



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

February 24, 2025

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings and Loan Association of McMinnville  
Charter Number 703773

118 NE 3rd Street  
McMinnville, Oregon 97128

Office of the Comptroller of the Currency

Seattle Office  
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Seattle, Washington 98101

**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, and should not 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.

## Contents

Overall CRA Rating .....	1
Description of Institution .....	2
Scope of the Evaluation .....	3
Discriminatory or Other Illegal Credit Practices Review .....	3
State Rating.....	5
State of Oregon .....	5
Community Development Test .....	9
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of MMSA and State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations .....	C-1
Appendix D: Tables of Performance Data .....	D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Outstanding.**

All ratings are based on the association's performance in the state of Oregon, which includes the Yamhill County assessment area (AA). The major factors that support this rating include:

- For the Lending Test, the reasonable loan-to-deposit (LTD) ratio, the reasonable distribution of home mortgage loans to low- and moderate-income (LMI) individuals and in LMI geographies, and the fact that a majority of the association's home mortgage loans are inside its AA.
- For the Community Development (CD) Test, the excellent level of CD loans and services during the evaluation period.

### Loan-to-Deposit Ratio

Considering the association's size, financial condition, and credit needs of the AA, the LTD ratio is reasonable.

First Federal Savings and Loan Association of McMinnville's (First Federal or association) quarterly average LTD ratio was 61.5 percent for the 12 quarters ending December 31, 2023. This represents the period from the last CRA examination, which evaluated the association's LTD ratio through December 31, 2020.

For comparison, we identified five similarly-sized institutions that operate within or near First Federal's footprint and therefore face similar demographic factors, economic factors, and lending opportunities. The quarterly average LTD ratio for this peer group was comparable at 65.8 percent.

### Lending in Assessment Area

A majority of the association's home mortgage loans are inside its AA.

Based on aggregate lending data, First Federal originated and purchased 71.9 percent of its home mortgage loans inside its AA during the evaluation period. There was a decline in the dollar amount of loans originated inside the AA within the last two years, however, on average, a majority of loans by both number and dollar amount remain inside the AA.

<b>Table D – Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2021	190	76.9	57	23.1	247	54,953	68.0	25,805	32.0	80,758
2022	43	51.8	40	48.2	83	13,875	32.6	28,649	67.4	42,524
2023	58	77.3	17	22.7	75	11,394	47.8	12,462	52.2	23,856
<b>Total</b>	<b>291</b>	<b>71.9</b>	<b>114</b>	<b>28.1</b>	<b>405</b>	<b>80,222</b>	<b>54.5</b>	<b>66,916</b>	<b>45.5</b>	<b>147,138</b>

*Source: Bank Data  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

First Federal Savings and Loan Association of McMinnville is a federal mutual savings association founded in 1922 that operates within the state of Oregon. The association was initially founded as American Savings and Loan Corporation in McMinnville but changed its name to First Federal in 1936. As of December 31, 2023, the association reported total assets of \$630 million. There is no holding company, and there are no subsidiaries or affiliates.

First Federal is headquartered in McMinnville and has offices in Amity, Carlton, Newberg, and Sheridan. In total there are six full-service branches, one lending center, and eight deposit-taking automated teller machines (ATMs). All offices and ATMs are located within Yamhill County, which comprises the association's single AA. During the evaluation period, on September 30, 2021, the association closed two limited-service branches that were located in retirement communities in McMinnville and Newberg. This should not materially impact access for LMI individuals, as the McMinnville branch was located in a middle-income census tract (tract or CT) and the Newberg branch, while located in a moderate-income tract, was less than one mile from a full-service branch that remains open. Additionally, the retirement communities that contained both branches have annual costs that exceed LMI thresholds.

First Federal offers a full suite of traditional community bank products and services. Deposit products include checking accounts, savings accounts, certificates of deposit, and individual retirement accounts. There are multiple ways for customers to make deposits during business hours at the branches and drive-up facilities. Additionally, at all hours, customers may use the deposit-taking ATMs, night depositories, and the mobile deposit function on the association's mobile banking platform.

Lending products offered to individuals include home purchase and refinance loans, construction loans, land loans, home equity loans and lines of credit, and automobile loans. Credit cards are also offered through a third-party. Lending products offered to businesses include commercial real estate loans and lines of credit, construction loans, land loans, multifamily loans, and other commercial loans and lines of credit.

Other products and services include online banking, mobile banking, safe deposit boxes, coin counting, wire transfers, notary services, and medallion signature guarantees.

