

PUBLIC DISCLOSURE

August 31, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bay Bank
Certificate Number: 34052

2555 Packerland Drive
Green Bay, Wisconsin 54313

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

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Outstanding**.

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

The following points summarize the bank's Outstanding Community Reinvestment Act (CRA) performance:

- **Loan-to-Deposit (LTD) Ratio:** The average LTD ratio reflects reasonable performance given the institution's size, financial condition, and credit needs of the assessment areas (AAs).
- **Assessment Area Concentration:** The bank originated a majority of the home mortgage and small business loans within the AAs.
- **Geographic Distribution:** The geographic distribution of home mortgage and small business loans reflects excellent dispersion throughout the AAs.
- **Borrower Profile:** Home mortgage and small business loans reflect reasonable distribution among individuals of different income levels and businesses of different sizes.
- **CRA-Related Complaints:** The bank has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the rating.

Management requested community development investments and services be considered in the CRA Performance Evaluation. These investments and services, which are targeted to Native Americans, demonstrate excellent responsiveness to community development needs and positively impacted the financial institution's CRA rating.

Examiners identified an isolated instance of discrimination during the 2017 Federal Deposit Insurance Corporation (FDIC) Compliance Examination. This violation did not influence the CRA rating.

DESCRIPTION OF INSTITUTION

Bay Bank (BB) is a full-service, minority-owned financial institution headquartered on Packerland Drive in Green Bay, Wisconsin (WI). The main office is in a middle-income census tract (CT). The financial institution also conducts business from a branch office located three miles north of its headquarters on West Mason Street. This branch office, located in a middle-income CT within the Oneida Nation Reservation, opened in November 2015. BB is wholly-owned by Bay Bancorporation Incorporated, a one-bank holding company owned entirely by the Oneida Nation. BB received an Outstanding rating during its previous FDIC Performance Evaluation, dated June 23, 2014, based on Small Bank Examination Procedures.

BB offers a variety of loan products and services, with a focus on Section 184 home mortgage loans offered through the U.S. Department of Housing and Urban Development. BB is the only financial institution in Wisconsin offering this loan product. Section 184 home mortgage loans provide financing for the construction, refinance, home improvement, and purchase of homes for American Indians and Alaska Natives who are members of a federally-recognized tribe, federally-recognized Indian tribes, tribally-designated housing entities, and Indian housing authorities. In June 2019, BB and its holding company became certified as a Community Development Financial Institution (CDFI). This certification allows the bank and its holding company to apply for grants through the CDFI Fund, which may be used to provide loans and/or investments, as well as technical assistance to underserved populations and communities.

Customers can access the products and services of BB through mobile and online banking services, as well as 19 non-depository automated teller machines (ATMs) located throughout Brown and Outagamie Counties.

As of June 30, 2020, BB maintained total assets of \$126 million, total loans of \$78 million and total deposits of \$95 million. Since the previous Performance Evaluation, commercial loans increased approximately 79 percent, while one-to-four family residential real estate loans increased approximately 11 percent.

Loan Portfolio Distribution as of 6/30/2020		
Loan Category	\$ (000s)	%
Construction, Land Development, and Other Land Loans	3,029	3.9
Secured by Farmland	436	0.5
Secured by 1-4 Family Residential Properties	16,065	20.5
Secured by Multifamily (5 or more) Residential Properties	2,358	3.0
Secured by Nonfarm Nonresidential Properties	27,697	35.3
Total Real Estate Loans	49,585	63.2
Commercial and Industrial Loans	24,436	31.1
Agricultural Production and Other Loans to Farmers	14	0.0
Consumer Loans	4,440	5.7
Other Loans	5	0.0
Total Loans	78,480	100.0
<i>Source: Reports of Condition and Income</i>		

No financial, legal or other impediments limit BB's ability to meet the credit needs of its AAs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. BB designated two contiguous AAs consisting of 57 CTs. The Green Bay Metropolitan Statistical Area (MSA) AA consists of all 54 CTs in Brown County. The Appleton MSA AA consists of three CTs in the eastern portion of Outagamie County that border Brown County. The sections below provide further information related to each AA.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated June 23, 2014, to the current evaluation. Examiners used Interagency Small Institution Examination Procedures to assess BB's CRA performance. This includes evaluating the institution's CRA performance based on its LTD ratio, AA concentration, geographic distribution, borrower profile, and response to CRA-related complaints.

Examiners conducted a full scope review of the Green Bay MSA AA, as it includes both of BB's office locations and approximately 95 percent of total CTs. Examiners conducted a limited-scope review of the Appleton MSA AA, as this area does not include any office locations and only approximately five percent of total CTs. For the reasons discussed above, examiners placed greater weight on the Green Bay MSA AA when evaluating the institution's community reinvestment performance.

