# **Classic City Bank Community Reinvestment Act Public File Information**

(Updated December 31, 2023)

Classic City Bank began operation on November 9, 2020 in a temporary modular branch unit located at 2361 West Broad Street, Athens, Georgia 30606. Upon completion of the bank's permanent facility at 2365 West Broad Street, the bank relocated all banking functions and all employees into that facility on March 1, 2021. Both of these facilities are located in Census Tract 13059.0012.00.

Classic City Bank was chartered in November, 2020 and has not closed any branches within the past two years.

Classic City Bank's hours of operation will be Monday – Thursday from 9:00 a.m until 4:30 p.m. and Friday from 9:00 a.m until 5:00 p.m.

Classic City Bank is a traditional community bank with the typical array of banking products. Deposit products include the following:

<u>Consumer</u> Non-interest bearing checking Interest-bearing checking Money market accounts Certificates of deposit of various maturities

In addition to the deposit products listed above, the bank offers on-line banking including bill pay, mobility banking, person to person payments, debit cards, and an atm.

## **Business**

Non-interesting checking options from small business to analysis Interest-bearing checking for qualifying businesses Money market accounts Certificates of deposit of various maturities

In addition to the deposit products listed above, the bank offers on-line banking including bill pay, remote deposit capture, mobility banking, positive pay, and debit cards.

Loan products will cover the gamut of business and consumer loan types including, but not limited to the following:

Consumer Vehicle Unsecured Home improvement Home Equity Lines of Credit Bridge or temporary loans Residential construction loans Permanent residential mortgages Other consumer purpose loans

#### **Business**

Working capital term loans Working capital revolving lines of credit Equipment financing Real estate construction loans – owner occupied Real estate construction loans – spec or investment Mini-perm loans – owner occupied Mini-perm loans – investor 1-4 residential investor loans Multi-family investor loans Industrial property investor loans Retail property investor loans

The above loan products are not intended to be an exhaustive list as borrower purposes are often unique to their specific situation. Classic City Bank intends to provide creative solutions to each unique borrower scenario.

Classic City Bank was formed to meet the legitimate credit needs of our community. One of the measures monitored to ensure that the bank meets this mandate is the bank's loan to deposit ratio which is calculated for this purpose on a quarterly basis from call report data. This calculation uses data points as of the last day of each calendar quarter. The numerator is net loans after deducting for loan loss reserve , and the denominator is total deposits. The bank was formed in November, 2020 so the first quarterly calculation is dated 12/31/20. The bank's goal is to maintain a loan to deposit ratio of at least 70%.

## Loan to Deposit Ratios

12/31/20	109.78%
3/31/21	72.80%
6/30/21	68.32%
9/30/21	66.99%

12/31/21	57.03%
3/31/22	46.02%
6/30/22	56.19%
9/30/22	60.84%
12/31/22	63.73%
3/31/23	74.18%
6/30/23	72.85%
9/30/23	74.82%
12/31/23	72.13%



Classic City Bank Personal Schedule of Fees

ATM foreign atm transaction fee \$3.00 Account research per hour \$25.00 Account research per copy \$1.00 Cashier's check account holders only \$5.00 Checks printing depends on style Collection item incoming/outgoing \$20.00 Copy image (per item) \$3.00 Debit Card Replacement Fee \$5.00 Debit Card Expediated Fee \$50.00 Dormant/Escheatment Fee \$60.00 Duplicate Recipient statement fee \$5.00 Foreign currency \$10.00 per order plus shipping fees apply Garnishment/Levies (processing Fee) \$100.00 Non Sufficient Funds Item Fee\* \$35.00 Overdraft Item Fee \$35.00 Overdraft Sweep Transfer Fee \$10.00 Return Deposited Item Fee \$10.00 Safe Box Rental Depends on size Safe Box Late Fee (over 30 days) \$15.00 Safe Box Drilled Fee \$150.00 Safe Box Lost key Fee \$20.00 Statement Reconciling per hour 1 hour min \$25.00 Stop Payment Fee in person \$20.00 Stop Payment Fee online banking \$10.00 Wire Transfer Domestic Outgoing/Incoming \$20.00 Wire Transfer International Outgoing \$45.00 Wire Transfer International Incoming \$35.00

\*A Non Sufficient Item Fee may be charged multiple times on the same item.

