PUBLIC DISCLOSURE

Date of Evaluation: **JANUARY 13, 2020**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **UNIVEST BANK AND TRUST CO.**

Institution's Identification Number: **354310**

Address: **14 MAIN STREET**

SOUDERTON, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106

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INSTITUTION'S CRA RATING

OVERALL RATING: SATISFACTORY

PERFORMANCE TEST RATING TABLE

The following table indicates the Community Reinvestment Act (CRA) performance level of Univest Bank & Trust Co. ("Univest") with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	Univest Bank & Trust Co.		
	PERFORMANCE TEST		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- A substantial majority of the bank's loans are made in its assessment area;
- The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The bank has made a relatively high level of community development loans;
- The bank has made a significant level of qualified community development investments and grants; and
- The bank provides a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Univest is a state-chartered full-service commercial bank headquartered in Souderton, Montgomery County, Pennsylvania. The bank is a multistate financial institution providing consumer and commercial banking services through 39 full-service branches, serving Berks, Bucks, Chester, Delaware, Lancaster, Lehigh, Northampton, Montgomery and Philadelphia Counties in Pennsylvania and Cape May County in New Jersey. Of the 39 full-service branch locations, one branch is situated in a low-income census tract, and nine branches are located in moderate-income census tracts within the bank's footprint. Additionally, eighteen branches are located in middle-income geographies, and the remaining eleven are in upper-income geographies. In addition to the branches noted above, Univest operates one loan production office (LPO), three limited-service facility (LSF) locations, and fourteen retirement community financial service centers (mobile banking services). None of the LPO or LSF locations are located in low- or moderate-income census tracts. Of Univest's retirement community service centers, all are located within the bank's Philadelphia, PA assessment area. None are located in low-income census tracts, while three are situated within moderate-income tracts.

The bank is a wholly-owned subsidiary of Univest Financial Corporation (formerly Univest Corporation of Pennsylvania), a financial holding company that as of June 30, 2019, held over $5.1 billion in assets, and was also located in Souderton, Pennsylvania. Univest Bank offers investment and wealth management, fiduciary services and trust services, equipment leasing, and insurance services to individuals, businesses and non-profits through its non-bank subsidiaries: Girard Advisory Services, LLC; 104 S. Oakland Ave., LLC; Girard Benefits Group, LLC; Girard Pension Services, LLC; Univest Capital, Inc.; Univest Insurance, LLC; and Girard Investment Services, LLC.

The table on the following page details the locations of Univest's full-service branches and other locations as of the CRA evaluation date.

Univest Bank & Trust Co.		
Assessment Area	**County**	**Number of Branches**
Full-Service Branches		
Philadelphia, PA Assessment Area	Bucks, Chester, Delaware, Montgomery and Philadelphia	31
Lancaster, PA Assessment Area	Lancaster	5
Allentown, PA Assessment Area	Lehigh and Northampton	2
Reading, PA Assessment Area	Berks	0
Ocean City, NJ Assessment Area	Cape May	1
Total Full Service Branches		**39**
LPOs[1] / LSFs[2]		
Philadelphia, PA Assessment Area	**LPO**: Philadelphia	1
	LSF: Bucks	1
Lancaster, PA Assessment Area	**LSF:** Lancaster	1
Allentown, PA Assessment Area	**LSF:** Lehigh	1
Total LPOs / LSFs		**4**
Retirement Community Financial Service Centers[3]		
Philadelphia PA Assessment Area	Bucks, Chester, Delaware, Montgomery and Philadelphia	14
Total Retirement Community Financial Service Centers		**14**

According to the Consolidated Reports of Condition and Income (Call Report) as of June 30, 2019, Univest reported $5.1 billion in assets, of which nearly $4.2 billion, or 81%, were loans.

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) represent the largest segment of the bank's loan portfolio at $2.1 billion, or 51%. Residential loans (which include closed-end and open-end loans secured by residential properties, and multifamily loans) represent the second largest segment of the bank's loan portfolio at nearly $1.1 billion, or 26%. The bank's loans to states and political subdivisions and loans secured by farmland represent the next largest segments of the bank's loan portfolio, each accounting for nearly 7% of the bank's total loan portfolio.

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[1] The LPO provides desk space for bank lending sales personnel with limited support staff.

[2] Services provided at LSFs include commercial lending sales, mortgage lending sales, and investment and insurance sales with limited support staff.

[3] Banking is conducted by mobile banking staff during specified hours during the week. Services provided include the ability to complete deposit and check cashing transactions, perform account opening requests, and accept loan requests.

The composition of the bank's loan portfolio as of June 30, 2019 is presented in the table below.

Univest Bank and Trust Co.		
LOANS as of 06/30/2019	**$000**	**%**
Loans Secured by Nonfarm Nonresidential Properties (Commercial Mortgages)	1,332,733	31.9
Commercial and Industrial Loans	799,152	19.1
Secured by Farmland	269,225	6.5
Secured by Residential Properties (Closed-end)	758,476	18.2
Secured by Residential Properties (Open-end)	198,821	4.8
Secured by Multifamily Residential Properties	128,890	3.1
Construction & Land Development	212,356	5.1
Consumer Loans	32,474	0.8
Loans to Finance Agricultural Production & Other Loans to Farmers	17,552	0.4
States and Political Subdivisions	273,439	6.6
Other Loans	3,997	0.1
Other Leases	142,287	3.4
TOTAL	**4,169,402**	**100.0**

Source: June 30, 2019 Consolidated Reports of Condition and Income, Schedule RC-C Part 1. Loans classified as closed-end loans secured by residential real estate include business purpose loans collateralized by residential properties.

