

# **PUBLIC DISCLOSURE**

December 2, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Portage Community Bank  
RSSD #2668598

1311 East Main Street  
Ravenna, OH 44266

Federal Reserve Bank of Cleveland

P.O. Box 6387  
Cleveland, OH 44101-1387

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, 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'S COMMUNITY REINVESTMENT ACT (CRA) RATING

**Portage Community Bank (Portage) is rated: Outstanding**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Outstanding**

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes; and,
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The bank's community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

### SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Intermediate Small Institutions was utilized to evaluate Portage's CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Portage's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Portage's 24-quarter average NLTD ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed end) loans, small business loans, consumer (motor vehicle, other secured, and other unsecured) loans, and home equity lines of credit were analyzed from January 1, 2022, through December 31, 2023.
- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by small business, home equity, and consumer lending, respectively.

- In accordance with CRA examination procedures, the HMDA universe was reviewed.<sup>1</sup> Conclusions were reached in the aggregate. The universe and not a sample of small business, home equity, and consumer loans was used in this evaluation. Conclusions were reached in the aggregate for consumer loans.
- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (38.4%) compared to LMI geographies (34.7%).
- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating the bank's lending performance in 2022 and 2023.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- The evaluation period for community development activities was November 27, 2018, through December 2, 2024. Community development activities are comprised of community development loans, qualified investments, and services.

### DESCRIPTION OF INSTITUTION

Portage is a community bank headquartered in Ravenna, Ohio. The bank's characteristics include:

- Portage is a wholly owned subsidiary of Portage Bancshares, Inc. in Ravenna, Ohio.
- Portage has total assets of \$500.6 million and total deposits of \$434.8 million as December 31, 2023. Portage has seen a 51.8% increase in total assets and a 58.8% increase in total deposits since the previous evaluation.<sup>2</sup>
- Since the previous evaluation, Portage opened two branches. On January 13, 2020, Portage opened a branch in Rootstown (Portage County); on April 19, 2021, Portage opened a branch in Cuyahoga Falls (Summit County).
- Portage maintains its main office with a full-service Automated Teller Machine (ATM) and three branches with full-service ATMs. In Portage County, the bank maintains its main office in Ravenna and a branch in Kent in moderate-income tracts and a branch in Rootstown in a middle-income tract. In Summit County, the bank has a branch in

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<sup>1</sup>HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.

<sup>2</sup>Financial As of Date: June 30, 2018

Cuyahoga Falls in a middle-income tract. All four offices offer drive-thru services, extended hours of service, and weekend hours.

- Portage has not closed any branches since the previous evaluation.
- Portage is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, and commercial and agriculture loans. Portage’s website, [portagecommunity.bank](http://portagecommunity.bank), and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances, what transactions have posted, pay bills, transfer funds between accounts, and make deposits.
- Portage has seen an upward trend in the use of its digital and mobile banking platforms. From 2019 through 2024 Portage has experienced a 13.3% increase in the number of online consumer banking clients, an 82.8% increase in the number of online business banking clients, and a 151.6% increase in the number of mobile banking users.

As shown in the table below, the loan portfolio composition as of December 31, 2023. Portage’s primary business focus is residential real estate.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2023	
	\$ (000s)	Percent
Construction and Development	6,524	1.8%
Secured by One- to Four- Family Dwellings	192,609	53.8%
Other Real Estate: Farmland	2,739	0.8%
Multifamily	2,968	0.8%
Nonfarm nonresidential	112,183	31.3%
Commercial and Industrial	36,525	10.2%
Loans to Individuals	4,358	1.2%
Agricultural Loans	0	0.0%
<b>Total</b>	<b>\$357,906</b>	<b>100.00%</b>

\*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included

Portage’s investment portfolio as of December 31, 2023, was \$108.7 million, which represented 21.7% of total assets. U.S. Treasury and agency securities accounted for 68.7% of total investments, while municipal securities, other securities, and interest-bearing bank balances accounted for 25.0%, 4.6%, and 1.6% of the remaining total investments, respectively.

There are no known legal, financial, or other factors impeding Portage’s ability to help meet the credit needs of its communities.

Portage was rated Satisfactory under the CRA at its previous evaluation conducted November 26, 2018. The lending and community development tests were each rated Satisfactory.

**DESCRIPTION OF ASSESSMENT AREA**

Portage is an intrastate bank in northeast Ohio with one delineated AA in the Akron, OH (Akron) MSA. Portage’s delineated AA consists of the entire MSA, which is comprised of Summit and Portage counties. The bank’s AA has not changed since the previous evaluation.

- The Census Bureau released new size and population data from the 2020 Census on August 12, 2021, as a result of these changes, the AA was comprised of the following tracts:

<b>Income Tract Designations</b>	
<b>Assessment Area: Akron, OH MSA #10420</b>	
<b>Income Tract Level</b>	<b>2022-2023</b>
Low	22
Moderate	39
Middle	66
Upper	45
Unknown	4
<b>Total</b>	<b>176</b>

- The MSA gained six income tracts since the previous evaluation. Specifically, the MSA lost eight low- and two middle-income tracts and gained five moderate-, seven upper-, and four unknown-income tracts.
- As of June 30, 2023, the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share report, ranks Portage 10<sup>th</sup> among 25 institutions operating in the MSA with 2.4% of the deposit market share, compared to the three largest market holders, The Huntington National Bank; JP Morgan Chase Bank, National Association; and PNC Bank, National Association, which hold a 27.9%, 16.0%, and 13.7% of the market, respectively.
- The 2023 HMDA Peer Market data indicates that Portage ranked 20<sup>th</sup> out of 394 HMDA reporters in Akron MSA and originated 183 loans. By comparison, first ranked The

Huntington National Bank, second ranked Cross Country Mortgage, LLC, and third ranked Third Federal Savings and Loan, originated 1,992, 995, and 791 loans, respectively.

- The 2022 HMDA Peer Market data indicates that Portage ranked 21<sup>st</sup> out of 425 HMDA reporters in Akron MSA and originated 262 loans. By comparison, first ranked The Huntington National Bank, second ranked Third Federal Savings and Loan, and third ranked Cross Country Mortgage, LLC, originated 2,366, 1,197, and 1,170 loans, respectively.
- Between 2022 and 2023, the total number of HMDA reporters in the MSA declined by 7.3% and originated mortgage loans declined by 20.7% among these same HMDA reporters. Specifically, Portage's originated mortgage loans declined by 30.2%.

### **Community Contact**

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The contact was from a community foundation that distributes grants to a wide variety of causes that help meet community needs. The contact stated that food insecurity is a significant issue in Greater Akron impacting a substantial portion of the population. Numerous factors contribute to food insecurity, including poverty, unemployment, and underemployment. Job opportunities are often limited, and many workers struggle with low wages and unstable employment. The contact stated that rising rents and food prices are forcing many low-income residents to choose between paying rent and covering other essential needs like food and healthcare. The growing gap between rent costs and area wages is a leading cause of increased housing instability and potential homelessness. The contact emphasized the need for increased rental assistance and eviction prevention services, which even in small amounts helps reduce homelessness, food insecurity, and chronic health issues. The contact believes there are opportunities for local financial institutions to help the ALICE (Asset Limited, Income Constrained, Employed) population have increased access to financial education and small, affordable, short-term loans to help pay for unexpected expenses either directly or partnering with local agencies embedded in the community. Lastly, the contact stated there are always opportunities for local financial institutions to help small businesses access the credit they need and increase awareness of the small business lending environment, especially for women-owned and minority-owned small businesses.

