



## **PUBLIC DISCLOSURE**

August 12, 2024

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

Mutual Savings and Loan Association  
Charter Number: 700165

2900 Clearview Pkwy  
Metairie, LA 70006-6532

Office of the Comptroller of the Currency

3850 N. Causeway Boulevard  
Suite 1330  
Metairie, LA 70002

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- A more than reasonable loan-to-deposit (LTD) ratio
- Having a majority of loans inside the assessment area
- Having a poor geographic distribution of home mortgage loans
- Having a reasonable distribution of loans to individuals of different income levels
- Operating with an appropriate complaint management program.

### LTD Ratio

Considering the size and financial condition of Mutual Savings and Loan Association (Mutual) and credit needs of the assessment areas (AAs), the LTD ratio is more than reasonable. The quarterly average LTD ratio for Mutual during the evaluation period was 125.3 percent. Since the prior examination, Mutual's quarterly LTD has ranged from a low of 102.9 percent in the fourth quarter of 2021 to a high of 151 percent in the fourth quarter of 2013. The quarterly average LTD ratio for similarly situated financial institutions located within or near the AAs was 110.1 percent.

Institution	Assets – As of December 31, 2023 (in thousands)	Average LTD
Mutual	35,769	125.30%
Eureka Homestead	105,070	124.18%
Heritage Bank of St. Tammany	171,040	96.10%

Source: Call Reports

### Lending in AAs

A majority of Mutual's loans are inside its AAs. Mutual originated and purchased 75 percent of its total loans inside its AAs during the evaluation period. 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.

Lending Inside and Outside of the AAs										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	24	75	8	25	32	8,072	75	2,619	25	10,692
<b>Total</b>	<b>24</b>	<b>75</b>	<b>8</b>	<b>25</b>	<b>32</b>	<b>8,072</b>	<b>75</b>	<b>2,619</b>	<b>25</b>	<b>10,692</b>

\*Source: Bank Data. Percentages may not total 100 percent due to rounding.

## Description of Institution

Mutual is a single-state community savings and loan association, which operates out of two branch locations in the state of Louisiana. Mutual's main branch is in Metairie, which is in Jefferson Parish, in what is locally known as the "south shore." Mutual's second branch is in Mandeville, which is in St. Tammany Parish, in what is locally known as the "north shore." The two branches are separated by Lake Pontchartrain, which covers 630 square miles. Access to the north shore and south shore is via the Lake Pontchartrain Causeway bridge, which spans Lake Pontchartrain, and is approximately 24 miles long.

Mutual designates a total of 87 census tracts (CTs) of the eastern side of Jefferson Parish and the western side of St. Tammany Parish as its AAs. These CTs are located within a reasonable distance from a branch location. Both areas are parts of the New Orleans-Metairie, LA Metropolitan Statistical Area (MSA). Mutual has no affiliate or operating subsidiary activities considered when evaluating CRA performance. There were no legal or financial factors impeding Mutual's ability to meet credit needs in its AAs during the evaluation period. Mutual's CRA performance was rated "Satisfactory" in the last performance evaluation dated August 3, 2020.

Mutual offers fixed- and variable-rate mortgage loans for the purchase, improvement, or refinance of owner-occupied, one- to four-family dwellings. Mutual offers a bi-weekly mortgage program which permits payments to be made every two weeks, resulting in interest savings to the borrower. The bi-weekly program shortens the term of the loan, allowing the borrower's equity to build up much faster than a traditional monthly mortgage payment. Mutual also offers a construction/permanent loan program (owner-occupied properties), which allows customers to lock into the interest rate at the time of application. Mutual's primary business strategy or strategic plan is to originate and retain mortgage loans; however, some loans have been sold in the past for interest rate risk purposes. Banking hours reasonably meet the community needs with lobby hours Monday through Friday at both locations.

