



PUBLIC DISCLOSURE

December 11, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

New Carlisle Federal Savings Bank
Charter Number: 703043

400 N. Main St.
New Carlisle, OH 45344

Office of the Comptroller of the Currency

655 Metro Place South
Suite 625
Dublin, OH 43017

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

The Lending Test rating is based on the state of Ohio rating and the following overall conclusions.

- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank exhibits a reasonable geographic distribution of loans in its AAs.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is more than reasonable.

The New Carlisle Federal Savings Bank's (NCFSB or bank) LTD ratio over the 14 quarters since the previous Community Reinvestment Act (CRA) evaluation (September 30, 2019, to December 31, 2022) is 118.9 percent. The ratio ranged from a low of 112.4 percent as of September 30, 2021, to a high of 128.7 percent as of September 30, 2020. NCFSB's average LTD ratio is more than reasonable when compared to other financial institutions of similar size and location (total assets between \$80 million and \$250 million and bank offices in the AAs). The bank's LTD ratio is the highest among two similarly situated financial institutions in the AAs. The other two banks had an average LTD ratio of 70 percent, ranging from 61.8 percent to 78.2 percent.

Lending in Assessment Area

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

The bank originated and purchased 64.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	563	63.9	318	36.1	881	102,195	61.2	64,705	38.8	166,900
Small Business	44	73.3	16	26.7	60	4,236	78.4	1,169	21.6	5,405
Total	607	64.5	334	35.5	941	106,431	61.8	65,874	38.2	172,305

Source: 1/1/20 – 12/31/22 Bank Data (Home Mortgage Disclosure Act data for home mortgage loans and loan sample for small business loans).

Due to rounding, totals may not equal 100.0%.

Description of Institution

NCFSB is a federally chartered mutual savings bank founded in 1883 and headquartered in New Carlisle, Ohio. The bank does not have a holding company. As of December 31, 2022, total assets were \$222.1 million with \$180.9 million in net loans, \$153.7 million in total deposits, and \$18.4 million in tier 1 capital. Net loans represented 81.5 percent of total assets. There was no merger or acquisition activity that affected the scope of the bank’s operations during the evaluation period.

NCFSB has four banking offices in Ohio. The main office is in New Carlisle, Ohio, in Clark County in a moderate-income census tract (CT). There are two offices in Springfield, Ohio, in Clark County, in middle- or upper-income CTs. The fourth branch is in Tipp City, Ohio, in Miami County in an upper-income CT in 2020 and 2021 as of 2015 American Community Survey (ACS) U.S. Census data and a middle-income CT in 2022 as of the 2020 U.S. Census data. All offices have a drive-thru facility and an automated teller machine (ATM). The Springfield Branch on Limestone Street was opened in July 2020. No branches have been closed during the evaluation period.

NCFSB is a single-state financial institution with one rating area (Ohio) and two AAs. The AAs meet the requirements of the regulation and do not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income (LMI) areas. The AAs are further described in the “Description of Institution’s Operations in Ohio” section of this performance evaluation. The AAs include Clark County, Ohio, in its entirety in the Springfield, OH MSA 44220 (Springfield MSA AA) and Miami County, Ohio, in its entirety, in the Dayton-Kettering, OH MSA 19430 (Dayton MSA AA).

NCFSB serves its community with traditional deposit and lending products and services, including online banking. As of the December 31, 2022, Consolidated Reports of Condition and Income (Call Report), the loan portfolio consisted of 49 percent in residential real estate loans (home mortgage), 46 percent in commercial and industrial and commercial real estate loans (business), 1 percent in consumer loans, and 4 percent in agriculture loans. The bank’s loan originations and purchases, based on the number of loans originated and purchased during the evaluation period, are approximately 46 percent residential real estate, 49 percent business (including SBA PPP loans), 5 percent consumer, and less than 1 percent in agriculture loans. The bank’s loan originations and purchases, based on the dollar amount of loans originated and purchased during the evaluation period, are approximately 61 percent residential real estate, 37 percent business (including SBA PPP loans), 1 percent consumer, and 1 percent agriculture loans. NCFSB’s primary business focus is home mortgage and business lending. During the

evaluation period, the bank sold approximately 577 home mortgage loans totaling \$106.2 million to the secondary market.

The COVID-19 pandemic in 2020 impacted the local economy, including unemployment data. The Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforces employed during the pandemic. The bank was particularly responsive to the SBA's PPP and originated a significant volume of PPP loans in 2020 and 2021. In 2020, the bank originated 376 SBA PPP loans totaling \$25.5 million. In 2021, the bank originated 607 SBA PPP loans totaling \$23 million.

