731	21.2
<b>Total HMDA related</b>	<b>37</b>	<b>60.7</b>	<b>6,964</b>	<b>57.1</b>	<b>24</b>	<b>39.3</b>	<b>5,242</b>	<b>42.9</b>
Small Business	346	78.1	64,969	72.5	97	21.9	24,594	27.5
<b>Total Small Business related</b>	<b>346</b>	<b>78.1</b>	<b>64,969</b>	<b>72.5</b>	<b>97</b>	<b>21.9</b>	<b>24,594</b>	<b>27.5</b>
<b>Total Loans</b>	<b>383</b>	<b>76.0</b>	<b>71,933</b>	<b>70.7</b>	<b>121</b>	<b>24.0</b>	<b>29,836</b>	<b>29.3</b>

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

- For the lending period of January 1, 2018, through June 30, 2021, 76.0% by volume and 70.7% by dollar amount were made inside the AA. Therefore, a majority of loans and other lending-related activities are in the bank's AA.

- Buckeye deferred 79 commercial, mortgage, consumer, and home equity loan payments totaling \$14.2 million (impacting \$23.9 million in originations) in 2020 and 2021 due to the COVID-19 emergency. Of these deferrals, 81.0% directly helped businesses and consumers in the bank's AA.

### Geographic Distribution of Loans

The geographic distribution reflects an excellent dispersion of loans across Buckeye's AA. The geographic distribution of small business lending, which received the most weight, is excellent, and HMDA-reportable lending is reasonable.

There was a significant level of lending gaps during the evaluation period.

Tract Income Level	Percentage of Lending Penetration					
	2016	2017	2018	2019	2020	1/1/2021-6/30/2021
Low	12.5%	9.1%	0.0%	0.0%	72.7%	54.5%
Moderate	11.1%	27.8%	16.7%	5.6%	77.8%	72.2%
Middle	28.1%	20.0%	30.0%	16.7%	70.0%	46.7%
Upper	46.7%	28.6%	42.9%	35.7%	57.1%	50.0%
Unknown	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>25.7%</b>	<b>21.6%</b>	<b>24.3%</b>	<b>14.9%</b>	<b>68.9%</b>	<b>54.1%</b>

While gaps in lending were particularly high in 2016 through 2019, especially in LMI tracts, Buckeye only originated 82 HMDA-reportable loans; however, in 2020 and the first half of 2021, Buckeye originated 346 commercial loans, including but not limited to PPP loans. Therefore, the penetration rate substantially increased, resulting in a moderate level of lending gaps in LMI tracts in the years with the greatest loan volume.

### *Small Business Lending*

From July 1, 2020, through June 30, 2021, Buckeye originated 346 small business loans totaling \$65.0 million. Buckeye made 62 (17.9%) small business loans in low-income tracts totaling \$4.9 million, which exceeded the percentage of businesses in these tracts at 7.9%. Buckeye made 87 (25.1%) small business loans in moderate-income tracts totaling \$21.9 million, which significantly exceeded the percentage of businesses in these tracts at 15.6%.

Distribution of January 1, 2020-June 30, 2021 Small Business Lending by Income Level of Geography Assessment Area: Cleveland-Elyria, OH MSA #17460					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	62	17.9	4,947	7.6	7.9
Moderate	87	25.1	21,874	33.7	15.6
Middle	134	38.7	24,676	38.0	39.9
Upper	63	18.2	13,473	20.7	36.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>346</b>	<b>100.0</b>	<b>64,969</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Overall, Buckeye's performance significantly exceeded proxy in LMI tracts. While this bank is not a CRA reporter, Buckeye's performance was also compared to the aggregate of all CRA lenders to gain additional performance context. Buckeye's small business lending significantly exceeded the aggregate of all CRA lenders at 6.3% in low- and 12.4% in moderate-income tracts. Considering the bank's performance and this additional context, the geographic distribution of small business loans in LMI tracts is excellent.

### *HMDA Lending*

Buckeye's HMDA performance was compared to the percentage of owner-occupied units (proxy) and the aggregate of all lenders. Buckeye's geographic distribution of HMDA-reportable lending is reasonable. See Appendix C for explicit HMDA-reportable lending data.

In 2019 Buckeye originated 15 HMDA loans totaling \$2.5 million. Buckeye made no HMDA loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 7.6% and the aggregate of all lenders at 1.7%. Buckeye made one (6.7%) HMDA loan in a moderate-income tract totaling \$81,000, which was significantly below the percentage of owner-occupied units in these tracts at 15.3% and slightly below the aggregate of all lenders at 7.3%.

In 2018 Buckeye originated 22 HMDA loans totaling \$4.4 million. Buckeye made no HMDA loans in low-income tracts, compared to the percentage of owner-occupied units in these tracts at 7.6% and the aggregate of all lenders at 2.0%. Buckeye made three (13.6%) HMDA loans in moderate-income tracts totaling \$834,000, which was below the percentage of owner-occupied units in these tracts at 15.3% but exceeded the aggregate of all lenders at 8.3%.

In 2017 Buckeye originated 18 HMDA loans totaling \$5.2 million. Buckeye made one (5.6%) HMDA loan in a low-income tract totaling \$62,000, which was below the percentage of owner-occupied units in these tracts at 7.6% but exceeded the aggregate of all lenders at 1.7%. Buckeye made five (27.8%) HMDA loans in moderate-income tracts totaling \$1.2 million, which significantly exceeded the percentage of owner-occupied units in these tracts at 15.3% and the aggregate of all lenders at 6.5%.

In 2016 Buckeye originated 27 HMDA loans totaling \$5.4 million. Buckeye made one (3.7%) HMDA loan in a low-income tract totaling \$32,000, which was below the percentage of owner-occupied units in these tracts at 4.2% but significantly exceeded the aggregate of all lenders at 0.6%. Buckeye made two (7.4%) HMDA loans in moderate-income tracts totaling \$79,000, which was below the percentage of owner-occupied units in these tracts at 16.9% but exceeded the aggregate of all lenders at 6.0%.