Small Business Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report as of June 30, 2019, indicates that just over $405 million (19%) of the bank's outstanding commercial loans[4] were designated as small business loans. At the previous CRA evaluation, Univest's outstanding commercial loan volume was $2.0 billion, of which $410.1 million (20%) was designated as small business loans. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less, as detailed in the following table.

Univest Bank & Trust Co. Small Business Loans		
	Amount Outstanding as of 06/30/2019 ($000)	**%**
Loans with original amounts of $100,000 or less	29,001	1.4
Loans with original amounts of more than $100,000 through $250,000	59,336	2.8
Loans with original amounts of more than $250,000 through $1,000,000	317,186	14.9
TOTAL SMALL BUSINESS LOANS	**405,523**	**19.0**
Loans with original amounts of more than $1,000,000	1,726,362	81.0
TOTAL COMMERCIAL LOANS	**2,131,885**	**100.0**

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[4] Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

Small Farm Loans

Schedule RC-C Part II of the Call Report as of June 30, 2019 also indicates that 41% of the bank's farm loans outstanding were designated as small farm loans. For purposes of this evaluation, a small farm loan is defined as a loan with an origination amount of $500 thousand or less which is secured by farmland, used to finance agricultural production, or other loans to farmers, as detailed in the following table.

Univest originated farm loans in its Philadelphia, PA and Lancaster, PA assessment areas. The bank reported $117 million in small farm loans outstanding as of the June 30, 2019 Call Report. This represents a significant increase in small farm loans from the bank's previous CRA evaluation, where small farm loans totaled $42 million. A substantial portion of the increase can be allocated to the Lancaster, PA assessment area where 92% of the bank's farm loans were made by number, and 91% by dollar volume.

Univest Bank & Trust Co. Small Farm Loans		
	Amount Outstanding as of 06/30/2019 ($000)	%
Loans with original amounts of $100,000 or less	15,231	5.3
Loans with original amounts of more than $100,000 through $250,000	36,065	12.6
Loans with original amounts of more than $250,000 through $500,000	65,876	23.0
TOTAL SMALL FARM LOANS	**117,172**	**40.9**
Loans with original amounts of more than $500,000	**169,605**	**59.1**
TOTAL FARM LOANS	**286,777**	**100.0**

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment area. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

Univest was rated satisfactory at its previous CRA evaluation performed by the Federal Reserve Bank of Philadelphia, dated September 11, 2017. The previous examination was performed using the Interagency Large Institution CRA Evaluation Procedures adopted by the Board of Governors of the Federal Reserve System (Board of Governors).

DESCRIPTION OF ASSESSMENT AREAS

For purposes of the CRA, Univest has designated five assessment areas, as follows:

(1) The Philadelphia, PA Assessment Area, which consists of two Metropolitan Divisions (MD): the Montgomery-Bucks-Chester County, PA MD; and the Philadelphia PA, MD, which consists of Delaware and Philadelphia Counties (these two MDs are part of the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA);

(2) The Lancaster, PA Assessment Area, which consists of Lancaster County, PA;

(3) The Allentown, PA Assessment Area, which consists of Lehigh and Northampton, PA Counties, located in the Allentown, Bethlehem, Easton PA-NJ MSA (this partial MSA excludes Carbon County, PA and Warren County, NJ);

(4) The Reading, PA Assessment Area, which consists of Berks County, PA; and

(5) The Ocean City, NJ Assessment Area, which consists of Cape May County, NJ.

The bank's assessment areas were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

It is noted that Univest's assessment area changed slightly from the previous CRA evaluation when the bank's Allentown, PA Assessment Area was comprised only of Lehigh County. Since the previous evaluation, Northampton County was added to this assessment area.

SCOPE OF EXAMINATION

The current evaluation of the bank's CRA performance covers the period from September 12, 2017, through January 13, 2020, in accordance with the Interagency Large Institution CRA Evaluation Procedures adopted by the Board of Governors.

Loan products evaluated include:

- Home-purchase, home-improvement, and multifamily loans and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar year 2017;
- Home-purchase, home-improvement and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans and loans with a purpose "not applicable," collectively titled HMDA loans reported by the bank for calendar year 2018;[5]
- Small business loans reported by the bank, pursuant to the CRA for calendar years 2017 and 2018;
- Small farm loans reported by the bank, pursuant to the CRA for calendar years 2017 and 2018; and
- Other loans that qualified as community development loans during the entire evaluation period from September 12, 2017 through January 13, 2020.

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[5] In October 2015 and August 2017, through final rules that amended Regulation C, the Consumer Financial Protection Bureau (CFPB) modified: (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered transactions); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. See 80 Fed. Reg. 66127 (October 28, 2015) (final rule); and 82 Fed. Reg. 43088 (September 13, 2017) (correction). The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the "home mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home-improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions under HMDA; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home mortgage loan."

