



PUBLIC DISCLOSURE

October 28, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Savings Bank
Charter Number 702631

633 LaSalle Street
Ottawa, Illinois 61350

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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.

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits a reasonable borrower distribution.
- The bank exhibits a reasonable geographic distribution.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are originated and purchased inside the assessment areas (AAs).

Loan-to-Deposit Ratio

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

The quarterly average LTD ratio was 76.7 percent for the 10-quarter period from September 30, 2021, through December 31, 2023, with a low of 62.5 percent and a high of 95.0 percent.

The bank ranked sixth out of 22 similarly situated Federal Deposit Insurance Corporation (FDIC) insured institutions that compete with the bank for deposits in the AAs. The comparable institutions range in total asset size from \$189.9 million to \$848.2 million and reported quarterly average LTD ratios from 39.8 percent to 104.6 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 68.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	877	68.6	402	31.4	1,279	165,815	55.5	133,153	44.5	298,968
Total	877	68.6	402	31.4	1,279	165,815	55.5	133,153	44.5	298,968

Description of Institution

First Federal Savings Bank (FFSB or bank) is an intrastate mutual thrift financial institution headquartered in Ottawa, Illinois with total assets of \$390.6 million at December 31, 2023. The bank has one subsidiary, which does not affect the bank's ability to meet the credit needs of its communities.

FFSB has one rating area in the state of Illinois with two legal AAs served by 12 branch locations. One AA is comprised of non-metropolitan statistical area (Non-MSA) counties while the second AA is comprised of counties in the Chicago-Naperville-Elgin, IL MSA (Chicago MSA). There were no branch closures or openings during the evaluation period.

FFSB is primarily a home mortgage lender. Residential loans represent the largest portfolio at \$194.7 million, followed by commercial loans at \$86.5 million, and consumer loans at \$11.1 million, per call report data as of December 31, 2023. FFSB also originates home mortgage loans for sale into the secondary market. Please see the Public File for more information on products and services offered by the bank.

The bank reported a net loans and leases to assets ratio of 74.1 percent and a leverage capital ratio of 11.1 percent at December 31, 2023.

The previous CRA rating, which the Office of the Comptroller of the Currency (OCC) determined using the Intermediate Small Bank evaluation procedures, was Satisfactory, as detailed in the Performance Evaluation (PE) dated September 13, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation covers the period from January 1, 2021, through December 31, 2023. We evaluated the bank under the Small Bank evaluation procedures, which includes a Lending Test.

The Lending Test evaluated loans originated and purchased between January 1, 2021, and December 31, 2023. The primary loan product for the evaluation period was determined to be home mortgage loans. The bank originated and purchased over 2,100 loans totaling \$388.1 million, with home mortgage lending representing 68.2 percent by number and 80.5 percent by dollar volume. The OCC evaluated the bank's lending performance by reviewing home mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA). The OCC compared home mortgage loans originated and purchased in 2021 to the 2015 American Community Survey Census Data while home mortgage loans originated and purchased in 2022 and 2023 were compared to the 2020 U.S. Census Data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, the OCC selected one or more of the AAs within that state for a full-scope review. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on lending performance within the state of Illinois rating area.

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 Illinois

CRA rating for the state of Illinois¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits a reasonable borrower distribution.
- The bank exhibits a reasonable geographic distribution.

Description of Institution's Operations in Illinois

FFSB has two legal AAs in the state of Illinois. The Chicago MSA consists of four whole counties containing 254 census tracts (CTs) in the 2021 year and 307 CTs in 2022-2023. In 2021, the Chicago MSA contained 14 low-income CTs and 50 moderate-income CTs while in 2022-2023, the number of low-income CTs decreased to seven and moderate-income CTs increased to 73. The Non-MSA contains six whole counties containing 77 CTs in the 2021 year and 78 CTs in 2022-2023. In 2021, the Non-MSA contained zero low-income CTs and nine moderate-income CTs while in 2022-2023, the number of low-income CTs was zero and the number of moderate-income CTs decreased to seven. Refer to Appendix A for a listing of AAs.

The bank serves its customers in the Chicago MSA with three branches and three automated teller machines (ATMs) located onsite at branches. The bank serves its customers in the Non-MSA with nine branches and nine ATMs located onsite at branches with one of the nine ATMs being a deposit-taking ATM.

Major employment sectors in the Chicago MSA include professional and business services, finance and insurance, and retail services, per 2023 demographic data. Major employment sectors in the Non-MSA include professional and business services, retail services, and agriculture, per 2023 demographic data.