NCFSB's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the credit needs of its AAs. NCFSB received a Satisfactory rating for its CRA performance during the prior evaluation period. This rating was reported in the OCC's CRA Performance Evaluation dated September 3, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) conducted a CRA performance evaluation to assess the bank's record of meeting the credit needs of its entire community, including LMI areas. The OCC used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2020, to December 31, 2022. A separate analysis was conducted for each AA.

The OCC evaluated the bank's lending performance based on its primary lending products, home mortgage and small business lending. While the bank offers other lending products, these products were not primary products during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. NCFSB's primary lending products are discussed under the "Description of Institution" section in this report. The OCC evaluated all home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2020, 2021, and 2022. For the Lending Test, the OCC transaction tested 20 small business loans per year for Lending in the AA and 20 small business loans per year per AA, or all if less than 20 per year, for the borrower income and geographic distribution analyses. The OCC relied on internal bank reports for the transaction testing of small business loans during the evaluation period.

For analysis purpose, the OCC compared the bank's lending performance with demographic data from the 2015 ACS U.S. Census for 2020 and 2021, the 2020 U.S. Census for 2022, and 2021 and 2022 Dun and Bradstreet (D&B) data. There are two sets of tables in Appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the

same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

NCFSB has two AAs in Ohio, as described in the “Description of Institution” and “Description of Institution’s Operations in Ohio” sections of this evaluation. The OCC completed a full-scope review for each AA.

Ratings

The bank’s overall rating is based on the state of Ohio rating. NCFSB operates all branches in a single state. Since all branches are in Ohio, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in both AAs.

During the evaluation period and based on the number of loan originations and purchases, approximately 46 percent were home mortgage and 49 percent were business loans. The OCC placed equal weight on the primary products. Of the home mortgage loans originated or purchased inside the AAs during the evaluation period, 80 percent were in the Springfield MSA AA. According to the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Reports as of June 30, 2022, 85 percent of the bank’s total deposits were in the Springfield MSA AA, with 15 percent in the Dayton MSA AA. Three of the four branches are in the Springfield MSA AA. The OCC placed more weight on the Springfield MSA AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable geographic distribution of loans in its AAs.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- NCFBSB has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.

Description of Institution's Operations in Ohio

NCFSB has two AAs in Ohio, the Springfield MSA AA and the Dayton MSA AA. The AAs are contiguous, meet the requirements of the regulation, and do not reflect illegal discrimination or arbitrarily exclude any LMI areas. Management selected the AAs based on their targeted lending territory, the area with the most deposit and lending activity, and office locations. The bank primarily lends within Clark and Miami Counties in Ohio. The OCC completed a full-scope review of each AA.

NCFSB has four banking offices in Ohio. All offices are in middle- and upper-income CTs except for the main office in New Carlisle, which is in a moderate-income tract. All offices have a drive-thru facility and an ATM.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for NCFSB's operations in Ohio. The tables below provide a summary of demographic data for each AA.

Springfield MSA AA

The Springfield MSA AA includes Clark County, Ohio, in its entirety, which is in the Springfield, OH MSA 44220. NCFSB has three banking offices in this AA. The main office is in New Carlisle, Ohio, in Clark County, in a moderate-income CT. The other two offices are in Springfield, Ohio, in Clark County, in middle- or upper-income CTs. Springfield is the county seat of Clark County.

Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	9.1	31.8	36.4	22.7	0.0
Population by Geography	136,827	7.4	27.0	40.9	24.7	0.0
Housing Units by Geography	61,241	7.8	27.2	40.5	24.5	0.0
Owner-Occupied Units by Geography	36,310	3.1	20.2	46.6	30.1	0.0
Occupied Rental Units by Geography	18,499	14.3	37.6	31.6	16.4	0.0
Vacant Units by Geography	6,432	15.2	37.1	31.3	16.5	0.0
Businesses by Geography	6,140	4.8	27.6	37.8	29.8	0.0
Farms by Geography	367	2.7	17.7	45.8	33.8	0.0
Family Distribution by Income Level	35,980	20.9	17.4	20.9	40.8	0.0
Household Distribution by Income Level	54,809	23.9	16.3	17.9	41.9	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$55,198	Median Housing Value			\$103,522
			Median Gross Rent			\$698
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	11.1	22.2	40.0	26.7	0.0
Population by Geography	136,001	7.6	20.7	41.4	30.2	0.0
Housing Units by Geography	61,283	8.7	20.8	42.6	27.9	0.0
Owner-Occupied Units by Geography	36,833	4.4	14.6	42.8	38.1	0.0
Occupied Rental Units by Geography	18,029	14.1	31.7	44.0	10.1	0.0
Vacant Units by Geography	6,421	17.6	25.8	37.5	19.1	0.0
Businesses by Geography	9,355	6.2	21.1	41.5	31.2	0.0
Farms by Geography	498	3.6	13.9	30.7	51.8	0.0
Family Distribution by Income Level	35,354	20.3	17.4	21.7	40.5	0.0
Household Distribution by Income Level	54,862	22.4	17.9	18.5	41.2	0.0
Median Family Income MSA - 44220 Springfield, OH MSA		\$63,361	Median Housing Value			\$114,435
			Median Gross Rent			\$747
			Families Below Poverty Level			11.1%
<i>Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Springfield MSA AA is 136,827, with 7.4 percent of the population living in low-income CTs, 27 percent in moderate-income CTs, 40.9 percent in middle-income CTs, and 24.7 percent in upper-income CTs. The AA consists of 44 CTs, and is comprised of four low-income, 14 moderate-income, 16 middle-income, and 10 upper-income CTs. The AA includes 35,980 families.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Springfield MSA AA is 136,001, with 7.6 percent of the population living in low-income CTs, 20.7 percent in moderate-income CTs, 41.4 percent in middle-income CTs, and 30.2 percent in upper-income CTs. The AA consists of 45 CTs, and is comprised of five low-income, 10 moderate-income, 18 middle-income, and 12 upper-income CTs. The AA includes 35,354 families.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$103,522. With the median family income of \$55,198, moderate-income families make less than \$44,158 annually and low-income families make less than \$27,599 annually. Median housing values are 2.3 times the annual income of moderate-income families and 3.8 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some LMI families. The 2015 ACS U.S. Census data show that there are 61,241 total housing units in the Springfield MSA AA, of which 59.3 percent are owner-occupied, 30.2 percent are rental-occupied, and 10.5 percent are vacant units. As of the 2015 ACS U.S. Census, 1960 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 61 years. Additionally, the median age of housing stock in low-income CTs was 77 years and 74 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 13.2 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$114,435. With the median family income of \$63,361, moderate-income families make less than \$50,689 annually and low-income families make less than \$31,681 annually. Median housing values are 2.3 times the annual income of moderate-income families and 3.6 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among LMI families. The 2020 U.S. Census data show that there are 61,283 total housing units in the Springfield MSA AA, of which 60.1 percent are owner-occupied, 29.4 percent are rental occupied, and 10.5 percent are vacant units. As of the 2020 U.S. Census, 1960 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 62 years. Additionally, the median age of housing stock in low-income CTs was 81 years and 73 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 11.1 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Springfield MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rate in Clark County, as well as the state and national unemployment rates, experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate for Clark County of 3.7 percent is reasonable when compared to the state of Ohio (3.6 percent) and the national (3.3 percent) unemployment rates for the same period. Major industries include manufacturing, trade, service, and government. Large employers in the county include Mercy Health, Assurant Inc., and Navistar Inc.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 12 financial institutions with 30 offices operated in Clark County, Ohio. NCFBSB held the 8th largest deposit market share at 5.9 percent as of June 30, 2022, with \$119.3 million in total deposits. This represents 85 percent of the bank’s total deposits. The bank’s primary competitors included financial institutions with significant deposit activity in the AA such as Park National Bank, Huntington National Bank, and PNC Bank, National Association (N.A.), with these three holding approximately 63 percent of the deposit market share.

Overall, NCFBSB’s primary business focus includes home mortgage and small business lending. Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, NCFBSB ranked 7th out of 245 lenders in the Springfield MSA AA in residential home mortgage volume. As of the 2021 Peer Mortgage Data Report, NCFBSB had 3.1 percent of the lending market share, based on the number of loans, lending approximately \$31.7 million. Based on 2021 Peer Mortgage Data, top mortgage lenders in the AA included Wright-Patt Credit Union, Inc., Rocket Mortgage, and Caliber Home Loans, Inc., with a combined market share of almost 25 percent. During the evaluation period, 80 percent of the bank’s home mortgage loan originations and purchases inside the AAs were in the Springfield MSA AA for 2020 and 2021.

Based on 2022 Peer Mortgage Data and 2020 ACS U.S. Census data, NCFBSB ranked 13th out of 249 lenders in the Springfield MSA AA in residential home mortgage volume. As of the 2022 Peer Mortgage Data Report, NCFBSB had 2.4 percent of the lending market share, based on the number of loans, lending approximately \$16 million. Based on 2022 Peer Mortgage Data, top mortgage lenders in the AA included Wright-Patt Credit Union, Inc., Caliber Home Loans, Inc., and Rocket Mortgage, with a combined market share of almost 24 percent. During the evaluation period, 80 percent of the bank’s home mortgage loan originations and purchases inside the AAs were in the Springfield MSA AA for 2022.

