



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 8, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Community Bank
Charter Number 25025

141 West Ohio Avenue
Dover, OH 44622

Office of the Comptroller of the Currency

200 Public Square Suite 1620
Cleveland, OH 44114-2301

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 community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable geographic distribution of home mortgage loans and loans to small businesses, and a reasonable distribution of home mortgage loans among borrowers of different incomes and loans to small businesses among businesses of different sizes, a reasonable loan-to-deposit (LTD) ratio, and a substantial majority of bank loans inside the assessment area (AA).
- The Community Development (CD) Test rating is based on adequate responsiveness to community needs through qualified CD loans, investments, and services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit ratio is reasonable.

First Federal Community Bank's (FFCB) LTD ratio is calculated on a bank-wide basis. Examiners evaluated the bank's quarterly LTD ratios for the period between January 1, 2020, to December 31, 2022. The bank's average LTD ratio during the evaluation period was 87.1 percent, with quarterly ratios ranging from 80.9 percent in the first quarter of 2021 to 94.6 percent in the first quarter of 2020. Examiners compared FFCB's LTD ratio to five similarly situated banks with the average LTD ratio ranging from 54.1 percent to 89.4 percent.

Lending in Assessment Area

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

The bank originated and purchased 85.0 percent by number and 83.5 percent by dollar amount of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table D - 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										
2020	27	90.0	3	10.0	30	5,980	93.4	420	6.6	6400
2021	27	90.0	3	10.0	30	4,379	88.5	568	11.5	4,947
2022	25	83.3	5	16.7	30	5,270	83.9	1,009	16.1	6,279
Total	79	87.8	11	12.2	90	15,629	88.7	1,997	11.3	17,626
Small Business										
2020	26	86.7	4	13.3	30	3,244	92.2	269	7.7	3513
2021	22	73.3	8	26.7	30	2343	69.2	1045	30.8	3,388
2022	26	86.7	4	13.3	30	3,766	69.7	1636	30.3	5,402
Total	74	82.2	16	17.7	90	9,353	76.0	2,950	24.0	12,303
Total	153	85.0	27	15.0	180	24,982	83.5	4,947	16.5	29,929

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

Description of Institution

FFCB is an intrastate bank headquartered in Dover, Ohio. It is a wholly owned subsidiary of First Federal Financial Corporation, a one bank holding company. As of December 31, 2022, the bank's assets totaled \$681.5 million and tier one capital totaled 58.5 million, or 8.6 percent of total assets. The bank has eight full-service branches located in Tuscarawas and Holmes Counties. Management opened one branch in 2021 and did not close any branches during the evaluation period. The bank has eleven ATMs, one at each branch and three at local businesses. None of the ATMs take deposits. Management has designated all of Tuscarawas and Holmes Counties as their AA. The AA comprises 34 contiguous census tracts (CTs) and is not part of a Metropolitan Statistical Area (MSA). The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

The bank's primary loan products are residential real estate loans and loans to small businesses. The bank's loan portfolio increased 47.3 percent from \$366.9 million as of December 31, 2019, to \$540.5 million as of December 31, 2022. As of December 31, 2022, the loan portfolio was comprised of residential real estate loans (\$211.5 million or 39.1 percent), non-farm or non-residential loans (\$164.5 million or 30.4 percent), multifamily loans (\$20.9 million or 3.9 percent), commercial and industrial loans (\$47.3 million or 8.8 percent), consumer loans (\$7.8 million or 1.4 percent), construction loans (\$21.2 million or 3.9 percent) and farmland (\$67.3 million or 12.5 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2019, and June 30, 2022, deposits at the bank have increased from \$373 million to \$584 million.

FFCB offers traditional home loan products, including home mortgage loans, home equity lines of credit, and home construction loans. The bank also offers vehicle, boat, and personal loans, and overdraft protection lines of credit. Business loans include term loans, business lines of credit, commercial real estate, and equipment. The bank's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts, health savings accounts, debit cards, online banking, bill pay, mobile banking, remote deposit capture, and safe deposit boxes. Business products include checking, savings, CDs, ATM/Check Card, and remote deposit capture.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AA. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated October 13, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using intermediate-small bank performance criteria, which includes lending and CD tests. The lending test evaluates FFCB's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the lending and CD test is January 1, 2020, through December 31, 2022.

Based on the bank's internal reports and discussions with management, examiners determined that the bank's primary lending product during the evaluation period was home mortgages loans and loans to small businesses. Examiners used other supporting information during the performance evaluation, including the 2015 American Community Survey (ACS) data, 2020 U.S. Census data, 2022 Dunn and Bradstreet data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA. Performance during 2020 and 2021 is compared to data from the 2010 census and 2015 American Community Survey (ACS) while performance during 2022 is compared to data from the 2020 U.S. census. The 2020-2021 analysis period received more weight in the lending test analysis, as this period included a larger portion of the bank's lending activity. Examiners also considered information from a community contact to help assess the needs of the bank's AA.