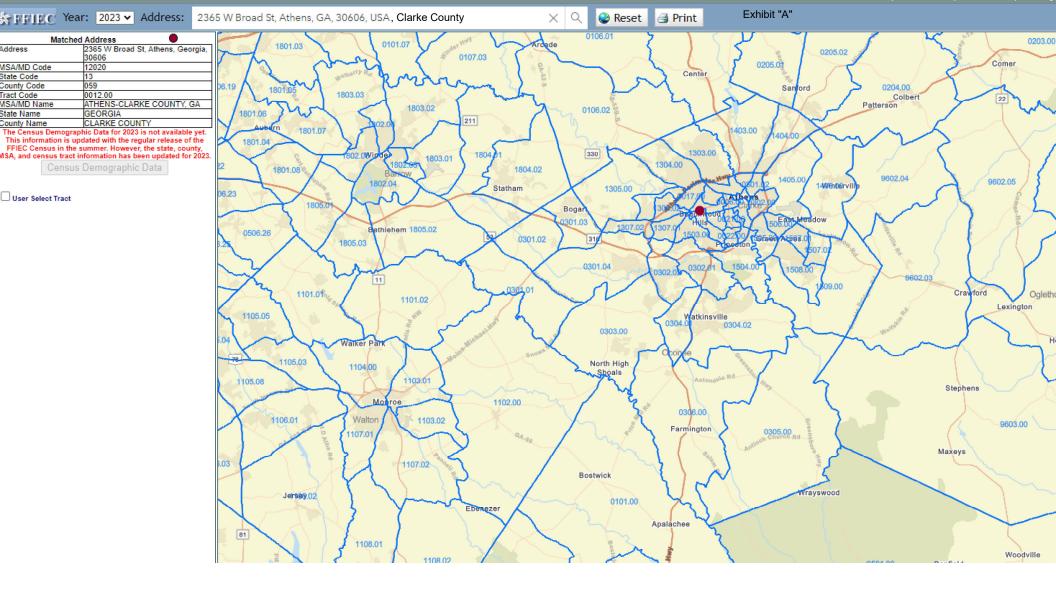


Exhibit "B" Page 1

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2022 FFIEC Census Report - Summary Census Demographic Information State: 13 - GEORGIA (GA) County: 059 - CLARKE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
13	059	0001.00	Upper	No	201.24	\$82,300	\$165,621	\$143,488	3167	18.38	582	32	73
13	059	0004.01	Moderate	No	70.60	\$82,300	\$58,104	\$50,341	1822	42.26	770	11	179
13	059	0004.02	Low	No	3.50	\$82,300	\$2,881	\$2,499	7400	18.78	1390	0	18
13	059	0006.00	Moderate	No	52.96	\$82,300	\$43,586	\$37,768	2679	31.43	842	95	736
13	059	0009.00	Low	No	27.69	\$82,300	\$22,789	\$19,750	3661	76.70	2808	262	965
13	059	0012.00	Upper	No	185.72	\$82,300	\$152,848	\$132,422	3060	30.59	936	706	928
13	059	0017.00	Middle	No	82.22	\$82,300	\$67,667	\$58,625	2034	34.56	703	528	915
13	059	0018.00	Middle	No	119.70	\$82,300	\$98,513	\$85,352	2490	20.28	505	498	1039
13	059	0019.00	Upper	No	167.32	\$82,300	\$137,704	\$119,306	3591	33.67	1209	492	1327
13	059	0020.00	Upper	No	217.70	\$82,300	\$179,167	\$155,227	1950	24.72	482	480	633
13	059	0021.00	Upper	No	184.07	\$82,300	\$151,490	\$131,250	3870	13.67	529	388	999
13	059	0022.00	Upper	No	137.29	\$82,300	\$112,990	\$97,891	2671	22.50	601	266	774
13	059	0301.01	Low	No	44.26	\$82,300	\$36,426	\$31,563	3029	29.75	901	27	646
13	059	0301.02	Moderate	No	72.29	\$82,300	\$59,495	\$51,550	3217	67.61	2175	326	938
13	059	0302.00	Low	No	32.99	\$82,300	\$27,151	\$23,523	4734	65.84	3117	642	1737
13	059	1303.00	Moderate	No	58.57	\$82,300	\$48,203	\$41,765	5532	76.39	4226	1316	2032
13	059	1304.00	Middle	No	82.75	\$82,300	\$68,103	\$59,006	6291	49.24	3098	1632	2649