**Population Characteristics**

Population Change			
Assessment Area: Akron, OH MSA			
Area	2020 Population	2023 Population	Percent Change
Portage County	161,791	162,665	0.5%
Summit County	540,428	535,733	-0.9%
<b>Akron, OH MSA</b>	<b>702,219</b>	<b>698,398</b>	<b>-0.5%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,785,935</b>	<b>-0.1%</b>

*Source: 2020-2023 U.S. Census Bureau  
2020 U.S. Census Bureau Decennial Census*

- From 2020 through 2023 the MSA experienced a 0.5% loss in population, compared to Portage County which experienced a 0.5% gain in population. Ohio experienced a slight loss in population at 0.1% during this period.
- 79.5% of the AA population was 18 years of age or older, the legal age to enter into a contract.
- 17.6% of the population in the AA was 65 or older, compared to 16.9% in Ohio.
- MSA population is aging and decreasing resulting in a shrinking working population or lack of labor supply and increasing demand for leisure and healthcare services.
- 27.9% of the AA’s population reside in the AA’s LMI tracts.
- According to Census data, Akron (Summit County) is the most populous city in MSA and the fifth largest in Ohio.<sup>3</sup> In 2023 Akron had a population of 188,701, and its population decreased by 0.9% since 2020. By comparison, the largest city in Portage County is Kent with a population of 27,601 in 2023, and its population decreased by 2.1% since 2020.<sup>4</sup>

<sup>3</sup> [Ohio Demographics – Ohio Cities by Population](#)

<sup>4</sup> [U.S. Census Bureau QuickFacts](#)



**Income Characteristics**

**Borrower Income Levels  
Akron, OH MSA**

FFIEC Estimated Median Family	% Change	Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$82,000	0 - \$40,999	\$41,000 - \$65,599	\$65,600 - \$98,399	\$98,400 - & above
2023	\$95,500 16.5%	0 - \$47,749	\$47,750 - \$76,399	\$76,400 - \$114,599	\$114,600 - & above

- The 2023 median family income (MFI) in the Akron MSA was \$95,500, it increased by 16.5% since 2022.
- MFI in the Akron MSA in 2020 was \$76,842, which represents a 24.3% increase from 2020 to 2023.
- In 2020 Ohio’s MFI was \$74,391, which was nearly 3.3% less than MFI in the Akron MSA. Ohio minimum wage<sup>5</sup> in 2023 was \$10.10 per hour or \$21,008 annually. The Federal minimum wage is \$7.25<sup>6</sup> per hour and has not increased since 2009.

<b>Poverty Rates</b>			
<b>Assessment Area: Akron, OH MSA</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Portage County	9.9%	12.4%	12.4%
Summit County	12.1%	12.5%	12.6%
<b>Ohio</b>	<b>12.6%</b>	<b>13.3%</b>	<b>13.4%</b>
<b>United States</b>	<b>11.9%</b>	<b>12.8%</b>	<b>12.6%</b>
<i>Source: Federal Reserve Economic Data   FRED   St. Louis Fed</i>			

- Poverty rates in Portage County were lower than Ohio and national rates in 2020, 2021 and 2022, while poverty rates in Summit County were lower than poverty rates in Ohio but varied with national rates during the same period.
- Of the 177,102 families in the AA, 38.4% are designated as LMI and 8.6% of families are living below the poverty level, compared to 9.6% of families living below the poverty level in Ohio.

<sup>5</sup> [Ohio Minimum Wage](#)

<sup>6</sup> [Federal Minimum Wage](#)

- Supplemental Nutrition Assistance Program (SNAP)<sup>7</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Assistance	
Assessment Area: Akron, OH MSA	
Area	2021
Portage County	9.0%
Summit County	14.7%
<b>Ohio</b>	<b>12.7%</b>
<i>Source: Federal Reserve Economic Data   FRED   St. Louis Fed</i>	

- While Summit and Portage counties had similar poverty rates in 2021, Summit County had the highest percentage of population receiving SNAP benefits by far.

**Housing Characteristics**

Housing Cost Change						
Assessment Area: Akron, OH MSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2022	Percent Change	2020	2022	Percent Change
Portage County	\$160,300	\$197,100	23.0%	\$870	\$990	13.8%
Summit County	\$151,300	\$182,500	20.6%	\$854	\$956	11.9%
<b>Ohio</b>	<b>\$151,400</b>	<b>\$183,300</b>	<b>21.1%</b>	<b>\$825</b>	<b>\$945</b>	<b>14.5%</b>
<i>Source: 2018-2022 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>						

- Median housing values from 2020 to 2022 in Portage County increased at a greater pace than housing values in Ohio and Summit County.
- While the percentage of rent increases in Portage and Summit counties was less than rent increases in Ohio, the rise in median gross rents indicates the need for more affordable housing in the MSA. According to 2020 Census data, 44.3% of all renters have rental costs that are 30.0% or greater of their income.
- According to HUD's 2023 Fair Market Rent (FMR) data,<sup>8</sup> the average rent for a two-

<sup>7</sup> [FRED – SNAP Benefits Recipients](#)

<sup>8</sup> [HUD's Fair Market Rent \(FMR\) – FY2023](#)

bedroom unit in Akron MSA is \$1,027, up from \$890 in 2022.

- With Ohio’s minimum wage at \$10.10, renters across Ohio can only afford \$525 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom apartment or would have to work 102 hours to afford a modest two-bedroom apartment in this AA.
- According to the National Low Income Housing Coalition,<sup>9</sup> full-time workers must earn at least \$19.09 an hour (\$39,702 annual salary) in Ohio to afford a two-bedroom rental apartment, which is almost double the minimum wage in the state. Rents continue to increase nationwide; currently the national average rent is \$1,486 a month, which requires workers to earn a minimum wage of \$28.58 (\$59,446 annual salary).<sup>10</sup>
- There are 315,600 housing units in the AA, of which 61.8% are owner-occupied, 30.0% are rentals, and 8.3% are vacant. Housing units in the AA primarily consist of single-family (75.3%) and multi-family (22.5%) dwellings.
- The median age of housing stock in the AA is 59 years old, and 25.0% of housing units were built prior to 1950. The age of the housing stock across the AA demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.<sup>11</sup>

Housing Cost Burden						
Assessment Area: Akron, OH MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Portage County	61.6%	31.5%	16.4%	81.6%	36.7%	47.7%
Summit County	62.5%	29.3%	16.8%	73.1%	33.1%	40.9%
<b>Akron, OH MSA</b>	<b>62.3%</b>	<b>29.8%</b>	<b>16.7%</b>	<b>74.9%</b>	<b>33.7%</b>	<b>42.2%</b>
<b>Ohio</b>	<b>59.3%</b>	<b>26.1%</b>	<b>16.4%</b>	<b>71.1%</b>	<b>24.7%</b>	<b>38.9%</b>

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy*

- 62.3% of low-income homeowners and 74.9% of low-income renters in the MSA are cost burdened, compared to 29.8% of moderate-income homeowners and 33.7% of moderate-income renters in the MSA.

<sup>9</sup> [National Low Income Housing Coalition-Ohio](#)

<sup>10</sup> [National Low Income Housing Coalition](#)

<sup>11</sup> [Ohio Department of Health/Know Our Programs/Childhood Lead Poisoning](#)

- Across the MSA, 16.7% of all homeowners compared to 42.2% of all renters are cost burdened.
- This data shows that cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Unemployment Rates					
Assessment Area: Akron, OH MSA					
Area	2019	2020	2021	2022	2023
Portage County	4.3%	7.3%	4.8%	3.8%	3.5%
Summit County	4.3%	8.3%	5.5%	4.1%	3.7%
<b>Akron, OH MSA</b>	<b>4.3%</b>	<b>8.1%</b>	<b>5.3%</b>	<b>4.0%</b>	<b>3.6%</b>
<b>Ohio</b>	<b>4.2%</b>	<b>8.2%</b>	<b>5.1%</b>	<b>4.0%</b>	<b>3.5%</b>

*Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics*

- In 2020 unemployment rates in the MSA and Ohio increased substantially in response to the COVID-19 pandemic and economic downturn. Post-COVID, unemployment rates in the MSA and Ohio decreased and reached historic lows in 2023.
- According to Ohio Office of Research:<sup>12</sup>
  - Portage County
    - Land use is primarily rural with less than 20.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
    - The leading industries are trade, transportation, and utilities; manufacturing; government; leisure and hospitality; and education and health care services.
    - The average private sector weekly wage at \$987 indicates employed persons can afford the median rent of \$990.
    - Major employers include but are not limited to Kent State University, McMaster-Carr Supply Company, Northeast Ohio Medical University, Parker-Hannifin, Portage County government, Ravenna City Schools, and UH Portage Medical Center.
  - Summit County
    - Land use is primarily urban with nearly 58.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.