Branch lobbies are open from 9:00 a.m. to 5:00 p.m. on Monday through Thursday, and from 9:00 a.m.

to 6:00 p.m. on Fridays. There are also extended drive-up hours beginning at 8:30 a.m. every weekday.

First Federal's CRA performance was rated "Outstanding" in the last examination, which was as of May 3, 2021, and there were no legal, financial, or other barriers present during the current evaluation period that would impede the association's ability to meet the credit and CD needs of its AA.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated First Federal using the Intermediate Small Bank CRA Examination Procedures due to its asset size. These procedures include both a lending test, which evaluates the association's record of meeting the credit needs of its AA through lending activities, and a CD test, which evaluates the association's record of meeting the CD needs of its AA through qualifying lending, investment, and service activities.

When completing the lending test, our primary objectives were to assess whether First Federal had originated and purchased a reasonable volume of home mortgage loans that benefited LMI individuals and individuals living in LMI areas. We also assessed whether a reasonable percentage of First Federal's home mortgage loans benefited individuals living inside the association's AA. The evaluation period for our lending test was from January 1, 2021, to December 31, 2023.

We determined the above scope by analyzing evaluation period lending activity and determining that home mortgage loans are the association's primary product. Specifically, during the evaluation period, home mortgage loans represented 60.3 percent of total originations and purchases by number, and 53 percent by dollar. Because First Federal is a Home Mortgage Disclosure Act (HMDA) reporter, we were able to use aggregate loan data in our analysis. Prior to this examination, we tested the accuracy of this data and found it to be reliable.

When completing the CD test, our primary objective was to assess whether First Federal has participated in a reasonable volume of qualifying lending, investment, and service activities. Our primary consideration was the level of CD activities within the association's AA, but to a lesser extent we also considered activities that benefited the broader statewide area. The evaluation period for our CD test was from January 1, 2021, to December 31, 2023.

### **Selection of Areas for Full-Scope Review**

First Federal has one AA, which is referred to as the Yamhill County AA throughout this report. This AA was selected for a full-scope review and evaluated under the State of Oregon rating area.

### **Ratings**

The association's overall rating is based entirely on our full-scope review of the Yamhill County AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the

OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Oregon

**CRA rating for the State of Oregon:** Outstanding

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

#### Lending Test

- The reasonable distribution of home mortgage loans in geographies with different income levels.
- The reasonable distribution of home mortgage loans to individuals with different income levels.
- The lack of complaints related to First Federal's CRA performance during the evaluation period.

#### Community Development Test

- The excellent level of CD loans.
- The excellent level of CD services.
- The reasonable level of qualified investments, which are entirely composed of donations.
- The high level of responsiveness to AA needs as CD activities are focused on addressing identified critical needs within the association's AA.

### Description of Institution's Operations in Oregon

The association's sole AA includes all of Yamhill County, Oregon. This AA meets regulatory requirements and does not exclude any LMI areas.

Yamhill County is in northwest Oregon, within both the Willamette Valley and the Portland-Vancouver-Hillsboro Metropolitan Statistical Area (MSA). One side of the county extends to approximately 15 miles from the city of Portland, and the other side extends to approximately 11 miles from the Pacific Ocean. The U.S. Census Bureau estimates the population of the county was 107,722 based on 2020 Census data. Primary industries, competition, and demographics are discussed further below.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, seven institutions have branches in Yamhill County. First Federal accounts for 32.6 percent of the county's total market share. U.S. Bank, N.A., Umpqua Bank, and Wells Fargo Bank, N.A. are the largest competitors, with 24.2, 16.1, and 12.5 percent of the market share, respectively. All competitors operate in additional locales outside Yamhill County.

First Federal primarily operates in McMinnville, which is the county seat. Within McMinnville, First Federal has its home office with an attached lending center, as well as one other full-service branch. There are also full-service branches in Amity, Carlton, Newberg, and Sheridan. Each branch has a deposit-taking ATM located on the premises.

In 2021, based on data from the 2015 American Community Survey (ACS), Yamhill County had 17 CTs. This included one low-income tract, six moderate-income tracts, nine middle-income tracts, and one upper-income tract. In 2022 and 2023, based on data from the 2020 Census, this changed to 19

tracts, including nine moderate-income tracts, eight middle-income tracts, and two upper-income tracts. Most of First Federal’s branches are in or near LMI tracts, except for the Carlton and Amity branches which are in middle-income tracts.

