



## **PUBLIC DISCLOSURE**

October 14, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

National Cooperative Bank, N.A.  
Charter Number 25093

139 S High St  
Hillsboro, OH 45133-1474

Office of the Comptroller of the Currency

400 7th Street S.W.  
Washington, DC 20219

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 **Outstanding**.

The following table indicates the performance level of National Cooperative Bank, N.A. (NCB, bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	National Cooperative Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the bank's performance in the state of Ohio and in selected markets outside the bank's assessment area (AA). The overall rating reflects excellent borrower distribution, excellent geographic distribution, and lending activity that demonstrates excellent responsiveness to identified affordable housing needs. The bank originated a high level of community development (CD) loans, which had a positive impact on the Lending Test rating.
- The Investment Test rating is based on the bank's performance in the state of Ohio and in markets outside the AA. The bank maintained an adequate level of qualified investments in the AA, given the limited investment opportunities within the AA and its strategic focus on serving the banking and lending needs of its cooperative entities located nationwide. The bank also maintained an adequate level of investments in the broader statewide or regional area (BSRA), and these investments had a positive impact on the bank's CD Investment Test rating.
- The Service Test rating is based on the bank's performance in the state of Ohio. The bank provided relatively high levels of CD services targeted to low- and moderate-income individuals and households.

### Innovative or Flexible Lending Products

During the evaluation period, the bank offered the following flexible lending products:

- *Fannie Mae HomeReady Mortgage Program:* The HomeReady Mortgage program is intended for low- to moderate-income borrowers with limited funds for down payment or closing costs. Borrower income must not exceed 80 percent of the area median income (AMI) for the property's location. The program allows down payments as low as three percent of the purchase price, with eligible sources of funds including gifts and grants. For purchase transactions, at least

one borrower must complete homebuyer education. Eligible property types include one- to four-unit owner-occupied principal residences. Loans may be underwritten through Fannie Mae's Desktop Underwriter or manually under program guidelines. During the evaluation period, the bank extended two loans through this program totaling \$259,000.

- *Closing Cost Assistance Program:* The bank provides a Closing Cost Assistance Program that provides a lender credit of \$1,000 for purchase transactions and \$500 for refinance transactions. During the evaluation period, the bank originated 18 mortgage loans totaling \$1.7 million and provided \$14,000 in lender credits under this program.
- *NCB Homebuyer Grant Program:* The NCB Homebuyer Grant is a community reinvestment program offered exclusively in Highland County, Ohio. The program provides a grant of up to \$10,000 per household to assist with the purchase of a primary residence. Homebuyers must contribute at least \$500 of their own funds and complete a homebuyer counseling program before closing. Seller-paid closing credits may not exceed three percent of the sales price. Funds are limited to households with incomes at or below 80 percent of the Department of Housing and Urban Development (HUD) AMI. During the evaluation period, the bank originated four loans totaling \$344,900 under this program and provided \$35,000 in lender grants.

### **Broader Statewide or Regional Area (BSRA)**

NCB operates under a cooperative charter with a nationwide business model that provides financial services, capital, and technical assistance to housing cooperatives, community-based organizations, and mission-driven enterprises that support low- and moderate-income individuals and communities. Because of this structure, the bank's CD activities extend beyond its AA to include broader statewide, regional, and national initiatives.

After evaluating the bank's responsiveness to CD needs within its AA and the BSRA, examiners considered CD loans originated to Low-Income Credit Unions (LICUs) located outside these areas. LICUs are federally designated credit unions that primarily serve low-income members and provide affordable financial services in underserved communities.

### **Lending in Assessment Area**

A very small percentage of the bank's loans were in its AA.

The bank originated and purchased 0.9 percent of its total loans inside the bank's AA during the evaluation period. This percentage is considered adequate given the bank's business model, which centers on providing credit and financial services to cooperatives and community-based entities nationwide.