<sup>12</sup> Ohio County Trends: [County Trends | Development](#)

- The leading industries are trade, transportation, and utilities; education and health care services; professional and business services; leisure and hospitality; and government.
  - The average private sector weekly wage at \$1,126 indicates employed persons can afford the median rent of \$956.
  - Major employers include but are not limited to Akron Children’s Hospital, Akron City Schools, Bridgestone Americas, Goodyear Tire & Rubber Company, Signet Jewelers, Summa Health System, and University of Akron.
- Based on 2020 Census data and BroadbandOhio,<sup>13</sup> while approximately 88.4% of households in Portage County and 90.4% in Summit County have a broadband internet subscription, at least 26.0% of the populated area and 11.0% of households in Portage County and at least 11.0% of the populated area and 5.0% of households in Summit County do not have access to the minimum bandwidth needed for basic internet activity. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>13</sup> [BroadbandOhio – Availability Gaps](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Portage’s overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

### LENDING TEST

Portage’s performance relative to the lending test is rated Satisfactory based on Portage’s loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

#### Net Loan-to-Deposit Ratio (NLTD)

A financial institution’s NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Portage’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). To assess the bank’s performance, we analyzed the NLTD ratio of comparable institutions. The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 6/30/2024 \$(000)	NLTD Ratio (%)
		24 – Quarter Average*
Portage Community Bank	\$510,058	77.0
<b>Similarly Situated Institutions</b>	<b>\$(000)</b>	<b>Custom Peer Ratio</b>
Apple Creek Banking Company	\$254,805	84.4
Hometown Bank	\$254,435	92.8
Middlefield Banking Company	\$1,824,245	93.1
<b>Quarterly LTD Ratio Average Since the Previous Evaluation</b>		<b>90.1</b>
* September 30, 2018 - June 30, 2024		

During this period, Portage’s NLTD ratio averaged 77.0%, compared to peer ratio at 90.1%. In discussions with bank management, they indicated there was an influx of deposits due to government stimulus payments during the economic downturn. More recently overall deposit and loan growth has slowed in this high-interest rate environment but is returning to more

normal levels. Given these factors, Portage’s NLTD ratio is considered reasonable given the bank’s size, financial condition, and AA credit needs.

**Assessment Area Concentration**

During the evaluation period, Portage’s lending was analyzed to determine the volume of lending inside and outside Portage’s AA. A majority of loans and other lending-related activities are in the AA.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Loan Data	121	87.7	\$3,285	86.8	17	12.3	\$499	13.2
<b>Total Consumer related</b>	<b>121</b>	<b>87.7</b>	<b>\$3,285</b>	<b>86.8</b>	<b>17</b>	<b>12.3</b>	<b>\$499</b>	<b>13.2</b>
Home Improvement	4	80	\$215	51.8	1	20	\$200	48.2
Home Purchase - Conventional	306	72.9	\$61,869	72.3	114	27.1	\$23,654	27.7
Home Purchase - FHA	49	64.5	\$7,959	65.3	27	35.5	\$4,231	34.7
Home Purchase - VA	4	57.1	\$916	58.1	3	42.9	\$660	41.9
Multi-Family Housing	8	47.1	\$5,723	48	9	52.9	\$6,211	52
Other Purpose Closed-End	22	84.6	\$2,266	75.2	4	15.4	\$748	24.8
Refinancing	74	84.1	\$13,228	77.7	14	15.9	\$3,793	22.3
<b>Total HMDA related</b>	<b>467</b>	<b>73.1</b>	<b>\$92,176</b>	<b>70</b>	<b>172</b>	<b>26.9</b>	<b>\$39,497</b>	<b>30</b>
Home Equity	298	85.4	\$31,635	81.1	51	14.6	\$7,355	18.9
<b>Total Non-HMDA</b>	<b>298</b>	<b>85.4</b>	<b>\$31,635</b>	<b>81.1</b>	<b>51</b>	<b>14.6</b>	<b>\$7,355</b>	<b>18.9</b>
Small Business	220	82.1	\$43,718	81.7	48	17.9	\$9,784	18.3
<b>Total Small Bus. related</b>	<b>220</b>	<b>82.1</b>	<b>\$43,718</b>	<b>81.7</b>	<b>48</b>	<b>17.9</b>	<b>\$9,784</b>	<b>18.3</b>
<b>TOTAL LOANS</b>	<b>1,106</b>	<b>79.3</b>	<b>\$170,814</b>	<b>74.9</b>	<b>288</b>	<b>20.7</b>	<b>\$57,135</b>	<b>25.1</b>

Of the bank’s total lending from January 1, 2022, to December 31, 2023, 79.3% by volume and 74.9% by dollar amount were made inside the AA.

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

The borrower distribution to borrowers of different income levels and businesses of different sizes is reasonable. The borrower distribution of consumer lending is excellent and reasonable to HMDA and small business lending and home equity lines of credit.

### *HMDA Lending*

HMDA loans are comprised of home purchase, refinance, other purpose closed-end, multi-family, and home improvement loans, respectively. See Appendix C for explicit HMDA lending data.

Portage's performance was compared to the percentage of families by family income (proxy) and aggregate lending performance. During the evaluation period, Portage originated 467 HMDA loans totaling \$92.2 million, of which 38 (8.1%) HMDA loans were made to borrowers with unknown-income designations. The bank made 9.4% of loans to borrowers with unknown incomes, compared to the aggregate of all lenders at 13.5% in 2022. The bank made 6.3% of loans to borrowers with unknown-incomes, compared to the aggregate of all lenders at 14.2% in 2023.

Portage originated 53 (11.3%) HMDA loans to low-income borrowers, which was below proxy at 20.7%. The bank's performance at 10.5% exceeded aggregate lending performance at 9.6% in 2022 and at 12.6% fell slightly below aggregate lending performance at 13.1% in 2023. Portage originated 104 (22.3%) HMDA loans to moderate-income borrowers, which exceeded proxy at 17.7%. The bank's performance at 25.3% exceeded aggregate lending performance at 21.3% in 2022 and at 17.9% fell below aggregate lending performance at 23.4% in 2023. Considering these factors along with the high percentage of LMI cost-burdened renters, Portage's borrower distribution of HMDA lending to LMI borrowers is reasonable.

### *Small Business Lending*

Portage's performance was compared to the percentage of small businesses (proxy). During the evaluation period, Portage originated 220 loans to businesses of different sizes totaling \$43.7 million.



**Small Business Loans by Business Revenue & Loan Size**  
**Assessment Area: Akron, OH MSA**

		Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	136	61.8%	24,545	56.1%	90.4%
	Over \$1 Million	84	38.2%	19,173	43.9%	8.6%
	<i>Total Rev. available</i>	220	100.0%	43,718	100.0%	99.1%
	Rev. Not Known	0	0.0%	0	0.0%	0.9%
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	<i>100%</i>
Loan Size	\$100,000 or Less	86	39.1%	5,221	11.9%	
	\$100,001 - \$250,000	77	35.0%	12,353	28.3%	
	\$250,001 - \$1 Million	57	25.9%	26,144	59.8%	
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	60	44.1%	3,593	14.6%	
	\$100,001 - \$250,000	44	32.4%	6,579	26.8%	
	\$250,001 - \$1 Million	32	23.5%	14,373	58.6%	
	<i>Total</i>	<i>136</i>	<i>100%</i>	<i>24,545</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information  
Percentages may not total 100 percent due to rounding

Portage originated 136 (61.8%) loans totaling \$24.6 million to businesses with revenues of \$1.0 million or less, which was below the percentage of small businesses at 90.4%. However, Portage originated 163 (74.1%) small dollar loans in amounts of \$250,000 or less. Portage’s willingness to lend in smaller amounts exhibits an adequate responsiveness to credit needs of small businesses in the AA. The community contact indicated a need for small businesses to have access to affordable credit. Considering these factors, the distribution among businesses of different sizes is reasonable.

*Home Equity Lending*

Portage’s performance was compared to the percentage of families (proxy) by family income. During the evaluation period, Portage originated 298 home equity lines of credit totaling \$31.6 million.