Based on a November 2024 Moody’s Analytics report for the Portland-Vancouver-Hillsboro MSA, the primary economic drivers for the MSA are technology, healthcare, and manufacturing. Strengths include the highly diversified economy, skilled workforce, and favorable job mix with high incomes and high quality of life. However, the report also noted the area is vulnerable to changes in terms of trade and exposed to volatility within the technology and manufacturing sectors. It also noted that housing is expensive in the area, with the MSA and Oregon trailing in housing affordability compared to the rest of the U.S.

Yamhill County is primarily an agricultural area. According to the Oregon Secretary of State, nursery and greenhouse crops, including fruit trees, nuts, wine grapes, berries, hay, silage, and field and grass seeds are the area’s major agricultural products. Yamhill County is the heart of Oregon’s wine industry, with over 80 wineries and 200 vineyards, representing the largest concentration of wine growers and producers in the state. Additionally, one third of the physical area within the county is dedicated to the lumber industry.

We conducted one community contact interview in conjunction with this examination. The contact is affiliated with a local nonprofit organization, and noted there is a severe lack of affordable childcare resources, including the lack of facilities and spaces. The contact also noted a lack of resources available to provide children with financial education. We considered these factors when evaluating First Federal’s lending and CD performance.

Yamhill County AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2021 Yamhill County AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (CTs)	17	5.9	35.3	52.9	5.9	0.0
Population by Geography	101,119	5.1	33.7	59.1	2.0	0.0
Housing Units by Geography	37,495	3.5	35.1	59.1	2.3	0.0
Owner-Occupied Units by Geography	23,203	2.3	27.2	67.3	3.1	0.0
Occupied Rental Units by Geography	11,222	6.1	50.2	43.1	0.7	0.0
Vacant Units by Geography	3,070	2.7	39.2	56.3	1.9	0.0
Businesses by Geography	11,233	2.4	37.1	57.1	3.4	0.0
Farms by Geography	913	1.2	17.7	74.5	6.6	0.0
Family Distribution by Income Level	24,518	27.4	20.5	20.3	31.8	0.0
Household Distribution by Income Level	34,425	26.5	19.4	17.8	36.3	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$73,089	Median Housing Value			\$223,021
			Median Gross Rent			\$931
			Families Below Poverty Level			12.0%

*Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%  
 (\*) The NA category consists of geographies that have not been assigned an income classification.*

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Yamhill County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (CTs)	19	0.0	47.4	42.1	10.5	0.0
Population by Geography	107,722	0.0	45.6	46.1	8.3	0.0
Housing Units by Geography	39,504	0.0	47.3	45.1	7.5	0.0
Owner-Occupied Units by Geography	26,349	0.0	39.2	51.9	8.9	0.0
Occupied Rental Units by Geography	11,193	0.0	66.5	29.2	4.4	0.0
Vacant Units by Geography	1,962	0.0	46.9	45.6	7.5	0.0
Businesses by Geography	14,597	0.0	46.4	42.2	11.4	0.0
Farms by Geography	1,129	0.0	31.9	53.5	14.6	0.0
Family Distribution by Income Level	26,483	24.8	21.8	21.7	31.6	0.0
Household Distribution by Income Level	37,542	25.9	20.6	18.2	35.3	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$94,727	Median Housing Value			\$328,043
			Median Gross Rent			\$1,146
			Families Below Poverty Level			8.4%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data. Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Scope of Evaluation in Oregon**

The rating for the state of Oregon is based entirely on the association’s performance in the Yamhill County AA, as this is the only AA in the state.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON**

**LENDING TEST**

The association’s performance under the Lending Test in the state of Oregon is rated satisfactory.

**Conclusions for Areas Receiving a Full-Scope Review**

Based on a full-scope review, the association’s lending performance in the Yamhill County AA is reasonable.

**Distribution of Loans by Income Level of the Geography**

The association exhibits reasonable geographic distribution of loans in the state.

### ***Home Mortgage Loans***

In 2021, the association originated and purchased 2.1 percent of its home mortgage loans in the single low-income CT, which was proximate to both the aggregate peer percentage of lending and the percentage distribution of owner-occupied housing units in this CT at 2.4 percent and 2.3 percent, respectively. It also originated and purchased 24.2 percent of its home mortgage loans in moderate-income CTs, which was near to both the aggregate peer percentage of lending and the percentage distribution of owner-occupied housing units in those CTs at 25.9 percent and 27.2 percent, respectively.