This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	19	0.87	2,161	99.13	2,180	1,561	0.07	2,153,007	99.93	2,154,568
Small Business	1	1.54	64	98.46	65	100	0.31	32,068	99.69	32,168
<b>Total</b>	<b>20</b>	<b>0.89</b>	<b>2,225</b>	<b>99.11</b>	<b>2,245</b>	<b>1,661</b>	<b>0.08</b>	<b>2,185,075</b>	<b>99.92</b>	<b>2,186,736</b>

*Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

National Cooperative Bank, N.A. is an intrastate national bank headquartered in Hillsboro, Ohio. The bank is the wholly owned and principal operating subsidiary of the National Consumer Cooperative Bank (NCCB). NCCB was established to promote wealth accumulation and distribution in underserved communities by advancing the cooperative form of homeownership and business development. In 1981, NCCB was privatized as a cooperatively owned financial institution and is currently owned by 3,439 customer-owners located across the country.

The bank conducts its retail operations through one branch office and one automated teller machine (ATM) located in the city of Hillsboro, Ohio, within Highland County. Highland County is designated as a non-metropolitan statistical area (non-MSA) and contains 11 census tracts. The majority of the county is rural with extensive agricultural land. NCB’s customers represent a diverse range of cooperatives across various industry sectors. These include consumer-owned and independent grocery stores, small business purchasing cooperatives, worker-owned cooperatives, housing cooperatives, condominiums, homeowners’ associations, and member-owned credit unions. Other customers include nonprofit and community-based organizations engaged in activities such as education, social services, renewable energy, and community development.

To serve its cooperative customer base, the bank maintains administrative offices in Arlington, Virginia; Anchorage, Alaska; and New York, New York. The bank’s business strategy focuses on multifamily and commercial real estate lending, commercial banking, cooperative and community development lending, and retail banking. Housing cooperative lending is primarily concentrated in large metropolitan areas such as New York City, Chicago, Los Angeles, and Washington DC. The bank also operates a Corresponding Banking Program for credit unions, several of which serve low-income and underserved communities. Through this program, the bank served 74 credit unions and 26 non-member credit union customers. Of these institutions, 35 were designated as LICUs and 16 were certified Community Development Financial Institution (CDFI) credit unions.

As of December 31, 2024, NCB reported total assets of \$3.8 billion, total deposits of \$3.2 billion, net loans and leases of \$2.9 billion, and tier 1 capital of \$403.2 million. The loan portfolio was comprised of 67.8 percent residential real estate mortgages, 29.6 percent commercial loans, and 2.6 percent individual loans. Other loans and leases accounted for less than one percent of the total. Of total deposits, \$135.5 million, or 4.2 percent, were derived from the Ohio branch footprint, and \$3.1 billion, or 95.8 percent, were sourced from the bank’s national customer base.

There are no known legal, financial, or other factors impeding NCB’s ability to help meet the credit needs of its AA. The bank received a Satisfactory rating in its previous CRA evaluation dated September 6, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period spanned from January 1, 2022, to December 31, 2024. Examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA). The bank did not originate or purchase a sufficient volume of small business or small farm loans within the AA to support a meaningful analysis. Consumer loans were not evaluated, as they did not represent a substantial portion of the bank's lending activity during the review period.

NCB mission is to support the development and expansion of cooperatives and community-based enterprises nationwide. Because of its national cooperative mandate, much of the bank's lending extend beyond its AA. After assessing the bank's lending performance within the AA, examiners also evaluated borrower distribution of home mortgage loans in selected markets outside the AA where the bank originated a significant volume of home mortgage loans. Five states: California, New York, Maryland, Michigan, and the District of Columbia were selected as a representative sample of the bank's entire marketplace.

CD activities benefiting individuals or geographies within the BSRA that includes the bank's AA were also considered in this evaluation. The BSRA encompassed the Great Lakes and Northeast regions of the United States. The Great Lakes Region included Ohio, Pennsylvania, New York, Michigan, Minnesota, Illinois, Indiana, and Wisconsin. The Northeast Region included Connecticut, Delaware, the District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Puerto Rico, Rhode Island, Vermont, the Virgin Islands, Virginia, and West Virginia.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section 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

NCB operates with a non-traditional business model. Accordingly, the bank's overall rating reflects its performance in the Highland County non-MSA AA, as well as activities conducted outside the AA in the BSRA and nationwide.

