



## **PUBLIC DISCLOSURE**

July 20, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First FS & LA of Greensburg  
Charter Number: 704656

212 N Franklin St  
Greensburg, IN 47240-1735

Office of the Comptroller of the Currency

Indianapolis Office  
8777 Purdue Rd., Suite 105  
Indianapolis, IN 46268

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.

**Table of Contents**

Overall CRA Rating..... 1

Description of Institution ..... 2

Scope of the Evaluation ..... 2

Discriminatory or Other Illegal Credit Practices Review ..... 3

State Rating..... 4

    State of Indiana ..... 4

Appendix A: Scope of Examination ..... 1

Appendix B: Summary of MMSA and State Ratings ..... 1

Appendix C: Definitions and Common Abbreviations..... 1

Appendix D: Tables of Performance Data..... 5

## 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 rating in the State of Indiana.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are made in its assessment areas (AAs).

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is **reasonable**.

The OCC compared First FS & LA's LTD ratio against all other thrifts and savings associations within Indiana of similar size since the end of the prior review period. During this time, the LTD ratio ranged from a high of 72.4 percent to a low of 49.5 percent. Aggregate peer institutions' LTD ratios averaged 76.3 percent with the highest at 92.8 percent and the lowest at 48.9 percent.

First FS & LA's LTD ratio is reasonable based on specific performance context information. First FS & LA maintains a significantly higher proportion of volatile public funds than the selected peer institutions, as it provides banking services to multiple political subdivisions within its AAs. Additionally, a significant portion of First FS & LA's home mortgage originations have been sold to the secondary market. This results in a lower LTD ratio but has not impaired First FS & LA's ability to meet the credit needs of its community.

## Lending in Assessment Area

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

The bank originated and purchased 75.1 percent of its total number of loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

The findings of this analysis do not impact the overall analysis of the geographic distribution of lending by income level of geography.

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	380	75.1	126	24.9	506	52,285	71.3	23,030	31.4	73,315
Total	380	75.1	126	24.9	506	52,285	71.3	23,030	31.4	73,315

## Description of Institution

First FS & LA of Greensburg (First FS & LA) is headquartered in Greensburg, Indiana. First FS & LA has total assets of \$194 million as of June 30, 2022. This is a single state institution with no holding company, affiliates, or subsidiaries. First FS & LA had no mergers or acquisitions during evaluation period.

First FS & LA has one rating area with two AAs. The AAs consist of Decatur County, located in a non-MSA portion of Indiana (Decatur AA), and Shelby County, located in the Indianapolis-Carmel MSA (Shelby AA). First FS & LA has one main office and one branch in Decatur County, and one branch in Shelby County. There are no standalone deposit-taking automated teller machines (ATMs). Loans comprise 45 percent of total assets. The loan portfolio includes real estate loans of \$81.6 million, consumer loans of \$3 million, and commercial loans of \$795,000. Tier 1 capital is \$15 million.

All AAs meet the requirements of the CRA. The AAs are comprised of complete political subdivisions and do not arbitrarily exclude low- or moderate-income geographies.

First FS & LA has a primary business strategy of offering home mortgage loans. Primary products are fixed and variable mortgage loans. First FS & LA also offers consumer loans and various commercial loan programs. All products are offered in all areas and branches. The last CRA examination was June 25, 2018, and First FS & LA was rated satisfactory.

There are no legal or financial impediments to First FS & LA's lending.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This evaluation addresses First FS & LA's Community Reinvestment Act (CRA) performance from January 1, 2019, through December 31, 2021. The OCC assessed this performance using Small Bank examination procedures, which consist of a lending test that includes an evaluation of First FS & LA's lending practices with respect to the following criteria:

- Loan-to-deposit ratio, considering internal and external factors,
- Percentage of loans originated in the AAs,
- Lending to borrowers of difference income levels,
- Lending in low- and moderate-income areas within the AAs, and
- The bank's record of taking action on written complaints regarding its performance in helping meet the credit needs of its AAs, if applicable.

