



SENIOR HOUSING CRIME PREVENTION FOUNDATION, INC.
SENIOR HOUSING CRIME PREVENTION FOUNDATION INVESTMENT CORPORATION

May 15, 2013

OCC Docket ID OCC-2013-0003
Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Mail Stop 9W-11
400 7th Street SW.
Washington, DC 20219

FDIC
Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street NW.
Washington, DC 20429

Federal Reserve Docket No. OP-1456
Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW.
Washington, DC 20551

Re: Comments on Community Reinvestment Act: Interagency Questions and Answers Regarding
Community Reinvestment

Dear Sir or Madam:

The Senior Housing Crime Prevention Foundation¹ appreciates the opportunity to provide comments on the proposed Interagency Questions and Answers Regarding Community Reinvestment issued by the three regulatory agencies on March 18, 2013 (the Q&A). In particular, our comments are addressed to Section __.12(g)(2)-1, and the questions posed by the Agencies:

1. Will the use of eligibility for free and reduced-price meals and Medicaid effectively identify individuals who are low-or moderate-income?
2. Will the use of these proxies reduce the burden on financial institutions and community organizations to obtain actual income and, thus, promote the provision of community development services?
3. Are there other commonly used proxies for low- or moderate-income that should be specifically included in the Q&A?

Our responses to questions 1 and 2 are very simple—the answers are yes. As a provider of services to nursing home residents, who are predominantly on Medicaid, the eligibility of the beneficiaries of our

¹ Senior Housing Crime Prevention Foundation's mission is to provide safe and secure living environments for our nation's senior housing residents.

programs as CRA qualified individuals is constantly subject to review and interpretation by field examiners. We concur with the conclusion reached in the proposed Q&A commentary that the various states use of their respective poverty level to determine Medicaid eligibility results in an eligibility benchmark that is at least equal to or below the LMI criteria used by the Agencies for CRA credit purposes, thereby effectively identifying LMI individuals. The use of this proxy will greatly enhance the effectiveness of organizations that provide services to such individuals, and promote the support for such services with financial institutions.

As relates to Agency question number 3 above, we propose that the Agencies consider adding another proxy example for low-or moderate-income individuals, those being individuals who qualify for HUD housing assistance under the Public Housing program, the Section 8 Housing Choice Voucher program, Section 202 housing for the elderly program, Section 811 housing for persons with disabilities program, and Section 236 rental program . The basis for our suggested addition is as follows:

- The statutory basis for HUD’s income limit policies is Section 3 of the U.S. Housing Act of 1937, as Amended. The primary income limits may be summarized as follow² :
 - Low-income families are defined as families whose incomes do not exceed 80 percent of the median family income for the area.
 - Very low-income families are defined as families whose incomes do not exceed 50 percent of the median family income for the area.
- The approvals for occupancy under the Public Housing Program and Sections 8, 202, 236, and 811 are all based on the very low-income and low-income limits³.
- HUD determines median family income for each metropolitan area, parts of some metropolitan areas and each non-metropolitan area⁴.
- Based on a comparison of median income determined by HUD⁵ and the median income per the FFIEC⁶, the median income determined by HUD is approximately the same as the median income determined by FFIEC. A sample of over 200 cities and state nonMSA’s was performed comparing median income per HUD and per FFIEC, and the result was the HUD median income on average being 3.2% less than the FFIEC median income (Exhibit 1).
- The Agencies are already providing financial institutions with direction to use HUD determined income levels for individuals in the Q&A as previously issued in Section _____.12(m)—1⁷.
- The higher level of determination of eligibility for occupancy at the HUD low-income level is the same as the CRA guideline for moderate-income, that being 80% of median income⁸.

² HUD Income Limits Briefing Material, US Department of Housing and Urban Development, December 11, 2012: page 1.

³ HUD Income Limits Briefing Material, US Department of Housing and Urban Development, December 11, 2012: page 14.

⁴ HUD Income Limits Briefing Material, US Department of Housing and Urban Development, December 11, 2012: page 1.

⁵ HUD Income Limits Briefing Material, US Department of Housing and Urban Development, December 11, 2012: Attachments 3, 4, and 6.

⁶ Per the FFIEC web site for FFIEC Census and FFIEC Estimated MSA/MD Median Family Income for 2012 CRA/HMDA Reports.

⁷ Federal Register /Vol. 75, No. 47/Thursday, March 11, 2010/Notices, page 11651.