**Borrower Distribution of Home Equity Lines of Credit**

**Assessment Area: Akron, OH MSA**

Household Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	33	11.1%	2,093	6.6%	20.7%
Moderate	66	22.1%	5,896	18.6%	17.7%
Middle	76	25.5%	7,108	22.5%	21.3%
Upper	123	41.3%	16,539	52.3%	40.3%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>298</b>	<b>100.0%</b>	<b>31,635</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated 33 (11.1%) home equity lines of credit to low-income borrowers, which was below proxy at 20.7%. Portage originated 66 (22.1%) home equity lines of credit to moderate-income borrowers, which exceeded proxy at 17.1%. Portage’s borrower distribution of home equity lines of credit to low-income borrowers is reasonable and excellent to moderate-income borrowers.

*Consumer Lending*

Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans. Portage’s performance was compared to the percentage of households by household income (proxy). During the evaluation period Portage originated 121 consumer loans totaling \$3.3 million, of which one (0.8%) consumer loan was made to borrowers with unknown-income designations.

### Borrower Distribution of Consumer Loans

Assessment Area: Akron, OH MSA

Household Income Levels	Bank Lending & Demographic Data				
	2022, 2023				Households by Household Income %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	30	24.8%	557	17.0%	24.5%
Moderate	35	28.9%	579	17.6%	16.1%
Middle	34	28.1%	883	26.9%	17.6%
Upper	21	17.4%	1,239	37.7%	41.8%
Unknown	1	0.8%	26	0.8%	0.0%
<i>Total</i>	<i>121</i>	<i>100.0%</i>	<i>3,285</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated 30 (24.8%) consumer loans to low-income borrowers, which was comparable to proxy at 24.5%. Portage originated 35 (28.9%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 16.1%. The community contact indicated a need for small dollar loans to pay for unexpected expenses, particularly for LMI individuals. Portage’s borrower distribution of consumer lending to LMI borrowers is excellent.

### Geographic Distribution of Loans

Portage’s geographic distribution of loans reflects a reasonable dispersion throughout the AA with a significant level of lending gaps. The geographic distribution of HMDA, small business, and consumer lending, and home equity lines of credit is reasonable.

**Lending Penetration**

	Akron, OH MSA - 2022				Akron, OH MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	22	15	7	31.8%	22	18	4	18.2%
Moderate	39	14	25	64.1%	39	20	19	48.7%
Middle	66	13	53	80.3%	66	17	49	74.2%
Upper	45	13	32	71.1%	45	17	28	62.2%
Unknown	4	4	0	0.0%	4	4	0	0.0%
<b>Total</b>	<b>176</b>	<b>59</b>	<b>117</b>	<b>66.5%</b>	<b>176</b>	<b>76</b>	<b>100</b>	<b>56.8%</b>

Portage penetrated 61.6% of the AA’s total tracts during the evaluation period, which is a significant level of lending gaps. Portage penetrated 25.0% of the low-income tracts, which is a substantial level of lending gaps and 56.4% of the moderate-income tracts, which is a significant level of lending gaps. However, the Akron market is competitive, and Portage only has a 2.4% deposit market share and four branches. It would be difficult to expect them to serve the entire MSA. Other factors impacting Portage’s ability to originate loans, especially in LMI tracts, includes the high-interest rate environment, rising home prices, the high number of rental/vacant housing units, and high poverty rates in LMI areas.

***HMDA Lending***

Portage’s performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending performance. During the evaluation period, Portage originated 467 HMDA loans totaling \$92.2 million. See Appendix C for explicit HMDA lending data.

Portage originated 11 (2.4%) HMDA loans in low-income tracts, which fell significantly below proxy at 5.1%. The bank’s performance at 2.2% fell significantly below aggregate lending performance at 4.7% in 2022, and at 2.6% fell significantly below aggregate lending performance at 5.7% in 2023. Portage originated 103 (22.1%) HMDA loans in moderate-income tracts, which exceeded proxy at 17.4%. The bank’s performance at 21.3% exceeded aggregate lending performance at 16.7% in 2022, and at 23.2% exceeded aggregate lending performance at 19.7% in 2023.

Considering the limited opportunities to originate mortgage loans in LMI tracts, particularly in low-income tracts that have a limited supply of housing units and high number of rental and vacant units, and high poverty rates; geographic distribution of HMDA lending in low-income tracts is reasonable and excellent in moderate-income tracts.

*Small Business Lending*

Portage’s performance was compared to the percentage of businesses by tract income (proxy). During the evaluation period, Portage originated 220 small business loans totaling \$43.7 million.

**Geographic Distribution of Small Business Loans**

Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022, 2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	4	1.8%	1,305	3.0%	7.4%
	Moderate	41	18.6%	8,410	19.2%	15.0%
	Middle	129	58.6%	25,540	58.4%	37.6%
	Upper	46	20.9%	8,462	19.4%	37.3%
	Unknown	0	0.0%	0	0.0%	2.7%
	<i>Total</i>	<i>220</i>	<i>100%</i>	<i>43,718</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data; 2023 D&B information

Percentages may not total 100 percent due to rounding

Portage originated four (1.8%) small business loans in low-incomes tracts, which fell significantly below proxy at 7.4%. Portage originated 41 (18.6%) small business loans in moderate-income tracts, which exceeded proxy at 15.0%. The geographic distribution of small business lending is poor in low-income tracts and excellent in moderate-income tracts.

*Home Equity Lending*

Portage’s performance was compared to the percentage of owner-occupied units (proxy). During the evaluation period Portage originated 298 home equity lines of credit totaling \$31.6 million.

**Geographic Distribution of Home Equity Lines of Credit**

Assessment Area: Akron, OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Families
	#	%	\$ (000s)	\$ %	%
Low	2	0.7%	68	0.2%	7.9%
Moderate	54	18.1%	4,611	14.6%	19.3%
Middle	183	61.4%	19,312	61.0%	40.1%
Upper	59	19.8%	7,644	24.2%	32.3%
Unknown	0	0.0%	0	0.0%	0.4%
<i>Total</i>	<i>298</i>	<i>100%</i>	<i>31,635</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Percentages may not total 100 percent due to rounding

Portage originated two (0.7%) home equity lines of credit in low-income tracts, which was significantly below proxy at 5.1%. Portage originated 54 (18.1%) home equity lines of credit in moderate-income tracts, which exceeded proxy at 17.4%. The geographic distribution of home equity lines of credit in low-income tracts is poor and excellent in moderate-income tracts.

*Consumer Lending*

Portage’s performance was compared to the percentage of households (proxy). During the evaluation period, Portage originated 121 consumer loans totaling \$3.3 million.

**Geographic Distribution of Consumer Loans**  
Assessment Area: Akron, OH MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2022, 2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	2	1.7%	55	1.7%	8.7%
Moderate	27	22.3%	680	20.7%	21.4%
Middle	76	62.8%	1,949	59.3%	40.1%
Upper	16	13.2%	600	18.3%	28.6%
Unknown	0	0.0%	0	0.0%	1.2%
<i>Total</i>	<i>121</i>	<i>100%</i>	<i>3,285</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data  
Percentages may not total 100 percent due to rounding

Portage originated two (1.7%) consumer loans in low-income tracts, which was significantly below proxy at 8.7%. Portage originated 27 (22.3%) consumer loans in moderate-income tracts, which exceeded proxy at 21.4%. The geographic distribution of consumer lending in low-income tracts is poor and excellent in moderate-income tracts.

**Response to Complaints**

Neither Portage nor this Reserve Bank has received any CRA-related complaints since the previous examination.

**Community Development Test**

Portage’s performance under the community development test is considered Outstanding.

Portage facilitated 525 PPP loans totaling \$41.0 million through the U.S. government’s Paycheck Protection Program (PPP) between April 3, 2020, through May 4, 2021, to help small businesses impacted by the COVID-19 emergency. Of these loans, 470 (89.5%) loans totaling \$37.3 million were originated within the bank’s AA, and 145 (30.9%) totaling \$11.4 million were made in LMI tracts. Consistent with information provided in the May 27, 2020, joint statement on CRA

Consideration for Activities in Response to Coronavirus FAQs.<sup>14</sup> Portage originated 145 PPP loans (30.9%) totaling \$11.4 million in LMI tracts; these loans are being considered in the community development test. PPP loans were originated outside of the evaluation period for the retail lending test.