Because the bank originated more HMDA loans, by both number and dollar volume, than small business and small farm loans across all of its assessment areas, HMDA loans were given the most weight in determining Univest's overall rating. In total, within the assessment areas, the bank originated 3,671 HMDA loans totaling nearly $781 million over the evaluation period. Small business loans were weighted the second highest, followed by small farm loans, as the result of volume. Over the evaluation period, Univest originated 1,600 small business loans totaling over $300 million, and 1,036 small farm loans totaling over $125 million within its assessment areas. With the exception of the Lancaster, PA assessment area, where small farm lending is quite prevalent, small farm loans were given considerably less weight in the CRA analysis, given their smaller volume.

Univest's HMDA, small business loans, and small farm loans were compared to the aggregate of all lenders in the bank's assessment areas that report home-mortgage loans pursuant to HMDA, and small business and small farm loans pursuant to CRA. These data are reported annually.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, the demographic data provides a business context for the bank's performance in the assessment area where it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of American Community Survey (ACS) data for loans originated in 2017 and 2018.[6] The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS Data in 2017 and 2018, unless otherwise noted.

For small business and small farm loans, examiners used Dun & Bradstreet data for comparison for the applicable years. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses and farms.

To supplement economic, demographic and performance data, and to gain a better perspective on community credit needs, interviews were conducted with eight community representatives during the course of the evaluation. Discussions were held with three community agencies focused on affordable housing, three with organizations focused on economic development, one small business incubator, and one community foundation focused on revitalization and stabilization efforts. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

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[6] According to FFIEC policy, 2015 ACS Data is used to analyze data starting in 2017 and thereafter.

For purposes of assessing the bank's overall CRA performance, greater weight was given to performance in the bank's Pennsylvania assessment areas, particularly the Philadelphia, PA and Lancaster, PA assessment areas. A substantial majority of the bank's lending and operations were in these two assessment areas and, as such, full-scope reviews of the bank's performance in both assessment areas were conducted. These areas accounted for 98% of the bank's overall deposits, 92% of loans by number and 90% of loans by dollar volume, and 92% of Univest's branch locations.

The Allentown, PA assessment area and the Reading, PA assessment area both received limited-scope reviews, where performance was compared with that in the full-scope areas to determine if it exceeded, was consistent with, or was below the performance in the full-scope areas. Univest operated two branches in the Allentown, PA assessment area, and no branch locations within the Reading, PA assessment area. The Allentown, PA assessment area accounted for 1% of the bank's deposits, and 6% of the bank's loan volume, by both number and dollar amount. The Reading, PA assessment area generated none of the bank's deposits, and approximately 1% of loans by both number and dollar amount.

In reaching statewide conclusions in the Commonwealth of Pennsylvania, greatest weight was given to the bank's performance in the Philadelphia, PA assessment area, followed by performance in the Lancaster, PA assessment area, and then the limited-scope Allentown, PA and Reading, PA assessment areas.

Finally, the least amount of weight was given to the bank's Ocean City, NJ assessment area in determining the bank's overall CRA rating. This assessment area is the only one located in the state of New Jersey, and Univest operates only one branch in this area. Further, the bank has a relatively small amount of lending in this assessment area compared to the other three assessment areas. More specifically, lending in the Ocean City, NJ assessment area comprises 1% by number of loans, and 3% by dollar volume. Similarly, the Ocean City, NJ assessment area accounts for only 1% of the institution's deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated high satisfactory.

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA, small business, and small farm lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses and farms of different sizes, including small businesses and farms;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;

- Responsiveness to the credit needs of low- income individuals and geographies, and very small businesses and farms;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Overall, Univest's lending levels reflect good responsiveness to the credit needs of its assessment areas in Pennsylvania and New Jersey. As of June 30, 2019, Univest reported total loans of nearly $4.2 billion, or 81% of bank assets, compared to the previous evaluation conducted as of September 11, 2017, when loans totaled $3.5 billion, or 79% of bank assets, using June 30, 2017 data. HMDA loans represent the largest overall volume in the bank's loan portfolio by number and dollar amount, followed by small business loans, and small farm loans.

The table below depicts the bank's HMDA and CRA lending activity during the evaluation period.

Univest Bank and Trust Co. Summary of Lending Activity				
Loan Type	#	%	$(000s)	%
Home Improvement	810	11.8	67,481	5.0
Home Purchase	2,259	32.8	517,874	38.3
Multifamily Housing	76	1.1	105,282	7.8
Refinancing	739	10.7	171,770	12.7
Other Purpose Closed-End	29	0.4	4,455	0.3
Other Purpose LOC	124	1.8	9,648	0.7
Total HMDA related	**4,037**	**58.6**	**$876,510**	**64.8**
Total Non-HMDA related	**0**	**0.0**	**0**	**0.0**
Total Small Business related	**1,703**	**24.7**	**328,341**	**24.3**
Total Small Farm related	**1,150**	**16.7**	**145,676**	**10.9**
Total Consumer related	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	**6,890**	**100.0**	**1,350,527**	**100.0**

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis consisted of an evaluation of Univest's HMDA loans, small business loans, and small farm loans. The assessment area concentration analysis indicated that a substantial majority of loans were made in the bank's assessment areas.

More specifically, during the evaluation period, Univest made 91% of HMDA loans by number, and 89% by dollar amount in the bank's assessment areas. With respect to small business loans, 94% of the number of small business loans and 92% of the aggregate dollar amount of loans were extended in the bank's assessment areas.

Finally, a total of 90% of small farm loans by number, and 86% by dollar amount were extended in the bank's assessment areas.

Overall, 92% of all loans by number, and 89% of loans by dollar volume were made within the five assessment areas included in this evaluation.