⁸ FDIC Law, Regulations, Related Acts, PART 345—COMMUNITY REINVESTMENT,§ 345.1 Definitions, (m) *Income level*, (2) *Moderate-income*.

Therefore, we proposed an addition to Section __.12(g)(2)-1. Additional example for an institution to determine that community services are offered to low-or moderate-income individuals:

- The community services are targeted to individuals who are eligible for HUD assisted housing programs, and in particular, the HUD Public Housing program, Section 8 Housing Choice Voucher program, Section 202 housing for the elderly program, Section 811 housing for persons with disabilities program, and Section 236 rental program .

We appreciate you consideration of our comments above, and should you have any questions pertaining to our discussion above, please do not hesitate to call, write or e-mail.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter K. Gwaltney", written over a horizontal line.

Peter K. Gwaltney,
Chairman, President and CEO

EXHIBIT 1.

Senior Housing Crime Prevention Foundation
 Comparison of Median Income per HUD and Median Income per FFIEC
 15-May-13

FFIEC CENSUS AND FFIEC ESTIMATED MSA/MD MEDIAN FAMILY INCOME FOR 2012 CRA/HMDA REPORTS (Note 2)			(Note 1)	
MSA/MD FIPS CODE	MSA/MD NAME	2012 FFIEC EST MSA/MD MEDIAN FAMILY INCOME	HUD 2013 MEDIAN INCOME	HUD OVER (UNDER)
10380	AGUADILLA-ISABELA-SAN SEBASTIAN, PR	\$16,600	\$18,200	\$1,600
11100	AMARILLO, TX	\$58,900	\$62,700	\$3,800
11260	ANCHORAGE, AK	\$85,200	\$87,800	\$2,600
11460	ANN ARBOR, MI	\$87,400	\$84,200	(\$3,200)
11700	ASHEVILLE, NC	\$58,400	\$53,900	(\$4,500)
12100	ATLANTIC CITY-HAMMONTON, NJ	\$72,100	\$65,400	(\$6,700)
12540	BAKERSFIELD-DELANO, CA	\$54,100	\$52,500	(\$1,600)
12620	BANGOR, ME	\$56,300	\$70,600	\$14,300
12700	BARNSTABLE TOWN, MA	\$80,000	\$74,900	(\$5,100)
13140	BEAUMONT-PORT ARTHUR, TX	\$57,500	\$53,100	(\$4,400)
13460	BEND, OR	\$66,400	\$59,700	(\$6,700)
13780	BINGHAMTON, NY	\$61,800	\$58,600	(\$3,200)
13820	BIRMINGHAM-HOOVER, AL	\$62,800	\$57,100	(\$5,700)
14060	BLOOMINGTON-NORMAL, IL	\$80,200	\$86,800	\$6,600
14484	BOSTON-QUINCY, MA	\$88,800	\$94,400	\$5,600