As of December 31, 2023, Mutual reported total assets of approximately \$36 million, total loans of approximately \$32 million, total deposits of approximately \$21 million and total tier 1 capital of approximately \$14 million. The loan portfolio breakdown reflects one- to four-family (inclusive of construction loans) real estate as Mutual's primary loan product at 95.4 percent of the total loan portfolio. The loan portfolio consisted of the following:

Mutual Savings and Loan Association		
Loan Category	Dollars (000)	Percentage
One- To Four-Family Real Estate (including construction loans)	30,694	95.38
Commercial Real Estate (including construction loans)	856	2.60
Multifamily	302	0.94
Consumer	326	1.01
<b>Total</b>	<b>32,178</b>	<b>100</b>

Source: Call Report; \*May not total 100% due to rounding.

The Metairie branch is not particularly visible from major thoroughfares and there is very little foot traffic in the surrounding area. The Mandeville branch, likewise, does not experience a lot of foot traffic. The customer base is maintained through the outreach efforts of the board and management team.

Mutual does not have any ATMs or a holding company and has not opened or closed any branches since the last CRA performance evaluation.

## **Scope of the Evaluation**

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

We evaluated CRA performance of Mutual using the Interagency Small Bank CRA procedures, which focus on an analysis of the primary loan products. The evaluation period for the lending test covered January 1, 2021, through December 31, 2023. Conclusions regarding lending performance are based on a review of residential real estate loans. Since Mutual is not a Home Mortgage Disclosure Act reporter, we conducted a manual analysis of all 24 residential real estate loans made inside the AAs during the review period.

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

Mutual operates in two AAs, with both being in the New Orleans-Metairie, LA MSA. As such, the AAs were combined for analysis purposes and this combined AA received a full-scope review. There were no additional limited-scope areas to review.

While there is only one AA for analysis purposes, the census bureau updated census data in 2022 and consequently there are two review periods during this evaluation. The first review period will analyze lending activity in the AA during 2021, and the second review period will combine lending activity in the AA during 2022 and 2023. As there were only eight loans made inside the AA in 2021, we placed more weight, or emphasis, on lending during the 2022 and 2023 review period.

### **Ratings**

Mutual's overall rating is based on activity in the state of Louisiana and focuses on mortgage lending in the combined AA.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks 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 Mutual (or any affiliate whose loans have been considered as part of Mutual's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this performance evaluation.

The OCC will consider any information that Mutual engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the 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 Louisiana

**CRA rating for the state of Louisiana:** Satisfactory

**The lending test is rated:** Satisfactory

The major factors that support this rating include:

- Having a poor geographic distribution of home mortgage loans
- Having a reasonable distribution of loans to individuals of different income levels
- Operating with an appropriate complaint management program.

### Description of Institution's Operations in Louisiana

Mutual serves its community through two branches, located in two AAs including Jefferson Parish and St. Tammany Parish, both of which are a part of the New Orleans-Metairie, LA MSA. Both AAs are combined for analysis purposes, and the combined AA received a full-scope review. Due to census data changes that occurred during the review period, the full-scope AA evaluation will analyze 2021 lending data independently from the combined lending data for 2022 and 2023. Mutual primarily offers one- to four-family residential real estate loans.

The New Orleans-Metairie, LA MSA includes eight parishes, and management determined the entire MSA to be too large to serve. So, management selected as their AA the parishes where their branches are located. Management further determined that, given Mutual's size and footprint, serving all of Jefferson and St. Tammany Parishes would not be possible and so selected those CTs within a reasonable distance from the branches. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding low- and moderate-income areas. Major cities in the AA include Metairie and Kenner in Jefferson Parish and Covington and Mandeville in St. Tammany Parish.

The AA's economy is diverse, with a variety of businesses including, healthcare, construction, and manufacturing. Primary employers include the parish school systems, Ochsner Hospital Systems, Shell, and local government. According to the Bureau of Labor Statistics, during the review period, the unemployment rate of the AA was approximately 3.9 percent, which was slightly lower than the Louisiana state average of four percent. During the review period, the unemployment rate varied significantly, ranging from an average high of 7.6 percent to 3 percent.