Selection of Areas for Full-Scope Review

FFCB has only one AA that includes all of Tuscarawas County and Holmes County, in Ohio referred to as the Tuscarawas AA. This AA received a full-scope review. The AA meets the requirements of the CRA and does not arbitrarily exclude any CTs based on the designation of their income level or the demographic make-up of the CTs. Please refer to appendix A – Scope of Examination for more information on this AA.

Ratings

FFCB's overall rating is based on performance within the bank's one AA. The OCC weighed information from the following performance criteria when analyzing the bank's primary lending products: lending within the AA, LTD ratio, lending to borrowers of different incomes and businesses of different sizes, and the geographic distribution of the bank's loans, as well as CD activity. Refer to the "Scope" paragraph within the "State" section of this document for details regarding how the areas were weighted in arriving at the respective ratings.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Ohio

CRA rating for the State of Ohio¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's overall distribution of home mortgage loans to borrowers of different income levels and loans to small businesses of different sizes is reasonable.
- The bank's geographic distribution of home mortgage loans and loans to small businesses of different sizes is reasonable.
- The bank originated an adequate level of CD loans, investments, and services.

Description of Institution's Operations in Ohio

FFCB operated eight full-service branches within the AA, and the main office is in an upper-income CT. The branches offer drive-thru services at each location. The bank has eleven ATMs, one at each branch and three at other businesses. None of the ATMs take deposits. The bank opened one branch in 2021 and did not close any branches during the evaluation period.

The AA complies with regulatory requirements. Based on 2015 ACS, the AA had 29 CTs consisting of three moderate-income CTs, twenty-four middle-income CTs, and two upper-income CTs. The AA changed to include the entire counties of Tuscarawas and Holmes resulting in a total of 34 CTs. The change in the AA and the 2020 U.S. Census data update resulted in one low-income CT, five moderate-income CTs, 20 middle-income CTs, and eight upper-income CTs for 2022.

Banking competition within the AA is high. According to the June 30, 2022, FDIC Deposit Market Share Report, there are fourteen financial institutions with 54 offices serving the Tuscarawas AA. FFCB is ranked second in terms of deposit market share in the AA, with 17.53 percent of total deposits. The other top four institutions in the June 2022 report had a combined market share of 58.72 percent. Banks in the AA include The Commercial and Savings Bank of Millersburg, The Killbuck Savings Bank Company, The Huntington National Bank, The First National Bank of Dennison, and JPMorgan Chase Bank, N.A.

Based on 2022 peer aggregate home mortgage lending data, lending competition is also strong. The bank is not rated since it is not a HMDA reporter. There are 215 lenders in the AA. The top five lenders have a total market share in the AA of 32.84 percent. The top five largest lenders by market share

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

percentage were Huntington National Bank, Rocket Mortgage, The Commercial and Savings Bank, PNC Bank N.A., and The Park National Bank.

The largest cities in the AA are New Philadelphia and Dover in Tuscarawas County, and Millersburg and Berlin in Holmes County. Prominent industries include manufacturing, retail trade, construction and health care and social assistance. Employers include Union Hospital, The Belden Brick Company, Allied Machine and Engineering, Lauren International Inc., and Weaver Leather. As of December 31, 2022, the unemployment rate in Tuscarawas County was 4.0 percent and Holmes County was 3.5 percent, which were near or at the state unemployment rate of 3.5 percent.

Examiners considered information obtained from one community contact within the AA to gain an understanding of the community development needs and credit opportunities of the AA. The community organization's focus is on affordable housing and community services to low- and moderate-income individuals. They identified the following need in the bank's AA: affordable housing options, workforce development, mental healthcare, financial literacy programs, and affordable and accessible healthy foods. They also noted the need for funding for minor and emergency home repairs, general operating funding to community organizations, lines of credit, volunteer income tax assistance, grants to match federal funds, and funding for capital improvements.