According to the U.S. Bureau of Labor Statistics, the annual unemployment rate in the state of Illinois was 6.1 percent for 2021 and then declined to 4.6 percent for 2022 and 4.5 percent for 2023. In the Chicago MSA, one of four counties compared unfavorably to the state of Illinois in the evaluation period. In the Non-MSA, three of six counties compared unfavorably to the state of Illinois in the evaluation period.

FFSB sourced 100.0 percent of its \$316.4 million deposits from the Illinois rating area, per FDIC data as of June 30, 2023. The Chicago MSA represented 31.8 percent of deposits and 56.6 percent of HMDA originations and purchases. The Non-MSA represented 68.2 percent of deposits and 43.4 percent of HMDA originations and purchases.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Competition for deposits and loans in the Chicago MSA is high among financial institutions and moderate in the Non-MSA. In the Chicago MSA, FFSB held a market share of 0.3 percent with \$100.5 million in deposits, per FDIC data as of June 30, 2023. The bank ranked 28th out of 55 institutions competing for the area's \$38.8 billion in deposits, as of June 30, 2023. In the Non-MSA, FFSB held a market share of 2.4 percent with \$215.9 million in deposits, per FDIC data as of June 30, 2023. The bank ranked 15th out of 43 institutions competing for the area's \$8.9 billion in deposits, as of June 30, 2023.

Housing in the Chicago MSA may be unaffordable to low-income borrowers but affordable to moderate-income borrowers. Based on information in Table A, low-income families earned less than \$37,512 in 2021 and less than 46,311 in 2023. Moderate-income families earned less than \$60,019 in 2021 and less than \$74,098 in 2023. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$938 in 2021 and \$1,158 in 2023 for low-income borrowers and a maximum monthly mortgage payment of \$1,500 in 2021 and \$1,852 in 2023 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Chicago MSA median housing value would be \$1,136 in 2021 and \$1,306 in 2023. Most moderate-income borrowers in the Chicago MSA would be able to afford a mortgage loan.

Housing in the Non-MSA may be affordable to both low- and moderate-income borrowers. Based on information in Table A, low-income families earned less than \$29,662 in 2021 and less than \$34,479 in 2023. Moderate-income families earned less than \$47,458 in 2021 and less than \$55,166 in 2023. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$742 in 2021 and \$862 in 2023 for low-income borrowers and a maximum monthly mortgage payment of \$1,186 in 2021 and \$1,379 in 2023 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Non-MSA median housing value would be \$621 in 2021 and \$660 in 2023. Most moderate-income borrowers in the Non-MSA would be able to afford a mortgage loan.

For the Non-MSA, we obtained a community contact representing a small business development organization that provides resources, guidance, and education opportunities to start-up and existing small businesses in the north central Illinois area, including Bureau, LaSalle, Lee, Livingston, Putnam, and Whiteside counties. The contact described the economic condition of the area to be stabilized since the Covid-19 pandemic. The contact commented the agricultural industry is the major driver for the area. The contact noted a need for small business loans and micro-loans. The contact had a positive perception of FFSB for being responsive in the area.

For the Chicago MSA, we obtained a community contact representing an economic development group that supports new and existing small businesses in Kane County through capital and expertise. The contact described the economic conditions as diverse. The contact noted a need for liquidity and capital for new and existing small businesses in the area. The contact had no negative perception of FFSB.

Chicago MSA - 2021

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	254	5.5	19.7	41.3	33.1	0.4
Population by Geography	1,379,194	3.5	17.8	38.1	40.7	0.0
Housing Units by Geography	483,795	3.6	16.8	40.5	39.1	0.0
Owner-Occupied Units by Geography	354,821	1.6	12.0	41.1	45.3	0.0
Occupied Rental Units by Geography	98,306	9.8	31.9	37.3	21.1	0.0
Vacant Units by Geography	30,668	6.2	24.4	44.4	25.0	0.0
Businesses by Geography	98,243	3.4	11.4	36.7	48.6	0.0
Farms by Geography	2,954	1.8	10.8	47.6	39.8	0.0
Family Distribution by Income Level	343,460	17.2	15.9	20.8	46.1	0.0
Household Distribution by Income Level	453,127	18.5	14.2	18.2	49.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$211,565
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,070
			Families Below Poverty Level			6.8%
<p>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.</p>						