Buckeye's performance mostly fell below proxy but exceeded the aggregate of all lenders; therefore, the geographic distribution of HMDA-reportable loans in LMI tracts is reasonable.

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

Buckeye's lending penetration among businesses of different sizes, which received the most weight, is reasonable and borrowers of different income (including LMI) levels is poor.

From April 28, 2020, to April 29, 2021, Buckeye facilitated 260 PPP loans totaling \$28.8 million through the PPP to help small businesses impacted by the COVID-19 emergency. Of the total PPP loans, 216 PPP loans totaling \$23.8 million were originated during the small business review period of July 1, 2020, through June 30, 2021, in this evaluation. PPP loans are considered responsive to the needs of the community during the pandemic. However, banks were not required to collect revenue data for PPP loans, since the intent of the PPP was to assist small businesses; therefore, these unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency are considered in this evaluation.

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### *Small Business Lending<sup>4</sup>*

From July 1, 2020, through June 30, 2021, Buckeye originated 346 small business loans totaling \$65.0 million to businesses of different sizes, and 252 (72.8%) loans totaling \$29.4 million were made to businesses with unknown gross annual revenues; most of the loans (86.0%) were PPP loans.

<b>Distribution of January 1, 2020-June 30,2021 Small Business Lending by Revenue Size of Businesses Assessment Area: Cleveland-Elyria, OH MSA #17460</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	45	13.0	16,094	24.8	91.2
<b>Over \$1 Million</b>	49	14.2	19,475	30.0	7.8
<b>Revenue Unknown</b>	252	72.8	29,401	45.3	1.0
<b>Total</b>	346	100.0	64,969	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	190	54.9	6,886	10.6	
<b>\$100,001 - \$250,000</b>	86	24.9	13,972	21.5	
<b>\$250,001 - \$1 Million</b>	60	17.3	27,077	41.7	
<b>Total</b>	346	100.0	64,969	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	16	35.6	848	5.3	
<b>\$100,001 - \$250,000</b>	12	26.7	2,194	13.6	
<b>\$250,001 - \$1 Million</b>	13	28.9	6,210	38.6	
<b>Total</b>	45	100.0	16,094	100.0	
<i>Source: 2020 and 2021 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Buckeye made 45 (13.0%) loans totaling \$16.1 million to businesses with revenues of \$1.0 million or less compared to the percentage of small businesses in the AA at 91.2%. If PPP loans had been excluded from this analysis, 34.6% of the bank's loans were made to businesses with revenues of \$1.0 million or less, which is a poor distribution.

<sup>4</sup> In the Small Business Distribution table the categories of "\$100,000 or Less," "\$100,001 - \$250,000," and "\$250,001 - \$1 Million" does not equal the totals presented in "Total" rows, because there were loans in excess of \$1 million captured in the totals that did not fit within the categories presented.



While this analysis is skewed by the large number of businesses with unknown gross annual revenues, Buckeye made 190 (54.9%) loans in amounts of \$100,000 or less. Buckeye's willingness to lend in smaller amounts exhibits good responsiveness to credit needs of small businesses in the AA, particularly those impacted by the COVID-19 emergency. If PPP loans had been excluded from this analysis, 40.0% of loans were made in amounts of \$100,000 or less, which exhibits adequate responsiveness.

Overall, Buckeye's performance was significantly below the percentage of small businesses in the AA. While this bank is not a CRA reporter, Buckeye's performance was also compared to the aggregate of all CRA lenders to gain additional performance context. Buckeye's non-PPP small business lending (34.6%) fell below the aggregate of all CRA lenders that made 46.5% of its loans to businesses with revenues of \$1.0 million or less. Also, the aggregate of CRA lenders made 86.0% of its loans in amounts of \$100,000 or less. The community contact indicated local banks have been responsive to small businesses during the pandemic by facilitating PPP loans and emphasized there is a need for small dollar loans to help businesses meet credit needs due to unexpected expenses or income short falls, especially during the COVID-19 emergency.

Considering this additional context, Buckeye's small business distribution is reasonable, and Buckeye exhibits an adequate responsiveness to credit needs of small businesses across its AA with its willingness to lend in smaller amounts.

### *HMDA Lending*

Buckeye's performance was compared to the percentage of families (proxy) and the aggregate of all lenders. Buckeye's borrower distribution of HMDA-reportable loans is poor. During the evaluation period, Buckeye originated 82 HMDA loans totaling \$17.5 million. See Appendix C for explicit HMDA-reportable lending data.

In 2019 Buckeye originated 15 HMDA loans totaling \$2.5 million. Buckeye made two (13.3%) HMDA loans to borrowers with unknown-income designations totaling \$269,000.

Buckeye made one (6.7%) HMDA loan to a low-income borrower totaling \$81,000, which was significantly below the percentage of families at 21.4% but exceeded the aggregate of all lenders at 4.5%. Buckeye made three (20.0%) HMDA loans to moderate-income borrowers totaling \$250,000, which exceeded the percentage of families at 17.7% and the aggregate of all lenders at 13.2%.

In 2018 Buckeye originated 22 HMDA loans totaling \$4.4 million. Buckeye made five (22.7%) HMDA loans to borrowers with unknown-income designations totaling \$1.2 million.

Buckeye made no HMDA loans to low-income borrowers, compared to the percentage of families at 21.4% and the aggregate of all lenders at 5.0%. Buckeye made one (4.5%) HMDA loan to a moderate-income borrower totaling \$75,000, which was significantly below the percentage of families at 17.7% and the aggregate of all lenders at 13.7%.

In 2017 Buckeye originated 18 HMDA loans totaling \$5.2 million. Buckeye made six (33.3%) HMDA loans to borrowers with unknown-income designations totaling \$2.9 million.