The table below shows the distribution of lending inside and outside the bank's assessment areas.

Loan Types	Inside				Outside			
Univest Bank and Trust Co. **Lending Inside and Outside the Assessment Areas**								
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	774	95.6	63,951	94.8	36	4.4	3,530	5.2
Home Purchase – Conventional	1,767	88.6	403,016	86.7	227	11.4	61,971	13.3
Home Purchase – FHA	218	89.0	43,338	90.8	27	11.0	4,370	9.2
Home Purchase – VA	18	90.0	4,830	93.3	2	10.0	349	6.7
Multifamily Housing	67	88.2	96,640	91.8	9	11.8	8,642	8.2
Other Purpose Closed-End	27	93.1	2,640	59.3	2	6.9	1,815	40.7
Other Purpose LOC	117	94.4	9,173	95.1	7	5.6	475	4.9
Refinancing	683	92.4	157,101	91.5	56	7.6	14,669	8.5
Total HMDA related	**3,671**	**90.9**	**780,689**	**89.1**	**366**	**9.1**	**95,821**	**10.9**
Total Small Business related	**1,600**	**94.0**	**300,559**	**91.5**	**103**	**6.0**	**27,782**	**8.5**
Total Small Farm related	**1,036**	**90.1**	**125,509**	**86.2**	**114**	**9.9**	**20,167**	**13.8**
TOTAL LOANS	**6,307**	**91.5**	**1,206,757**	**89.4**	**583**	**8.5**	**143,770**	**10.6**

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, the bank's distribution of loans among borrowers of different income levels, including low- and moderate-income borrowers, is good, due to the good performance in Pennsylvania's Philadelphia, PA assessment area, excellent performance in the Lancaster, PA assessment area, and poor penetration in the Ocean City, NJ assessment area.

The geographic distribution of loans reflects good penetration throughout the bank's assessment areas, due to good performance in the Philadelphia, PA assessment area, good performance in the Lancaster, PA assessment area, and adequate performance in the Ocean City, NJ assessment area.

Distributions in the Allentown, PA assessment area were consistent with the levels of the two full-scope assessment areas in Pennsylvania, and borrower and geographic distribution were below the levels of the two full-scope assessment areas in the Reading, PA assessment area.

Small Business Lending

Overall, the borrower distribution of small business loans reflects good penetration throughout the bank's assessment areas, due to adequate performance in the Philadelphia, PA assessment area, and excellent performance in the Lancaster, PA assessment area. Because of loan volume, which would not have yielded meaningful conclusions, small business loans were not analyzed in the Ocean City, NJ assessment area.

Univest's geographic distribution of small business loans reflects adequate penetration throughout the bank's assessment areas as a result of adequate performance in Pennsylvania's Philadelphia, PA assessment area, and poor performance in the Lancaster, PA assessment area. Again, due to low loan volume, small business loans were not analyzed in the Ocean City, NJ assessment area.

As indicated earlier, the distribution of lending in the Allentown, PA assessment area was consistent with the levels of the two full-scope assessment areas in Pennsylvania, and the distribution in the Reading, PA assessment area was below the levels of the two full-scope assessment areas.

Small Farm Lending

Univest's borrower distribution of small farm loans reflects excellent penetration throughout the bank's assessment areas, due to excellent performance in the Philadelphia, PA and Lancaster, PA assessment areas. No small farm loans were made within the Ocean City, NJ assessment area.

The geographic distribution of small farm loans was excellent in the Philadelphia, PA assessment area, but not analyzed in the Lancaster, PA assessment area because less than 1% of total farms are located in low- or moderate-income tracts. Again, no small farm loans were made in the Ocean City, NJ assessment area.

Small farm lending was not analyzed in the limited-scope review assessment areas. No small farm loans were made in the Allentown, PA assessment area, and only one loan was made in the Reading, PA assessment area over the two-year evaluation period.

Responsiveness to Credit Needs

Univest exhibits a good record of serving the credit needs of low-income individuals and areas, and very small businesses and small farms. Affordable housing was a credit need identified by nearly all community contacts in all of the bank's assessment areas, and the bank's HMDA lending record shows that home-mortgage loans are being originated throughout the assessment areas and include loans made to low- and moderate-income borrowers. Additionally, Univest has taken a lead role in support of affordable housing initiatives in the assessment area, as the participating lender in the Philadelphia Neighborhood Home Preservation Loan Program. During the evaluation period, Univest originated 32 loans under the Restore, Repair, Renew (RRR) program sponsored jointly by the City of Philadelphia and the Philadelphia Redevelopment Authority totaling $550 thousand in the assessment area. Further, Univest addresses revitalization needs through participation with a lending consortium that provides financing for community development projects in the Philadelphia, PA, Lancaster, PA, Allentown, PA, Reading, PA, and Ocean City, NJ assessment areas. Finally, as described below, the bank offers a number of flexible loan programs meant to assist low- and moderate-income borrowers, and small businesses. More detail of the bank's participation can be found within individual assessment area discussions.

Innovative and Flexible Lending Practices

In an effort to address the credit needs of low- and moderate-income borrowers, Univest makes use of several innovative and flexible lending programs in servicing credit needs in its assessment areas. The bank participated in a variety of programs to meet the credit needs of low- and moderate-income individuals, small businesses, and small farms. Throughout the evaluation period, the bank's lending under flexible lending programs totaled $90 million, as summarized below, and detailed in the discussions for each assessment area.