Refer to the **Scope** section under the State Rating section 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) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 Consumer Financial Protection Bureau, 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 Ohio

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

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to credit needs in the AA.
- The overall geographic and borrower distribution of loans was excellent.
- The bank was a leader in making CD loans. A relatively high level of CD lending in the BSRA had a positive impact on the Lending Test rating.
- The bank made an adequate level of qualified investments and donations. Qualified investments were responsive to identified CD needs.
- The bank made a relatively high level of CD services.

### Description of Institution's Operations in Ohio

NCB's Ohio operations consisted of one branch and one cash-dispensing ATM in Highland County, which is a non-MSA.

According to the FDIC Summary of Deposits as of June 30, 2024, NCB held a 77.9 percent deposit market share and ranked first out of nine depository institutions in the AA. For FDIC reporting purposes, the bank's nationwide deposits are attributed to its branch office in Hillsboro, Ohio, resulting in an inflated local market share. Based on the bank's internal data as of December 31, 2024, deposits sourced from customers within the AA totaled approximately \$135.5 million, or 4.2 percent of total deposits and \$3.1 billion, or 95.8 percent were derived from the bank's national customer base.

According to the most recent 2024 Peer Mortgage Data, there were 134 HMDA reporters who originated or purchased \$157.7 billion home mortgage loans within the bank's AA. NCB ranked 32 with a 0.8 percent market share. The five most prominent financial institutions accounted for 31.8 percent of the total market share.

### Demographic Data

Based on the information in the table below, low-income families make less than \$40,800 and moderate-income families make less than \$65,280. 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 calculates to a maximum monthly mortgage payment of \$1,020 for low-income borrowers and

\$1,632 for moderate-income borrowers. Assuming a 30-year mortgage with a six percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage rate for a home at the MSA median housing value would be \$1,306. Under these assumptions, low-income borrowers would be challenged to afford a mortgage loan on a median-priced home, while moderate-income borrowers would typically be able to afford a mortgage within this AA.

The following table depicts demographic information for the bank’s AA:

Table 2: Assessment Area - NCB Highland County non-MSA AA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
<b>Geographies (Census Tracts)</b>	11	0.00	18.18	72.73	9.09	0.00
<b>Population by Geography</b>	43,317	0.00	9.99	76.59	13.43	0.00
<b>Housing Units by Geography</b>	19,321	0.00	11.45	74.89	13.65	0.00
<b>Owner-Occupied Housing by Geography</b>	11,732	0.00	9.13	75.34	15.53	0.00
<b>Occupied Rental Units by Geography</b>	5,015	0.00	9.27	79.48	11.25	0.00
<b>Vacant Units by Geography</b>	2,574	0.00	26.30	63.91	9.79	0.00
<b>Businesses by Geography</b>	1,120	0.00	5.54	82.14	12.32	0.00
<b>Farms by Geography</b>	145	0.00	2.07	80.69	17.24	0.00
<b>Family Distribution by Income Level</b>	11,658	22.73	19.87	21.06	36.34	0.00
<b>Household Distribution by Income Level</b>	16,747	27.92	16.62	17.89	37.57	0.00
<b>Unemployment rate (%)</b>	4.81	0.00	8.27	4.95	2.79	0.00
<b>Households Below Poverty Level (%)</b>	17.50	0.00	27.60	18.38	6.24	0.00
<b>Median Family Income (Non-MSAs - OH)</b>		\$66,160		<b>Median Housing Value</b>		\$126,700
<b>Median Family Income (Non-MSAs - OH) for 2024</b>		\$81,600		<b>Median Gross Rent</b>		\$693
				<b>Families Below Poverty Level</b>		13.14
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

### Economic Data and Employment

According to the Moody’s Analytics report dated October 2024, Ohio’s economy remains in a mid-expansion phase of the business cycle with growth trending slightly below the national average. The state benefits from a diverse industrial base, a low cost of living, and strong performance in healthcare, higher education, and advanced manufacturing, though population growth and labor force gains remain modest. Major employers include the Cleveland Clinic Foundation, Walmart, Kroger, Ohio State University, Wright-Patterson Air Force Base, and Procter & Gamble, along with major hospital systems such as University Hospitals and OhioHealth. Key industries contributing to the state’s output are manufacturing, healthcare, education, trade and transportation, and professional services. Exports are concentrated in automotive products, chemicals, and industrial machinery, with primary trading partners in Canada, Mexico, and China.