Buckeye made no HMDA loans to low-income borrowers, compared to the percentage of families at 21.4% and aggregate of all lenders at 4.1%. Buckeye made no HMDA loans to moderate-income borrowers, compared to the percentage of families at 17.7% and the aggregate of all lenders at 11.9%.

In 2016 Buckeye originated 27 HMDA loans totaling \$5.4 million. Buckeye made three (11.1%) HMDA loans to borrowers with unknown-income designations totaling \$420,000.

Buckeye made two (7.4%) HMDA loans to low-income borrowers totaling \$72,000, which was significantly below the percentage of families at 20.7% but exceeded the aggregate of all lenders at 4.1%. Buckeye made one (3.7%) HMDA loan to a moderate-income borrower totaling \$60,000, which was significantly below the percentage of families at 18.1% and the aggregate of all lenders at 11.6%.

Buckeye's performance mostly fell significantly below proxy and the aggregate of all lenders; therefore, the borrower distribution of HMDA-reportable loans to LMI borrowers is poor.

### **Response to Complaints**

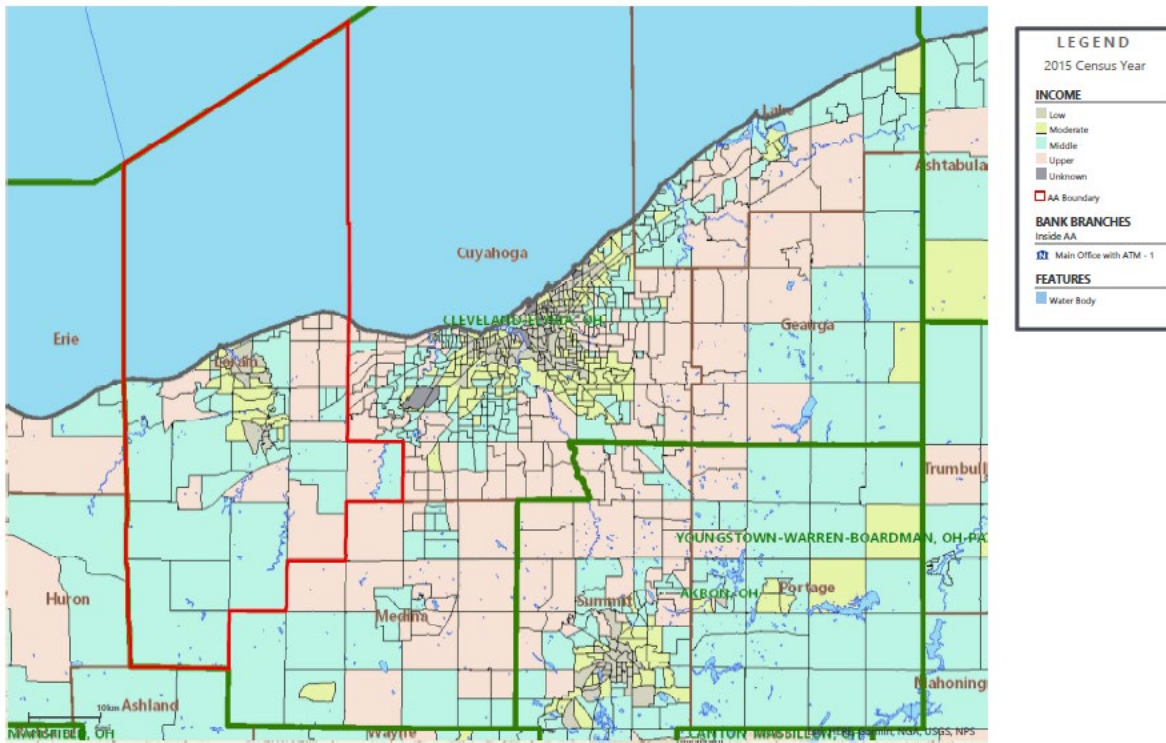
Neither Buckeye nor this Reserve Bank has received any CRA-related complaints since the previous examination.

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

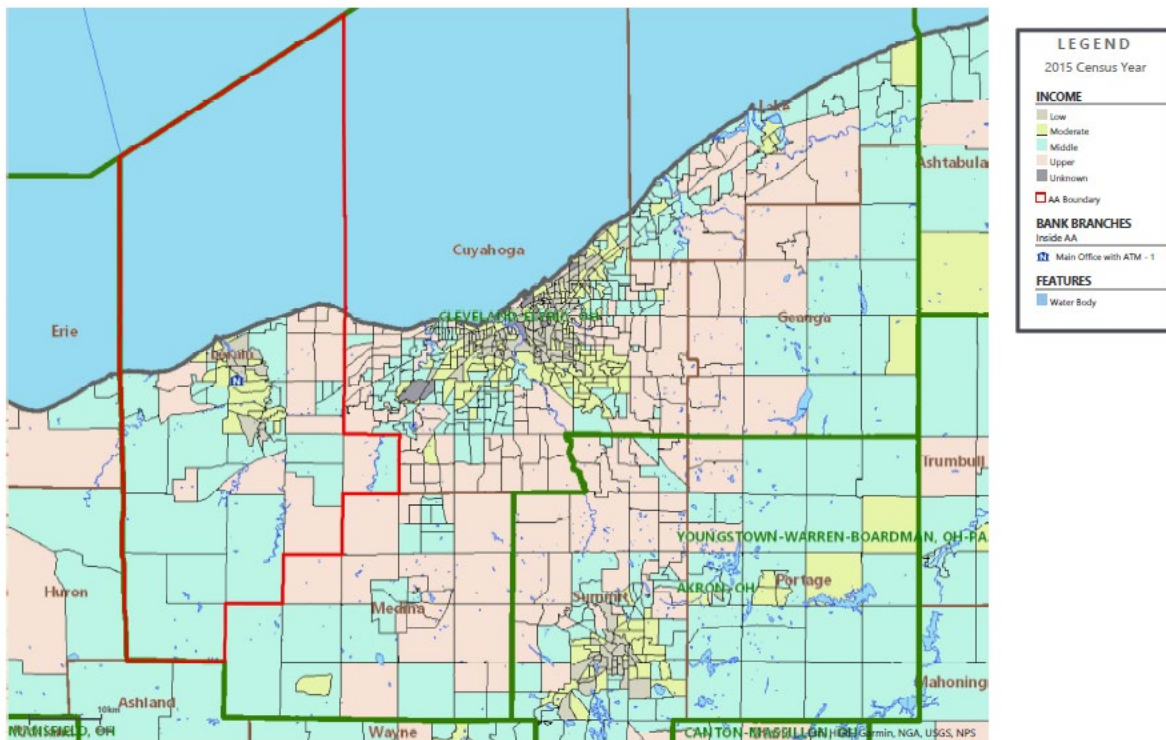
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited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