In 2022 and 2023, there were no low-income CTs in the AA. However, there were nine moderate-income CTs, and the association originated and purchased 36.6 percent of its home mortgage loans in those CTs. This was near to both the aggregate peer percentage of lending and the percentage distribution of owner-occupied housing units in those CTs at 37.8 percent and 39.2 percent, respectively.

Refer to Table O in the state of Oregon section of appendix D for more information about the facts and data used to evaluate the geographic distribution of the association's home mortgage loan originations and purchases.

### **Distribution of Loans by Income Level of the Borrower**

The association exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the association.

### ***Home Mortgage Loans***

In 2021, 11.1 percent of the association's home mortgage loans were to low-income borrowers, which exceeded the aggregate peer percentage of lending to low-income borrowers at 7.5 percent but was below the percentage of families within the AA who are low-income at 27.4 percent. In 2022 and 2023, 12.9 percent of the association's home mortgage loans were to low-income borrowers, which exceeded the aggregate peer percentage of lending to low-income borrowers at 5.9 percent but was below the percentage of families within the AA who are low-income at 24.8 percent. The comparison to peer was given greater weight due to performance context factors that are discussed further below.

In 2021, 23.2 percent of the association's home mortgage loans were to moderate-income borrowers, which exceeded both the aggregate peer percentage of lending to moderate-income borrowers at 21.7 percent and the percentage of AA families that are moderate-income at 20.5 percent. In 2022 and 2023, 13.9 percent of the association's home mortgage loans were to moderate-income borrowers, which was below both the aggregate peer percentage of lending to moderate income-borrowers at 20.1 percent and the percentage of AA families that are moderate-income at 21.8 percent. We placed greater weight on 2021 performance because, as shown in Table D, 2021 lending activity represented more than half the association's total lending activity for the three-year evaluation period.

Housing affordability impacts low-income borrowers acutely. Table A, which is included in the "Description of Institution's Operations in Oregon" section above, shows that throughout the evaluation period, 8.4 percent to 12 percent of AA families were living below the poverty level. Our examination considered that families living below the poverty level can experience difficulties meeting industry-standard credit underwriting criteria.

We also considered housing prices as a barrier to homeownership. As shown in Table A, using the most recent data available, the median housing value in Yamhill County was \$328 thousand. This was 3.5 times the median family income, 4.3 times the upper limit for moderate-income families, and 6.9 times the upper limit for low-income families, which further indicates housing may be unaffordable for many LMI families.

Refer to Table P in the state of Oregon section of appendix D for more information about the facts and data used to evaluate the borrower distribution of the association’s home mortgage loan originations and purchases.

**Responses to Complaints**

There were no complaints related to First Federal’s CRA performance during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The association’s performance under the CD Test in the state of Oregon is rated outstanding.

**Conclusions for Areas Receiving a Full-Scope Review**

Based on a full-scope review, the association exhibits excellent responsiveness to Yamhill County’s CD needs, considering the association’s capacity and the need for, and availability of, such opportunities for CD in the AA.

**Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the association’s level of CD lending. The table includes all CD loans, including loan commitments and any multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
<b>Assessment Area</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>
Yamhill County AA	18	64.3	16,509	51.6
Statewide	10	35.7	15,478	48.4
<b>Total</b>	<b>28</b>	<b>100</b>	<b>31,987</b>	<b>100</b>

First Federal’s volume of CD lending demonstrates excellent responsiveness to AA needs. During the evaluation period, the association originated 12 qualifying loans and six qualifying letters of credit totaling \$16.5 million that benefited individuals and businesses in Yamhill County.

Examples include:

- Eight loans totaling \$15.2 million that funded affordable housing.
- Two loans totaling \$1 million that promoted economic development by financing small businesses.
- Two loans totaling \$192 thousand that contributed to community services for LMI individuals.

In addition to the lending activity that directly benefited Yamhill County, First Federal also originated ten qualifying loans totaling \$15.5 million that benefited the broader statewide area. These loans funded affordable housing and promoted economic development by supporting small businesses. Our focus was on CD activities that directly benefited the AA; however, these additional activities further demonstrate the association’s commitment to CD.

**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Yamhill County AA	0	0	86	307.3	86	100	307.3	100	0	0

\* Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

First Federal’s volume of CD investments demonstrates adequate responsiveness to AA needs. During the evaluation period, the association donated \$307.3 thousand to non-profit organizations that provide qualifying services in Yamhill County. Our examination considered donated funds to be more impactful as they do not require repayment by the recipients.