Moody’s projects that Ohio’s economy will slow over the next year, with growth lagging the national pace. Weaker manufacturing activity, slower consumer spending, and reduced business investment are expected to temper near-term performance. Despite these headwinds, stable household finances, infrastructure investment, and a diverse industry base will help cushion the slowdown and support gradual recovery beyond 2025.

According to the U.S. Bureau of Labor Statistics, the unemployment rate as of December 2024 in Highland County was 4.6 percent, compared with 4.3 percent for Ohio and 4.1 percent nationwide.

### **Community Contacts**

Examiners leveraged information from the Ohio Housing Finance Agency’s (OHFA) 2024–2025 Housing Needs Assessment and a community contact interview conducted during the evaluation period to identify the area’s primary community development needs. The contact represented a local nonprofit organization that provides housing, utility assistance, and supportive services to low-income residents of Highland County.

The OHFA assessment highlighted ongoing shortages of affordable rental and owner-occupied housing, particularly for low- and moderate-income households, seniors, and individuals with disabilities. Rising home prices, limited new construction, and an aging housing stock have contributed to housing cost burdens, especially among lower-income residents. The assessment also emphasized the need for rehabilitation of existing homes and investments in infrastructure to support stable, affordable neighborhoods.

The community contact emphasized the need for affordable housing rehabilitation, emergency utility assistance, and supportive services addressing transportation, childcare, and healthcare access. These conditions reflect broader economic constraints facing rural communities with modest employment opportunities and limited infrastructure investment.

### **Scope of Evaluation in Ohio**

The evaluation included the bank’s performance in the Highland County non-MSA AA and lending in markets outside the AA. The review focused on the bank’s largest residential markets in the states of California, Maryland, Michigan, New York, and the District of Columbia.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

The bank’s performance under the Lending Test in Ohio is rated Outstanding.

#### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Highland County non-MSA AA was excellent.

#### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs. In reaching the overall conclusions, examiners took into account the bank’s business model, which is centered in serving

cooperatives and other member-controlled organizations nationwide, resulting in limited retail lending activity within the AA.

Table 3: Lending Activity						2022 - 2024
Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Highland County Non-MSA	19	1	4	24	22.02	100.00
Broader Statewide or Regional Area	--	--	43	43	39.45	--
Nationwide	--	--	42	42	38.53	--
<b>Total</b>	<b>19</b>	<b>1</b>	<b>89</b>	<b>109</b>	<b>100.00</b>	<b>100.00</b>
Dollar Volume of Loans (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Highland County Non-MSA	1,561	100	7,000	8,561	1.77	100.00
Broader Statewide or Regional Area	--	--	319,962	319,962	65.85	--
Nationwide	--	--	157,261	157,261	32.37	--
<b>Total</b>	<b>1,561</b>	<b>100</b>	<b>484,223</b>	<b>485,884</b>	<b>100.00</b>	<b>100.00</b>
<i>Source: 1/1/2022 - 12/31/2024 Bank Data.</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share Report dated June 30, 2024, the bank held a 77.9 percent deposit market share and ranked first among nine depository institutions in the AA.

Based on 2024 peer mortgage data, the bank held a 0.8 percent market share of home mortgage originations and purchases and ranked 32 out of 982 lenders. The top three lenders, with a combined market share of 21.6 percent, were First State Bank (8.9 percent), Fifth Third Bank, N.A. (6.8 percent), and Rocket Mortgage (5.9 percent). The bank's home mortgage lending rank in the AA was significantly lower than its deposit market share and deposit rank. As previously noted, a substantial majority of the bank's deposits are derived from cooperative customers outside the AA and are reported under the bank's single branch in Hillsboro, Ohio. As a result, the deposit market share in the AA is elevated and reflects deposits derived from both local customers and, to a large extent, the bank's national cooperative customer base.

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

The bank exhibited an excellent geographic distribution of loans in its AA.

#### *Home Mortgage Loans*

Refer to Table 7 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The AA did not include any low-income geographies. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

### ***Lending Gap Analysis***

Examiners reviewed summary reports and maps to analyze the geographic distribution of home mortgage loans. Examiners did not identify any unexplained conspicuous lending gaps in the bank's AA.