Tuscarawas AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Tuscarawas AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.0	10.3	82.8	6.9	0.0
Population by Geography	136,133	0.0	9.0	85.6	5.4	0.0
Housing Units by Geography	53,614	0.0	10.9	83.4	5.7	0.0
Owner-Occupied Units by Geography	35,481	0.0	7.9	85.7	6.4	0.0
Occupied Rental Units by Geography	13,917	0.0	18.2	76.7	5.1	0.0
Vacant Units by Geography	4,216	0.0	11.8	85.7	2.5	0.0
Businesses by Geography	8,536	0.0	11.2	83.3	5.5	0.0
Farms by Geography	535	0.0	3.0	91.8	5.2	0.0
Family Distribution by Income Level	35,427	17.6	19.6	23.2	39.6	0.0
Household Distribution by Income Level	49,398	21.7	15.7	19.5	43.1	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$123,288
			Median Gross Rent			\$652
			Families Below Poverty Level			10.5%
<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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022 Tuscarawas AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	2.9	14.7	58.8	23.5	0.0
Population by Geography	137,486	2.5	13.7	62.3	21.5	0.0
Housing Units by Geography	53,840	2.8	16.4	60.2	20.5	0.0
Owner-Occupied Units by Geography	35,767	1.1	16.0	61.9	21.0	0.0
Occupied Rental Units by Geography	13,490	6.4	17.0	56.5	20.0	0.0
Vacant Units by Geography	4,583	5.4	17.7	58.8	18.1	0.0
Businesses by Geography	13,376	4.2	9.2	64.8	21.8	0.0
Farms by Geography	739	0.7	7.4	71.7	20.2	0.0
Family Distribution by Income Level	34,468	17.5	18.7	23.1	40.8	0.0
Household Distribution by Income Level	49,257	20.8	15.7	19.2	44.4	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$156,831
			Median Gross Rent			\$739
			Families Below Poverty Level			8.7%
<i>Source: 2020 U.S. Census and 2022 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 Ohio

This analysis reflects a full-scope review of the Tuscarawas AA. Examiners considered the number of home mortgage loans originated or purchased by the bank from January 1, 2020, through December 31, 2022. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information. The bank expanded their AA to now include the entire county of Holmes. The majority of housing units are located in the middle- and upper-income CTs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Ohio is 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 Ohio 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.

2020-2021

FFCB's distribution of home mortgage loans among geographies of different income levels in the Tuscarawas AA is reasonable. There were no low-income CTs with this AA during the evaluation period. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 9.3 percent. This is above the 7.9 percent of the AA's owner-occupied housing units in moderate-income geographies and is near the 9.5 percent of aggregate bank lending.

2022

FFCB's distribution of home mortgage loans among geographies of different income levels in the Tuscarawas AA is reasonable. The bank's percentage of home mortgage loans among low-income CTs in the AA was 4.0 percent. This exceeded the 1.1 percent of the AA's owner-occupied housing units in low-income geographies and the 2.8 percent of aggregate bank lending. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 12.0 percent. This is below the 16.0 percent of the AA's owner-occupied housing units in moderate-income geographies and below the 17.4 percent of aggregate bank lending.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

2020-2021

The geographic distribution of FFCB's loans to small businesses in the Tuscarawas AA is adequate. In our evaluation, we considered that the AA has no low-income CTs during evaluation period and that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2021 D&B data, those CTs contained 88.8 percent of businesses in the AA. The bank originated 8.3 percent of its loans to small businesses in moderate-income CTs. This is below the percentage of businesses in the CTs of 11.2 percent but exceeds the aggregate of 7.5 percent.

2022

FFCB's distribution of small loans to businesses in low- and moderate-income geographies is adequate. In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2021 D&B data, those CTs contained 88.8 percent of businesses in the AA. The bank's loans to small business in low-income CTs was 3.8 percent. This is near the percentage of businesses in the low-income CTs of 4.2 percent and exceeds the aggregate of 2.4 percent. The bank's loans to small business in moderate-income CTs was 7.7 percent. This is below the percentage of businesses in the moderate-income CTs of 9.2 percent but above the aggregate of 7.5 percent.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Ohio 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.

2020-2021

FFCB's distribution of home mortgage loans to borrowers of different income levels in the Tuscarawas AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 1.9 percent. This is below the 17.6 percent of low-income families living in the AA, and the 6.5 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 16.7 percent. This is below the 19.6 percent of moderate-income families living in the AA and the 22.0 percent aggregate bank lending level.

2022

FFCB's distribution of home mortgage loans to borrowers of different income levels in the Tuscarawas AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 4.0 percent. This is below the 17.5 percent of low-income families living in the AA and the 8.2 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers is 24.0 percent. It exceeds the 18.7 percent of moderate-income families living in the AA and the 23.1 percent aggregate bank lending level.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

2020-2021

The borrower distribution of FFCB's loans to small businesses in the Tuscarawas AA is adequate. The bank originated 68.8 percent of its loans to small businesses with revenues of \$1 million or less. This is below the percentage of businesses with revenues of \$1 million or less at 80.1 percent but is significantly above the aggregate lending percentage of loans to small businesses of 50.6 percent.

2022

The borrower distribution of FFCB's loans to small businesses in the Tuscarawas AA is adequate. The bank originated 57.7 percent of its loans to small businesses with revenues of \$1 million or less. This is significantly below the percentage of businesses with revenues of \$1 million or less at 87.0 percent and is above the aggregate lending percentage of loans to small businesses of 50.3 percent.