Activities Reviewed

Commercial and home mortgage loans continue to represent the bank's major product lines. Examiners made this determination in consideration of BB's business strategy, as well as the number and dollar volume of small business and home mortgage loans originated during the evaluation period. As of June 30, 2020, commercial loans represented approximately 66 percent of the loan portfolio, while one-to-four family residential real estate loans represented approximately 20 percent of the portfolio. Small farm loans represent a nominal percentage of BB's loan portfolio; therefore, examiners did not analyze them as part of this evaluation.

More specifically, examiners reviewed residential real estate loans recorded on the 2018 and 2019 Loan Application Registers reported under the Home Mortgage Disclosure Act (HMDA), as well as a sample of small business loans originated during 2019. This lending activity is representative of the bank's lending performance throughout the evaluation period.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$ (000s)	#	\$ (000s)
Home Mortgage 2018	154	21,016	154	21,016
Home Mortgage 2019	146	21,896	146	21,896
Small Business	213	25,569	57	6,564
<i>Source: 2018 and 2019 HMDA Loan Application Registers; Bank Data</i>				

Examiners placed more weight on small business lending activity based on the number and dollar volume of commercial loan originations, as well as the growth in this segment of the loan portfolio. D&B data from 2019 provided a standard of comparison for the bank's small business lending activity, while aggregate HMDA data and 2015 American Community Survey (ACS) Census Data provided a standard of comparison for the bank's home mortgage lending activity.

Examiners also reviewed community development investments and services initiated since the previous Performance Evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BB demonstrates reasonable performance under the Lending Test. The distribution of home mortgage and small business loans to borrowers of different income levels and businesses of different sizes, particularly in the Green Bay MSA AA, primarily supports this conclusion.

Loan-to-Deposit Ratio

BB's LTD ratio reflects reasonable performance given the institution's size and financial condition, as well as the credit needs within the AAs. BB's LTD ratio averaged 76 percent over the previous 25 quarters, with a high of 82 percent and a low of 65 percent. This ratio is comparable to that of similarly-situated institutions whose average LTD ratios ranged from 69 percent to 95 percent over the same period. Examiners selected these comparable financial institutions based on loan portfolio composition, asset size and geographical location.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2020 \$ (000s)	Average Net LTD Ratio (%)
Bay Bank	126,387	76.1
Similarly-Situated Institution #1	320,368	95.3
Similarly-Situated Institution #2	159,960	68.7
Similarly-Situated Institution #3	151,260	80.7
Similarly-Situated Institution #4	115,127	90.6
<i>Source: Reports of Condition and Income 6/30/2014 – 6/30/2020</i>		

Assessment Area Concentration

BB originated a majority of home mortgage and small business loans within its AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$ (000s)				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	82	53.2	72	46.8	154	10,591	50.4	10,425	49.6	21,016
2019	83	56.8	63	43.2	146	11,397	52.1	10,499	47.9	21,896
Subtotal	165	55.0	135	45.0	300	21,988	51.2	20,924	48.8	42,912
Small Business	47	82.5	10	17.5	57	5,448	83.0	1,116	17.0	6,564
Source: 2018 and 2019 HMDA Reported Data; Bank Data										

Although the number of home mortgage loans originated within BB's AAs declined from 68 percent in 2013 to 57 percent in 2019, examiners noted that BB is the only financial institution in Wisconsin offering Section 184 home mortgage loans. Consequently, BB receives many credit

applications from eligible borrowers throughout the state who may not reside within the AAs. Nonetheless, a majority of BB's mortgage lending activity remains inside the AAs.

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects excellent dispersion throughout both AAs. The excellent performance within the heavier-weighted Green Bay MSA AA primarily supports this conclusion.

Borrower Profile

The distribution of home mortgage and small business loans to borrowers of different income levels and businesses of different sizes reflects reasonable penetration throughout both AAs. The reasonable performance within the heavier-weighted Green Bay MSA primarily supports this conclusion. Further, the distribution of Section 184 home mortgage loans, as well as small business loans through the Oneida Small Business Program, Small Business Association, and Paycheck Protection Program, positively impacted BB's Borrower Profile performance.

Response to Complaints

BB has not received any CRA-related complaints since the previous evaluation; therefore, examiners did not consider this criterion for the Lending Test rating.

QUALIFIED INVESTMENTS AND SERVICES

At the request of bank management, examiners assessed BB's community development investments and services as part of the CRA Performance Evaluation. BB has not made any qualified investments since the previous evaluation; however, the institution has provided numerous community development services which have positively influenced BB's CRA rating.

Community Development Services

Section 184 Lending

BB is one of three approved Section 184 lenders in Wisconsin and the only lender in the state currently offering Section 184 loans. Under the terms and conditions of this loan program, borrowers can use loan proceeds on and off native lands for the construction, refinance, purchase or improvement of a single-family home that is or will be a primary residence. Section 184 loans require a lower down payment than traditional secondary market loans (2.25 percent on loans over \$50,000 and 1.25 percent on loans under \$50,000) and provide lower interest rates based on market conditions, rather than an applicant's credit score. BB actively markets Section 184 loans to tribes across Wisconsin by providing workshops and tribal presentations, as well as participating in panelist discussions. The table below summarizes the number and volume of Section 184 loans originated by BB since the previous evaluation.