Appendix A-Maps of the Assessment Areas

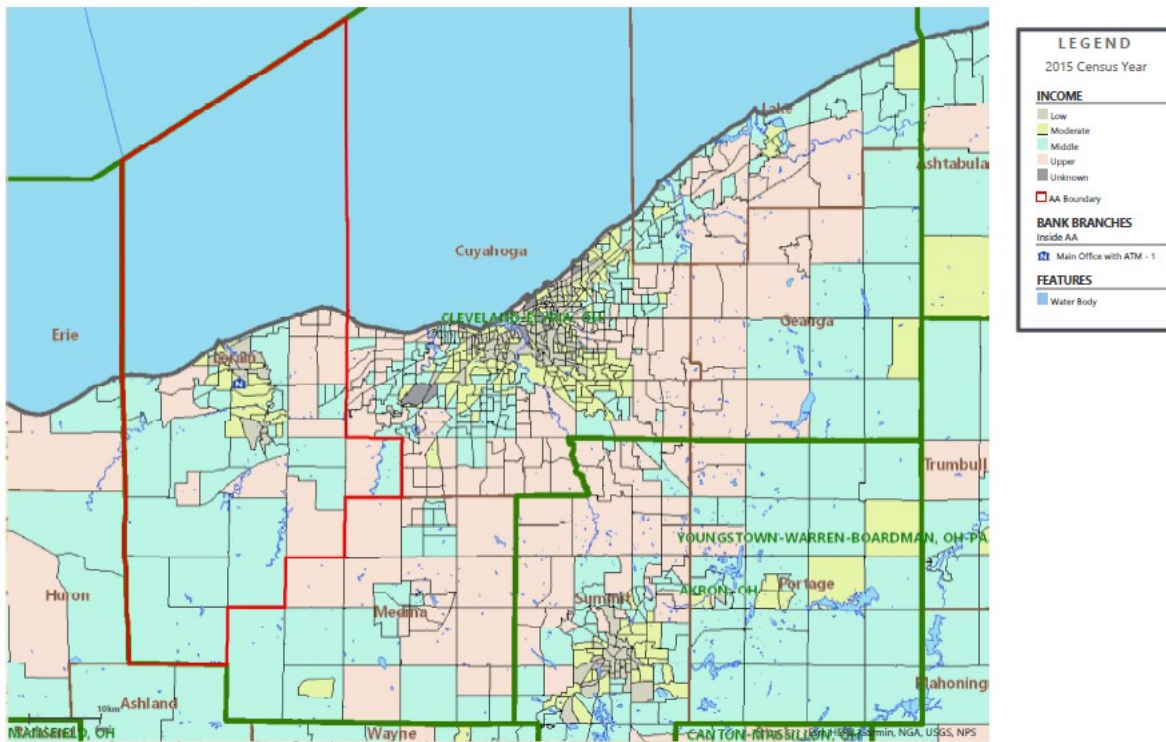
Assessment Area: 2021 Cleveland-Elyria, OH MSA #17460



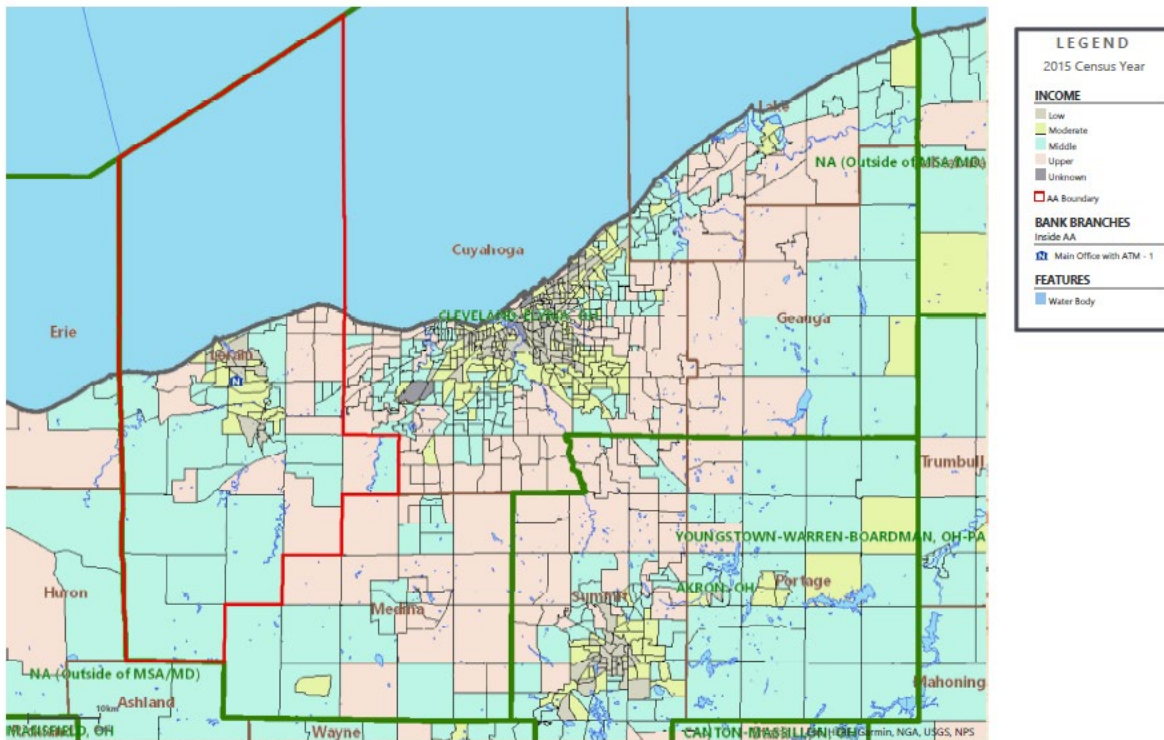
Assessment Area: 2020 Cleveland-Elyria, OH MSA #17460