To evaluate First FS & LA's lending practices, the OCC reviewed data from First FS & LA's primary loan products. Based on the number and dollar volume of lending, the primary loan product was home mortgage loans. The sample included all HMDA-reportable mortgage loans originated or purchased during the evaluation period.

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

In each state where the bank has an office, one or more of 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. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

First FS & LA only has one rating area, so the overall and State of Indiana ratings are identical.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

The OCC has not identified that this institution 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 Indiana

**CRA rating for the State of Indiana: Satisfactory**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- A reasonable geographic distribution of loans in the AAs.
- A reasonable distribution of loans to individuals of different income levels.

### Description of Institution’s Operations in Indiana

First FS & LA has a primary business strategy of offering home mortgage loans in Indiana. First FS & LA also offers consumer loans and various commercial loan programs. First FS & LA has two AAs. All products are offered in all areas and branches. There were no loans originated or purchased outside of Indiana.

#### Decatur AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Decatur						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	50.0	33.3	0.0
Population by Geography	26,240	0.0	17.6	39.6	42.8	0.0
Housing Units by Geography	11,217	0.0	19.0	39.7	41.3	0.0
Owner-Occupied Units by Geography	7,076	0.0	15.8	40.5	43.7	0.0
Occupied Rental Units by Geography	2,998	0.0	26.9	36.3	36.9	0.0
Vacant Units by Geography	1,143	0.0	18.1	44.1	37.8	0.0
Businesses by Geography	1,778	0.0	20.4	30.4	49.2	0.0
Farms by Geography	278	0.0	11.2	31.7	57.2	0.0
Family Distribution by Income Level	7,046	18.2	19.1	19.8	42.9	0.0
Household Distribution by Income Level	10,074	19.4	15.8	21.0	43.8	0.0
Median Family Income Non-MSAs IN		\$55,715	Median Housing Value			\$119,193
			Median Gross Rent			\$723
			Families Below Poverty Level			11.2%

*Source: 2015 ACS Census 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.*

The Decatur AA has the main office and one branch. Total deposits in the Decatur AA are \$106 million or 67 percent of bank deposits. This ranks First FS & LA third out of five institutions in the AA with 17.8 percent of deposits. Major competitors are First Financial Bank, The Napoleon State Bank, and Fifth Third Bank, National Association. Within the AA, First FS & LA ranks 4<sup>th</sup> in mortgage originations with 6.8 percent market share. Competition is primarily from larger regional banks and nationwide mortgage originators.

### Community Contact

The OCC selected one community contact within the Decatur AA. The contact works for an organization that assists with funding needs for various charitable organizations in the AA. The contact identified community development opportunities with local housing organization and food banks. Affordable housing for lower income families is a significant credit need within the community.

### **Shelby AA – Limited Scope**

The Shelby AA has one branch. Total deposits in the Shelby AA are \$52 million or 33 percent of bank deposits. This ranks First FS & LA seventh out of nine institutions in the market with 6.2 percent of deposits. Major competitors are First Financial Bank, KeyBank National Association, First Merchants Bank, PNC Bank, National Association, and JPMorgan Chase Bank, National Association. Within the AA, First FS & LA ranks 32<sup>nd</sup> in mortgage originations with 0.7 percent market share. Competition is significant within the AA from nationwide mortgage lenders and large regional and national banks. In this AA, no single lender has greater than 6.6 percent market share.

### **Scope of Evaluation in Indiana**

The Decatur AA was selected for full-scope review. The main office and a second branch are located within the Decatur AA, most deposits are generated within the Decatur AA, and the majority of lending occurs in the Decatur AA. Due to the relative market share in each of the AAs and the ratio of bank lending in each of the AAs, the full-scope review of the Decatur AA is weighted more heavily than the limited scope review of the Shelby AA in determining the ratings.

Refer to Appendix A for a list of all AAs under review.

### **Lending Test**

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

The state rating is based on performance in all AAs under review, but the full scope review of the Decatur AA is weighted more heavily.