Often, the home-mortgage credit needs of low- and moderate-income borrowers can be more effectively addressed by alternative mortgage products, which have more flexible credit terms than traditional home financing. Throughout its assessment areas, Univest offers mortgage products through the Federal Housing Administration's (FHA) loan program, Fannie Mae-Federal National Mortgage Association (FNMA), the U.S. Department of Veterans Affairs' (VA) home loan program, the U.S. Department of Agriculture's Rural Development (USDA) Rural Housing Service guaranteed loan program, the Pennsylvania Housing Finance Agency (PHFA) loan program, the Freddie Mac-Federal Home Loan Mortgage Corporation (FHLMC) program, and the Federal Home Loan Bank of Pittsburgh's First Front Door (FFD) grant program.

In total, during the evaluation period, Univest made 216 FHA loans totaling $43.6 million, 59 FNMA loans totaling $10.5 million, 24 VA loans totaling $6.2 million, 19 USDA loans totaling $3.4 million, 12 PHFA loans totaling $2.1 million, five FHLMC loans totaling $798 thousand, 78 FFD grants totaling $382 thousand, and 32 RRR loans totaling nearly $550 thousand.

Similarly, to address the needs of small businesses, the bank is a preferred Small Business Administration (SBA) Express lender, offering loans under the SBA's loan program. In total, during the evaluation period, Univest made 29 SBA loans totaling $13 million throughout its assessment areas. Finally, the bank makes small business loans through its proprietary Main Street Banking product, designed to help small business owners. In total, Univest made 251 Main Street loans, totaling $9.3 million.

All special program loans are discussed in more detail by assessment area throughout this Performance Evaluation.

Community Development Lending

Univest makes a relatively high level of community development loans. The bank originated 49 community development loans totaling $73.8 million during the evaluation period that benefit its assessment areas. The bank's dollar amount of community development lending has increased quite notably since the previous evaluation period, when Univest extended 27 community development loans totaling $37.8 million.

Eight of the 49 loans supported revitalization/stabilization efforts ($28.1 million), 32 loans supported affordable housing ($24.6 million), five loans provided community services to low- and moderate-income individuals ($14 million), and four loans supported economic development ($7.1 million).

By dollar amount of community development loans, the bank's lending was highest in the Philadelphia, PA assessment area; (49% or $35.9 million), followed by the Allentown, PA assessment area (34% or $25.4 million), Lancaster, PA assessment area (12% or $8.5 million), Reading, PA assessment area (3% or $2.4 million), and the Ocean City, NJ assessment area (2% or $1.7 million).

The following table reflects the bank's overall community development lending during the evaluation period.

Univest Bank & Trust Co. Community Development Loans (All Assessment Areas)				
Assessment Areas – Pennsylvania and New Jersey	#	%	$	%
Philadelphia, PA Assessment Area	30	61.2	35,897,169	48.9
Lancaster, PA Assessment Area	9	18.4	8,486,250	11.5
Allentown, PA Assessment Area	5	10.2	25,397,000	34.4
Reading, PA Assessment Area	4	8.2	2,351,463	3.2
Ocean City, NJ Assessment Area	1	2.0	1,650,000	2.2
Total	**49**	**100.0**	**73,781,882**	**100.0**

INVESTMENT TEST

Overall, performance under the investment test is rated high satisfactory. The investment test was rated high satisfactory in the Philadelphia, PA assessment area, low satisfactory in the Lancaster, PA assessment area, and low satisfactory in the Ocean City, NJ assessment area. Performance in the Allentown, PA assessment area was consistent with performance of the full-scope assessment areas in Pennsylvania. Finally, performance in the Reading, PA assessment area was below the Pennsylvania full-scope review assessment areas.

Univest has a significant level of qualified investments, grants and donations, which exhibit good responsiveness to community development needs. Qualified investments, grants and donations total nearly $23 million and have increased significantly since the prior CRA evaluation in 2017, when qualified investments totaled $3.6 million. The vast majority of investment dollars were made in the Philadelphia, PA assessment area (47% or $10.8 million), followed by the Allentown, PA assessment area (23% or $5.2 million), the Lancaster, PA assessment area (17% or $3.9 million), the Ocean City, NJ assessment area (7% or $1.7 million), and the Reading, PA assessment area (5% or over $1.2 million). Additionally, Univest made one qualified donation totaling just under $8 thousand in York, Pennsylvania. Because the bank adequately met the qualified investment needs within its assessment areas, this donation, which was made in the greater statewide/regional area, also receives qualified investment consideration.

Of the assessment area investments, 93% supported affordable housing, 6% went to organizations that provided community services to low- and moderate-income individuals and geographies, less than 1% supported economic development, and less than 1% was dedicated to revitalization and stabilization efforts in the assessment area.

Univest exhibits good responsiveness to credit and community development needs of the assessment area. Most of the bank's qualified investments and donations support affordable housing. In addition, community contacts interviewed during the course of the evaluation emphasized affordable housing, economic development, including workforce development needs, and revitalization and stabilization programs most frequently as needs throughout the assessment areas.

Overall, Univest makes occasional use of innovative and/or complex investments to support community development initiatives when opportunities exist, most notably in the Philadelphia, PA assessment area. Investment volume and grants activity overall have significantly increased since the prior evaluation which occurred subsequent to bank expansion through acquisition. Three prior qualified investments are still active, and twelve new qualified investments were made since the prior evaluation.