Responses to Complaints

FFCB did not receive any complaints during the evaluation period that would affect its CRA rating.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test in the state of Ohio is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area(s).

Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Tuscarawas AA	36	100	12,961	100

FFCB originated 36 loans totaling approximately \$12.96 million in their AA. The CD loans made by FFCB provided financing for affordable housing for low- and moderate-income (LMI) individuals.

Highlights of CD loans are as follows:

- 30 loans totaling approximately \$10.5 million for loans for purchase of affordable rental properties within the Tuscarawas AA which rent at rates well-below fair market rental values.
- Six loans totaling approximately \$2.5 million for vehicles for cities in the AA.

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD investments.

During the evaluation period, FFCB made a satisfactory level of CD investments The bank made five qualified investments totaling approximately \$3.88 million. FFCB also made approximately \$97,526 in donations within the AA.

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)
Tuscarawas AA	2	2,880	3	1,001	5	100	3,881	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.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, First Federal Community Bank (FFCB) staff served on 12 organizations as board members, volunteers, and members. The bank’s employees provided approximately 2,796 service hours to the organizations during the evaluation period. These organizations provide the assessment area with community services and economic development.

Appendix A: Scope of Examination

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”.

Time Period Reviewed:	January 1, 2020, to December 31, 2022	
Bank Products Reviewed:	Home mortgage, and loans to small business Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Tuscarawas AA	Full-Scope	Counties of Tuscarawas and Holmes
State		
Ohio		

Appendix B: Summary of MMSA and State Ratings

RATINGS FIRST FEDERAL COMMUNITY BANK, NA			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Federal Community Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Ohio	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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.
- 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 assessment area.
- 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.

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.

- 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 assessment area.
- 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/assessment area.

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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Tuscarawas	54	10,359	100	3,018	0.0	0.0	0.0	7.9	9.3	9.5	85.7	75.9	80.6	6.4	14.8	9.9	0.0	0.0	0.0	
Total	54	10,589	100	3,018	0.0	0.0	0.0	7.9	9.3	9.5	85.7	75.9	80.6	6.4	14.8	9.9	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 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
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% 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	
Tuscarawas	25	5,270	100	2,032	1.1	4.0	2.8	16.0	12.0	17.4	61.9	64.0	57.4	21.0	20.0	22.4	0.0	0.0	0.0	
Total	25	5,270	100	2,032	1.1	4.0	2.8	16.0	12.0	17.4	61.9	64.0	57.4	21.0	20.0	22.4	0.0	0.0	0.0	

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

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.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Tuscarawas	54	10,359	100	3,018	17.6	1.9	6.5	19.6	16.7	22.0	23.2	22.2	23.4	39.6	59.3	30.2	0.0	0.0	18.0	
Total	54	10,359	100	3,018	17.6	1.9	6.5	19.6	16.7	22.0	23.2	22.4	23.4	39.6	59.3	30.2	0.0	0.0	18.0	

*Source: 2015 ACS; 01/01/2020 - 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
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Tuscarawas	25	5,270	100	2,032	17.5	4.0	8.2	18.7	24.0	23.1	23.1	16.0	25.8	40.8	56.0	27.3	0.0	0.0	15.6	
Total	25	5,270	100	2,032	17.5	4.0	8.2	18.7	24.0	23.1	23.1	16.0	25.8	40.8	56.0	27.3	0.0	0.0	15.6	

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

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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Tuscarawas	48	5,586	100	2,105	0.0	0.0	0.0	11.2	8.3	7.5	83.3	87.5	86.2	5.5	4.2	6.3	0.0	0.0	0.0	
Total	48	5,586	100	2,105	0.0	0.0	0.0	11.2	8.3	7.5	83.3	87.5	86.2	5.5	4.2	6.3	0.0	0.0	0.0	

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Tuscarawas	26	3,766	100	2,738	4.2	3.8	2.4	9.2	7.7	7.5	64.8	80.8	68.0	21.8	7.7	22.2	0.0	0.0	0.0	
Total	26	3,766	100	2,738	4.2	3.8	2.4	9.2	7.7	7.5	64.8	80.8	68.0	21.8	7.7	22.2	0.0	0.0	0.0	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Tuscarawas	48	5,586	100	2,105	80.1	68.8	50.6	6.9	31.2	13.1	0.0	
Total	48	5,586	100	2,105	80.1	68.8	50.6	6.9	31.2	13.1	0.0	

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Tuscarawas	26	3,766	100	2,738	87.0	57.7	50.3	4.3	42.3	8.7	0.0	
Total	26	3,766	100	2,738	87.0	57.7	50.3	4.3	42.3	8.7	0.0	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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.