13	059	1305.00	Middle	No	86.29	\$82,300	\$71,017	\$61,528	2832	43.96	1245	852	1259
13	059	1306.01	Moderate	No	67.49	\$82,300	\$55,544	\$48,125	4022	57.53	2314	764	1048
13	059	1306.02	Upper	No	129.65	\$82,300	\$106,702	\$92,448	2898	28.50	826	639	857
13	059	1307.01	Middle	No	103.43	\$82,300	\$85,123	\$73,750	4011	34.33	1377	888	1087
13	059	1307.02	Middle	No	106.84	\$82,300	\$87,929	\$76,182	2947	52.05	1534	255	433
13	059	1403.00	Low	No	44.51	\$82,300	\$36,632	\$31,742	5151	75.11	3869	1046	2167
13	059	1404.00	Moderate	No	65.11	\$82,300	\$53,586	\$46,429	3537	74.98	2652	1042	1406
13	059	1405.00	Moderate	No	60.80	\$82,300	\$50,038	\$43,352	2113	79.37	1677	204	909
13	059	1406.00	Middle	No	113.39	\$82,300	\$93,320	\$80,849	5036	49.11	2473	1339	2019

\* Will automatically be included in the 2023 Distressed or Underserved Tract List

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State Code		Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
13	059	1503.00	Upper	No	167.42	\$82,300	\$137,787	\$119,375	3861	34.50	1332	903	1421
13	059	1504.00	Moderate	No	77.83	\$82,300	\$64,054	\$55,500	5100	35.16	1793	143	731
13	059	1505.00	Moderate	No	55.63	\$82,300	\$45,783	\$39,671	5285	38.13	2015	315	1227
13	059	1506.00	Moderate	No	67.48	\$82,300	\$55,536	\$48,120	4089	48.79	1995	336	1437
13	059	1507.01	Middle	No	96.84	\$82,300	\$79,699	\$69,050	4928	48.19	2375	772	1473
13	059	1507.02	Upper	No	137.62	\$82,300	\$113,261	\$98,125	1439	34.61	498	401	596
13	059	1508.00	Upper	No	126.64	\$82,300	\$104,225	\$90,300	5939	38.73	2300	1769	2270
13	059	1509.00	Middle	No	116.82	\$82,300	\$96,143	\$83,295	4285	30.83	1321	1019	1770