Assessment Area: 2019 Cleveland-Elyria, OH MSA #17460

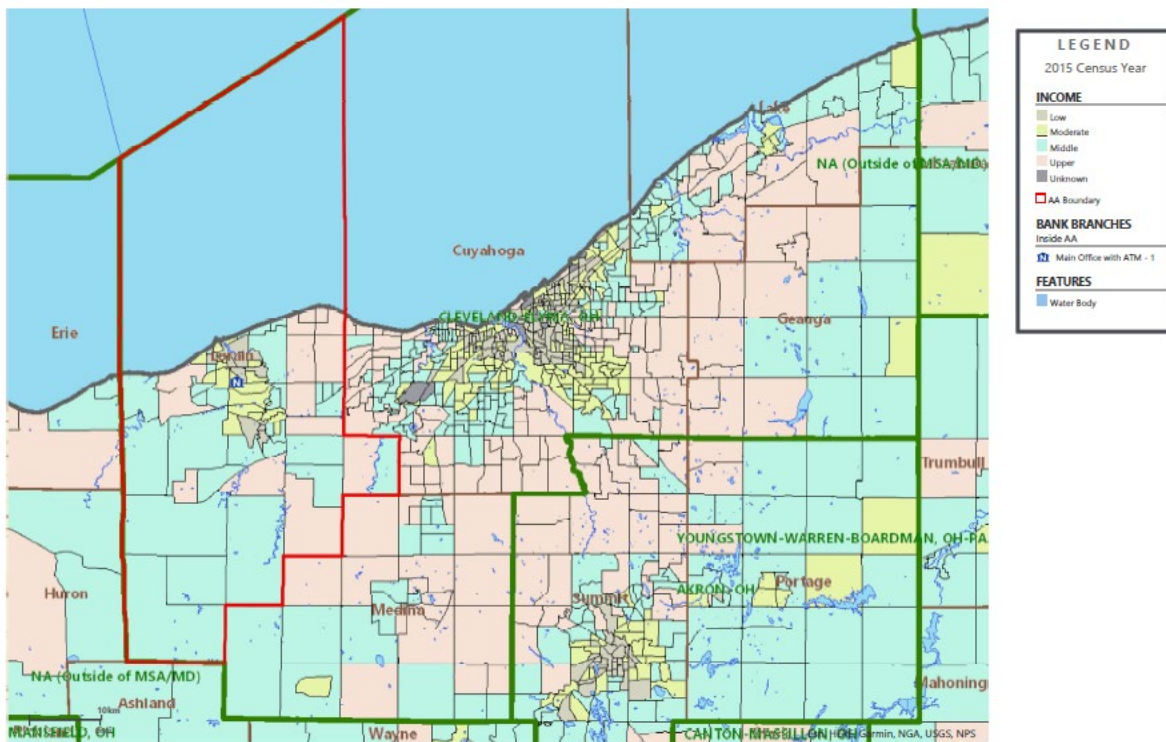


Assessment Area: 2018 Cleveland-Elyria, OH MSA #17460



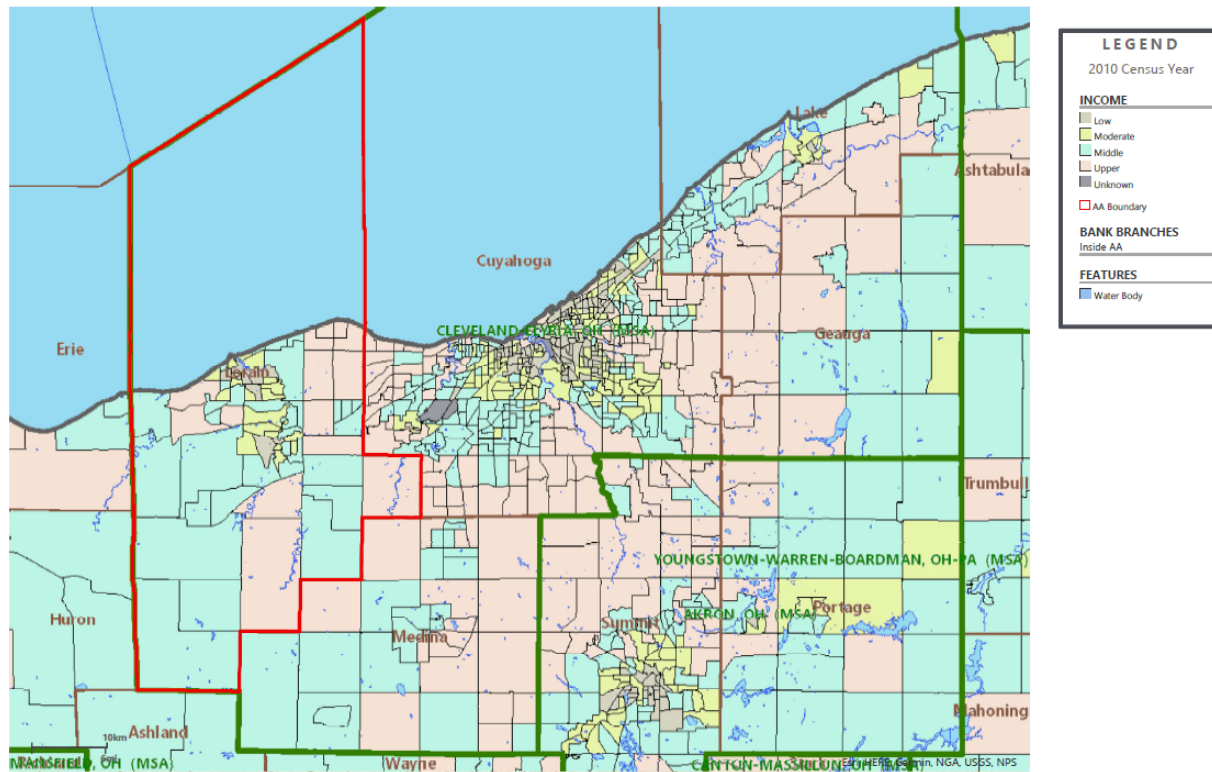


Assessment Area: 2017 Cleveland-Elyria, OH MSA #17460





Assessment Area:: 2016 Cleveland-Elyria, OH MSA #17460



## Appendix B–Demographic Information

2021 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.9	8,731	10.9	2,878	33.0	17,095	21.4
Moderate	18	24.3	13,883	17.4	2,522	18.2	14,122	17.7
Middle	30	40.5	32,429	40.7	2,359	7.3	16,653	20.9
Upper	14	18.9	24,728	31.0	932	3.8	31,901	40.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>79,771</b>	<b>100.0</b>	<b>8,691</b>	<b>10.9</b>	<b>79,771</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	15,608	6,364	7.6	40.8	7,013	44.9	2,231	14.3
Moderate	26,867	12,808	15.3	47.7	10,755	40.0	3,304	12.3
Middle	48,998	35,763	42.8	73.0	9,952	20.3	3,283	6.7
Upper	36,795	28,656	34.3	77.9	5,987	16.3	2,152	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>128,268</b>	<b>83,591</b>	<b>100.0</b>	<b>65.2</b>	<b>33,707</b>	<b>26.3</b>	<b>10,970</b>	<b>8.6</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	864	7.9	772	7.8	82	9.6	10	9.1
Moderate	1,704	15.6	1,533	15.4	158	18.5	13	11.8
Middle	4,361	39.9	4,014	40.3	302	35.3	45	40.9
Upper	3,994	36.6	3,639	36.5	313	36.6	42	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10,923</b>	<b>100.0</b>	<b>9,958</b>	<b>100.0</b>	<b>855</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.2</b>		<b>7.8</b>		<b>1.0</b>
Total Farms by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	5.3	11	5.4	0	0.0	0	0.0
Middle	141	67.8	137	67.8	4	66.7	0	0.0
Upper	56	26.9	54	26.7	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>208</b>	<b>100.0</b>	<b>202</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.1</b>		<b>2.9</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

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2020 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.9	8,731	10.9	2,878	33.0	17,095	21.4
Moderate	18	24.3	13,883	17.4	2,522	18.2	14,122	17.7
Middle	30	40.5	32,429	40.7	2,359	7.3	16,653	20.9
Upper	14	18.9	24,728	31.0	932	3.8	31,901	40.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>79,771</b>	<b>100.0</b>	<b>8,691</b>	<b>10.9</b>	<b>79,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,608	6,364	7.6	40.8	7,013	44.9	2,231	14.3
Moderate	26,867	12,808	15.3	47.7	10,755	40.0	3,304	12.3
Middle	48,998	35,763	42.8	73.0	9,952	20.3	3,283	6.7
Upper	36,795	28,656	34.3	77.9	5,987	16.3	2,152	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>128,268</b>	<b>83,591</b>	<b>100.0</b>	<b>65.2</b>	<b>33,707</b>	<b>26.3</b>	<b>10,970</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	864	7.9	772	7.8	82	9.6	10	9.1
Moderate	1,704	15.6	1,533	15.4	158	18.5	13	11.8
Middle	4,361	39.9	4,014	40.3	302	35.3	45	40.9
Upper	3,994	36.6	3,639	36.5	313	36.6	42	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10,923</b>	<b>100.0</b>	<b>9,958</b>	<b>100.0</b>	<b>855</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.2</b>		<b>7.8</b>		<b>1.0</b>	
	Total Farms by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	5.3	11	5.4	0	0.0	0	0.0
Middle	141	67.8	137	67.8	4	66.7	0	0.0