Portage’s community development performance demonstrates an excellent responsiveness to the credit and community development needs of its AA through community development loans, qualified investments and donations, and community development services, considering Portage’s capacity and the need and availability of such opportunities in the AA. Community development activities also represent a significant increase by dollar amount since the previous evaluation. Community development loans supported businesses during the height of the COVID-19 emergency, as well as economic development, services to LMI individuals and families, and to a lesser extent affordable housing. Portage was able to obtain a new qualified investment that supported renovations to a university serving a moderate-income community and increase its levels of small dollar donations and community development services since the previous evaluation. The community contact stressed the need to reduce food insecurity, chronic health issues, and homelessness and increase access to financial literacy education and help LMI individuals and small businesses have easier access to the credit they need. Portage’s community development activities supported these expressed needs.

***Community Development Loans***

Portage originated 180 community development loans totaling approximately \$48.0 million during the evaluation period. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization / Stabilization	150	\$14,205,978
Economic Development	19	\$28,110,000
Services to LMI	10	\$5,258,132
Affordable Housing	1	\$375,000
<b>Total</b>	<b>180</b>	<b>\$47,949,110</b>
<i>Totals include loans that benefit broader regional area</i>		

<sup>14</sup> [May 27 2020 - Frequently Asked Questions \(FAQs\) for Consideration for Activities in Response to the Coronavirus](#)



### **Revitalization / Stabilization**

- 145 PPP loans totaling \$11.3 million were originated in LMI geographies in the AA. These loans are considered responsive to credit needs of small businesses and helped to stabilize these communities during the height of the COVID-19 emergency.
- Five loans totaling \$2.8 million provided financing to five small businesses in moderate-income geographies. These loans helped to create and retain job opportunities for residents in the construction, fast food, and service sectors. For instance, one loan provided funding to a Community Development Corporation (CDC) to renovate a community test kitchen and retain two staff to help residents learn to cook healthy meals on a budget.

### **Economic Development**

- 11 SBA 504 loans totaling \$24.4 million were originated to two businesses. SBA 504 loans support small business growth and job creation and automatically qualify for CRA credit.
- Four loans totaling \$1.9 million provided working capital to a small business to expand its operations. These loans helped create and/or retain 17 full-time jobs and one part-time job.
- Two loans totaling \$995,000 to a small business to construct a building and renovate an existing building to provide space to expand operations. These loans helped create five permanent jobs and retain 10 permanent jobs.
- Two loans totaling \$900,000 to a small business to renovate a historic church building into a brewery. This loan helped create at least 10 permanent jobs.

### **Services to LMI**

- Three loans totaling \$2.0 million provided working capital to a county agency to continue providing behavioral health services, including substance abuse prevention and treatment to LMI residents in a moderate-income community.
- One loan totaling \$760,000 provided funding to renovate a county office building to continue and expand its public health and referral services to LMI families in a moderate-income community.
- Two loans totaling \$590,620 provided working capital to a daycare center, primarily serving LMI families in a moderate-income community, to continue its operations. These loans are considered responsive since a lack of affordable, quality childcare can impact the workforce, particularly LMI workers.
- Two loans totaling \$505,511 provided funding to a nonprofit to purchase additional handicap accessible vehicles and hire at least two additional drivers to expand its non-

emergency transportation services, primarily to LMI individuals in a moderate-income community.

- One loan totaling \$112,000 provided funding to a nonprofit to purchase a building in a moderate-income tract to continue and expand its backpack food programs that offer LMI families free groceries for weekends and school breaks.

### **Affordable Housing**

- One loan totaling \$375,000 to purchase a multi-family building. This loan supported 11 units of unsubsidized affordable housing in a moderate-income neighborhood.

Because Portage has been responsive to community development needs and opportunities, consideration was given to a community development loan totaling approximately \$1.3 million that benefited broader regional area (Cuyahoga County). This loan provided funding to a daycare center, primarily serving LMI families in a moderate-income community, to continue its operations.

### ***Community Development Investments***

Portage has \$708,977 in community development investments and donations.

Portage obtained a new revenue bond worth approximately \$420,000. This bond helps finance the building and renovation of various Kent State University facilities, including but not limited to housing and dining, medical and health, and research facilities. Several of these facilities are located in a moderate-income area. Portage also holds a prior period municipal bond with a current book value of approximately \$258,302. This bond helps finance the building of a community center in a moderate-income area. These bonds help to revitalize and stabilize moderate-income communities.

Qualified investments also took the form of donations totaling \$30,675. Portage partnered with 45 organizations and nonprofits to fund initiatives aimed at responding to community needs.

The following table reflects the total number community development small dollar donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	\$
Services to LMI	82	\$29,525
Affordable Housing	7	\$1,150
<b>Total</b>	<b>89</b>	<b>\$30,675</b>

Impactful donations include but are not limited to:

- \$3,000 (three donations) to a nonprofit that provides mental health and substance abuse services, and temporary housing during rehabilitation to individuals regardless of their ability to pay.
- \$2,675 (four donations) to sponsor financial literacy materials, primarily for LMI schools.
- \$2,000 (one donation) to a nonprofit providing mammogram screenings at no cost to uninsured or underinsured LMI women.
- \$1,910 (five donations) to three community food pantries providing free food to LMI people in need.
- \$1,900 (one donation) supporting a student leadership conference benefiting multiple LMI schools.
- \$1,150 (seven donations) to a large nonprofit affordable housing organization.

**Community Development Services**

The following table provides a breakdown of qualified community development services by community development purpose. Employees were involved with organizations and activities that promote or facilitate, economic development, revitalization / stabilization, and to a lesser extent, community services targeted to LMI individuals.

Purpose of CD Service	# Services	# Organizations	# Employees*
Services to LMI	10	7	10
Economic Development	7	5	6
Revitalization / Stabilization	5	3	5
<b>Total</b>	<b>22</b>	<b>15</b>	<b>21</b>
*May be double-counted if employee provides multiple services Totals include loans that benefit broader regional area			

Portage’s directors, officers, and staff members provided their financial expertise to the community primarily serving on boards and committees, followed by conducting financial literacy training and providing technical assistance in the AA.

Community development services include but are not limited to the following:

- Two employees provided financial literacy training to students in an LMI school.
- One employee provided financial literacy training in partnership with three nonprofits, consisting of workshops for first-time home ownership and individual sessions covering budgeting, credit scores, loan programs, and how to apply for grants. These sessions were targeted to LMI first-time homebuyers and/or LMI individuals.
- An employee provided technical expertise to an organization explaining various program eligibility requirements for small business owners seeking community-based lending initiatives.
- Six employees served on boards/committees of six organizations/nonprofits and assisted with fundraising.

Because Portage has been responsive to community development needs and opportunities, consideration was given to a community development service that benefited the broader regional area (Stark County). An employee participated in a Junior Achievement financial literacy event attended by majority LMI students on led interactive sessions on aspects of personal finance, entrepreneurship, and workforce readiness.

*Financial Education* – Portage partners with Cemark and Junior Achievement and also offers proprietary curriculum:

- Cemark, Inc.<sup>15</sup>
  - How To Do Your Banking
    - A seven-lesson course in banking skills taught by school faculty as a supplement to their regular teaching curriculum. Instructional materials (with Portage’s logo) help students learn the basics of money management.
  - Saving with Mandy and Randy
    - Curriculum supplement in the form of a coloring book – addresses students’ competency in mathematics, economics, civics, and language arts.
    - Portage purchases the workbooks and donates them to schools in its footprint.
- Junior Achievement<sup>16</sup>
  - Curriculum equips high school students with foundational personal finance skills. Volunteers engage with students through a variety of activities that may include guest speaking, coaching, or advising for case study and project coursework.

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<sup>15</sup> [Cemark, Inc. - Banks](#)

<sup>16</sup> [Junior Achievement Financial Literacy](#)

- Proprietary curriculum
  - Portage offers various courses designed to help students and/or adults learn about first-time home buying, credit building, budgeting, digital/mobile banking, and fraud awareness and cyber security programs (targeted toward seniors).