Mutual's competition is considerable in the AA and includes state and federal community banks, credit unions, and mortgage banking companies with regional and national footprints. Based on the most recent Deposit Market Share Report the bank ranked 27 out of 29 institutions in its AA, holding 0.1 percent of market share. The top four largest competitors command 70.9 percent of the deposit market, evidencing significant competition in the AA.

In conjunction with this performance evaluation, we conducted an interview with a community leader in the MSA. The primary credit needs in the community were identified as small business lending and

affordable housing. According to this contact, local banks have been active in helping meet the credit needs of the AA.

The following table depicts the demographic information for the AA for 2021.

<b>Table A – Demographic Information of the AA</b>						
<b>AA: Jefferson and St Tammany Parishes AA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (CTs)	93	4.3	15.1	37.6	43.0	0.0
Population by Geography	351,175	3.3	13.1	36.5	47.1	0.0
Housing Units by Geography	154,613	3.8	13.2	37.3	45.7	0.0
Owner-Occupied Units by Geography	91,194	0.9	6.9	38.6	53.7	0.0
Occupied Rental Units by Geography	49,378	8.2	24.0	36.3	31.6	0.0
Vacant Units by Geography	14,041	7.0	16.9	32.9	43.3	0.0
Businesses by Geography	61,646	3.6	12.4	29.0	55.0	0.0
Farms by Geography	1,039	1.5	10.6	42.6	45.2	0.0
Family Distribution by Income Level	89,026	17.1	14.0	17.7	51.2	0.0
Household Distribution by Income Level	140,572	19.6	14.3	15.7	50.5	0.0
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$70,100	Median Housing Value			\$208,215
			Median Gross Rent			\$940
			Families Below Poverty Level			8.8%
<i>Source: 2015 ACS and 2021 D&amp;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>						

The MSA consists of 93 CTs including four low-income CTs (4.3 percent), 14 moderate-income CTs (15.1 percent), 35 middle-income CTs (37.5 percent), and 40 upper-income CTs (43.1 percent).

The Federal Financial Institutions Examination Council's (FFIEC) updated 2021 median family income for the AA was \$70,100. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>New Orleans-Metairie, LA MSA Median Family Income (35380)</b>				
2021 (\$70,100)	<\$35,050	\$35,050 to <\$56,080	\$56,080 to <\$84,120	≥\$84,120
<i>Source: FFIEC</i>				



Low-income families earning a median family income less than \$35,050 represented 17.1 percent of families in the AA, while moderate-income families earning between \$35,050 and \$56,080 comprised 14 percent of the AA population. According to 2021 ACS US census data, 8.8 percent of families in the AA earned wages below the poverty level.

Opportunities for residential lending are limited within the four low-income and 14 moderate-income CTs in the AA. Of the 154,613 housing units in the AA, only 5,855 are in the low-income CTs. Of those 5,855, only 827 (14.1 percent) are owner-occupied housing units, with 4,044 (69.1 percent) being rentals and 984 (16.8 percent) being vacant. The moderate-income CTs contain 20,462 housing units with 6,253 (30.6 percent) being owner-occupied housing units, 11,843 (57.9 percent) being rentals, and 2,366 (11.5 percent) being vacant. With average monthly rents of \$940 and the average medium housing price of \$208,215, there is limited demand for residential lending for low- or moderate-income borrowers due to the unaffordability of housing and limited supply.