The bank's investment test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

SERVICE TEST

Overall, performance under the service test is rated high satisfactory. Performance is rated high satisfactory in the Philadelphia, PA assessment area, and low satisfactory in the Lancaster, PA and Ocean City, NJ assessment areas. Performance in the Allentown, PA assessment area is consistent with that in the Pennsylvania full-scope review areas. Finally, performance in the Reading, PA assessment area is below that in the Pennsylvania full-scope review assessment areas.

Branch delivery systems are accessible to essentially all portions of the bank's assessment areas. As noted previously, Univest operates 38 branches in Pennsylvania, and one branch in New Jersey. Univest is a member of both the STAR® and Allpoint® ATM networks which provide greater access to Univest customers. Univest operates a network of 46 ATMs which provide electronic access to banking services. Thirty-eight of the ATMs are maintained at current branch locations, and eight cash-dispensing ATMs are at either a branch, or remote locations throughout the bank's footprint. One of the bank's ATMs are located in a low-income tract, and a total of 11 ATMs are located in moderate-income tracts.

Thirty-one of the bank's 38 Pennsylvania branches are located in the Philadelphia, PA assessment area, with five branch locations in the Lancaster, PA assessment area, and two in the Allentown, PA assessment area. The Reading assessment area does not contain any branch locations. In New Jersey, the sole Univest branch is located in the Ocean City assessment area.

Univest's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals or areas. Since the previous evaluation, the bank has opened three branches and closed three branches.[7]

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[7]During the evaluation period, three branches were opened, two in the Lancaster, PA assessment area, and one in the Allentown, PA assessment area. In addition, three branches were closed in the Philadelphia, PA assessment area. They are discussed further in the evaluation of each assessment area.

Banking services do not vary in a way that inconveniences its constituents, irrespective of census tracts or income level. More specifically, hours of operation are reasonable, with all but three branches offering extended business hours at least one day a week, and thirty-six of the branch locations offering Saturday hours.

Additionally, the bank provides alternative delivery systems that include mobile deposit capture, night deposit, telephone banking, online banking, and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, and make loan and other bill payments. The bank's website is fully transactional, allowing the capability to open accounts and apply for loans online.

Finally, the bank provides a relatively high level of community development services in its Philadelphia, PA assessment area, and an adequate level of community development services in its Lancaster, PA assessment area, and a limited level of community development services in its Ocean City, NJ assessment area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Univest is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

COMMONWEALTH OF PENNSYLVANIA

STATE RATING

Performance Test	Performance Level
Lending	High Satisfactory
Investment	High Satisfactory
Service	High Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects good penetration among retail customers of different income levels and businesses of different sizes, and excellent penetration among farms of different sizes;
- The geographic distribution of loans reflects good penetration throughout the Pennsylvania assessment areas;
- The bank makes use of innovative and/or flexible lending practices;
- The bank made a relatively high level of community development loans in Pennsylvania;
- The bank has a significant level of qualified community development investments and grants in the state; and
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

Univest's CRA performance in Pennsylvania was evaluated for the period from September 12, 2017 through January 13, 2020. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, small farm loans, and other loans that qualified as community development.

As mentioned previously, examiners completed a full-scope review for the Philadelphia, PA and Lancaster, PA assessment areas, as the vast majority of the bank's operations are in these assessment areas, including branches and deposit and lending production.

Examiners conducted limited-scope reviews in the Allentown, PA and Reading, PA assessment areas. Each area was added as an assessment area during calendar year 2016, and deposit and loan levels are significantly less than in the full-scope review assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In Pennsylvania, the vast majority of the bank's business is conducted in the Philadelphia, PA assessment area, and thus, it was given the most weight in determining the overall CRA rating in the Commonwealth and was evaluated using full-scope review procedures. In total, 31 of the bank's 39 branches (79%) are located in this assessment area. Likewise, 92% of the bank's deposits are held in the assessment area. From a loan perspective, 64% of loans by number, and 68% of loans by dollar volume are made within the Philadelphia, PA assessment area.

The Lancaster, PA assessment area was given the second highest weight in determining the overall state rating in Pennsylvania and was evaluated using full-scope review procedures. During the evaluation period, Univest operated five branches in the assessment area (13%), and these branches generated 6% of the bank's total deposits. From a loan standpoint, 28% of the bank's loans by number, and 22% by dollar volume, were made in the Lancaster, PA assessment area.

The Allentown, PA assessment area was provided the third highest amount of weight in determining the overall state rating in the Commonwealth, and was evaluated using limited-scope review procedures, as discussed previously. Univest operates two branches in the Allentown, PA assessment area (5%), and these branches generated 1% of the bank's total deposits. Lending volumes are considerably lower in this assessment area than in the full-scope review Pennsylvania assessment areas. More specifically, approximately 6% of the bank's loans by number, and 6% by dollar volume, were made in the Allentown, PA assessment area.

Finally, the Reading, PA assessment area was provided the least amount of weight in determining the state rating, and was also evaluated using limited-scope review procedures. Univest does not have a physical branch location in the Reading, PA assessment area, and as such, no deposits are generated in this assessment area. Lending volumes are much lower in this assessment area than in any other Pennsylvania assessment area. Less than 1% of the bank's loans by number, and 1% by dollar volume, were made in the Reading, PA assessment area.