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

The bank exhibited an excellent distribution of loans among individuals of different income, given the product lines offered by the institution.

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

Refer to Table 8 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The percentage of home mortgage loans to both low- and moderate-income borrowers exceeded both the percentage of those families and the aggregate percentage of all reporting lenders.

### **Distribution of Loans by Income Level of the Borrower Outside the bank's AA**

After evaluating NCB's performance within the AA, examiners analyzed borrower distribution of loans originated or purchased outside the bank's AA. The analysis focused on the bank's largest residential markets in the states of California, Maryland, Michigan, New York, and the District of Columbia as a representative sample of the bank's entire marketplace.

Overall, lending performance in the markets outside the bank's AA was good with excellent performance in Maryland, good performance in California and Michigan, and adequate performance in the District of Columbia.

In New York, the bank originated or purchased a high percentage of HMDA-reportable loans to commercial entities that were not natural persons with approximately 49 percent during 2022-2023 analysis period and 55.1 percent in 2024 analysis period. The bank was not required to report income information on these loans for HMDA data purposes. Considering the high percentage of loans without borrower income in New York, the analysis of borrower income distribution was not meaningful.

Refer to Table 8 in each state 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.

### ***California***

The bank's borrower distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but exceeded the aggregate percentage of all reporting lenders.

The bank's performance in 2024 was weaker than the 2022 -2023 analysis period. Weaker performance was due to a lower percentage of loans to low-and-moderate- income borrowers compared to the demographic and aggregate benchmarks.

### ***District of Columbia***

The bank's borrower distribution of home mortgage loans was adequate.

For the 2022-2023 analysis period, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's performance in 2024 was consistent with the performance in 2022-2023 analysis period.

### ***Maryland***

The bank's borrower distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans to both low-and moderate-income borrowers exceeded both the percentage of low-income families and the aggregate percentage of all reporting lenders.

The bank's performance in 2024 was weaker than the 2022-2023 analysis period due to a weaker distribution of loans to moderate-income borrowers compared to the aggregate and demographics benchmarks.

### ***Michigan***

The bank's borrower distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the percentage of home mortgage loans to low-income borrowers exceeded both the percentage of low-income families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's performance in 2024 was stronger than the 2022-2023 analysis period due to a better distribution of loans to moderate-income borrowers compared to the aggregate performance and demographics benchmarks.

## Community Development Lending

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, NCB originated 89 CD loans totaling \$484.2 million representing 120.1 percent of tier 1 capital. Of these, four loans for \$7 million were made in the AA, 43 loans for \$320 million in the BSRA, and 42 loans for \$157.3 million nationwide to LICUs. CD loans were responsive to identified community credit needs of the AA and positively influenced the bank's Lending Test performance.

Examples of CD loans include the following:

- The bank made a \$5.5 million construction loan supported by Low-Income Housing Tax Credits (LIHTC) to finance a 56-unit affordable housing development in Hillsboro Ohio.
- The bank made 10 loans totaling \$200.2 million to support a cooperative affordable housing development in New York that provides long-term affordable housing for low- and moderate-income families. The development operates under state oversight with restrictions intended to preserve long-term affordable housing and promote shared cooperative ownership.
- The bank made a \$10 million loan to support the preservation of an affordable housing development within a limited-equity cooperative in Pennsylvania. The project includes HUD-subsidized units through Section 8 vouchers serving very low-income residents.
- The bank made a \$6.9 million to finance a multifamily rental housing leveraging LIHTC and state and federal bond financing.
- The bank made a \$10 million loan to support an impact-investment initiative focused on financing small businesses and cooperatives in underserved markets nationwide.

## Product Innovation and Flexibility

The institution used flexible lending practices in order to serve AA credit needs. All flexible loan programs were bankwide and were not innovative. These programs were responsive to affordable housing needs within the AA. Refer to the "Description of the Institution" section for additional details regarding flexible lending programs.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Ohio is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Highland County non-MSA AA was adequate.