14500	BOULDER, CO	\$93,800	\$91,600	(\$2,200)
14860	BRIDGEPORT-STAMFORD-NORWALK, CT	\$106,700	\$87,900	(\$18,800)
15260	BRUNSWICK, GA	\$60,200	\$51,900	(\$8,300)
15500	BURLINGTON, NC	\$56,100	\$51,700	(\$4,400)
16220	CASPER, WY	\$67,000	\$60,900	(\$6,100)
16620	CHARLESTON, WV	\$54,900	\$57,900	\$3,000
17420	CLEVELAND, TN	\$52,000	\$47,600	(\$4,400)
17780	COLLEGE STATION-BRYAN, TX	\$58,200	\$54,900	(\$3,300)
17820	COLORADO SPRINGS, CO	\$73,400	\$69,100	(\$4,300)
17900	COLUMBIA, SC	\$64,500	\$60,400	(\$4,100)
17980	COLUMBUS, GA-AL	\$52,300	\$48,200	(\$4,100)
18020	COLUMBUS, IN	\$68,200	\$62,500	(\$5,700)
18700	CORVALLIS, OR	\$74,200	\$80,800	\$6,600
19180	DANVILLE, IL	\$53,300	\$48,200	(\$5,100)
19260	DANVILLE, VA	\$48,700	\$45,300	(\$3,400)
19380	DAYTON, OH	\$63,300	\$57,800	(\$5,500)
19500	DECATUR, IL	\$60,300	\$55,900	(\$4,400)
20940	EL CENTRO, CA	\$45,000	\$48,000	\$3,000
21340	EL PASO, TX	\$41,700	\$42,000	\$300
21780	EVANSVILLE, IN-KY	\$63,800	\$60,100	(\$3,700)
21820	FAIRBANKS, AK	\$92,900	\$78,400	(\$14,500)
21940	FAJARDO, PR	\$23,500	\$23,500	\$0
22380	FLAGSTAFF, AZ	\$61,800	\$56,500	(\$5,300)
22420	FLINT, MI	\$58,400	\$52,100	(\$6,300)
22500	FLORENCE, SC	\$51,800	\$47,000	(\$4,800)
22744	FORT LAUDERDALE-POMPANO BEACH-DEERFIELD BEA	\$62,600	\$61,700	(\$900)
23104	FORT WORTH-ARLINGTON, TX	\$69,200	\$65,600	(\$3,600)
23420	FRESNO, CA	\$55,500	\$54,600	(\$900)
24780	GREENVILLE, NC	\$54,700	\$57,600	\$2,900
25020	GUAYAMA, PR	\$20,200	\$22,600	\$2,400
25180	HAGERSTOWN-MARTINSBURG, MD-WV	\$65,900	\$69,500	\$3,600
25260	HANFORD-CORCORAN, CA	\$54,300	\$50,400	(\$3,900)
25540	HARTFORD-WEST HARTFORD-EAST HARTFORD, CT	\$87,700	\$85,500	(\$2,200)
25620	HATTIESBURG, MS	\$50,200	\$53,200	\$3,000
25980	HINESVILLE-FORT STEWART, GA	\$47,700	\$42,600	(\$5,100)
26180	HONOLULU, HI	\$82,700	\$86,300	\$3,600
26300	HOT SPRINGS, AR	\$49,400	\$46,700	(\$2,700)
26380	HOUMA-BAYOU CANE-THIBODAUX, LA	\$58,400	\$64,400	\$6,000
26980	IOWA CITY, IA	\$76,200	\$75,800	(\$400)
27060	ITHACA, NY	\$73,800	\$82,000	\$8,200
27100	JACKSON, MI	\$61,600	\$56,500	(\$5,100)