Section 184 Loans		
Year	Number of Loans	\$ (000s)
2014	55	7,900
2015	85	11,086
2016	105	13,676
2017	96	12,637
2018	116	16,411
2019	84	12,605
YTD June 2020	24	4,859
<i>Source: Bank Data</i>		

Oneida Small Business Loan Programs

BB originates and services several commercial loans under the Oneida Small Business Loan Programs, as described below.

- Type 96 and Type 98 Program

The Oneida Nation created two \$500,000 revolving loan accounts after receiving two separate grants from the State of Wisconsin. BB uses funds from these programs to provide financing to start-up businesses with fewer than 15 employees. Borrowers must provide evidence of completion of a small business course (Urban Hope), a business-related degree, or three years of small business operations experience. Under both programs, BB may extend loans to businesses located on or adjacent to the reservation and majority-owned by an Oneida tribal member. Both programs limit the maximum loan amount to \$300,000. BB underwrites, closes and services the loans. BB originated one Type 96 loan for \$5,000 and six Type 98 loans totaling \$285,657 since the previous Performance Evaluation.

- Type 97 Program

The Type 97 Program is a revolving loan program funded by tribal members that was created to provide start-up financing to businesses located on or adjacent to the Oneida reservation, with fewer than 50 employees and majority owned by an Oneida tribal member. The program is no longer offered; however, BB continues to service two loans previously originated under this program.

- Type 99 Program

The Type 99 Program is a \$7,000,000 revolving loan program created by the Oneida Nation using legislative award funds and tribal member contributions. The Oneida Nation created this loan program to provide loans to businesses with start-up or business expansion costs. Under this program, BB may extend a loan up to \$300,000 to businesses located in Wisconsin and majority-owned by an Oneida tribal member. BB underwrites, closes and services the loans. BB originated 34 loans under this program since the previous Performance Evaluation totaling \$2,155,888.

Community Development Financial Institution

In June 2019, the US Department of Treasury's CDFI Fund certified BB and its holding company as a CDFI. Certification requirements include having a primary mission of promoting community development, predominantly serving eligible target markets, providing development services and

serving as a financial entity that is neither a government entity, nor controlled by a government entity. This program allows BB and its holding company to apply for grants through the CDFI fund, to use to provide banking services to its targeted community. BB designated its CDFI target community as Native Americans in Wisconsin.

In September 2019, BB received a \$245,547 award from the Bank Enterprise Award (BEA) Program for demonstrating an increase in lending, investing, and service-related activities in distressed communities. The BEA Program Agreement requires BB to deploy 10 percent (\$24,555) of the awarded funds in Persistent Poverty Counties (PPC) by the end of 2020. Menominee County is the only PPC in Wisconsin. As of August 31, 2020, BB's lending in Menominee County year-to-date was \$6.8 million.

Loans to CDFIs

In August 2017, BB provided a three-year, \$200,000 commercial loan to a non-profit CDFI known as Wisconsin Native Loan Fund Incorporated (WINLF). In January 2020, BB's Board of Directors approved a second loan to WINLF for \$300,000. Further, in August 2020, BB's Loan Committee approved the renewal of the initial \$200,000 loan. WINLF provides consumer loans to Native American borrowers throughout Wisconsin, who are typically underbanked individuals with credit issues. WINLF provides borrower counseling, credit repair and debt consolidation services.

Low Income Housing Tax Credit Projects

BB assisted with several Low Income Housing Tax Credit (LIHTC) projects since the previous evaluation by providing construction loans for three tribal LIHTC projects. The table below provides details about each project.

Year	Borrower	\$ (000s)	Purpose
2014	Borrower 1	1,500	Build 20 low-income family rental homes on an Indian reservation in WI.
2014	Borrower 2	1,350	Rehabilitate and convert a motel located on an Indian reservation in WI into a 24-unit apartment complex with 23 low-income rental units.
2017	Borrower 3	375	Rehabilitate 38 low-income rental units located on an Indian reservation in WI.

All three projects listed above also qualified for an Affordable Housing Program (AHP) grant from the Federal Home Loan Bank of Chicago (FHLBC). The AHP Program requires an FHLBC member bank to sponsor each grant application. BB agreed to sponsor all three AHP grants listed above. In addition, BB sponsored a fourth AHP grant project in 2014 for the rehabilitation of 24 low-income rental units on an Indian reservation in Wisconsin.

Oneida Small Business Assistance Grant Program

In 2020, the Oneida Nation received COVID-19 related federal funds through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The Oneida Nation used some of these funds to create a grant program for small businesses owned by its tribal members and asked BB to administer the program. BB assisted with the development of final grant eligibility requirements, creation of a written grant application and agreement, and development and administration of procedures used to review, submit and fund grant applications. Further, BB placed all of the grant

program materials on its website. Under this program, BB processed 98 applications and approved 95 grants totaling \$1,587,786, including 60 on-reservation grants totaling \$1,106,337.