CONCLUSION WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be high satisfactory in Pennsylvania. The lending test was rated high satisfactory in the Philadelphia, PA assessment area, and high satisfactory in the Lancaster, PA assessment area. Using the limited-scope review procedures, the Allentown, PA assessment area lending test performance was consistent with the performance of the two full-scope review assessment areas. In contrast, performance in the Reading, PA assessment area was below the performance of the two full-scope review assessment areas. Primary drivers of the overall lending test rating include lending activity, borrower and geographic distribution of loans, the bank's use of flexible lending practices, and community development lending. It is noted that borrower distribution is weighted more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on lending test components is provided in the discussions of each Pennsylvania assessment area.

INVESTMENT TEST

Overall, the investment test was determined to be high satisfactory in Pennsylvania, as it was rated high satisfactory in the Philadelphia, PA assessment area, and low satisfactory in the Lancaster, PA assessment area. Performance in the Allentown, PA assessment area was consistent with the performance in the full-scope review areas, and performance in the Reading, PA assessment area was below that in the full-scope review areas. The investment test rating is driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness and complexity of such investments. More detail on the investment test components is provided in the discussions of each Pennsylvania assessment area.

SERVICE TEST

Overall, the service test was determined to be high satisfactory in Pennsylvania. The service test was rated high satisfactory in the Philadelphia, PA assessment area, and low satisfactory in the Lancaster, PA assessment area. Once again, performance in limited-scope assessment areas mirrored the other tests. Namely, performance in the Allentown, PA assessment area was consistent with that in the full-scope review areas, and performance in the Reading, PA assessment area was below that in the full-scope review areas. The service test was influenced by retail service aspects, particularly the accessibility of delivery systems and reasonableness of hours and services in serving the assessment area needs, as well as the level of community development services provided by the bank in the Commonwealth. More detail on the service test components is provided in the discussions of each assessment area.

PHILADELPHIA, PA ASSESSMENT AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Univest's Philadelphia, PA assessment area consists of the Montgomery-Bucks-Chester County, PA Metropolitan Division (MD), and the Philadelphia, PA Metropolitan Division (MD), which consists of Delaware and Philadelphia Counties. These two MDs are two of four MDs that comprise the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA. The assessment area is situated in southeastern Pennsylvania.

For the purposes of assessing Univest's CRA performance in the Commonwealth of Pennsylvania and overall, the greatest weight was given to the performance in the Philadelphia, PA assessment area. Of the bank's total loans, 64% by number, and 68% by dollar amount can be attributed to this assessment area. Further, Univest operates thirty-one branches in the assessment area and holds almost $3.9 billion in deposits, or 92% of the bank's total deposits as of June 30, 2019. In addition, Univest operates one loan production office located in Center City, Philadelphia County, and one limited-service facility located in Doylestown, Bucks County. Finally, within the assessment area, Univest operates mobile branches, providing banking services on-site at 14 retirement communities.

Univest's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS Data, there were 998 census tracts in the bank's Philadelphia, PA assessment area. Of these, 72 were designated as low-income tracts (7%), 252 were moderate-income tracts (25%), 330 were middle-income tracts (33%), 327 were upper-income tracts (33%), and 17 were unknown-income tracts (2%).

Of the 72 low-income tracts, 50% were located in Philadelphia County (69%), 10 were in Montgomery County (14%), five were in Chester County (7%), four were in Bucks County (6%), and three were in Delaware County (4%). In total, 7% of the assessment area's population resided in low-income census tracts as of the 2015 ACS.

Of the 252 moderate-income tracts, 130 were located in Philadelphia County (52%), 39 were in Montgomery County (15%), 36 were in Bucks County (14%), 24 were in Chester County (10%), and 23 were in Delaware County (9%). In total, 25% of the assessment area's population resided in moderate-income census tracts as of the 2015 ACS.

A map of the Philadelphia, PA assessment area at the 2015 ACS update is available in Appendix F.

Per the 2015 ACS Data, the Philadelphia, PA assessment area had a population of 4,066,105. This assessment area is the most populated assessment area of the entire Univest footprint. Population counts in the five counties that make up the assessment area from highest to lowest are: Philadelphia (1,555,072); Montgomery (812,970); Bucks (626,583); Delaware (561,683); and Chester (509,797).

According to the Federal Deposit Insurance Corporation's (FDIC's) Summary of Deposits Report as of June 30, 2019, there were 72 depository institutions operating branches in Univest's Philadelphia, PA assessment area. These institutions collectively operated 1,123 branches maintaining just under $128 billion in deposits. Univest ranked seventh with nearly $3.9 billion in deposits, or 3% of the retail deposit market. Univest's ranking follows after six national banks that together hold 70% of the deposit market in the assessment area. Wells Fargo Bank, N.A. ranked first, holding 21% of the market, followed by PNC Bank, N.A. (13%), Citizens Bank, N.A. (12%), TD Bank, N.A. (11%), Bank of America, N.A. (10%), and Santander Bank, N.A. (4%).

Univest reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. According to 2017 data, there were 705 HMDA reporters in the assessment area, who originated or purchased a total of 107,406 HMDA loans in the Philadelphia, PA assessment area. Univest ranked fifteenth, with 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 12% of the market, followed by Police & Fire Federal Credit Union and Quicken Loans, Inc., each with 3%.