Upper	56	26.9	54	26.7	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>208</b>	<b>100.0</b>	<b>202</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>97.1</b>		<b>2.9</b>		<b>0.0</b>	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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2019 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.9	8,731	10.9	2,878	33.0	17,095	21.4
Moderate	18	24.3	13,883	17.4	2,522	18.2	14,122	17.7
Middle	30	40.5	32,429	40.7	2,359	7.3	16,653	20.9
Upper	14	18.9	24,728	31.0	932	3.8	31,901	40.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>79,771</b>	<b>100.0</b>	<b>8,691</b>	<b>10.9</b>	<b>79,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,608	6,364	7.6	40.8	7,013	44.9	2,231	14.3
Moderate	26,867	12,808	15.3	47.7	10,755	40.0	3,304	12.3
Middle	48,998	35,763	42.8	73.0	9,952	20.3	3,283	6.7
Upper	36,795	28,656	34.3	77.9	5,987	16.3	2,152	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>128,268</b>	<b>83,591</b>	<b>100.0</b>	<b>65.2</b>	<b>33,707</b>	<b>26.3</b>	<b>10,970</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	878	8.0	784	7.9	82	9.4	12	10.5
Moderate	1,688	15.4	1,514	15.2	162	18.6	12	10.5
Middle	4,339	39.5	3,981	39.9	311	35.7	47	41.2
Upper	4,067	37.1	3,707	37.1	317	36.4	43	37.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10,972</b>	<b>100.0</b>	<b>9,986</b>	<b>100.0</b>	<b>872</b>	<b>100.0</b>	<b>114</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.0</b>		<b>7.9</b>		<b>1.0</b>
	Total Farms by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	4.7	10	4.9	0	0.0	0	0.0
Middle	154	72.6	150	72.8	4	66.7	0	0.0
Upper	48	22.6	46	22.3	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>212</b>	<b>100.0</b>	<b>206</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.2</b>		<b>2.8</b>		<b>0.0</b>
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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2018 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.9	8,731	10.9	2,878	33.0	17,095	21.4
Moderate	18	24.3	13,883	17.4	2,522	18.2	14,122	17.7
Middle	30	40.5	32,429	40.7	2,359	7.3	16,653	20.9
Upper	14	18.9	24,728	31.0	932	3.8	31,901	40.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>79,771</b>	<b>100.0</b>	<b>8,691</b>	<b>10.9</b>	<b>79,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,608	6,364	7.6	40.8	7,013	44.9	2,231	14.3
Moderate	26,867	12,808	15.3	47.7	10,755	40.0	3,304	12.3
Middle	48,998	35,763	42.8	73.0	9,952	20.3	3,283	6.7
Upper	36,795	28,656	34.3	77.9	5,987	16.3	2,152	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>128,268</b>	<b>83,591</b>	<b>100.0</b>	<b>65.2</b>	<b>33,707</b>	<b>26.3</b>	<b>10,970</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	883	8.1	777	7.9	84	9.4	22	14.6
Moderate	1,652	15.1	1,469	14.9	169	18.9	14	9.3
Middle	4,304	39.4	3,923	39.7	319	35.7	62	41.1
Upper	4,079	37.4	3,705	37.5	321	35.9	53	35.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10,918</b>	<b>100.0</b>	<b>9,874</b>	<b>100.0</b>	<b>893</b>	<b>100.0</b>	<b>151</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>8.2</b>		<b>1.4</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	4.7	10	4.9	0	0.0	0	0.0
Middle	156	73.9	151	74.0	4	66.7	1	100.0
Upper	45	21.3	43	21.1	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>211</b>	<b>100.0</b>	<b>204</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>96.7</b>		<b>2.8</b>		<b>0.5</b>
<i>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