As of the 2021 Peer Small Business Data report, there were 61 lenders originating or purchasing small business loans in the Springfield MSA AA. The top three lenders included Park National Bank, American Express National Bank, and JPMorgan Chase Bank, N.A., with a combined market share of 41 percent. NCFBSB is not included in the peer small business data report as the bank is not required to report CRA small business loans.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization that serves both Clark and Miami Counties. The contact stated that general credit needs include affordable housing, small dollar mortgage products, and down payment assistance. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Dayton MSA AA

The Dayton MSA AA includes Miami County, Ohio, in its entirety, in the Dayton-Kettering, OH MSA 19430. The Tipp City Branch is in Miami County in an upper-income CT in 2020 and 2021 and a middle-income CT in 2022. Troy is the largest city and county seat of Miami County.

Demographic Information of the Assessment Area						
Assessment Area: Dayton MSA AA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	61.9	23.8	0.0
Population by Geography	103,517	0.0	15.1	55.7	29.1	0.0
Housing Units by Geography	44,266	0.0	15.5	57.4	27.1	0.0
Owner-Occupied Units by Geography	28,906	0.0	13.8	55.1	31.1	0.0
Occupied Rental Units by Geography	12,229	0.0	19.3	61.5	19.2	0.0
Vacant Units by Geography	3,131	0.0	16.8	62.6	20.6	0.0
Businesses by Geography	6,200	0.0	11.8	59.0	29.2	0.0
Farms by Geography	399	0.0	7.3	69.9	22.8	0.0
Family Distribution by Income Level	27,826	18.4	18.1	22.1	41.4	0.0
Household Distribution by Income Level	41,135	20.2	16.4	18.3	45.1	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$61,957	Median Housing Value			\$136,433
			Median Gross Rent			\$734
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Dayton MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	13.0	56.5	30.4	0.0
Population by Geography	108,774	0.0	12.3	52.0	35.7	0.0
Housing Units by Geography	44,394	0.0	14.2	54.0	31.8	0.0
Owner-Occupied Units by Geography	29,748	0.0	12.8	51.3	35.9	0.0
Occupied Rental Units by Geography	11,512	0.0	17.3	59.8	22.9	0.0
Vacant Units by Geography	3,134	0.0	15.7	57.8	26.5	0.0
Businesses by Geography	9,383	0.0	10.8	50.5	38.8	0.0
Farms by Geography	521	0.0	6.0	55.7	38.4	0.0
Family Distribution by Income Level	26,976	15.3	18.0	24.1	42.6	0.0
Household Distribution by Income Level	41,260	19.7	15.5	19.4	45.3	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$75,125	Median Housing Value			\$153,493
			Median Gross Rent			\$800
			Families Below Poverty Level			5.0%
<i>Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Dayton MSA AA is 103,517, with 15.1 percent of the population living in moderate-income CTs, 55.7 percent in middle-income CTs, and 29.1 percent in upper-income CTs. The AA consists of 21 CTs, and is comprised of three moderate-income, 13 middle-income, and five upper-income CTs. The AA includes 27,826 families.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Dayton MSA AA is 108,774, with 12.3 percent of the population living in moderate-income CTs, 52 percent in middle-income CTs, and 35.7 percent in upper-income CTs. The AA consists of 23 CTs, and is comprised of three moderate-income, 13 middle-income, and seven upper-income CTs. The AA includes 26,976 families.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value is \$136,433. With the median family income of \$61,957, low-income families make less than \$30,979 annually and moderate-income families make less than \$49,566 annually. Median housing values are 4.4 times the annual income of low-income families and 2.8 times the annual income of moderate-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some low-income families. The 2015 ACS U.S. Census data show that there are 44,266 total housing units in the Dayton MSA AA, of which 65.3 percent are owner-occupied, 27.6 percent are rental-occupied, and 7.1 percent are vacant

units. As of the 2015 ACS U.S. Census, 1964 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 57 years. Additionally, the median age of housing stock in moderate-income CTs was 74 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Approximately 9.8 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 ACS U.S. Census data, the median housing value is \$153,493. With the median family income of \$75,125, low-income families make less than \$37,563 annually and moderate-income families make less than \$60,100 annually. Median housing values are 4.1 times the annual income of low-income families and 2.6 times the annual income of moderate-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2020 U.S. Census data show that there are 44,394 total housing units in the Dayton MSA AA, of which 67.1 percent are owner-occupied, 25.9 percent are rental occupied, and 7.1 percent are vacant units. As of the 2020 U.S. Census, 1967 was the weighted average of median year built for housing, with the median age of housing stock within the AA of approximately 55 years. Additionally, the median age of housing stock in moderate-income CTs was 75 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs.