#### Exhibit "C"

2022 FFIEC Census Report - Summary Census Housing Information State: 13 - GEORGIA (GA) County: 059 - CLARKE COUNTY



State Code	County Code	Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
13	059	0001.00	1225	73	16	Yes	32	248	5	945
13	059	0004.01	812	179	39	Yes	11	89	8	712
13	059	0004.02	359	18	44	Yes	0	34	0	325
13	059	0006.00	1250	736	44	Yes	95	94	68	1061
13	059	0009.00	1890	965	59	Yes	262	120	262	1508
13	059	0012.00	1744	928	44	Yes	706	28	706	1010
13	059	0017.00	915	915	51	Yes	528	55	528	332
13	059	0018.00	1147	1039	62	Yes	498	142	498	507
13	059	0019.00	1700	1327	56	Yes	492	179	483	1029
13	059	0020.00	1014	633	54	Yes	480	28	480	506
13	059	0021.00	1546	999	48	Yes	388	133	367	1025
13	059	0022.00	1159	774	48	Yes	266	64	253	829
13	059	0301.01	1144	646	18	Yes	27	150	27	967
13	059	0301.02	1333	938	27	Yes	326	23	326	984
13	059	0302.00	2425	1737	46	Yes	642	184	617	1599
13	059	1303.00	2227	2032	32	Yes	1316	65	1316	846
13	059	1304.00	2649	2649	37	Yes	1632	207	1632	810
13	059	1305.00	1259	1259	37	Yes	852	56	852	351
13	059	1306.01	1803	1048	34	Yes	764	41	747	998
13	059	1306.02	1368	857	30	Yes	639	99	639	630
13	059	1307.01	1759	1087	27	Yes	888	87	804	784
13	059	1307.02	1110	433	23	Yes	255	0	255	855
13	059	1403.00	2220	2167	34	Yes	1046	103	1046	1071
13	059	1404.00	1406	1406	35	Yes	1042	89	1042	275
13	059	1405.00	934	909	43	Yes	204	25	204	705
13	059	1406.00	2153	2019	35	Yes	1339	90	1339	724
13	059	1503.00	1823	1421	35	Yes	903	58	864	862
13	059	1504.00	1593	731	26	Yes	143	142	130	1308
13	059	1505.00	2163	1227	28	Yes	315	273	248	1575
13	059	1506.00	2101	1437	40	Yes	336	109	308	1656
13	059	1507.01	2203	1473	35	Yes	772	35	772	1396
13	059	1507.02	596	596	25	Yes	401	0	401	195
13	059	1508.00	2574	2270	30	Yes	1769	0	1728	805
13	059	1509.00	1848	1770	28	Yes	1019	118	1019	711

## Classic City Bank HMDA Disclosure Statement

The HMDA data about our residential mortgage lending is available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site:

www.consumerfinance.gov/hmda

HMDA data for many other financial institutions are also available at this Web site.

# **PUBLIC DISCLOSURE**

July 18, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Classic City Bank Certificate Number: 59219

2365 W. Broad Street Athens, Georgia 30606

Federal Deposit Insurance Corporation Division of Depositor and Consumer Protection Atlanta Regional Office

> 10 10th Street NE, Suite 800 Atlanta, Georgia 30309-3849

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, nor should it 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.

## **INSTITUTION RATING**

### INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment area.
- The bank made a majority of loans inside its assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of loans reflects, given the demographics of the assessment area, overall reasonable penetration among businesses of different sizes and individuals of different income levels.
- The bank has not received any Community Reinvestment Act (CRA)-related complaints since opening for business on November 9, 2020. Therefore, this factor did not affect the Lending Test rating.

Examiners did not identify any financial or legal impediments, other than legal lending limits, that would affect the bank's ability to meet the credit needs of its assessment area.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Classic City Bank has designated a single CRA assessment area that includes Clarke County, Georgia, in its entirety. Clarke County is one of four counties located in the Athens-Clarke County, GA Metropolitan Statistical Area (MSA). The geographic boundaries of the assessment area remain unchanged since the bank's opening.

#### **Economic and Demographic Data**

The assessment area is comprised of 30 census tracts including 7 low-, 4 moderate-, 10 middle-, and 8 upper-income tracts, and 1 tract with no income classification. The census tract income classifications are based on the 2015 American Community Survey (ACS). The following table presents assessment area demographic information from the 2015 ACS census and 2021 D&B data.