Wisconsin Economic Development Corporation Small Business 20/20 Grant Program.

In April 2020, the Wisconsin Economic Development Corporation (WEDC) administered a grant program to provide funds to CDFIs in Wisconsin with the purpose of distributing funds to smaller business in need of economic relief. BB received a grant of \$427,700 from WEDC and distributed funds to business customers who maintained \$2 million or less in annual revenues and 20 or fewer employees for the purpose of paying rent and payroll expenses. BB distributed funds to 45 customers, 40 of which maintained gross annual revenues (GAR) of less than \$1 million. In aggregate, BB extended \$370,355 of the total grant money to small businesses with GAR of less than \$1 million.

Paycheck Protection Program Loans

In 2020, BB extended 92 loans totaling \$11,922,000 (15% of the bank's total loan portfolio) under the Paycheck Protection Program (PPP) administered by the Small Business Association (SBA). PPP loans, which were designed to help businesses keep their workforce employed during the COVID-19 pandemic, are forgivable under specific SBA guidelines. The percentage of PPP loans originated by BB in comparison to its total loan portfolio places the bank in 12th place out of 153 community banks who originated PPP loans during 2020.

FHLB Down Payment Plus Program

BB participates in the FHLB's Down Payment Plus Program by facilitating grants to low- and moderate-income borrowers who may use the funds for down payment and closing cost assistance, homebuyer counseling costs, and/or eligible rehabilitation costs associated with the purchase of a home. The table below provides a summary of the number and volume of grants facilitated since the previous Performance Evaluation.

FHLB Down Payment Plus Program Grants		
Year	Number of Grants	Dollar Amount of Grants \$ (000s)
2014	1	8
2015	7	42
2016	6	36
2017	6	36
2018	7	42
2019	9	54
YTD 2020	7	42
<i>Source: Bank Data</i>		

Small Dollar Lending

Although BB does not maintain a formal small dollar loan program, they do originate a significant number of small dollar unsecured loans as an alternative to pay-day or other predatory loan programs available within the AAs. During 2018, BB originated 131 small dollar unsecured loans totaling \$169,108 with an average loan amount of \$1,291. In 2019, BB originated 143 small dollar unsecured loans totaling \$212,173 with an average loan amount of \$1,488.

SBA Loans

BB offers SBA guaranteed loans to qualifying businesses. In April 2016, BB extended one SBA Type 7(a) loan for approximately \$994,000. The loan provided funds to make improvements to a restaurant located in a moderate-income CT. A Type 7(a) loan is 75 percent guaranteed by the SBA and designed to provide start-up business costs, working capital, or furniture and fixture improvements to small businesses.

Indian Loan Guarantee Program

BB extended two loans under the Indian Loan Guarantee (ILG) Program since the previous evaluation. In 2018, BB extended a \$2,755,000 loan to build a new grocery store on an Indian reservation that replaces an old and outdated grocery store. The new store is larger than the previous store, which creates jobs and allows for additional product lines and services. In 2020, BB extended a \$4,020,000 loan to refinance existing debt and provide approximately \$3,000,000 of new funds towards the construction of a new convenience store located on an Indian reservation in WI. The ILG Program, offered through the United States Department of the Interior, promotes economic development on or near an Indian community's reservation or service area. The program provides lenders with up to a 90 percent guarantee on commercial loans to eligible borrowers. Eligible borrowers include federally recognized American Indian tribes and Alaska Native groups, individuals of a federally recognized American Indian tribe or Alaska Native group, and business organizations with no less than 51 percent ownership by federally recognized American Indians or Alaska Natives. Loans provided under the program may be used for operating capital, equipment purchases, business acquisition and refinance, building construction and lines of credit.

In March 2019, bank management presented during an ILG Program webinar facilitated by the FDIC Department of Community Affairs. The webinar provided bankers with information about the ILG Program, including a step-by-step explanation of a loan transaction previously made under the program.

Financial Counseling

Several bank employees provide financial counseling presentations to tribal members. The presentations include information on the home loan application process, budgeting, building good credit, and reading and understanding a credit report. On average, employees provide two presentations each year.

Other Initiatives

Several members of the bank hold positions for numerous community development organizations. The following table provides the positions held and a description of each organization.

Community Development Involvement		
Role	Organization	Description
Board President	First American Capital Corporation	Provide small business loans to Native American and minority owned small businesses.
Board Member	American Indian Chamber of Commerce of Wisconsin	Provide statewide advocacy, networking, one-to-one business management counseling, and access to financial products and services to Wisconsin-based American Indian business people.
Board Member	Wisconsin Native Loan Fund	Provide consumer, small business, and mortgage loans and financial literacy services to Native American borrowers located within the 11 tribal communities of Wisconsin.
Board Chairman	Oweesta Corporation	A financial intermediary that lends capital to other certified Native American CDFIs. The organization also provides train-the-trainer services for financial literacy.
Leadership Council Member	Center for Indian Country Development, Federal Reserve Bank of Minneapolis	A department of the Federal Reserve Bank of Minneapolis dedicated to supporting research and economic development in Indian Country.
Community Reinvestment Committee Member (Over 10 Years)	NeighborWorks Green Bay	A resident-led nonprofit business and Community Housing Development Organization that serves the Green Bay neighborhoods and broader community with homeownership preparation services, down payment and closing cost assistance, and community-interest real estate development.
Board Member	First Nations Community Financial	A Native American CDFI that provides consumer loans and literacy services to members of the Ho-Chunk Nation.
<i>Source: Bank Data, American Indian Chamber of Commerce</i>		