Job Market and Economic Conditions

The economic conditions in the Dayton MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rate in Miami County, as well as the state and national unemployment rates, experienced a spike in 2020 followed by a gradual recovery through the end of 2021. According to the Ohio Department of Job and Family Services/Office of Workforce Development – Bureau of Labor Market Information as of December 2022, the “not seasonally adjusted” unemployment rate for Miami County of 3.2 percent is reasonable when compared to the state of Ohio (3.6 percent) and the national (3.3 percent) unemployment rates for the same period. Major industries include manufacturing, trade, service, and government. Large employers in Miami County include Upper Valley Medical Center, Clopay Corporation, and F&P America.

Competition

Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 15 financial institutions with 33 offices operated in Miami County, Ohio. NCFBSB held the lowest deposit market share at 1 percent as of June 30, 2022, with \$20.4 million in total deposits. This represents 15 percent of the bank’s total deposits. The bank’s primary competitors included financial institutions with significant deposit activity in the AA such as Fifth Third Bank, N.A, U.S. Bank, N.A, and JPMorgan Chase Bank, N.A., with these three holding approximately 54 percent of the deposit market share.

Overall, NCFBSB’s primary business focus includes home mortgage and small business lending. Based on 2022 Peer Mortgage Data and 2020 ACS U.S. Census data, NCFBSB ranked 33rd out of 221 lenders in Miami County in residential home mortgage volume. As of the 2022 Peer Mortgage Data Report, NCFBSB had 0.6 percent of the lending market share, based on the number of loans, lending approximately \$4.5 million. Based on 2022 Peer Mortgage Data, top mortgage lenders in the AA included Fifth Third Bank, N.A., Wright-Patt Credit Union, Inc., and Union Savings Bank, with a

combined market share of almost 30 percent. During the evaluation period, 20 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Dayton MSA AA for 2022.

As of the 2021 Peer Small Business Data report, there were 71 lenders originating or purchasing small business loans in the Dayton MSA AA. The top three lenders included U.S. Bank, N.A, American Express National Bank, and JPMorgan Chase Bank, N.A., with a combined market share of 42.8 percent. NCFBSB is not included in the peer small business data report as the bank is not required to report CRA small business loans.

Community Contacts/Credit Needs

As part of the CRA performance evaluation, the OCC reviewed information provided from one interview with a representative from an affordable housing organization that serves both Clark and Miami Counties. The contact stated that general credit needs include affordable housing, small dollar mortgage products, and down payment assistance. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review for each AA, the Springfield MSA AA and Dayton MSA AA. Home mortgage and small business lending are the bank's primary lending products and were evaluated under the Lending Test. As discussed above, the OCC used HMDA loan data for 2020, 2021, and 2022 for the mortgage lending analysis and transaction tested loans for the small business loan analysis.

As stated above under the "Scope of the Evaluation" (Ratings) section, the Springfield MSA AA is weighted heavier than the Dayton MSA AA as the bank has a larger retail presence in the Springfield MSA AA. Additionally, about 80 percent of home mortgage loan originations and purchases inside the AAs, based on number of loans originated or purchased, were in the Springfield MSA AA. The OCC placed equal weight on the primary lending products. Refer to the above "Scope of the Evaluation" section for more details.

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Springfield MSA AA and Dayton MSA AA is good.

In determining the rating, the OCC weighed demographic factors of the AAs that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, and area demographics. The bank's main office in New Carlisle is in a moderate-income CT, with the remaining offices in middle- and upper-income geographies.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

The bank's overall geographic distribution of home mortgage lending reflects reasonable distribution.

Springfield MSA AA

NCFSB exhibits a reasonable geographic distribution of loans in the Springfield MSA AA. One of the bank's three branches in this AA is in a moderate-income CT.

In the 2020 – 2021 analysis, the percentage of home mortgage loans originated or purchased by the bank in low-income CTs exceeded aggregate data and was below demographic data. The percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs was below both demographic and aggregate data but overall reasonable.

In the 2022 analysis, the percentage of home mortgage loans originated or purchased in low-income tracts equaled aggregate data but was below demographic data. The percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs exceeded demographic data and was near aggregate data.

In the lending analysis, the OCC considered other factors contributing to limited lending opportunities within the moderate-income CTs, including significant market competition in the AA. The top three financial institutions in home mortgage lending accounted for 25 percent of the home mortgage market share as of the 2021 Peer Mortgage Data Report, with NCFSB ranking 7th with 3.1 percent of the lending market share. As of the 2022 Peer Mortgage Data Report, the top three financial institutions in home mortgage lending accounted for 24 percent of the home mortgage market share, with NCFSB ranking 13th with 2.4 percent of the lending market share. Many lenders are competing for the same LMI loans in this AA. Additionally, the median age of housing stock in low-income CTs was 77 years and 74 years in moderate-income CTs, as of the 2015 ACS U.S Census data. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs.

Dayton MSA AA

NCFSB exhibits an overall reasonable geographic distribution of loans in the Dayton MSA AA. There are no low-income CTs in this AA.