The following table depicts the demographic information for the AA for 2022 and 2023.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>AA: Jefferson and St Tammany Parishes AA 2022 - 2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (CTs)	87	2.3	23.0	34.5	40.2	0.0
Population by Geography	319,180	1.9	22.4	33.1	42.6	0.0
Housing Units by Geography	131,958	1.9	23.4	34.6	40.0	0.0
Owner-Occupied Units by Geography	79,995	0.7	16.0	36.1	47.2	0.0
Occupied Rental Units by Geography	39,949	4.3	39.1	31.8	24.8	0.0
Vacant Units by Geography	12,014	2.3	21.1	33.8	42.7	0.0
Businesses by Geography	61,199	1.5	20.5	32.0	46.0	0.0
Farms by Geography	1,173	1.2	15.7	40.8	42.3	0.0
Family Distribution by Income Level	77,062	20.1	14.4	18.3	47.3	0.0
Household Distribution by Income Level	119,944	21.3	13.3	16.3	49.0	0.0
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$82,050	Median Housing Value			\$230,932
			Median Gross Rent			\$1,007
			Families Below Poverty Level			9.7%
<i>Source: 2020 U.S. Census and 2023 D&amp;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>						

The MSA consists of 87 CTs including two low-income CTs (2.3 percent), 20 moderate-income CTs (22.9 percent), 30 middle-income CTs (34.5 percent), and 35 upper-income CTs (40.2 percent).

The FFIEC updated 2022 median family income for the AA was \$82,050. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>New Orleans-Metairie, LA MSA Median Family Income (35380)</b>				
2022 and 2023 (82,050)	<\$41,025	\$41,026 to <65,620	\$65,621 to <98,460	≥\$98,460
<i>Source: FFIEC</i>				

Low-income families earning a median family income less than \$41,025 represented 20.1 percent of families in the AA, while moderate-income families earning between \$41,026 and \$65,620 comprised 14.4 percent of the AA population. According to 2022 ACS US census data, 9.7 percent of families in the AA earned wages below the poverty level.

Opportunities for residential lending are limited within the two low-income and 20 moderate-income CTs in the AA. Of the 131,958 housing units in the AA, only 2,569 are in the low-income CTs. Of those 2,569, only 582 (22.7 percent) are owner-occupied housing units, with 41,711 (66.6 percent) being rentals and 276 (10.7 percent) being vacant. The moderate-income CTs contain 30,916 housing units with 12,765 (41.3 percent) being owner-occupied housing units, 15,613 (50.5 percent) being rentals, and 2,538 (8.2 percent) being vacant. With average monthly rents of \$1,007 and the average medium housing price of \$230,932, there is limited demand for residential lending for low- or moderate-income borrowers due to the unaffordability of housing and limited supply.

## **Scope of Evaluation in Louisiana**

Mutual operates in one assessment area in the state of Louisiana and has mortgage lending as its primary product. Consequently, the only AA received a full-scope review, and we reviewed all mortgage loans to conduct our analysis.

## **LENDING TEST**

Mutual's performance under the lending test in Louisiana is rated Satisfactory.

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

Based on a full-scope review, Mutual's performance in the full-scope AA is adequate.

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

Mutual exhibits poor geographic distribution of loans in the state.

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

Refer to Table O in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the home mortgage loan originations and purchases.

2021

With only eight loans originated during the year, Mutual did not make a sufficient number of loans during this review period to allow for meaningful analysis.

2022 – 2023

Mutual exhibits poor geographic distribution in both the low- and moderate-income CTs during the review period. While Mutual did not make any loans in the low-income CTs, it should be noted that only 0.7 percent of the owner-occupied housing units and only 1.9 percent of the population are in those two low-income CTs. Additionally, Mutual faces significant competition in the AA, ranking 27 out of 29 financial institutions. While Mutual made loans in the moderate-income CTs, Mutual's lending in those CTs was significantly less than both the percentage of owner-occupied housing units (comparator) and peer lending, evidencing poor geographic distribution.

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

Mutual exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered.

***Home Mortgage Loans***

Refer to Table P in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the home mortgage loan originations and purchases.

2021

With only eight loans originated during the year, Mutual did not make a sufficient number of loans during this review period to allow for meaningful analysis.