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners identified an isolated Fair Housing Act violation during the 2017 FDIC Compliance Examination for discrimination based on familial status. In response to this violation, management updated underwriting procedures, provided staff training, expanded secondary reviews and internal compliance audits, and encouraged the harmed individual to reapply for credit. This isolated violation has not impacted the CRA rating, given the isolated nature of the violation, as well as management's prompt corrective action.

Green Bay MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREEN BAY MSA AA

The Green Bay MSA AA consists of all 54 CTs in Brown County. Sources of data used in this section include 2015 ACS census, 2019 D&B, the Federal Financial Institution Examination Council (FFIEC), the Wisconsin Department of Workforce Development, the Wisconsin Realtor’s Association and the U.S. Bureau of Labor Statistics.

Economic and Demographic Data

The table below summarizes demographic characteristics of the Green Bay MSA AA.

Demographic Information of the Green Bay MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	5.6	27.8	46.3	18.5	1.9
Population by Geography	254,717	2.3	26.5	45.7	25.0	0.5
Housing Units by Geography	106,532	2.6	28.6	45.9	22.9	0.0
Owner-Occupied Units by Geography	66,370	1.2	21.4	50.0	27.4	0.0
Occupied Rental Units by Geography	34,270	4.7	41.5	38.2	15.6	0.0
Vacant Units by Geography	5,892	6.0	34.6	43.8	15.6	0.0
Businesses by Geography	14,620	3.4	27.7	44.4	24.4	0.0
Farms by Geography	540	1.1	11.5	48.3	39.1	0.0
Family Distribution by Income Level	65,128	19.9	18.2	21.4	40.5	0.0
Household Distribution by Income Level	100,640	22.8	16.9	19.0	41.3	0.0
Median Family Income MSA - 24580 Green Bay, WI MSA		\$67,666	Median Housing Value			\$157,532
			Median Gross Rent			\$719
			Families Below Poverty Level			8.6%
Source: 2015 ACS and 2019 D&B Data (*) The NA category consists of geographies that have not been assigned an income classification.						

The table below provides the median family income and corresponding income levels in the Green Bay MSA AA for 2018 and 2019. This information provides the basis for analyzing home mortgage lending activities under the Borrower Profile criterion.

Median Family Income Ranges – Green Bay MSA AA				
Median Family Income	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2018 (\$75,600)	<\$37,800	\$37,800 to <\$60,480	\$60,480 to <\$90,720	≥\$90,720
2019 (\$81,300)	<\$40,650	\$40,650 to <\$65,040	\$65,040 to <\$97,560	≥\$97,560
<i>Source: FFIEC</i>				

The table below reflects the median home sale price in Brown County compared to the State of Wisconsin during the evaluation period. From 2014 to 2019, home prices for Brown County and the State of Wisconsin increased 33 percent, including a 15 percent increase from 2017 to 2019.

Median Home Sale Price		
Year	Brown County (\$)	State of Wisconsin (\$)
2014	146,750	147,750
2015	149,950	155,000
2016	157,700	163,500
2017	169,000	172,500
2018	182,000	184,000
2019	195,000	197,000
June 2020	239,900	225,500
<i>Source: Wisconsin Realtor's Association</i>		

The table below provides the annual unemployment rates for Brown County compared to the State of Wisconsin during the evaluation period.

Annual Unemployment Rates		
Year	Brown County (%)	State of Wisconsin (%)
2014	4.8	5.4
2015	4.1	4.5
2016	3.6	4.0
2017	2.9	3.3
2018	2.7	3.0
2019	3.1	3.3
June 2020	8.8	8.6
<i>Source: U.S. Bureau of Labor Statistics</i>		

According to 2019 D&B data, 14,620 businesses operate within the AA, of which, 78 percent reported a gross annual revenue (GAR) of \$1 million or less. Further, 83 percent of these businesses employ less than 10 people. According to the Wisconsin Department of Workforce Development, 58 percent of employment opportunities in the AA come from several major industries, including education and health; manufacturing; and trade, transportation, and utilities. Major employers in the AA include Bellin Health, Humana, Oneida Nation, Schneider National and Aurora Health Care.

Competition

Competition in the Green Bay MSA AA is very strong. According to the June 30, 2019 Deposit Market Share Report compiled by the FDIC, 18 financial institutions maintain 69 offices in Brown County. Five large national banks retain approximately 78 percent of the deposit market share. BB ranks 12th with a deposit market share of approximately one percent.