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 15-May-13

MSA/MD FIPS CODE	MSA/MD NAME	2012 FFIEC EST MSA/MD MEDIAN FAMILY INCOME	(Note 1)	
			HUD 2013 MEDIAN INCOME	HUD OVER (UNDER)
27140	JACKSON, MS	\$58,800	\$55,600	(\$3,200)
27180	JACKSON, TN	\$54,400	\$50,900	(\$3,500)
27860	JONESBORO, AR	\$52,000	\$48,500	(\$3,500)
27900	JOPLIN, MO	\$48,200	\$53,700	\$5,500
28100	KANKAKEE-BRADLEY, IL	\$65,300	\$61,000	(\$4,300)
28660	KILLEEN-TEMPLE-FORT HOOD, TX	\$56,700	\$59,900	\$3,200
28740	KINGSTON, NY	\$73,900	\$69,800	(\$4,100)
29340	LAKE CHARLES, LA	\$62,400	\$53,900	(\$8,500)
29420	LAKE HAVASU CITY-KINGMAN, AZ	\$51,200	\$45,300	(\$5,900)
29460	LAKELAND-WINTER HAVEN, FL	\$54,500	\$51,000	(\$3,500)
29540	LANCASTER, PA	\$69,500	\$65,600	(\$3,900)
29700	LAREDO, TX	\$39,600	\$40,300	\$700
29740	LAS CRUCES, NM	\$43,800	\$45,000	\$1,200
29820	LAS VEGAS-PARADISE, NV	\$64,300	\$63,100	(\$1,200)
30340	LEWISTON-AUBURN, ME	\$57,600	\$52,700	(\$4,900)
30620	LIMA, OH	\$58,800	\$54,200	(\$4,600)
31084	LOS ANGELES-LONG BEACH-GLENDALE, CA	\$64,800	\$61,900	(\$2,900)
31140	LOUISVILLE/JEFFERSON COUNTY, KY-IN	\$63,800	\$60,400	(\$3,400)
31540	MADISON, WI	\$82,900	\$80,900	(\$2,000)
32580	MCALLEN-EDINBURG-MISSION, TX	\$34,200	\$38,500	\$4,300
32780	MEDFORD, OR	\$58,500	\$52,200	(\$6,300)
32900	MERCED, CA	\$51,200	\$50,200	(\$1,000)
33124	MIAMI-MIAMI BEACH-KENDALL, FL	\$52,600	\$49,000	(\$3,600)
33460	MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MN-WI	\$83,900	\$82,300	(\$1,600)
33540	MISSOULA, MT	\$59,900	\$64,000	\$4,100
33700	MODESTO, CA	\$62,000	\$56,600	(\$5,400)
34060	MORGANTOWN, WV	\$56,600	\$64,400	\$7,800
34740	MUSKEGON-NORTON SHORES, MI	\$55,000	\$48,200	(\$6,800)
34820	MYRTLE BEACH-NORTH MYRTLE BEACH-CONWAY, SC	\$55,000	\$51,400	(\$3,600)
34900	NAPA, CA	\$86,100	\$80,600	(\$5,500)
34940	NAPLES-MARCO ISLAND, FL	\$72,800	\$65,700	(\$7,100)
34980	NASHVILLE-DAVIDSON-MURFREESBORO-FRANKLIN, TN	\$67,100	\$62,300	(\$4,800)
35004	NASSAU-SUFFOLK, NY	\$107,500	\$105,900	(\$1,600)
35300	NEW HAVEN-MILFORD, CT	\$82,500	\$80,500	(\$2,000)
35644	NEW YORK-WHITE PLAINS-WAYNE, NY-NJ	\$68,300	\$63,000	(\$5,300)
35660	NILES-BENTON HARBOR, MI	\$58,200	\$54,500	(\$3,700)
35980	NORWICH-NEW LONDON, CT	\$84,400	\$81,900	(\$2,500)
36084	OAKLAND-FREMONT-HAYWARD, CA	\$93,500	\$89,200	(\$4,300)
36100	OCALA, FL	\$50,500	\$45,800	(\$4,700)
36140	OCEAN CITY, NJ	\$71,100	\$76,600	\$5,500
36220	ODESSA, TX	\$56,500	\$52,300	(\$4,200)
36780	OSHKOSH-NEENAH, WI	\$62,000	\$65,800	\$3,800
37100	OXNARD-THOUSAND OAKS-VENTURA, CA	\$89,300	\$56,700	(\$32,600)
37340	PALM BAY-MELBOURNE-TITUSVILLE, FL	\$58,600	\$61,800	\$3,200
37380	PALM COAST, FL	\$57,600	\$53,100	(\$4,500)
37620	PARKERSBURG-MARIETTA-VIENNA, WV-OH	\$53,200	\$57,400	\$4,200
37700	PASCAGOULA, MS	\$58,400	\$54,900	(\$3,500)
38660	PONCE, PR	\$20,600	\$21,200	\$600
38900	PORTLAND-VANCOUVER-HILLSBORO, OR-WA	\$73,000	\$68,300	(\$4,700)
38940	PORT ST. LUCIE, FL	\$57,000	\$53,300	(\$3,700)
39100	POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY	\$87,200	\$85,800	(\$1,400)
39140	PRESCOTT, AZ	\$57,700	\$50,400	(\$7,300)
39300	PROVIDENCE-NEW BEDFORD-FALL RIVER, RI-MA	\$75,600	\$71,100	(\$4,500)
39340	PROVO-OREM, UT	\$67,100	\$61,900	(\$5,200)
39380	PUEBLO, CO	\$53,600	\$51,400	(\$2,200)
39540	RACINE, WI	\$69,700	\$66,100	(\$3,600)