2017 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.9	8,731	10.9	2,878	33.0	17,095	21.4
Moderate	18	24.3	13,883	17.4	2,522	18.2	14,122	17.7
Middle	30	40.5	32,429	40.7	2,359	7.3	16,653	20.9
Upper	14	18.9	24,728	31.0	932	3.8	31,901	40.0
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>79,771</b>	<b>100.0</b>	<b>8,691</b>	<b>10.9</b>	<b>79,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	15,608	6,364	7.6	40.8	7,013	44.9	2,231	14.3
Moderate	26,867	12,808	15.3	47.7	10,755	40.0	3,304	12.3
Middle	48,998	35,763	42.8	73.0	9,952	20.3	3,283	6.7
Upper	36,795	28,656	34.3	77.9	5,987	16.3	2,152	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>128,268</b>	<b>83,591</b>	<b>100.0</b>	<b>65.2</b>	<b>33,707</b>	<b>26.3</b>	<b>10,970</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	761	8.6	663	8.4	84	9.7	14	14.0
Moderate	1,355	15.2	1,181	14.9	167	19.2	7	7.0
Middle	3,580	40.3	3,216	40.6	316	36.4	48	48.0
Upper	3,194	35.9	2,861	36.1	302	34.8	31	31.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8,890</b>	<b>100.0</b>	<b>7,921</b>	<b>100.0</b>	<b>869</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.1</b>			<b>9.8</b>	<b>1.1</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	5.7	11	5.9	0	0.0	0	0.0
Middle	136	70.8	132	71.0	4	66.7	0	0.0
Upper	45	23.4	43	23.1	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>192</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.9</b>			<b>3.1</b>	<b>0.0</b>
Source: 2017 FFIEC Census Data 2017 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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2016 CLEVELAND-ELYRIA, OH MSA #17460 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	10.8	5,641	7.0	2,298	40.7	16,647	20.7
Moderate	18	24.3	15,534	19.4	2,879	18.5	14,529	18.1
Middle	32	43.2	33,331	41.5	2,046	6.1	17,519	21.8
Upper	15	20.3	25,724	32.1	1,064	4.1	31,535	39.3
Unknown	1	1.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>80,230</b>	<b>100.0</b>	<b>8,287</b>	<b>10.3</b>	<b>80,230</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,777	3,546	4.2	36.3	4,468	45.7	1,763	18.0
Moderate	28,594	14,324	16.9	50.1	10,830	37.9	3,440	12.0
Middle	51,084	37,212	43.8	72.8	10,002	19.6	3,870	7.6
Upper	36,091	29,873	35.2	82.8	4,224	11.7	1,994	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>125,546</b>	<b>84,955</b>	<b>100.0</b>	<b>67.7</b>	<b>29,524</b>	<b>23.5</b>	<b>11,067</b>	<b>8.8</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	642	6.5	562	6.3	70	7.9	10	10.0
Moderate	1,401	14.2	1,235	13.9	153	17.2	13	13.0
Middle	4,210	42.5	3,822	42.9	339	38.1	49	49.0
Upper	3,646	36.8	3,290	36.9	328	36.9	28	28.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9,899</b>	<b>100.0</b>	<b>8,909</b>	<b>100.0</b>	<b>890</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.0</b>		<b>9.0</b>		<b>1.0</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.3	5	2.3	0	0.0	0	0.0
Middle	140	63.3	137	63.4	3	60.0	0	0.0
Upper	76	34.4	74	34.3	2	40.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>221</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>97.7</b>		<b>2.3</b>		<b>0.0</b>	
Source: 2016 FFIEC Census Data 2016 Dun & Bradstreet Data 2006-2010 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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### Appendix C—Lending Tables