Community Contact(s)

Examiners reviewed information provided by two community contacts from the Green Bay area. According to a representative from a local housing authority, the Green Bay area provides tremendous opportunity for affordable housing. This individual explained that the housing authority is currently leasing 99 percent of its managed units, with a waiting list of approximately 100 people. Further, the COVID-19 pandemic has put financial pressure on many individuals within the community who are finding it difficult to make their rental payments.

According to a second community contact who represents a local economic development agency, many projects remain on hold due to the COVID-19 pandemic. However, the agency maintains four housing projects that continue to progress, including two low- and moderate-income housing projects. The contact further indicated the pandemic has placed financial pressures on a number of businesses in the area, including restaurants, salons, and day cares. Restaurants continue to do what they can to be innovative and stay afloat; however, it appears at least one restaurant closed and the possibility that it will re-open remains unclear. Finally, the contact indicated the need for start-up business financing in the area.

Credit Needs

According to economic and demographic data, as well as community contact information, the primary credit needs of the community appear to be affordable housing and start-up business financing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREEN BAY MSA AA

LENDING TEST

BB demonstrates reasonable performance under the Lending Test. BB's distribution of loans to borrowers of different income levels and businesses of different sizes primarily supports this conclusion.

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects excellent dispersion throughout the AA. BB's home-mortgage lending performance reflects reasonable dispersion; however, the heavier-weighted small business lending performance reflects excellent dispersion and primarily supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA.

Geographic Distribution of Home Mortgage Loans – Green Bay MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$ (000s)	%
Low						
2018	1.2	1.6	2	3.2	88	1.0
2019	1.2	1.1	4	6.9	414	5.3
Moderate						
2018	21.4	20.7	14	22.6	1,964	22.9
2019	21.4	19.3	7	12.1	666	8.4
Middle						
2018	50.0	46.6	31	50.0	4,437	51.8
2019	50.0	47.3	32	55.1	4,507	57.2
Upper						
2018	27.4	31.1	15	24.2	2,081	24.3
2019	27.4	32.3	15	25.9	2,292	29.1
Totals						
2018	100.0	100.0	62	100.0	8,570	100.0
2019	100.0	100.0	58	100.0	7,879	100.0
<i>Source: 2015 ACS; 2018 & 2019 HMDA Aggregate Data; 2018 and 2019 HMDA Reported Data</i>						

The distribution of 2018 and 2019 home mortgage loans in low-income CTs exceeds peer performance and demographic data, with a positive trend year-over-year.

The distribution of 2018 home mortgage loans in moderate-income CTs is consistent with peer performance and demographic data. However, the distribution of 2019 home mortgage loans in

moderate-income CTs declined and trailed peer performance and demographic data. A government shutdown from December 22, 2018, through January 25, 2019, contributed to this decline, as the bank could not originate any Section 184 home mortgage loans during the shutdown. Further, BB's performance is reasonable considering the location of bank offices and competition from other financial institutions within Brown County. Both of BB's offices are located on the west side of Green Bay, approximately three miles from the closest moderate income CTs. Additionally, more than 17 financial institution maintain offices between BB's branches and the closest moderate income CTs, including three of the five largest national banks in the United States and several large credit unions.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the AA, despite the lack of lending activity in low-income CTs.

Geographic Distribution of Small Business Loans - Green Bay MSA AA					
Tract Income Level	% of Businesses	#	%	\$ (000s)	%
Low	3.4	0	0.0	0	0.0
Moderate	27.8	18	45.0	1,944	43.1
Middle	44.4	11	27.5	712	15.8
Upper	24.4	11	27.5	1,852	41.1
Total	100.0	40	100.0	4,508	100.0
<i>Source: 2019 D&B Data; Bank Data</i>					

BB did not extend any small business loans sampled to entities located in low-income CTs; however, a very limited number of businesses operate in these tracts. Further, BB's branches are located approximately five miles from the three low-income CTs, with more than 25 other financial institution branches in closer proximity to the CTs. The limited number of businesses in low-income CTs, strong competition, and the location of BB's offices limits the bank's ability to establish a greater penetration of lending activity in these CTs.

Conversely, BB's distribution of small business loans to borrowers located in moderate-income CTs significantly exceeds the percentage of businesses located in moderate-income CTs.

Borrower Profile

The distribution of home mortgage and small business reflects reasonable dispersion among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

The distribution of borrowers, given the demographics of the AA, reflects reasonable penetration among individuals of different income levels.