The institution had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Highland County non-MSA AA	0	0	64	174	64	37.6	174	1.4	-	-
Broader Statewide or Regional Area	8	1,935	98	10,555	106	62.4	12,490	98.6	-	--
<b>Total</b>	<b>8</b>	<b>1,935</b>	<b>162</b>	<b>10,729</b>	<b>170</b>	<b>100.0</b>	<b>12,664</b>	<b>100.0</b>	-	-

\* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank made 64 qualified investments totaling \$174,000 during the evaluation period, all of which were donations made to 31 CD organizations in the AA. These donations primarily supported community services to low- and moderate-income individuals and, to a lesser extent, affordable housing and economic development.

In the BSRA, the bank made 98 qualified investments totaling \$10.6 million during the evaluation period. Of this amount, \$5.5 million were qualified investments and \$5.1 million were grants and donations. In addition, the bank benefitted from ongoing impact of eight prior period qualified investments with an outstanding balance of \$1.9 million. The dollar volume of current- and prior- period investments represented 3.1 percent of tier 1 capital.

Examples of CD investments and donations included:

- The bank made four donations totaling \$47,500 to an organization that provides a wide range of services targeting low- and moderate-income individuals and families in the bank’s AA. The organization’s programs include housing assistance, energy support/HEAP, early childhood education/Head Start, workforce development, transportation services, and food support.
- The bank partnered with a national nonprofit CDFI to fund three catalytic grants totaling \$4.5 million in the BSRA to support cooperative projects designed to expand economic opportunity, affordable housing, and access to healthy food in underserved and low-wealth communities.

- The bank made a \$5 million equity investment in a social impact fund that financed healthcare facilities in medically underserved markets. The investment supported revitalization efforts within the BSRA by expanding access to medical care in underserved communities.

## SERVICE TEST

The bank’s performance under the Service Test in Ohio is rated Outstanding.

### Conclusions for Area a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Highland County non-MSA was excellent.

### Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

												2022-2024			
Assessment Area	Deposits	Branches							Population						
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography						
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA		
Highland County non-MSA	100.00	1	100.00	0.00	0.00	100.00	0.00	0.00	0.00	9.99	76.59	13.43	0.00		
<b>Total</b>	<b>100.00</b>	<b>1</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>9.99</b>	<b>76.59</b>	<b>13.43</b>	<b>0.00</b>		

Source: FFIEC File – 2020,2024 Census  
1/1/2022 - 12/31/2024 Bank Data  
Due to rounding, totals may not equal 100.0%

\* The table presents the data for all AAs. The narrative below addresses performance in full-scope areas only.

NCB operates one full-service branch, and one ATM located in a middle-income geography in the AA. The ATM is cash dispensing only and does not accept deposits. There were no low-income geographies in the AA.

The bank provides banking services through a number of alternative delivery systems (ADS) including telephone banking, online banking, mobile banking, and remote check deposit services. The bank also offers free check cashing services for government issued checks to customers and non-customers. The examiners did not place significant weight on ADS as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of low- and moderate-income individuals.

The bank did not open or close any branches during the evaluation period.

Services and business hours do not vary in a way that inconveniences, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals.

## **Community Development Services**

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided approximately 1,148 CD service hours to 24 organizations. Of these, 1,052 hours were performed within the bank's AA and 96 within the BSRA. Leadership involvement was evident with 13 employees serving on boards or committees, including eight within the AA and five within the BSRA.

In the AA, service hours were concentrated in community service activities for low- and moderate-income individuals and families. In the BSRA, service hours supported both affordable housing initiatives and community services.

Examples of CD services include:

- A CRA officer provided 194.5 hours of service as a board member and treasurer of a nonprofit organization that provides food and personal care items to individuals and families experiencing food insecurity.
- Fifty-two employees provided 624 hours through an employee-driven Corporate Contribution Committee to support nonprofit organizations locally, nationally and globally. Employees applied their financial expertise by reviewing financial statements and evaluating funding requests.
- Two employees conducted 22 service hours for the Teach Children to Save program, a national campaign sponsored by the American Bankers Association (ABA). The program was offered in schools where a majority of students qualified for the National School Lunch Program (NSLP).