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

Based on a full-scope review, the bank's performance in the Decatur AA is **good**.

## **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 Indiana 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.

Distribution of home mortgage loans to geographies of different income levels within the Decatur AA is reasonable. There are no conspicuous gaps in lending. The AA has no low-income geographies but does have one moderate-income census tract (CT). The ratio of lending to this CT was similar to the overall ratio of owner-occupied housing units in the tract, but below the aggregate.

## **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 and farms of different sizes, given the product lines offered by the bank.

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

Refer to Table P in the state of Indiana 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.

Distribution of home mortgage loans to borrowers of different income levels was reasonable within the Decatur AA. The ratio of bank lending to moderate-income borrowers exceeds the ratio of moderate-income families but is below aggregate lending. The ratio of bank lending to low-income borrowers was within a reasonable range of the aggregate ratio of lending but is below the percentage of low-income families in the AA.

## **Responses to Complaints**

There have been no complaints related to the institution's CRA performance within the State of Indiana.

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

Based on a limited scope review, the bank's performance under the Lending Test in the Shelby AA is **stronger than** the bank's overall performance under the Lending Test in the full scope area. Lending to borrowers in low- and moderate-income CTs exceeds both the ratio of borrowers in each CT and exceeds aggregate lending in those CTs. First FS & LA's ratio of loans to moderate-income borrowers exceeds the ratio of moderate-income families but is below aggregate lending. Lending to low-income borrowers is near to aggregate lending but is below the percentage of low-income families in the AA.



## **Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	<b>01/01/2019 to 12/31/2021</b>	
<b>Bank Products Reviewed:</b>	Home mortgage	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	n/a	n/a
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Indiana</b>		
<b>Decatur AA</b>	<b>Full-scope</b>	County of Decatur, IN
<b>Shelby AA</b>	<b>Limited-scope</b>	County of Shelby, IN

**Appendix B: Summary of MMSA and State Ratings**

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<b>RATINGS First FS &amp; LA of Greensburg</b>	
Overall Bank:	Lending Test Rating
<b>First FS &amp; LA of Greensburg</b>	<b>Satisfactory</b>
<b>MMSA or State:</b>	
<b>State of Indiana</b>	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Decatur - Non MSA	263	42,247	85.1	1,155	0.0	0.0	0.0	15.8	15.2	24.4	40.5	28.1	35.8	43.7	56.7	39.8	0.0	0.0	0.0
Shelby - MSA	46	5,224	17.1	2,460	4.0	15.2	5.4	4.5	8.7	5.0	79.9	73.9	77.4	11.6	2.2	12.3	0.0	0.0	0.0
<b>Total</b>	<b>309</b>	<b>47,471</b>	<b>100.0</b>	<b>3,615</b>	<b>2.5</b>	<b>2.3</b>	<b>3.7</b>	<b>8.6</b>	<b>14.2</b>	<b>11.2</b>	<b>65.6</b>	<b>35.0</b>	<b>64.1</b>	<b>23.3</b>	<b>48.5</b>	<b>21.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Decatur - Non MSA	263	42,247	85.1	1,155	18.2	4.2	6.7	19.1	19.4	24.3	19.8	20.9	23.3	42.9	54.0	28.1	0.0	1.5	17.7
Shelby - MSA	46	5,224	14.9	2,460	22.4	10.9	11.9	17.9	19.6	24.4	23.7	15.2	22.8	35.9	47.8	22.8	0.0	6.5	18.0
<b>Total</b>	<b>309</b>	<b>47,471</b>	<b>100.0</b>	<b>3,615</b>	<b>20.8</b>	<b>5.2</b>	<b>10.2</b>	<b>18.4</b>	<b>19.4</b>	<b>24.4</b>	<b>22.2</b>	<b>20.6</b>	<b>23.0</b>	<b>38.5</b>	<b>53.1</b>	<b>24.5</b>	<b>0.0</b>	<b>2.3</b>	<b>17.9</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%