Distribution of Home Mortgage Loans by Borrower Income Level – Green Bay MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$ (000s)	%
Low						
2018	19.9	9.5	4	6.5	335	3.9
2019	19.9	9.8	9	15.5	741	9.4
Moderate						
2018	18.2	21.1	20	32.3	2,283	26.6
2019	18.2	22.7	13	22.4	1,451	18.4
Middle						
2018	21.4	22.7	17	27.4	2,572	30.0
2019	21.4	22.8	15	25.9	2,368	30.1
Upper						
2018	40.5	33.8	13	21.0	2,049	23.9
2019	40.5	30.6	10	17.2	1,732	22.0
Not Available						
2018	0.0	12.9	8	12.8	1,331	15.6
2019	0.0	14.1	11	19.0	1,587	20.1
Totals						
2018	100.0	100.0	62	100.0	8,570	100.0
2019	100.0	100.0	58	100.0	7,879	100.0
<i>Source: 2015 ACS; 2018 & 2019 HMDA Aggregate Data; 2018 and 2019 HMDA Reported Data</i>						

BB's percentage of loans to low-income borrowers in 2018 trailed peer performance and demographic data. However, nine percent of low-income families earn an income below the poverty level, lacking the financial resources to obtain a home mortgage loan and limiting a financial institution's opportunity to lend to these borrowers. Considering the percentage of families below poverty level, BB's distribution of 2018 home mortgage loans to low-income borrowers reflects reasonable performance. In 2019, the percentage of loans to low-income borrowers increased significantly and outperformed peer performance by approximately six percent.

BB's distribution of 2018 home mortgage loans reflects excellent dispersion among moderate-income borrowers, as the bank's performance significantly exceeds demographic data and peer performance. BB's distribution of home mortgage loans to moderate-income borrowers decreased in 2019, but remains consistent with peer performance and demographic data.

The distribution of home mortgage loans to low- and moderate-income borrowers has benefitted from BB's origination of Section 184 loans, which have been included in the analysis above.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes.

Distribution of Small Business Loans by Gross Annual Revenue - Green Bay MSA AA					
Gross Annual Revenues	% of Businesses	#	%	\$ (000s)	%
≤ \$1,000,000	78.4	27	67.5	3,637	80.7
> \$1,000,000	8.4	13	32.5	871	19.3
Revenue Not Available	13.2	0	0.0	0	0.0
Total	100.0	40	100.0	4,508	100.0
<i>Source: 2019 D&B Data; Bank Data</i>					

Although BB's distribution of 2019 small business loans is not comparable to demographic data, it is reasonable given the competition from other financial institutions, including larger national banks with more lending and marketing resources, as well as lending activities not included in the small business loan sample. Since the previous Performance Evaluation, BB has originated 41 loans totaling \$2.4 million under the Oneida Small Business Program. This activity is summarized below.

Oneida Small Business Program Loans		
Year	Number	\$ (000s)
2014	6	541
2015	4	352
2016	5	50
2017	9	469
2018	7	466
2019	8	479
YTD June 2020	2	90
Total	41	2,447
<i>Source: Bank Data</i>		

BB also extended a \$994,000 SBA loan in April 2016, as well as 92 PPP loans in 2020, totaling \$11,922,000. The bank's participation in these loan programs, as well as their willingness to assist small businesses obtain the financing they need through other lending partners, supports the reasonable rating.

APPLETON MSA AA – Limited-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE APPLETON MSA AA

The Appleton MSA AA includes the three most eastern CTs of Outagamie County, which border Brown County and contain approximately half of the Oneida Nation Reservation. The AA contains two middle-income level CTs and one moderate-income level CT.

Economic and Demographic Data

The table below summarizes demographic characteristics of the Appleton MSA AA.

Demographic Information of the Assessment Area – Appleton MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	17,621	0.0	26.5	73.5	0.0	0.0
Housing Units by Geography	6,703	0.0	23.9	76.1	0.0	0.0
Owner-Occupied Units by Geography	4,851	0.0	28.1	71.9	0.0	0.0
Occupied Rental Units by Geography	1,505	0.0	13.1	86.9	0.0	0.0
Vacant Units by Geography	347	0.0	12.4	87.6	0.0	0.0
Businesses by Geography	854	0.0	17.1	82.9	0.0	0.0
Farms by Geography	124	0.0	25.0	75.0	0.0	0.0
Family Distribution by Income Level	4,967	18.2	20.9	24.2	36.7	0.0
Household Distribution by Income Level	6,356	20.6	17.6	18.8	43.0	0.0
Median Family Income MSA - 11540 Appleton, WI MSA		\$73,709	Median Housing Value			\$182,815
			Median Gross Rent			\$766
			Families Below Poverty Level			7.5%
Source: 2015 ACS and 2019 D&B Data (*) The NA category consists of geographies that have not been assigned an income classification.						

The table below provides the median family income and corresponding income levels of the Appleton MSA AA for 2018 and 2019. This information provides the basis for analyzing home mortgage lending activities under the Borrower Profile criterion.

Median Family Income Ranges – Appleton MSA AA				
Median Family Income	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2018 (\$77,900)	<\$38,950	\$38,950 to <\$62,320	\$62,320 to <\$ 93,480	≥\$ 93,480
2019 (\$83,800)	<\$41,900	\$41,900 to <\$67,040	\$67,040 to <\$100,560	≥\$100,560
Source: FFIEC				

The table below provides the median home sale price for Outagamie County and the State of Wisconsin since the previous Performance Evaluation.