Demographi	c Information o	f the Asses	sment Area			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	23.3	13.3	33.3	26.7	3.3
Population by Geography	120,905	22.0	12.9	36.4	22.3	6.4
Housing Units by Geography	51,529	22.1	13.0	40.4	23.8	0.7
Owner-Occupied Units by Geography	17,549	14.0	10.5	46.4	29.1	0.0
Occupied Rental Units by Geography	25,807	26.5	14.5	37.5	20.4	1.1
Vacant Units by Geography	8,173	25.7	13.7	37.0	22.9	0.8
Businesses by Geography	12,815	17.8	10.1	42.0	28.5	1.7
Farms by Geography	314	15.9	12.7	43.9	26.4	1.0
Family Distribution by Income Level	20,812	32.2	14.3	16.7	36.7	0.0
Household Distribution by Income Level	43,356	35.5	14.6	14.6	35.3	0.0
Median Family Income - Athens-Clarke Co	unty, GA MSA	\$57,116	Median Hou	using Val	ue	\$157,890
			Median Gro	ss Rent		\$802
			Families Be	low Pove	rty Level	22.2%

Due to rounding, totals may not equal 100.0 percent.

(\*) The NA category consists of geographies that have not been assigned an income classification.

The Geographic Distribution compares home mortgage loans to the distribution of owner-occupied housing units and small business loans to the percentage of businesses in low-, moderate-, middle-, and upper-income census tracts. The largest volume of owner-occupied units and businesses is in the middle-income tracts, indicating more potential lending opportunities in these areas. The volume of businesses and owner-occupied housing units in upper-income tracts is higher than the

percent), Truist Bank (13.5 percent), First American Bank and Trust Company (10.9 percent), and Wells Fargo Bank, National Association (10.4 percent).

### Community Contact(s)

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying area credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available.

Examiners used an existing contact with an economic development organization within Clarke County. The contact noted the local economy was steadily improving prior to the COVID-19 pandemic. However, the COVID-19 pandemic struck the hospitality industry hard, increasing the need for assistance to small business owners and the lower-income population that relied on hospitality jobs for employment. Although conditions are slowly improving, there continues to be a need for small business financial education and access to small business financing. Overall, the contact indicated that financial institutions have been responsive to the current credit needs of the assessment area.

#### **Credit Needs**

Considering demographic and economic data, examiners determined that small business loans represent a primary credit need of the assessment area. The significant percentage of businesses with gross annual revenues of \$1 million or less (86.9 percent) and the large number of businesses with four or fewer employees (57.4 percent) support the conclusion that there is a need for small business lending. Affordable housing also represents a need, as 46.5 percent of families are low- or moderate-income, and 22.2 percent of families live below poverty.

## **SCOPE OF EVALUATION**

#### **General Information**

This evaluation covers the period from the bank's opening on November 9, 2020, to the current evaluation dated July 18, 2022. Examiners used the Interagency Small Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the CRA Small Bank Lending Test.

#### **Activities Reviewed**

Examiners determined the bank's major product lines are small business and home mortgage loans. This conclusion considered the bank's business strategy and distribution of the loan portfolio. No other loan types, such as small farm or consumer loans, represent a major product line. Therefore, they provided no material support for conclusions or ratings and are not presented. Small business loans received greater weight in determining the overall rating given the level of loans originated by product type.

For the Lending Test, examiners reviewed the number and dollar volume of small business and

bank's average net loan-to-deposit ratio was compared to that of a peer group, as defined by the Uniform Bank Performance Report (UBPR). The UBPR's Peer Group includes de novo banks opened in 2020 having assets less than \$750.0 million. The Peer Group's net loan-to-deposit ratio ranged from a low of 54.0 percent as of June 30, 2021, to a high of 63.7 percent as of December 31, 2021, and averaged 57.8 percent. The bank's net loan-to-deposit ratio was consistently higher than the Peer Group net loan-to-deposit ratio through September 30, 2021, and then was lower than the Peer Group ratio through March 31, 2022. However, the bank's average net loan-to-deposit ratio was well above the Peer Group average.

Classic City Bank is also involved in other lending activities that help to meet the credit needs within the assessment area that are not reflected in its average net loan-to-deposit ratio. Specifically, the bank acts as a broker for a mortgage lender that originates longer term, fixed rate mortgage products not currently offered in-house. During 2021 and year-to-date 2022, Classic City Bank facilitated the origination of seven residential mortgages totaling \$1.9 million, primarily within the assessment area.