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MSA/MD FIPS CODE	MSA/MD NAME	2012 FFIEC EST MSA/MD MEDIAN FAMILY INCOME	HUD 2013 MEDIAN INCOME	HUD OVER (UNDER)
39580	RALEIGH-CARY, NC	\$79,900	\$75,300	(\$4,600)
39660	RAPID CITY, SD	\$58,100	\$64,000	\$5,900
39820	REDDING, CA	\$59,000	\$54,400	(\$4,600)
39900	RENO-SPARKS, NV	\$71,400	\$65,200	(\$6,200)
40140	RIVERSIDE-SAN BERNARDINO-ONTARIO, CA	\$63,300	\$62,600	(\$700)
40580	ROCKY MOUNT, NC	\$49,700	\$55,300	\$5,600
40900	SACRAMENTO--ARDEN-ARCADE--ROSEVILLE, CA	\$76,100	\$70,900	(\$5,200)
41060	ST. CLOUD, MN	\$69,300	\$65,800	(\$3,500)
41100	ST. GEORGE, UT	\$57,100	\$56,800	(\$300)
41140	ST. JOSEPH, MO-KS	\$56,400	\$59,300	\$2,900
41500	SALINAS, CA	\$68,700	\$63,100	(\$5,600)
41540	SALISBURY, MD	\$64,400	\$59,300	(\$5,100)
41740	SAN DIEGO-CARLSBAD-SAN MARCOS, CA	\$75,900	\$72,300	(\$3,600)
41884	SAN FRANCISCO-SAN MATEO-REDWOOD CITY, CA	\$103,000	\$101,200	(\$1,800)
41900	SAN GERMAN-CABO ROJO, PR	\$19,600	\$18,400	(\$1,200)
41940	SAN JOSE-SUNNYVALE-SANTA CLARA, CA	\$105,000	\$101,300	(\$3,700)
41980	SAN JUAN-CAGUAS-GUAYNABO, PR	\$25,700	\$26,500	\$800
42020	SAN LUIS OBISPO-PASO ROBLES, CA	\$75,400	\$70,900	(\$4,500)
42060	SANTA BARBARA-SANTA MARIA-GOLETA, CA	\$73,300	\$71,000	(\$2,300)
42100	SANTA CRUZ-WATSONVILLE, CA	\$87,000	\$73,800	(\$13,200)
42140	SANTA FE, NM	\$68,700	\$62,000	(\$6,700)
42220	SANTA ROSA-PETALUMA, CA	\$82,600	\$74,900	(\$7,700)
43580	SIOUX CITY, IA-NE-SD	\$59,600	\$59,700	\$100
44140	SPRINGFIELD, MA	\$70,200	\$66,100	(\$4,100)
44220	SPRINGFIELD, OH	\$56,800	\$53,500	(\$3,300)
44700	STOCKTON, CA	\$66,300	\$58,600	(\$7,700)
44940	SUMTER, SC	\$47,700	\$44,900	(\$2,800)
45220	TALLAHASSEE, FL	\$64,300	\$60,000	(\$4,300)
45500	TEXARKANA, TX-TEXARKANA, AR	\$51,900	\$57,300	\$5,400
45780	TOLEDO, OH	\$62,600	\$57,100	(\$5,500)
46340	TYLER, TX	\$58,700	\$64,200	\$5,500
46540	UTICA-ROME, NY	\$58,800	\$63,800	\$5,000
46660	VALDOSTA, GA	\$50,900	\$45,400	(\$5,500)
47220	VINELAND-MILLVILLE-BRIDGETON, NJ	\$63,300	\$68,600	\$5,300
47300	VISALIA-PORTERVILLE, CA	\$49,500	\$48,500	(\$1,000)
47380	WACO, TX	\$54,700	\$50,000	(\$4,700)
47894	WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-W	\$105,700	\$107,300	\$1,600
48140	WAUSAU, WI	\$69,200	\$65,200	(\$4,000)
48424	WEST PALM BEACH-BOCA RATON-BOYNTON BEACH, FL	\$64,100	\$64,600	\$500
48700	WILLIAMSPORT, PA	\$54,800	\$53,100	(\$1,700)
49340	WORCESTER, MA	\$83,600	\$81,300	(\$2,300)
49420	YAKIMA, WA	\$51,200	\$49,600	(\$1,600)
49500	YAUCO, PR	\$17,000	\$16,400	(\$600)
49700	YUBA CITY, CA	\$59,400	\$56,300	(\$3,100)
49740	YUMA, AZ	\$44,500	\$47,300	\$2,800
99999	nonmetro portion of MISSISSIPPI	\$42,200	\$42,000	(\$200)
99999	nonmetro portion of ARKANSAS	\$43,900	\$44,000	\$100
99999	nonmetro portion of KENTUCKY	\$43,600	\$44,700	\$1,100
99999	nonmetro portion of GEORGIA	\$45,200	\$45,600	\$400
99999	nonmetro portion of ALABAMA	\$47,600	\$46,000	(\$1,600)
99999	nonmetro portion of WEST VIRGINIA	\$45,400	\$46,100	\$700
99999	nonmetro portion of TENNESSEE	\$46,000	\$46,700	\$700
99999	nonmetro portion of NEW MEXICO	\$47,700	\$47,000	(\$700)
99999	nonmetro portion of SOUTH CAROLINA	\$48,300	\$47,500	(\$800)
99999	nonmetro portion of FLORIDA	\$45,900	\$48,000	\$2,100
99999	nonmetro portion of LOUISIANA	\$47,000	\$48,000	\$1,000