While Portage did not conduct in-person events due to the transition to virtual learning as well as social distancing guidelines that were in place during the COVID-19 emergency, Portage provided access to practical financial management resources on their website and partnered with Portage County to help deliver virtual financial literacy events. Post-COVID, Portage has returned to offering and attending in-person financial literacy events.

In 2020 Portage became an approved partner with the Bank On Rubber City initiative<sup>17</sup> and offers accounts that meet specific standards of safety and affordability, including a low opening deposit, free debit card, and no overdraft or other hidden fees. Portage's Neighbors United Checking Account is certified to meet the Bank On account standards.

*Board and Committee Memberships* – Officers, managers, and staff provide financial expertise through their involvement with community development organizations throughout the AA by serving as executive directors, presidents, board members, loan committee members, or treasurers.

*Technical Assistance* – Employees provide technical assistance to community development organizations, typically in the form of program eligibility assistance and fundraising.

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

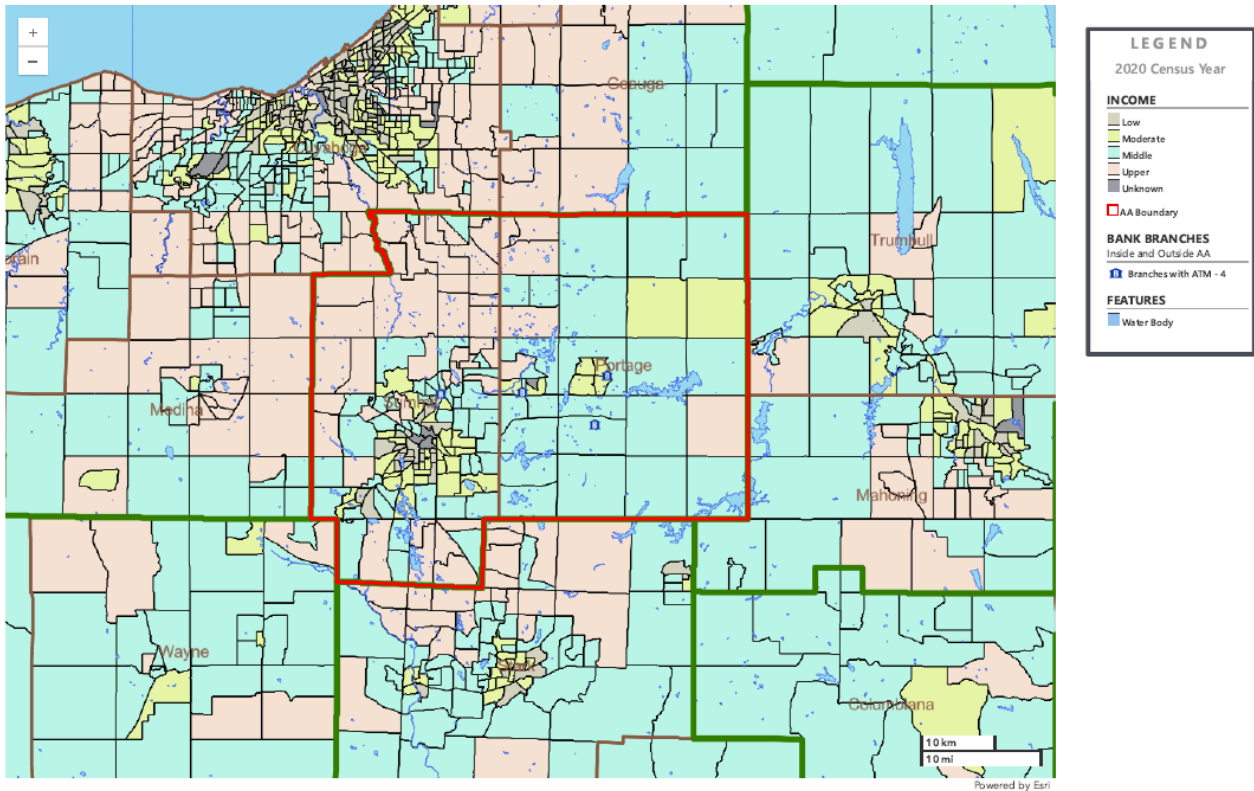
An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

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<sup>17</sup> Bank On Rubber City is a coalition led by United Way of Summit & Medina counties and the city of Akron and is committed to helping residents, particularly LMI unbanked and underbanked residents, access safe and affordable banking products and services to help build financial sufficiency and stability.

### Appendix A – Assessment Area Map

Akron, OH MSA 2022-2023



Appendix B – Demographic Tables

Combined Demographics Report

Assessment Area: Akron, OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	22	12.5%	13,911	7.9%	4,054	29.1%	36,691	20.7%	
Moderate-income	39	22.2%	34,182	19.3%	5,254	15.4%	31,302	17.7%	
Middle-income	66	37.5%	71,057	40.1%	3,814	5.4%	37,656	21.3%	
Upper-income	45	25.6%	57,232	32.3%	1,760	3.1%	71,453	40.3%	
Unknown-income	4	2.3%	720	0.4%	358	49.7%	0	0.0%	
<b>Total Assessment</b>	<b>176</b>	<b>100.0%</b>	<b>177,102</b>	<b>100.0%</b>	<b>15,240</b>	<b>8.6%</b>	<b>177,102</b>	<b>100.0%</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	29,377	10,010	5.1%	34.1%	15,245	51.9%	4,122	14.0%	
Moderate-income	69,330	33,850	17.4%	48.8%	28,106	40.5%	7,374	10.6%	
Middle-income	125,581	83,508	42.8%	66.5%	32,551	25.9%	9,522	7.6%	
Upper-income	86,783	67,240	34.5%	77.5%	15,541	17.9%	4,002	4.6%	
Unknown-income	4,529	288	0.1%	6.4%	3,167	69.9%	1,074	23.7%	
<b>Total Assessment</b>	<b>315,600</b>	<b>194,896</b>	<b>100.0%</b>	<b>61.8%</b>	<b>94,610</b>	<b>30.0%</b>	<b>26,094</b>	<b>8.3%</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2,460	7.4%	2,190	7.3%	249	8.7%	21	6.8%	
Moderate-income	4,967	15.0%	4,512	15.1%	420	14.7%	35	11.3%	
Middle-income	12,434	37.6%	11,375	38.0%	940	32.9%	119	38.3%	
Upper-income	12,333	37.3%	11,088	37.1%	1,122	39.2%	123	39.5%	
Unknown-income	895	2.7%	753	2.5%	129	4.5%	13	4.2%	
<b>Total Assessment</b>	<b>33,089</b>	<b>100.0%</b>	<b>29,918</b>	<b>100.0%</b>	<b>2,860</b>	<b>100.0%</b>	<b>311</b>	<b>100.0%</b>	
		Percentage of Total Businesses:		90.4%		8.6%		0.9%	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	8	2.3%	7	2.0%	1	25.0%	0	0.0%	
Moderate-income	30	8.6%	30	8.7%	0	0.0%	0	0.0%	
Middle-income	193	55.5%	191	55.5%	2	50.0%	0	0.0%	
Upper-income	117	33.6%	116	33.7%	1	25.0%	0	0.0%	
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<b>Total Assessment</b>	<b>348</b>	<b>100.0%</b>	<b>344</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	
		Percentage of Total Farms:		98.9%		1.1%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