2022-2023

Mutual exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered. The distribution of mortgage loans to low-income borrowers is poor as Mutual did not make any loans to low-income borrowers during the review period. Mutual's distribution of mortgage loans to moderate-income borrowers is excellent due to Mutual's lending exceeding both the percentage of families (the comparator) and peer lending during the review period.

**Responses to Complaints**

There were no lending related complaints filed during the review period.



## 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>	01/01/2021-12/31/2023	
<b>Bank Products Reviewed:</b>	Home Mortgage	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of AAs and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Jefferson / St. Tammany AA	Full Scope	2021 and 2022/2023 loan data analyzed separately

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: Mutual Savings and Loan Association	
Overall Bank:	Lending Test Rating
Satisfactory	Satisfactory
State: Louisiana	
Satisfactory	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/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. CTs nest within parishes, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

**Low Income Geography:** A CT with a 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/AA.

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



employment center or centers, plus adjacent parishes associated with the main/secondary parish or parishes through commuting ties.

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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

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### Content of Standardized Tables

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

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

- Table O. AA 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. AA 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 multistate MSA/AA. The table also presents aggregate peer data for the years the data is available.

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

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
AA:	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
Combined AAs	8	2,556	100	17,070	0.9	0.0	0.3	6.9	0.0	6.6	38.6	12.5	33.4	53.7	87.5	59.7	0.0	0.0	0.0
<b>Total</b>	<b>8</b>	<b>2,556</b>	<b>100</b>	<b>17,070</b>	<b>0.9</b>	<b>0.0</b>	<b>0.3</b>	<b>6.9</b>	<b>0.0</b>	<b>6.6</b>	<b>38.6</b>	<b>12.5</b>	<b>33.4</b>	<b>53.7</b>	<b>87.5</b>	<b>59.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, *Due to rounding, totals may not equal 100.0%*

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
AA:	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
Combined AAs	16	5,517	0.0	7,734	0.7	0.0	0.6	16.0	6.25	13.7	36.1	43.8	32.2	47.2	50.0	53.5	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>5,517</b>	<b>100</b>	<b>7,734</b>	<b>0.7</b>	<b>0.0</b>	<b>0.6</b>	<b>16.0</b>	<b>6.25</b>	<b>13.7</b>	<b>36.1</b>	<b>43.8</b>	<b>32.2</b>	<b>47.2</b>	<b>50.0</b>	<b>53.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, *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.

<b>Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2021</b>
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>AA:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Combined AAs	8	2,556	100	17,070	17.1	0.0	3.6	14.0	0.0	12.8	17.7	25.0	18.5	51.2	75.0	46.1	0.0	0.0	19.0
<b>Total</b>	<b>8</b>	<b>2,556</b>	<b>100</b>	<b>17,070</b>	<b>17.1</b>	<b>0.0</b>	<b>3.6</b>	<b>14.0</b>	<b>0.0</b>	<b>12.8</b>	<b>17.7</b>	<b>25.0</b>	<b>18.5</b>	<b>51.2</b>	<b>75.0</b>	<b>46.1</b>	<b>0.0</b>	<b>0.0</b>	<b>19.0</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, Due to rounding, totals may not equal 100.0%*

<b>Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022-23</b>
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>AA:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Combined AAs	16	5,517	100	7,734	20.1	0.0	5.3	14.4	18.75	16.8	18.3	6.25	20.4	47.3	75.0	40.5	0.0	0.0	17.0
<b>Total</b>	<b>16</b>	<b>5,517</b>	<b>100</b>	<b>7,734</b>	<b>20.1</b>	<b>0.0</b>	<b>5.3</b>	<b>14.4</b>	<b>18.75</b>	<b>16.8</b>	<b>18.3</b>	<b>6.25</b>	<b>20.4</b>	<b>47.3</b>	<b>75.0</b>	<b>40.5</b>	<b>0.0</b>	<b>0.0</b>	<b>17.0</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 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.