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FFIEC CENSUS AND FFIEC ESTIMATED MSA/MD MEDIAN FAMILY INCOME FOR 2012 CRA/HMDA REPORTS (Note 2)		(Note 1)		
MSA/MD FIPS CODE	MSA/MD NAME	2012 FFIEC EST MSA/MD MEDIAN FAMILY INCOME	HUD 2013 MEDIAN INCOME	HUD OVER (UNDER)
99999	nonmetro portion of MISSOURI	\$47,800	\$48,200	\$400
99999	nonmetro portion of NORTH CAROLINA	\$50,200	\$48,300	(\$1,900)
99999	nonmetro portion of ARIZONA	\$46,900	\$49,300	\$2,400
99999	nonmetro portion of OKLAHOMA	\$49,500	\$49,900	\$400
99999	nonmetro portion of TEXAS	\$49,300	\$50,500	\$1,200
99999	nonmetro portion of IDAHO	\$50,500	\$51,200	\$700
99999	nonmetro portion of OREGON	\$53,400	\$51,300	(\$2,100)
99999	nonmetro portion of VIRGINIA	\$52,600	\$51,600	(\$1,000)
99999	nonmetro portion of MICHIGAN	\$52,100	\$51,700	(\$400)
99999	nonmetro portion of MASSACHUSETTS	\$89,500	\$52,400	(\$37,100)
99999	nonmetro portion of INDIANA	\$53,600	\$52,700	(\$900)
99999	nonmetro portion of OHIO	\$53,600	\$53,000	(\$600)
99999	nonmetro portion of MAINE	\$54,900	\$53,200	(\$1,700)
99999	nonmetro portion of KANSAS	\$54,400	\$55,200	\$800
99999	nonmetro portion of PENNSYLVANIA	\$55,600	\$55,300	(\$300)
99999	nonmetro portion of MONTANA	\$56,600	\$55,400	(\$1,200)
99999	nonmetro portion of WASHINGTON	\$57,400	\$55,400	(\$2,000)
99999	nonmetro portion of ILLINOIS	\$57,400	\$56,200	(\$1,200)
99999	nonmetro portion of NEBRASKA	\$57,000	\$57,000	\$0
99999	nonmetro portion of CALIFORNIA	\$57,900	\$57,300	(\$600)
99999	nonmetro portion of DELAWARE	\$62,600	\$57,500	(\$5,100)
99999	nonmetro portion of NEW YORK	\$56,900	\$57,700	\$800
99999	nonmetro portion of UTAH	\$57,500	\$57,700	\$200
99999	nonmetro portion of WISCONSIN	\$59,900	\$58,600	(\$1,300)
99999	nonmetro portion of COLORADO	\$61,000	\$59,600	(\$1,400)
99999	nonmetro portion of SOUTH DAKOTA	\$56,400	\$59,600	\$3,200
99999	nonmetro portion of IOWA	\$59,300	\$59,800	\$500
99999	nonmetro portion of MINNESOTA	\$60,000	\$61,700	\$1,700
99999	nonmetro portion of VERMONT	\$63,800	\$62,900	(\$900)
99999	nonmetro portion of NEVADA	\$66,000	\$64,700	(\$1,300)
99999	nonmetro portion of NORTH DAKOTA	\$63,800	\$64,800	\$1,000
99999	nonmetro portion of HAWAII	\$73,400	\$66,500	(\$6,900)
99999	nonmetro portion of NEW HAMPSHIRE	\$70,300	\$69,100	(\$1,200)
99999	nonmetro portion of WYOMING	\$68,300	\$73,300	\$5,000
99999	nonmetro portion of ALASKA	\$71,100	\$73,800	\$2,700
99999	nonmetro portion of MARYLAND	\$72,600	\$78,800	\$6,200
99999	nonmetro portion of CONNECTICUT	\$83,200	\$82,600	(\$600)
Totals		\$12,596,600	\$12,195,600	(\$401,000)
Sum of variance divided by sum of FFIEC Median Income				-3.2%

Note 1: HUD Income Limits Briefing Material, US Department of Housing and Urban Development, December 11, 2012: Attachments 3, 4, and 6.

Note 2: Per the FFIEC web site for FFIEC Census and FFIEC Estimated MSA/MD Median Family Income for 2012 CRA/HMDA Reports.