# 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 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”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage loans, CD loans, qualified Investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Ohio		
Highland County non-MSA	Full-scope	

## Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State
National Cooperative Bank, N.A.	Outstanding	Low Satisfactory	Outstanding	Outstanding
State:				
Ohio	Outstanding	Low Satisfactory	Outstanding	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests 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 the 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 low- and moderate-income 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):** 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

**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 CD loans and qualified investments, branch distribution, and CD services).

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

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### 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 loans are treated the same 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 7. 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 8. 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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
NCB Highland County Non-MSA	19	1,561	100.00	3,004	--	--	--	9.13	21.05	9.79	75.34	73.68	77.06	15.53	5.26	13.15	--	--	--
<b>Total</b>	<b>19</b>	<b>1,561</b>	<b>100.00</b>	<b>3,004</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>9.13</b>	<b>21.05</b>	<b>9.79</b>	<b>75.34</b>	<b>73.68</b>	<b>77.06</b>	<b>15.53</b>	<b>5.26</b>	<b>13.15</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
NCB Highland County Non-MSA	19	1,561	100.00	3,004	22.73	31.58	11.22	19.87	36.84	23.67	21.06	15.79	25.03	36.34	15.79	24.70	--	--	15.38
<b>Total</b>	<b>19</b>	<b>1,561</b>	<b>100.00</b>	<b>3,004</b>	<b>22.73</b>	<b>31.58</b>	<b>11.22</b>	<b>19.87</b>	<b>36.84</b>	<b>23.67</b>	<b>21.06</b>	<b>15.79</b>	<b>25.03</b>	<b>36.34</b>	<b>15.79</b>	<b>24.70</b>	<b>--</b>	<b>--</b>	<b>15.38</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
California	292	167,703	100.00	1,525,487	22.96	4.11	4.37	16.82	11.64	8.94	18.71	26.37	17.60	41.51	55.14	48.39	--	2.74	20.71
<b>Total</b>	<b>292</b>	<b>167,703</b>	<b>100.00</b>	<b>1,525,487</b>	<b>22.96</b>	<b>4.11</b>	<b>4.37</b>	<b>16.82</b>	<b>11.64</b>	<b>8.94</b>	<b>18.71</b>	<b>26.37</b>	<b>17.60</b>	<b>41.51</b>	<b>55.14</b>	<b>48.39</b>	<b>--</b>	<b>2.74</b>	<b>20.71</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
California	134	76,207	100.00	603,367	22.96	0.75	4.39	16.82	8.96	7.75	18.71	17.91	17.01	41.52	68.66	51.76	--	3.73	19.08
<b>Total</b>	<b>134</b>	<b>76,207</b>	<b>100.00</b>	<b>603,367</b>	<b>22.96</b>	<b>0.75</b>	<b>4.39</b>	<b>16.82</b>	<b>8.96</b>	<b>7.75</b>	<b>18.71</b>	<b>17.91</b>	<b>17.01</b>	<b>41.52</b>	<b>68.66</b>	<b>51.76</b>	<b>--</b>	<b>3.73</b>	<b>19.08</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
District of Columbia	84	26,028	100.00	29,082	30.40	1.19	7.66	13.35	26.19	16.19	14.28	30.95	19.30	41.97	38.10	41.45	--	3.57	15.39
<b>Total</b>	<b>84</b>	<b>26,028</b>	<b>100.00</b>	<b>29,082</b>	<b>30.40</b>	<b>1.19</b>	<b>7.66</b>	<b>13.35</b>	<b>26.19</b>	<b>16.19</b>	<b>14.28</b>	<b>30.95</b>	<b>19.30</b>	<b>41.97</b>	<b>38.10</b>	<b>41.45</b>	<b>--</b>	<b>3.57</b>	<b>15.39</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
District of Columbia	34	11,723	100.00	10,029	26.43	2.94	4.44	12.05	17.65	10.47	13.58	26.47	17.48	47.94	52.94	48.83	--	--	18.79
<b>Total</b>	<b>34</b>	<b>11,723</b>	<b>100.00</b>	<b>10,029</b>	<b>26.43</b>	<b>2.94</b>	<b>4.44</b>	<b>12.05</b>	<b>17.65</b>	<b>10.47</b>	<b>13.58</b>	<b>26.47</b>	<b>17.48</b>	<b>47.94</b>	<b>52.94</b>	<b>48.83</b>	<b>--</b>	<b>--</b>	<b>18.79</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Maryland	83	15,001	100.00	325,235	22.34	26.51	10.32	17.85	31.33	22.56	21.68	20.48	22.00	38.13	13.25	27.53	--	8.43	17.60
<b>Total</b>	<b>83</b>	<b>15,001</b>	<b>100.00</b>	<b>325,235</b>	<b>22.34</b>	<b>26.51</b>	<b>10.32</b>	<b>17.85</b>	<b>31.33</b>	<b>22.56</b>	<b>21.68</b>	<b>20.48</b>	<b>22.00</b>	<b>38.13</b>	<b>13.25</b>	<b>27.53</b>	<b>--</b>	<b>8.43</b>	<b>17.60</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Maryland	28	5,083	100.00	144,644	21.32	21.43	7.77	17.38	14.29	19.49	21.44	35.71	22.11	39.87	14.29	29.75	--	14.29	20.88
<b>Total</b>	<b>28</b>	<b>5,083</b>	<b>100.00</b>	<b>144,644</b>	<b>21.32</b>	<b>21.43</b>	<b>7.77</b>	<b>17.38</b>	<b>14.29</b>	<b>19.49</b>	<b>21.44</b>	<b>35.71</b>	<b>22.11</b>	<b>39.87</b>	<b>14.29</b>	<b>29.75</b>	<b>--</b>	<b>14.29</b>	<b>20.88</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022 - 2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Michigan	143	14,179	100.00	500,952	20.65	40.56	11.29	17.89	13.29	22.59	21.12	20.28	22.94	40.35	20.98	31.70	--	4.90	11.48
<b>Total</b>	<b>143</b>	<b>14,179</b>	<b>100.00</b>	<b>500,952</b>	<b>20.65</b>	<b>40.56</b>	<b>11.29</b>	<b>17.89</b>	<b>13.29</b>	<b>22.59</b>	<b>21.12</b>	<b>20.28</b>	<b>22.94</b>	<b>40.35</b>	<b>20.98</b>	<b>31.70</b>	<b>--</b>	<b>4.90</b>	<b>11.48</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