Median Home Sale Price		
Year	Outagamie County (\$)	State of Wisconsin (\$)
2014	137,600	147,750
2015	144,900	155,000
2016	149,500	163,500
2017	160,000	172,500
2018	174,000	184,000
2019	184,950	197,000
June 2020	235,000	225,500
<i>Source: Wisconsin Realtor's Association</i>		

The table below provides the unemployment rate of Outagamie County compared to the State of Wisconsin since the previous Performance Evaluation.

Annual Unemployment Rates		
Year	Outagamie County (%)	State of Wisconsin (%)
2014	4.8	5.4
2015	4.0	4.5
2016	3.5	4.0
2017	3.0	3.3
2018	2.8	3.0
2019	3.0	3.3
June 2020	7.8	8.6
<i>Source: U.S. Bureau of Labor Statistics</i>		

According to 2019 D&B data, 854 businesses operate within the AA, of which, 79 percent reported GAR of \$1 million or less. Further, 81 percent of these businesses employ less than 10 people. According to the Wisconsin Department of Workforce Development, 56 percent of employment opportunities in the AA come from several major industries, including education and health; manufacturing; and trade, transportation and utilities. Major employers in the AA include ThedaCare, Affinity Health Systems, Kimberly-Clark, and Thrivent Financial.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE APPLETON MSA AA

LENDING TEST

The institution's Lending Test performance in the Appleton MSA AA reflects reasonable performance that is consistent with the institution's Lending Test performance in the full-scope Green Bay MSA AA.

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects excellent dispersion including within the moderate-income census tract in the AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the AA.

Geographic Distribution of Home Mortgage Loans – Appleton MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$ (000s)	%
Moderate						
2018	28.1	14.1	18	90.0	1,713	84.8
2019	28.1	15.4	20	80.0	2,833	80.5
Middle						
2018	71.9	85.9	2	10.0	308	15.2
2019	71.9	84.6	5	20.0	685	19.5
Totals						
2018	100.0	100.0	20	100.0	2,021	100.0
2019	100.0	100.0	25	100.0	3,518	100.0
<i>Source: 2015 ACS; 2018 & 2019 HMDA Aggregate Data; 2018 and 2019 HMDA Reported Data</i>						

BB's distribution of 2018 and 2019 home mortgage loans in moderate-income CTs significantly exceeds demographic data and peer performance.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the AA.

Geographic Distribution of Small Business Loans - Appleton MSA AA					
Tract Income Level	% of Businesses	#	%	\$ (000s)	%
Moderate	17.1	7	100.0	940	100.0
Middle	82.9	0	0.0	0	0.0
Total	100.0	7	100.0	940	100.0
<i>Source: 2019 D&B Data; Bank Data</i>					

BB extended all small business loan sampled to entities conducting business in moderate-income census tracts, significantly exceeding demographic data.

Borrower Profile

BB's distribution of home mortgage and small business loans reflects reasonable dispersion among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels.

Distribution of Home Mortgage Loans by Borrower Income Level – Appleton MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$ (000s)	%
Low						
2018	18.2	6.4	3	15.0	140	6.9
2019	18.2	8.2	2	8.0	239	6.8
Moderate						
2018	20.9	17.9	5	25.0	471	23.3
2019	20.9	19.9	5	20.0	518	14.7
Middle						
2018	24.2	25.4	7	35.0	926	45.8
2019	24.2	26.0	9	36.0	1,360	38.7
Upper						
2018	36.7	41.9	5	25.0	484	24.0
2019	36.7	34.2	9	36.0	1,401	39.8
Not Available						
2018	0.0	8.4	0	0.0	0	0.0
2019	0.0	11.7	0	0.0	0	0.0
Totals						
2018	100.0	100.0	20	100.0	2,021	100.0
2019	100.0	100.0	25	100.0	3,518	100.0
<i>Source: 2015 ACS; 2018 & 2019 HMDA Aggregate Data; 2018 and 2019 HMDA Reported Data</i>						

BB's distribution of 2018 home mortgage loans to low and moderate-income borrowers exceeds peer performance and demographic data after accounting for those families living below the poverty level (eight percent). Although the distribution of loans to both classes of borrowers declined in 2019, the bank's performance remained consistent with demographic data and peer performance.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category - Appleton MSA AA					
Gross Annual Revenues	% of Businesses	#	%	\$ (000s)	%
≤ \$1,000,000	79.2	5	71.4	492	52.3
> \$1,000,000	9.6	2	28.6	448	47.7
Revenue Not Available	11.2	0	0.0	0	0.0
Total	100.0	7	100.0	940	100.0
<i>Source: 2019 D&B Data; Bank Data</i>					

Although BB's distribution of small business loans to borrowers with GAR less than or equal to \$1 million is below demographic data, the bank's performance is considered reasonable given BB's participation in several loans programs designed to meet the credit needs of small business owners, including those sponsored by the SBA and the Oneida Small Business Loan Program loans, a majority of which have not been included in the chart above.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the institution under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

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

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

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

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

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

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

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

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

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

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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