Examples include:

- \$22.3 thousand to support a non-profit organization that aids the victims of domestic violence.
- \$19.7 thousand to support a non-profit organization that provides LMI individuals with affordable housing.
- \$16 thousand to support a non-profit organization that provides resources to individuals with disabilities in Yamhill County.
- \$4.7 thousand to support a non-profit organization that provides LMI individuals with cancer treatments.

**Extent to Which the Bank Provides Community Development Services**

The association’s volume of CD services demonstrates excellent responsiveness to AA needs. During the evaluation period, First Federal employees contributed 950 qualifying service hours to 25 organizations.

Examples include:

- One employee contributed 201 hours as a board member for a non-profit organization that provides community services to LMI individuals.
- One employee contributed 142.5 hours as a board member for an organization that provides affordable housing for LMI individuals.
- One employee contributed 31.5 hours as a board member for an organization that provides resources and support for LMI children and families.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2021 to December 31, 2023	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans CD Loans, Investments, and Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of AAs and Type of Examination</b>		
<b>Rating and AAs</b>	<b>Type of Examination</b>	<b>Other Information</b>
Oregon		
Yamhill County	Full-Scope	This AA includes all of Yamhill County, which is within the Portland-Vancouver-Hillsboro MSA.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		First Federal Savings and Loan Association of McMinnville		
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating	
First Federal Savings and Loan Association of McMinnville	Satisfactory	Outstanding	Outstanding	
MMSA or State:				
State of Oregon	Satisfactory	Outstanding	Outstanding	

(\*) The Lending Test and CD Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with

the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low-Income Geography:** A CT with a MFI that is less than 50 percent.

**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 state/AA.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

**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 CD.

**Rating Area:** A rated area is a state or multi-state MSA. 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 multi-state MSA, the institution will receive a rating for the multi-state MSA.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a MFI that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MSAs, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless

of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Yamhill County AA	190	54,953	100.0	7,096	2.3	2.1	2.4	27.2	24.2	25.9	67.3	73.2	69.3	3.1	0.5	2.4	0.0	0.0	0.0
<b>Total</b>	<b>190</b>	<b>54,953</b>	<b>100.0</b>	<b>7,096</b>	<b>2.3</b>	<b>2.1</b>	<b>2.4</b>	<b>27.2</b>	<b>24.2</b>	<b>25.9</b>	<b>67.3</b>	<b>73.2</b>	<b>69.3</b>	<b>3.1</b>	<b>0.5</b>	<b>2.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Yamhill County AA	101	25,269	100.0	2,295	0.0	0.0	0.0	39.2	36.6	37.8	51.9	59.4	52.3	8.9	4.0	9.8	0.0	0.0	0.0
<b>Total</b>	<b>101</b>	<b>25,269</b>	<b>100.0</b>	<b>2,295</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>39.2</b>	<b>36.6</b>	<b>37.8</b>	<b>51.9</b>	<b>59.4</b>	<b>52.3</b>	<b>8.9</b>	<b>4.0</b>	<b>9.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Yamhill County AA	190	54,953	100.0	7,096	27.4	11.1	7.5	20.5	23.2	21.7	20.3	27.4	25.5	31.8	33.7	26.8	0.0	4.7	18.5
<b>Total</b>	<b>190</b>	<b>54,9523</b>	<b>100.0</b>	<b>7,096</b>	<b>27.4</b>	<b>11.1</b>	<b>7.5</b>	<b>20.5</b>	<b>23.2</b>	<b>21.7</b>	<b>20.3</b>	<b>27.4</b>	<b>25.5</b>	<b>31.8</b>	<b>33.7</b>	<b>26.8</b>	<b>0.0</b>	<b>4.7</b>	<b>18.5</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Yamhill County AA	101	25,269	100.0	2,295	24.8	12.9	5.9	21.8	13.9	20.1	21.7	30.7	28.8	31.6	32.7	29.5	0.0	9.9	15.6
<b>Total</b>	<b>101</b>	<b>25,269</b>	<b>100.0</b>	<b>2,295</b>	<b>24.8</b>	<b>12.9</b>	<b>5.9</b>	<b>21.8</b>	<b>13.9</b>	<b>20.1</b>	<b>21.7</b>	<b>30.7</b>	<b>28.8</b>	<b>31.6</b>	<b>32.7</b>	<b>29.5</b>	<b>0.0</b>	<b>9.9</b>	<b>15.6</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%