Chicago MSA – 2022-2023

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA for Census 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	307	2.3	23.8	37.5	35.2	1.3
Population by Geography	1,397,279	1.4	21.0	38.0	39.1	0.5
Housing Units by Geography	498,038	1.5	22.7	38.9	36.5	0.4
Owner-Occupied Units by Geography	373,927	0.6	17.5	39.3	42.3	0.4
Occupied Rental Units by Geography	101,782	4.1	40.1	37.2	18.0	0.6
Vacant Units by Geography	22,329	4.6	30.9	40.8	23.2	0.4
Businesses by Geography	134,259	1.5	15.1	37.2	46.0	0.2
Farms by Geography	3,784	1.0	16.2	44.0	38.4	0.4
Family Distribution by Income Level	354,354	17.4	17.2	21.8	43.5	0.0
Household Distribution by Income Level	475,709	19.2	15.1	18.7	47.0	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$243,195
Median Family Income MSA - 20994 Elgin, IL		\$97,326	Median Gross Rent			\$1,201
			Families Below Poverty Level			5.3%
<p><i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>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></p>						

Non-MSA – 2021

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA IL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	0.0	11.7	72.7	15.6	0.0
Population by Geography	282,757	0.0	9.3	74.4	16.3	0.0
Housing Units by Geography	125,332	0.0	10.1	74.4	15.5	0.0
Owner-Occupied Units by Geography	83,202	0.0	8.4	74.5	17.1	0.0
Occupied Rental Units by Geography	29,045	0.0	14.0	75.3	10.7	0.0
Vacant Units by Geography	13,085	0.0	11.8	72.2	16.1	0.0
Businesses by Geography	16,511	0.0	12.4	73.1	14.4	0.0
Farms by Geography	1,797	0.0	3.1	81.1	15.9	0.0
Family Distribution by Income Level	73,827	17.3	17.5	21.5	43.8	0.0
Household Distribution by Income Level	112,247	21.1	15.5	17.3	46.0	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$115,752
			Median Gross Rent			\$666
			Families Below Poverty Level			8.9%
<p><i>Source: 2015 ACS and 2021 D&B Data</i> <i>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></p>						

Non-MSA – 2022-2023

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA IL for Census 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	78	0.0	9.0	73.1	17.9	0.0
Population by Geography	274,190	0.0	7.1	72.4	20.5	0.0
Housing Units by Geography	125,770	0.0	7.5	73.5	18.9	0.0
Owner-Occupied Units by Geography	82,056	0.0	6.1	73.0	20.9	0.0
Occupied Rental Units by Geography	30,494	0.0	11.4	74.7	13.8	0.0
Vacant Units by Geography	13,220	0.0	7.2	74.1	18.7	0.0
Businesses by Geography	19,901	0.0	9.5	70.5	20.0	0.0
Farms by Geography	2,051	0.0	2.4	71.4	26.2	0.0
Family Distribution by Income Level	72,503	18.0	16.7	22.1	43.3	0.0
Household Distribution by Income Level	112,550	20.8	16.4	17.1	45.7	0.0
Median Family Income Non-MSAs - IL		\$68,958	Median Housing Value			\$122,946
			Median Gross Rent			\$749
			Families Below Poverty Level			8.5%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>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 Illinois

The two AAs in the Illinois rating area received full-scope reviews.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Chicago MSA and Non-MSA are reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Chicago MSA:

The distribution of home mortgage loans is reasonable.

2021

The distribution of home mortgage loans is reasonable. The proportion of lending in low-income geographies exceeded both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies was less than the percent of owner-occupied housing units and near to the aggregate distribution of all reporting lenders.

2022-2023

The distribution of home mortgage loans is excellent. The proportion of lending in low-income geographies exceeded both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies was near to the percent of owner-occupied housing units and exceeded the aggregate distribution of all reporting lenders.

Non-MSA:

The distribution of home mortgage loans is poor.

2021

The distribution of home mortgage loans is poor. The proportion of lending in moderate-income geographies was less than both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders. There were no low-income geographies in the 2021 period.

2022-2023

The distribution of home mortgage loans is poor. The proportion of lending in moderate-income geographies was less than both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders. There were no low-income geographies in the 2021 period.

Lending Gap Analysis

We performed a lending gap analysis that included a review of density maps of HMDA loans. We did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

When determining our conclusions for borrower distribution of home mortgage loans, we considered that home mortgages may not be affordable to low-income borrowers in the Chicago MSA, throughout the evaluation period.

Chicago MSA:

The distribution of home mortgage loans is excellent.