#### **Assessment Area Concentration**

	Lending	Inside a	nd Outsi	de of the	Assessment	Area			
ľ	Number o	of Loans			Dollar A				
Insi	ide	Outside Total Inside	le	Outside		Total			
#	%	#	%	#	\$	%	\$	%	\$(000s)
38	56.7	29	43.3	67	7,330	40.6	10,714	59.4	18,044
80	65.6	42	34.4	122	18,368	59.3	12,584	40.7	30,952
118	62.4	71	37.6	189	25,698	52.4	23,298	47.6	48,996
	1 Insi # 38 80	Number of   Inside   # %   38 56.7   80 65.6	Number of Loans   Inside Out   # % #   38 56.7 29   80 65.6 42	Number of Loans   Inside Outside   # % # %   38 56.7 29 43.3   80 65.6 42 34.4	Number of Loans   Inside Outside Total   # % # % #   38 56.7 29 43.3 67   80 65.6 42 34.4 122	Number of Loans Dollar A   Inside Outside Total Inside   # % # % # \$   38 56.7 29 43.3 67 7,330   80 65.6 42 34.4 122 18,368	Inside Outside Total Inside   # % # % # % %   38 56.7 29 43.3 67 7,330 40.6   80 65.6 42 34.4 122 18,368 59.3	Number of Loans   Inside Outside Total Inside Outside Outside Outside Outside Outside Outside Outside Inside Outside Outside Outside Inside Outside Outside Outside Inside Outside	Number of Loans   Inside Outside Total Inside Outside Outside No

A majority of loans was originated in the assessment area. See the below table for details.

#### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Reasonable performance for small business and home mortgage lending supports this conclusion.

#### Small Business Loans

The geographic distribution of small business lending reflects reasonable dispersion throughout the assessment area. Small business lending in low-income census tracts was above demographics and in moderate-income census tracts was in-line with demographics. Refer to the following table for details.

percent, which remains below but is more comparable to demographics. The following table reflects the distribution of small business loans among businesses of different sizes.

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	86.9	16	34.0	4,982	50.2
>\$1,000,000	3.1	13	27.7	3,272	33.0
Revenue Not Available	9.9	18	38.3	1,665	16.8
Total	100.0	47	100.0	9,919	100.0

Examiners also evaluated the universe of 80 small business loans originated inside the assessment area during 2021 using loan size. A majority of the small business loans originated in the assessment area by number were less than \$250,000, indicating that the bank is helping to serve the needs of smaller businesses in the assessment area. The following table reflects the distribution of small business loans by loan size.

Distribution of Small Business Loans by Loan Size									
Loan Size	Count	Percent	\$(000s)	Percent					
<\$100,000	30	37.5	1,226	6.7					
\$100,000 - \$249,999	25	31.3	3,799	20.7					
\$250,000 - \$499,999	11	13.7	3,691	20.1					
\$500,000 - \$1,000,000	14	17.5	9,652	52.5					
Total	80	100.0	18,368	100.0					

#### Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable performance among borrowers of different incomes. The bank did not originate any home mortgage loans to low-income borrowers during the evaluation period. A low-income individual earned less than \$36,550 in 2021. With a median home value of \$157,890, many low-income individuals would likely have difficulty qualifying for a conventional home mortgage loan. Additionally, the level of families living below the poverty level is high at 22.2 percent or 69.0 percent of low-income families, further impacting the ability of those living below the poverty level to qualify for a conventional home mortgage loan. For home mortgage lending to moderate-income borrowers, performance was well below demographics based on the number of loans originated; however, it is noted that the dollar volume of loans originated to moderate-income borrowers was in line with demographics. Examiners also noted that 27 of the 38 loans (71.0 percent) did not include income information. Individual family income information was not available for these loans as they were originated to business entities and not individuals. Considering only loans with income data available, lending to moderate-income borrowers is 27.2 percent, which is significantly above the demographics.

## APPENDICES

## **SMALL BANK PERFORMANCE CRITERIA**

#### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is 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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.