In the 2020 – 2021 analysis, the percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs was below both demographic and aggregate data. However, in 2022, the

percentage of home mortgage loans originated or purchased by the bank in moderate-income CTs exceeded aggregate data and was near demographic data demonstrating overall reasonable performance.

The OCC considered other factors that could impact the percentage of loans by the bank in the moderate-income CTs for 2020 and 2021. The COVID-19 pandemic impacted the local economy and possibly the customers' credit needs at that time. Another factor that that could have contributed to limited lending opportunities within the Dayton MSA AA is competition. NCFBSB only has one branch in this AA which is in Tipp City. The branch is not near the three moderate-income CTs in the Piqua area, as of the 2015 ACS U.S. Census data.

Small Loans to Businesses

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

The OCC compared the percentage of the number of small loans to businesses originated or purchased by the bank in the four geographic income categories (low-, moderate-, middle-, and upper-income) to the distribution of businesses throughout those geographies (demographic data), placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of small loans to businesses of other lenders (aggregate data), as demonstrated by CRA aggregate data.

In determining conclusions, the OCC gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of businesses located in LMI tracts within the AAs.

The bank's overall geographic distribution of small loans to businesses is reasonable.

Springfield MSA AA

New Carlisle FSB exhibits a reasonable geographic distribution of loans in the Springfield MSA AA.

In the 2020 – 2021 analysis, the percentage of small loans to businesses originated or purchased in low-income CTs was below both aggregate and demographic data. However, the percentage of small loans to businesses originated or purchased in moderate-income CTs significantly exceeded both demographic and aggregate data.

In the 2022 analysis, the percentage of small loans to businesses originated or purchased in low-income CTs significantly exceeded demographic data. The percentage of small loans to businesses originated or purchased in moderate-income CTs was below demographic data but overall reasonable. Aggregate CRA data was not available for 2022.

Competition for business loans remains strong in the AA. As of the 2021 Peer Small Business Data Report, there were 61 lenders originating or purchasing small business loans in the Springfield MSA AA. The top three lenders accounted for a combined market share of 41 percent and were much larger financial institutions than NCFBSB. The bank is not included in the peer small business data report as the bank is not required to report CRA small business data.

Dayton MSA AA

During the evaluation period, NCFBSB did not originate or purchase any small business loans in the moderate-income CTs in the Dayton MSA AA. There are no low-income CTs in this AA. However, overall performance is considered reasonable, given the performance context factors discussed below. Management also stated that the majority of small business loans are originated in the Springfield MSA AA, with home mortgage lending more of a primary product in the Dayton MSA AA.

In the 2020 – 2021 analysis, the bank did not originate or purchase any small business loans in the moderate-income CTs. In 2022, the bank did not originate or purchase a sufficient volume of small loans to businesses in the Dayton MSA AA for a meaningful analysis.

Due to the limited volume of small loans to businesses originated or purchased in the Dayton MSA AA in 2020 and 2021, OCC examiners had to include 30 SBA PPP loans in the small business loan sample in the Dayton MSA AA. Without the origination of SBA PPP loans in 2022, the bank only had nine small loans to businesses originated or purchased that year.

NCFBSB only has one branch in this AA which is in Tipp City. The branch is not near the three moderate-income CTs in the Piqua area as of the 2015 ACS U.S. Census. Competition is also strong in the Dayton MSA AA. As of the 2021 Peer Small Business Data report, there were 71 lenders originating or purchasing small business loans in the Dayton MSA AA. The top three lenders included U.S. Bank, N.A., American Express National Bank, and JPMorgan Chase Bank, N.A., with a combined market share of 42.8 percent. NCFBSB is not included in the peer small business data report as the bank is not required to report CRA small business data.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

NCFBSB exhibits an overall reasonable distribution of home mortgage loans among borrowers of different income levels.

Springfield MSA AA

The bank exhibits a reasonable distribution of home mortgage loans among borrowers of different income levels within the Springfield MSA AA.

In the 2020 – 2021 analysis, NCFBSB’s percentage of home mortgage loans to low-income borrowers was near aggregate data and below demographic data. The percentage of home mortgage loans to moderate-income was below both demographic and aggregate data but overall reasonable.

The OCC considered other factors in the bank’s performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. Median housing values are 2.3 times the annual income of moderate-income families and 3.8 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some LMI families. Approximately 13.2 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. The percentage of families below poverty in low-income tracts was 45.7 percent and 21.7 percent in moderate-income tracts. There is strong competition for home mortgage loans in the Springfield MSA AA. Competition is comprised of local community banks and branches of larger financial institutions. Based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data, NCFBSB ranked 7th out of 245 lenders in the Springfield MSA AA in residential home mortgage volume. As of the 2021 Peer Mortgage Data Report, NCFBSB had 3.1 percent of the lending market share.