Distribution of 2019 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	3.9	0	0.0	1.7	7.6
Moderate	1	6.7	10.7	81	3.2	7.3	15.3
Middle	5	33.3	40.2	765	30.0	34.8	42.8
Upper	9	60.0	45.2	1,702	66.8	56.1	34.3
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>2,548</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Distribution of 2018 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	4.1	0	0.0	2.0	7.6
Moderate	3	13.6	11.5	834	18.9	8.3	15.3
Middle	11	50.0	40.9	1,536	34.8	34.7	42.8
Upper	8	36.4	43.5	2,046	46.3	55.0	34.3
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>4,416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							



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Distribution of 2017 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Low</b>	1	5.6	4.5	62	1.2	1.7	7.6
<b>Moderate</b>	5	27.8	11.7	1,212	23.5	6.5	15.3
<b>Middle</b>	7	38.9	41.2	1,702	33.0	34.1	42.8
<b>Upper</b>	5	27.8	42.5	2,181	42.3	57.7	34.3
<b>Total</b>	18	100.0	100.0	5,157	100.0	100.0	100.0
<i>Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

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Distribution of 2016 HMDA Reportable Loans by Income Level of Geography							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	1	9.1	1.5	32	1.9	0.6	4.2
Moderate	2	18.2	12.1	79	4.8	6.4	16.9
Middle	3	27.3	41.4	588	35.5	33.4	43.8
Upper	5	45.5	45.0	957	57.8	59.7	35.2
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,656</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.4	0	0.0	0.6	4.2
Moderate	0	0.0	8.3	0	0.0	4.2	16.9
Middle	7	50.0	37.4	1,758	49.0	29.3	43.8
Upper	7	50.0	52.9	1,833	51.0	65.8	35.2
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>3,591</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.1	0	0.0	0.5	4.2
Moderate	0	0.0	15.1	0	0.0	5.8	16.9
Middle	1	100.0	41.2	130	100.0	31.1	43.8
Upper	0	0.0	41.6	0	0.0	62.6	35.2
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>130</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
Low	0	0.0	8.7	0	0.0	0.4	9.5
Moderate	0	0.0	26.1	0	0.0	13.4	39.4
Middle	1	100.0	47.8	45	100.0	38.9	30.8
Upper	0	0.0	17.4	0	0.0	47.4	20.3
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							<b>Owner Occupied Units %</b>
Low	1	3.7	1.5	32	0.6	0.6	4.2
Moderate	2	7.4	10.8	79	1.5	6.0	16.9
Middle	12	44.4	39.9	2,521	46.5	32.2	43.8
Upper	12	44.4	47.7	2,790	51.5	61.2	35.2
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>5,422</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2016 FFIEC Census Data							
2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2019 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	1	6.7	9.1	81	3.2	4.5	21.4
Moderate	3	20.0	19.1	250	9.8	13.2	17.7
Middle	1	6.7	22.7	100	3.9	20.2	20.9
Upper	8	53.3	33.6	1,848	72.5	42.4	40.0
Unknown	2	13.3	15.5	269	10.6	19.8	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>2,548</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Distribution of 2018 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	9.7	0	0.0	5.0	21.4
Moderate	1	4.5	19.5	75	1.7	13.7	17.7
Middle	3	13.6	21.3	351	7.9	18.7	20.9
Upper	13	59.1	34.8	2,742	62.1	43.0	40.0
Unknown	5	22.7	14.6	1,248	28.3	19.6	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>4,416</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

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Distribution of 2017 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Low</b>	0	0.0	9.1	0	0.0	4.1	21.4
<b>Moderate</b>	0	0.0	18.5	0	0.0	11.9	17.7
<b>Middle</b>	2	11.1	21.1	248	4.8	18.5	20.9
<b>Upper</b>	10	55.6	33.9	1,996	38.7	43.9	40.0
<b>Unknown</b>	6	33.3	17.4	2,913	56.5	21.5	0.0
<b>Total</b>	18	100.0	100.0	5,157	100.0	100.0	100.0
<i>Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

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Distribution of 2016 HMDA Reportable Loans by Borrower Income Level							
Assessment Area: Cleveland-Elyria, OH MSA #17460							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>							
Low	2	18.2	10.7	72	4.3	5.0	20.7
Moderate	1	9.1	21.5	60	3.6	14.8	18.1
Middle	1	9.1	19.7	66	4.0	18.6	21.8
Upper	5	45.5	32.8	1,083	65.4	48.8	39.3
Unknown	2	18.2	15.3	375	22.6	12.9	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,656</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	6.1	0	0.0	3.2	20.7
Moderate	0	0.0	13.4	0	0.0	8.6	18.1
Middle	2	14.3	20.0	214	6.0	16.4	21.8
Upper	12	85.7	39.9	3,377	94.0	50.6	39.3
Unknown	0	0.0	20.7	0	0.0	21.1	0.0
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>3,591</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	8.4	0	0.0	3.0	20.7
Moderate	0	0.0	18.8	0	0.0	11.0	18.1
Middle	0	0.0	20.5	0	0.0	13.7	21.8
Upper	1	100.0	46.7	130	100.0	62.7	39.3
Unknown	0	0.0	5.6	0	0.0	9.6	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>130</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total HMDA Reportable Loans</b>							
Low	2	7.4	8.8	72	1.3	4.1	20.7
Moderate	1	3.7	18.3	60	1.1	11.6	18.1
Middle	3	11.1	19.8	280	5.2	16.7	21.8
Upper	18	66.7	36.0	4,590	84.7	46.9	39.3
Unknown	3	11.1	17.1	420	7.7	20.8	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>5,422</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2016 FFIEC Census Data 2006-2010 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

### Appendix D–Glossary of Terms

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

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

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1.0 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar

amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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



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have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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