2021

The distribution of home mortgage loans is excellent. The proportion of lending to low-income borrowers was less than the percent of families but exceeded the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded both the percent of families and the aggregate distribution of all reporting lenders.

2022-2023

The distribution of home mortgage loans is excellent. The proportion of lending to low-income borrowers was less than the percent of families but exceeded the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers exceeded both the percent of families and the aggregate distribution of all reporting lenders.

Non-MSA:

The distribution of home mortgage loans is reasonable.

2021

The distribution of home mortgage loans is reasonable. The proportion of lending to low-income borrowers was less than the percent of families but exceeded the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers was near to both the percent of families and the aggregate distribution of all reporting lenders.

2022-2023

The distribution of home mortgage loans is reasonable. The proportion of lending to low-income borrowers was less than the percent of families and near to the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers was exceeded the percent of families and was near to the aggregate distribution of all reporting lenders.

Responses to Complaints

The bank did not receive any complaints about its performance in helping to meet the credit needs of its AAs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the MSAs and Non-MSAs 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”.

Time Period Reviewed:	January 1, 2021 through December 31, 2023	
Bank Products Reviewed:	Home mortgage	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Illinois		
Chicago MSA	Full-Scope	Full counties for Bureau, LaSalle, Lee, Livingston, Putnam, and Whiteside
Non-MSA	Full-Scope	Full counties for Grundy, Kane, Kendall, and Will.

Appendix B: Summary of MMSA and State Ratings

RATINGS	First Federal Savings Bank
Overall Bank:	Lending Test Rating
Overall	Satisfactory
State:	
Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

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/assessment area.

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. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts 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 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 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 low- or moderate-income 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 census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct 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 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 census tract with a median family income 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/assessment area.

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: 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 Metropolitan Statistical Area 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 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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 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 median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th 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/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

2021

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
Chicago MSA	239	54,308	54.2	93,511	1.6	2.1	0.8	12.0	7.1	8.2	41.1	49.0	39.2	45.3	41.8	51.7	0.0	0.0	0.0
Non-MSA IL	202	28,111	45.8	8,072	0.0	0.0	0.0	8.4	3.5	5.9	74.5	68.3	71.8	17.1	28.2	22.3	0.0	0.0	0.0
Total	441	82,419	100.0	101,583	1.3	1.1	0.8	11.3	5.4	8.0	47.4	57.8	41.8	39.9	35.6	49.4	0.0	0.0	0.0

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%
 First Federal Savings Bank (10000702631) excluded from Aggregate

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
Chicago MSA	239	54,308	54.2	93,511	17.2	7.1	6.6	15.9	24.3	17.7	20.8	22.6	22.9	46.1	42.7	34.7	0.0	3.3	18.0
Non-MSA IL	202	28,111	45.8	8,072	17.3	7.9	7.5	17.5	15.8	18.1	21.5	24.8	23.4	43.8	47.0	34.7	0.0	4.5	16.3
Total	441	82,419	100.0	101,583	17.2	7.5	6.7	16.1	20.4	17.8	20.9	23.6	23.0	45.7	44.7	34.7	0.0	3.9	17.8

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%
 First Federal Savings Bank (10000702631) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

2022-2023

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	
Chicago MSA	257	57,300	58.9	32,367	0.6	1.6	0.6	17.5	16.3	15.2	39.3	50.2	40.4	42.3	31.5	43.0	0.4	0.4	0.8	
Non-MSA IL	179	26,097	41.1	4,220	0.0	0.0	0.0	6.1	3.9	7.3	73.0	76.5	71.8	20.9	19.6	20.9	0.0	0.0	0.0	
Total	436	83,396	100.0	36,587	0.5	0.9	0.5	15.4	11.2	14.3	45.3	61.0	44.1	38.4	26.6	40.5	0.3	0.2	0.7	

*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%
First Federal Savings Bank (10000702631) excluded from Aggregate*

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	
Chicago MSA	257	57,300	58.9	32,367	17.4	11.3	7.7	17.2	25.3	23.2	21.8	23.7	24.8	43.5	30.0	29.4	0.0	9.7	15.0	
Non-MSA IL	179	26,097	41.1	4,220	18.0	8.9	12.3	16.7	23.5	24.5	22.1	25.7	23.2	43.3	34.1	27.3	0.0	7.8	12.7	
Total	436	83,396	100.0	36,587	17.5	10.3	8.2	17.1	24.5	23.3	21.9	24.5	24.6	43.5	31.7	29.1	0.0	8.9	14.7	

*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%
First Federal Savings Bank (10000702631) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.