In the 2022 analysis, the percentage of home mortgage loans to low-income borrowers was near aggregate data and below demographic data. The percentage of home mortgage loans to moderate-income borrowers was very near to demographic data and below aggregate data, demonstrating reasonable performance.

The OCC considered other factors in the bank’s performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. Median housing values are 2.3 times the annual income of moderate-income families and 3.6 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some LMI families. Approximately 11.1 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. The percentage of families below poverty in low-income tracts was 35.5 percent and 21.4 percent in moderate-income tracts. There is strong competition for home mortgage loans in the Springfield MSA AA. Competition is comprised of local community banks and branches of larger financial institutions. Based on 2022 Peer Mortgage Data and 2020 ACS U.S. Census data, NCFBSB ranked 13th out of 249 lenders in the Springfield MSA AA in residential home mortgage volume. As of the 2022 Peer Mortgage Data Report, NCFBSB had 2.4 percent of the lending market share.

Dayton MSA AA

The bank exhibits a reasonable distribution of home mortgage loans among borrowers of different income levels within the Dayton MSA AA.

In the 2020 – 2021 analysis, NCFBSB’s percentage of home mortgage loans to low-income borrowers was near aggregate data and below demographic data. The percentage of home mortgage loans to moderate-income was below both demographic and aggregate data.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. Median housing values are 4.4 times the annual income of low-income families and 2.8 times the annual income of moderate-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some LMI families. Approximately 9.8 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. The percentage of families below poverty in moderate-income tracts was 23 percent. There is strong competition for home mortgage loans in the Dayton MSA AA. Competition is comprised of local community banks and branches of larger financial institutions.

In the 2022 analysis, the percentage of home mortgage loans to low-income borrowers was below both aggregate and demographic data. The percentage of home mortgage loans to moderate-income borrowers was below both demographic and aggregate data. OCC examiners noted that the bank only originated 24 home mortgage loans in 2022 in this AA.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for LMI borrowers. Median housing values are 4.1 times the annual income of low-income families and 2.6 times the annual income of moderate-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among some low-income families. Although only five percent of the total families live below the poverty level in this AA, 14.1 percent of the families in moderate-income tracts live below poverty, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan. There is strong competition for home mortgage loans in the Dayton MSA AA. Competition is comprised of local community banks and branches of larger financial institutions. Based on 2022 Peer Mortgage Data and 2020 ACS U.S. Census data, NCFBSB ranked 33rd out of 221 lenders in Miami County in residential home mortgage volume. As of the 2022 Peer Mortgage Data Report, NCFBSB had 0.6 percent of the lending market share.

Small Loans to Businesses

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

The OCC compared the percentage distribution of the number of small loans to businesses originated or purchased by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less (demographic data). The OCC also compared the bank's performance to aggregate small business data (aggregate data), as demonstrated by CRA aggregate data.

In evaluating the borrower distribution of small loans to businesses of different sizes, the OCC considered the level of competition and its effect on limiting the bank's ability to lend, as well as the economic conditions in the AAs.

NCFBSB exhibits an overall reasonable distribution of small loans to businesses of different sizes, given the performance context factors discussed below.

Springfield MSA AA

NCFSB exhibits a reasonable distribution of small loans to businesses of different sizes within the Springfield MSA AA. The data in Table R does not include any SBA PPP loans for the Springfield MSA AA.

In the 2020 – 2021 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less was near aggregate data but below demographic data. The OCC noted that 25 percent of the loans that were transaction tested did not have revenues reported. Many of these were loans in which management used personal income to qualify the borrowers.

In the 2022 analysis, the bank’s percentage of small loans to businesses with gross annual revenues of \$1 million or less was below demographic data. However, aggregate data was not available for 2022. Similar to the 2020 – 2021 analysis, management used personal income to qualify some of the loans; therefore, business revenues were not available.

Dayton MSA AA

NCFSB exhibits a reasonable distribution of small loans to businesses of different sizes within the Dayton MSA AA. The data in Table R includes SBA PPP loans for the Dayton MSA AA.

In the 2020 – 2021 analysis, the percentage of small loans to businesses with gross annual revenues of \$1 million or less was near aggregate data. OCC examiners noted that 50 percent of the loans that were transaction tested did not have revenues reported. These were either SBA PPP loans or loans in which management used personal income to qualify the borrowers. The COVID-19 pandemic impacted the local economy in 2020 and 2021. The bank was particularly responsive to the credit needs of local businesses with the origination of SBA PPP loans in both years. However, business revenues were not available for many of these loans.

In 2022, the bank did not originate or purchase a sufficient volume of small loans to businesses in the Dayton MSA AA for a meaningful analysis.