Appendix C – HMDA Lending Tables

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Akron, OHMSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022					2023							
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar		Dollar			
		#	%	\$(000s)	\$%		#	%	Agg %	\$(000s)	\$%	\$%	#	%	Agg %		Bank	Agg	
HOME PURCHASE	Low	44	12.3%	4,846	6.9%	20.7%	25	12.2%	9.8%	2,820	7.5%	4.9%	19	12.3%	12.2%	2,026	6.1%	6.4%	0.0%
	Moderate	87	24.2%	12,897	18.2%	17.7%	55	26.8%	21.9%	7,847	20.9%	15.7%	32	20.8%	24.6%	5,050	15.3%	18.7%	0.0%
	Middle	82	22.8%	15,036	21.3%	21.3%	46	22.4%	19.6%	8,052	21.4%	18.5%	36	23.4%	19.9%	6,984	21.1%	19.7%	0.0%
	Upper	121	33.7%	34,598	48.9%	40.3%	62	30.2%	30.4%	17,119	45.5%	44.7%	59	38.3%	24.8%	17,479	52.8%	36.8%	0.0%
	Unknown	25	7.0%	3,367	4.8%	0.0%	17	8.3%	18.4%	1,796	4.8%	16.2%	8	5.2%	18.5%	1,571	4.7%	18.5%	0.0%
	<i>Total</i>	<i>359</i>	<i>100%</i>	<i>70,744</i>	<i>100%</i>	<i>100.0%</i>	<i>205</i>	<i>100%</i>	<i>100%</i>	<i>37,634</i>	<i>100%</i>	<i>100%</i>	<i>154</i>	<i>100%</i>	<i>100%</i>	<i>33,110</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
REFINANCE	Low	4	5.4%	377	2.9%	20.7%	2	4.1%	10.6%	248	3.1%	5.7%	2	8.0%	16.6%	129	2.5%	10.1%	0.0%
	Moderate	14	18.9%	2,013	15.2%	17.7%	13	26.5%	22.8%	1,850	23.2%	16.8%	1	4.0%	22.9%	163	3.1%	18.8%	0.0%
	Middle	17	23.0%	2,203	16.7%	21.3%	10	20.4%	25.2%	1,251	15.7%	23.6%	7	28.0%	22.9%	952	18.2%	23.0%	0.0%
	Upper	35	47.3%	8,137	61.5%	40.3%	22	44.9%	33.5%	4,351	54.5%	44.4%	13	52.0%	28.5%	3,786	72.3%	37.6%	0.0%
	Unknown	4	5.4%	498	3.8%	0.0%	2	4.1%	7.9%	290	3.6%	9.5%	2	8.0%	9.1%	208	4.0%	10.6%	0.0%
	<i>Total</i>	<i>74</i>	<i>100%</i>	<i>13,228</i>	<i>100%</i>	<i>100.0%</i>	<i>49</i>	<i>100%</i>	<i>100%</i>	<i>7,990</i>	<i>100%</i>	<i>100%</i>	<i>25</i>	<i>100%</i>	<i>100%</i>	<i>5,238</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	7.2%	0	0.0%	4.6%	0	0.0%	11.2%	0	0.0%	6.2%	0.0%
	Moderate	2	50.0%	66	30.7%	17.7%	1	50.0%	19.1%	18	15.0%	14.2%	1	50.0%	21.6%	48	50.5%	16.4%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	25.6%	0	0.0%	22.6%	0	0.0%	25.9%	0	0.0%	23.1%	0.0%
	Upper	1	25.0%	47	21.9%	40.3%	0	0.0%	45.8%	0	0.0%	55.7%	1	50.0%	38.0%	47	49.5%	50.8%	0.0%
	Unknown	1	25.0%	102	47.4%	0.0%	1	50.0%	2.3%	102	85.0%	2.8%	0	0.0%	3.2%	0	0.0%	3.6%	0.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>215</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>120</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>95</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.6%	0	0.0%	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	0.8%	0	0.0%	0.1%	0	0.0%	1.6%	0	0.0%	0.1%	0.0%
	Unknown	8	100.0%	5,723	100.0%	0.0%	6	100.0%	99.2%	4,965	100.0%	99.9%	2	100.0%	96.8%	758	100.0%	99.9%	0.0%
	<i>Total</i>	<i>8</i>	<i>100%</i>	<i>5,723</i>	<i>100%</i>	<i>100.0%</i>	<i>6</i>	<i>100%</i>	<i>100%</i>	<i>4,965</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>758</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	8.7%	0	0.0%	5.7%	0	0.0%	14.3%	0	0.0%	8.2%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	17.6%	0	0.0%	12.4%	0	0.0%	21.5%	0	0.0%	16.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	23.7%	0	0.0%	19.5%	0	0.0%	24.9%	0	0.0%	23.1%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	47.4%	0	0.0%	59.7%	0	0.0%	36.2%	0	0.0%	49.4%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	2.7%	0	0.0%	3.1%	0	0.0%	3.3%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data



Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023				Families by Family Income %	2022					2023							
		Bank		Dollar			Count		Dollar			Count		Dollar		Dollar			
		#	%	\$(000s)	\$%		#	%	Agg %	\$(000s)	\$%	\$%	#	%	Agg %	\$(000s)	\$%	Agg %	Dollar %
OTHER PURPOSE CLOSED/EXEMPT	Low	5	22.7%	248	10.9%	20.7%	2	13.3%	11.9%	138	7.6%	7.8%	3	42.9%	14.7%	110	23.8%	10.0%	0.0%
	Moderate	1	4.5%	72	3.2%	17.7%	1	6.7%	19.2%	72	4.0%	14.8%	0	0.0%	22.9%	0	0.0%	18.9%	0.0%
	Middle	7	31.8%	796	35.1%	21.3%	6	40.0%	25.7%	700	38.8%	20.9%	1	14.3%	24.3%	96	20.8%	23.8%	0.0%
	Upper	9	40.9%	1,150	50.8%	40.3%	6	40.0%	34.4%	894	49.6%	46.5%	3	42.9%	32.3%	256	55.4%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	8.7%	0	0.0%	9.9%	0	0.0%	5.8%	0	0.0%	5.1%	0.0%
	<i>Total</i>	<i>22</i>	<i>100%</i>	<i>2,266</i>	<i>100%</i>	<i>100.0%</i>	<i>15</i>	<i>100%</i>	<i>100%</i>	<i>1,804</i>	<i>100%</i>	<i>100%</i>	<i>7</i>	<i>100%</i>	<i>100%</i>	<i>462</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.7%	0	0.0%	0.6%	0	0.0%	0.3%	0	0.0%	1.0%	0	0.0%	0.5%	0.0%
	Moderate	0	0.0%	0	0.0%	17.7%	0	0.0%	2.4%	0	0.0%	1.2%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.3%	0	0.0%	1.2%	0	0.0%	1.5%	0	0.0%	1.0%	0	0.0%	0.7%	0.0%
	Upper	0	0.0%	0	0.0%	40.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	95.9%	0	0.0%	96.9%	0	0.0%	98.0%	0	0.0%	98.7%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0.0%</i>
HMDA TOTALS	Low	53	11.3%	5,471	5.9%	20.7%	29	10.5%	9.6%	3,206	6.1%	4.6%	24	12.6%	13.1%	2,265	5.7%	6.3%	0.0%
	Moderate	104	22.3%	15,048	16.3%	17.7%	70	25.3%	21.3%	9,787	18.6%	13.9%	34	17.9%	23.4%	5,261	13.3%	16.5%	0.0%
	Middle	106	22.7%	18,035	19.6%	21.3%	62	22.4%	22.0%	10,003	19.0%	17.8%	44	23.2%	21.5%	8,032	20.3%	18.4%	0.0%
	Upper	166	35.5%	43,932	47.7%	40.3%	90	32.5%	33.7%	22,364	42.6%	40.3%	76	40.0%	27.8%	21,568	54.4%	34.0%	0.0%
	Unknown	38	8.1%	9,690	10.5%	0.0%	26	9.4%	13.5%	7,153	13.6%	23.4%	12	6.3%	14.2%	2,537	6.4%	24.8%	0.0%
	<i>Total</i>	<i>467</i>	<i>100%</i>	<i>92,176</i>	<i>100%</i>	<i>100.0%</i>	<i>277</i>	<i>100%</i>	<i>100%</i>	<i>52,513</i>	<i>100%</i>	<i>100%</i>	<i>190</i>	<i>100%</i>	<i>100%</i>	<i>39,663</i>	<i>100%</i>	<i>100%</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022					2023							
		Bank				Owner Occupied Units %	Count			Dollar			Count		Dollar			Dollar	
		Count	%	Dollar	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Agg	Agg			
#	%	\$	%	#	%	\$	%	\$	%	#	%	\$	%	\$	%	\$	%		
HOME PURCHASE	Low	9	2.5%	1,045	1.5%	5.1%	6	2.9%	6.3%	547	1.5%	3.0%	3	1.9%	7.1%	498	1.5%	3.6%	0.0%
	Moderate	85	23.7%	11,010	15.6%	17.4%	47	22.9%	20.2%	5,817	15.5%	12.8%	38	24.7%	23.1%	5,193	15.7%	15.0%	0.0%
	Middle	203	56.5%	42,459	60.0%	42.8%	116	56.6%	41.2%	23,155	61.5%	38.3%	87	56.5%	39.8%	19,304	58.3%	39.0%	0.0%
	Upper	62	17.3%	16,230	22.9%	34.5%	36	17.6%	31.9%	8,115	21.6%	45.8%	26	16.9%	29.7%	8,115	24.5%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.4%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.1%	0.0%
	<b>Total</b>	<b>359</b>	<b>100%</b>	<b>70,744</b>	<b>100%</b>	<b>100.0%</b>	<b>205</b>	<b>100%</b>	<b>100%</b>	<b>37,634</b>	<b>100%</b>	<b>100%</b>	<b>154</b>	<b>100%</b>	<b>100%</b>	<b>33,180</b>	<b>100%</b>	<b>100%</b>	<b>0.0%</b>
REFINANCE	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	3.0%	0	0.0%	1.6%	0	0.0%	4.1%	0	0.0%	2.5%	0.0%
	Moderate	13	17.6%	1,505	11.4%	17.4%	9	18.4%	13.9%	1,091	13.7%	9.4%	4	16.0%	15.8%	414	7.9%	11.6%	0.0%
	Middle	39	52.7%	6,482	49.0%	42.8%	29	59.2%	43.9%	4,627	57.9%	38.9%	10	40.0%	42.5%	1,855	35.4%	39.4%	0.0%
	Upper	22	29.7%	5,241	39.6%	34.5%	11	22.4%	39.1%	2,272	28.4%	50.0%	11	44.0%	37.3%	2,969	56.7%	46.4%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.1%	0.0%
	<b>Total</b>	<b>74</b>	<b>100%</b>	<b>13,228</b>	<b>100%</b>	<b>100.0%</b>	<b>49</b>	<b>100%</b>	<b>100%</b>	<b>7,990</b>	<b>100%</b>	<b>100%</b>	<b>25</b>	<b>100%</b>	<b>100%</b>	<b>5,238</b>	<b>100%</b>	<b>100%</b>	<b>0.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	2.4%	0	0.0%	1.0%	0	0.0%	3.0%	0	0.0%	1.7%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	10.0%	0	0.0%	6.4%	0	0.0%	14.0%	0	0.0%	8.8%	0.0%
	Middle	3	75.0%	113	52.6%	42.8%	1	50.0%	40.1%	18	15.0%	34.6%	2	100.0%	42.3%	95	100.0%	38.5%	0.0%
	Upper	1	25.0%	102	47.4%	34.5%	1	50.0%	47.5%	102	85.0%	58.0%	0	0.0%	40.6%	0	0.0%	51.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>Total</b>	<b>4</b>	<b>100%</b>	<b>215</b>	<b>100%</b>	<b>100.0%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>120</b>	<b>100%</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>95</b>	<b>100%</b>	<b>100%</b>	<b>0.0%</b>
MULTI FAMILY	Low	1	12.5%	210	3.7%	9.5%	0	0.0%	16.1%	0	0.0%	3.7%	1	50.0%	22.2%	210	27.7%	7.3%	0.0%
	Moderate	2	25.0%	678	11.8%	25.2%	1	16.7%	31.4%	130	2.6%	33.5%	1	50.0%	27.0%	548	72.3%	3.3%	0.0%
	Middle	5	62.5%	4,835	84.5%	36.7%	5	83.3%	30.5%	4,835	97.4%	30.0%	0	0.0%	31.7%	0	0.0%	23.7%	0.0%
	Upper	0	0.0%	0	0.0%	22.0%	0	0.0%	16.1%	0	0.0%	26.9%	0	0.0%	15.9%	0	0.0%	65.1%	0.0%
	Unknown	0	0.0%	0	0.0%	6.7%	0	0.0%	5.9%	0	0.0%	5.9%	0	0.0%	3.2%	0	0.0%	0.6%	0.0%
	<b>Total</b>	<b>8</b>	<b>100%</b>	<b>5,723</b>	<b>100%</b>	<b>100.0%</b>	<b>6</b>	<b>100%</b>	<b>100%</b>	<b>4,965</b>	<b>100%</b>	<b>100%</b>	<b>2</b>	<b>100%</b>	<b>100%</b>	<b>758</b>	<b>100%</b>	<b>100%</b>	<b>0.0%</b>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	2.0%	0	0.0%	1.1%	0	0.0%	3.1%	0	0.0%	1.5%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	10.3%	0	0.0%	6.0%	0	0.0%	13.0%	0	0.0%	9.3%	0.0%
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	39.5%	0	0.0%	33.8%	0	0.0%	41.3%	0	0.0%	34.9%	0.0%
	Upper	0	0.0%	0	0.0%	34.5%	0	0.0%	48.1%	0	0.0%	58.8%	0	0.0%	42.5%	0	0.0%	54.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0</b>	<b>0.0%</b>	<b>100%</b>	<b>0.0%</b>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Akron, OH MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending												
		2022, 2023					2022						2023						
		Bank				Owner Occupied Units %	Count		Dollar		Count	Dollar		Count	Dollar		Dollar		
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%		Bank	Agg		\$ (000s)	%		Agg	%
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	4.5%	96	4.2%	5.1%	0	0.0%	4.6%	0	0.0%	2.9%	1	14.3%	4.2%	96	20.8%	3.8%	0.0%
	Moderate	3	13.6%	217	9.6%	17.4%	2	13.3%	17.3%	192	10.6%	10.9%	1	14.3%	14.7%	25	5.4%	12.9%	0.0%
	Middle	14	63.6%	1,143	50.4%	42.8%	9	60.0%	38.8%	802	44.5%	34.5%	5	71.4%	47.0%	341	73.8%	41.0%	0.0%
	Upper	4	18.2%	810	35.7%	34.5%	4	26.7%	39.3%	810	44.9%	51.7%	0	0.0%	34.1%	0	0.0%	42.3%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	22	100%	2,266	100%	100.0%	15	100%	100%	1,804	100%	100%	7	100%	100%	462	100%	100%	0.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.1%	0	0.0%	6.5%	0	0.0%	2.9%	0	0.0%	2.0%	0	0.0%	0.9%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	26.5%	0	0.0%	16.2%	0	0.0%	29.6%	0	0.0%	20.6%	0.0%
	Middle	0	0.0%	0	0.0%	42.8%	0	0.0%	47.6%	0	0.0%	50.1%	0	0.0%	45.9%	0	0.0%	51.1%	0.0%
	Upper	0	0.0%	0	0.0%	34.5%	0	0.0%	18.2%	0	0.0%	29.9%	0	0.0%	22.4%	0	0.0%	27.5%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	1.2%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0.0%
HMDA TOTALS	Low	11	2.4%	1,351	1.5%	5.1%	6	2.2%	4.7%	547	1.0%	2.6%	5	2.6%	5.7%	804	2.0%	3.7%	0.0%
	Moderate	103	22.1%	13,410	14.5%	17.4%	59	21.3%	16.7%	7,230	13.8%	13.9%	44	23.2%	19.7%	6,180	15.6%	12.7%	0.0%
	Middle	264	56.5%	55,032	59.7%	42.8%	160	57.8%	41.7%	33,437	63.7%	37.2%	104	54.7%	40.9%	21,595	54.4%	37.4%	0.0%
	Upper	89	19.1%	22,383	24.3%	34.5%	52	18.8%	36.6%	11,299	21.5%	45.5%	37	19.5%	33.4%	11,084	27.9%	46.1%	0.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.8%	0	0.0%	0.2%	0	0.0%	0.2%	0.0%
	Total	467	100%	92,176	100%	100.0%	277	100%	100%	52,513	100%	100%	190	100%	100%	39,663	100%	100%	0.0%

Originations & Purchases  
Based on 2023 FFIEC Census Data; 2016-2020 ACS data

## Appendix D – Glossary of Terms

**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.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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 lines of credit, 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar

amount of investments), and qualitative factors (for example, 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, 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.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on

specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**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.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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