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	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Michigan	57	5,224	100.00	225,966	20.52	28.07	9.86	17.82	33.33	21.55	21.16	19.30	22.60	40.50	17.54	33.17	--	1.75	12.81
<b>Total</b>	<b>57</b>	<b>5,224</b>	<b>100.00</b>	<b>225,966</b>	<b>20.52</b>	<b>28.07</b>	<b>9.86</b>	<b>17.82</b>	<b>33.33</b>	<b>21.55</b>	<b>21.16</b>	<b>19.30</b>	<b>22.60</b>	<b>40.50</b>	<b>17.54</b>	<b>33.17</b>	<b>--</b>	<b>1.75</b>	<b>12.81</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data.  
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	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New York	715	1,162,530	100.00	601,750	24.22	0.70	6.67	16.47	4.34	17.49	18.75	9.65	21.72	40.56	36.36	38.66	--	48.95	15.45
<b>Total</b>	<b>715</b>	<b>1,162,530</b>	<b>100.00</b>	<b>601,750</b>	<b>24.22</b>	<b>0.70</b>	<b>6.67</b>	<b>16.47</b>	<b>4.34</b>	<b>17.49</b>	<b>18.75</b>	<b>9.65</b>	<b>21.72</b>	<b>40.56</b>	<b>36.36</b>	<b>38.66</b>	<b>--</b>	<b>48.95</b>	<b>15.45</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%

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Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New York	196	512,871	100.00	236,032	24.18	0.51	6.52	16.44	4.59	16.08	18.73	9.69	22.12	40.64	30.10	41.30	--	55.10	13.98
<b>Total</b>	<b>196</b>	<b>512,871</b>	<b>100.00</b>	<b>236,032</b>	<b>24.18</b>	<b>0.51</b>	<b>6.52</b>	<b>16.44</b>	<b>4.59</b>	<b>16.08</b>	<b>18.73</b>	<b>9.69</b>	<b>22.12</b>	<b>40.64</b>	<b>30.10</b>	<b>41.30</b>	<b>--</b>	<b>55.10</b>	<b>13.98</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%