Responses to Complaints

NCFSB has not received any complaints about its performance in helping to meet the AAs’ credit needs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2020 – 12/31/2022	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
Springfield MSA AA	Full-scope	The AA includes Clark County, Ohio, in its entirety, which is in the Springfield, OH MSA 44220.
Dayton MSA AA	Full-scope	The AA includes Miami County, Ohio, in its entirety, which is in the Dayton-Kettering, OH MSA 19430.

Appendix B: Summary of State Ratings

RATINGS: NEW CARLISLE FEDERAL SAVINGS BANK	
Overall Bank:	Lending Test Rating
New Carlisle Federal Savings Bank	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division (MD): 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 (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 Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Dayton MSA AA	89	19,765	20.0	6,410	0.0	0.0	0.0	13.8	4.5	10.0	55.1	41.6	50.3	31.1	53.9	39.7	0.0	0.0	0.0	
Springfield MSA AA	357	61,988	80.0	5,848	3.1	1.4	1.0	20.2	15.7	18.4	46.6	46.5	47.1	30.1	36.4	33.6	0.0	0.0	0.0	
Total	446	81,753	100.0	12,258	1.8	1.1	0.5	17.3	13.5	14.0	50.4	45.5	48.8	30.5	39.9	36.8	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Dayton MSA AA	24	4,499	20.5	4,071	0.0	0.0	0.0	12.8	12.5	10.9	51.3	54.2	47.3	35.9	33.3	41.8	0.0	0.0	0.0	
Springfield MSA AA	93	15,943	79.5	3,945	4.4	2.2	2.2	14.6	16.1	17.6	42.8	45.2	44.9	38.1	36.6	35.3	0.0	0.0	0.0	
Total	117	20,442	100.0	8,016	2.5	1.7	1.1	13.8	15.4	14.2	46.6	47.0	46.1	37.1	35.9	38.6	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Dayton MSA AA	89	19,765	20.0	6,410	18.4	6.7	7.8	18.1	13.5	19.9	22.1	21.3	22.0	41.4	52.8	32.8	0.0	5.6	17.5	
Springfield MSA AA	357	61,988	80.0	5,848	20.9	5.9	6.7	17.4	11.5	18.9	20.9	19.3	21.6	40.8	52.4	32.8	0.0	10.9	20.0	
Total	446	81,753	100.0	12,258	19.8	6.1	7.3	17.7	11.9	19.4	21.4	19.7	21.8	41.0	52.5	32.8	0.0	9.9	18.7	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Dayton MSA AA	24	4,499	20.5	4,071	15.3	8.3	10.8	18.0	8.3	21.0	24.1	20.8	23.8	42.6	54.2	31.4	0.0	8.3	13.0	
Springfield MSA AA	93	15,943	79.5	3,945	20.3	5.4	7.1	17.4	17.2	21.9	21.7	12.9	24.4	40.5	48.4	30.7	0.0	16.1	15.9	
Total	117	20,442	100.0	8,016	18.1	6.0	8.9	17.7	15.4	21.4	22.7	14.5	24.1	41.4	49.6	31.1	0.0	14.5	14.4	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dayton MSA AA	40	2,530	50.0	2,087	0.0	0.0	0.0	11.8	0.0	10.9	59.0	37.5	57.2	29.2	62.5	31.9	0.0	0.0	0.0
Springfield MSA AA	40	5,548	50.0	1,680	4.8	2.5	4.0	27.6	32.5	25.4	37.8	25.0	37.5	29.8	40.0	33.1	0.0	0.0	0.0
Total	80	8,078	100.0	3,767	2.4	1.3	1.8	19.7	16.3	17.4	48.5	31.2	48.4	29.5	51.2	32.4	0.0	0.0	0.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000s)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Dayton MSA AA	9	4,631	31.0	0.0	0.0	10.8	0.0	50.5	77.8	38.8	22.2	0.0	0.0	
Springfield MSA AA	20	1,696	69.0	6.2	10.0	21.1	15.0	41.5	20.0	31.2	55.0	0.0	0.0	
Total	29	6,327	100.0	3.1	6.9	15.9	10.4	46.0	37.9	35.0	44.8	0.0	0.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dayton MSA AA	40	2,530	50.0	2,087	81.5	45.0	49.1	6.1	5.0	12.5	50.0
Springfield MSA AA	40	5,548	50.0	1,680	79.3	50.0	51.8	6.1	25.0	14.6	25.0
Total	80	8,078	100.0	3,767	80.4	47.5	50.3	6.1	15.0	13.5	37.5

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dayton MSA AA	9	4,631	31.0	--	87.5	66.7	--	3.9	22.2	8.6	11.1
Springfield MSA AA	20	1,696	69.0	--	86.3	45.0	--	3.9	45.0	9.7	10.0
Total	29	6,327	100.0	--	86.9	51.7	--	3.9	37.9	9.1	10.3

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