According to 2018 aggregate HMDA data, 119,507 home-mortgage loans were collectively originated or purchased by 710 HMDA institutions in the assessment area. Univest ranked twentieth, with 1% of the market. Wells Fargo Bank, N.A. is the largest HMDA reporter in the bank's assessment area, reporting 11% of all such loans followed by Citizens Bank of Pennsylvania with 4%, and Police and Fire Federal Credit Union, with over 3% of all loans originated and purchased.

Similarly, the institution reports its small business and small farm loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2017 data, there were 199 small business and small farm reporters in the assessment area, originating or purchasing 86,497 small business and small farm loans. Univest ranked twentieth, with less than 1% of the market. American Express Bank, FSB led the market with 25% market share, followed by PNC Bank, N.A., with 8% of the market, and Wells Fargo Bank, N.A. with 7%.

According to 2018 CRA market data, the assessment area had a total of 183 small business and small farm reporters, who collectively originated or purchased 90,955 small business and small farm loans in the bank's Philadelphia assessment area. Again, Univest ranked twentieth, with less than 1% of the market. American Express National Bank led the market, with 25% of small business and small farm loans, followed by Chase Bank USA, N.A., with nearly 10% market share, and Wells Fargo Bank, N.A. with 8% of all loans originated and purchased.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators. More specifically, in 2018, American Express National Bank, N.A., Chase Bank USA, N.A., Wells Fargo Bank, N.A., Citibank, N.A. and PNC Bank, N.A. were the top five small business and small farm reporters, collectively holding over 55% of the market share in the assessment area.

To supplement economic, demographic and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Philadelphia, PA assessment area. One interview was held with a consumer agency focused on homeownership counseling in the region, and the other was an agency that provides early start-up funding to small businesses in the region. These contacts identified funding for financial literacy programs and increased opportunities for bank and small business partnerships as needs in the assessment area communities. Further, the contacts identified effective first-time homebuyer products that have less stringent credit requirement than traditional products, as well as financing for start-up businesses, as important credit needs in the region. Lastly, contacts noted a need for deposit products tailored to low- to moderate-income consumers, such as products with no overdraft fees.

Economic Characteristics

The bank's Philadelphia, PA assessment area is located in the Delaware Valley region of southeastern Pennsylvania, within the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. Philadelphia is the largest city in Pennsylvania, and the fifth largest city in the nation, with a population of over 1.5 million according to 2015 ACS data.

As indicated previously, the bank's Philadelphia assessment area is located in the Delaware Valley region of southeastern Pennsylvania, in the Philadelphia MSA. Philadelphia is the largest city in Pennsylvania, and the fifth largest city in the nation with a population of over 1.5 million according to 2010 Census data. Philadelphia is one of the strongest economies in Pennsylvania, with a falling unemployment rate and broad-based job gains including private services and construction. According to the May 2019 Moody's Analytics Precis Report for the entire Philadelphia MSA, strengths of the area include the fact that the city has a concentration of well-regarded, higher-education institutions, and is a center for healthcare and medical research. Philadelphia continues to see a rising housing market, mostly in single-family housing, supported by strong house price appreciation. On the other hand, weaknesses include the fact that the region suffers from weak population growth, significant fiscal problems that crowd out other government spending, and prohibitive city taxes that push many businesses into the suburbs or neighboring states.

Philadelphia's economy is in late expansion mode, and the metro division is outperforming the Commonwealth and region with year-over-year job growth, exceeding the U.S average according to Moody's Analytics. Steady job creation pushed the jobless rate well below 5%, its lowest rate in history. Healthcare remains an important economic driver, with the city's large healthcare institutions employing one in three Philadelphia workers, although gains are expected to slow as the pool of available workers thins. The growing share of seniors support the demand for medical services and Philadelphia's top-ranked hospitals remain a magnet for medical tourism.

The city boasts a developed port and international airport which assists in promoting trade and tourism for the city. According to Moody's, hospitality, entertainment and cultural attractions, visitor counts are soaring. Center City's hotel occupancy rate reached a new record of nearly 80% in 2018, even as room supply increased by 18%. Since Philadelphia draws both domestic and international tourists, visitor arrivals and spending are expected to continue.

Education and health services represent the largest employment segments in Philadelphia, contributing 31% of the total jobs. Professional and business services, and government are the second largest employment segments, both at nearly 14%, followed closely by leisure and hospitality, at 10% of jobs in the MSA. Major employers in Philadelphia include the University of Pennsylvania Health Systems, Thomas Jefferson University Hospital, Comcast, Drexel University, and Aramark Corporation.

Brief descriptions of each county in the assessment area follow below.

Montgomery County

Montgomery County had a population of 812,970 residents as of the 2015 ACS Data. The county is located adjacent to and northwest of Philadelphia, and is located directly south of Lehigh County, part of the Lehigh Valley region in Pennsylvania. The county seat and largest city is Norristown. Montgomery County is geographically diverse, ranging from farms and open land in the extreme north of the county to densely populated suburban neighborhoods in the southern and central portions of the county.

Montgomery County is home to several large business parks located in Blue Bell, Lansdale, Fort Washington, Horsham and King of Prussia, which employ thousands of workers across the region. Major employers in Montgomery County include Abington Hospital-Jefferson Health, Abington School District, and pharmaceutical companies such as Glaxo Smith Kline, Merck, and Pfizer. Finally, Montgomery County is home to a number of colleges and universities, including Ursinus College, St. Joseph's University, Bryn Mawr College, Arcadia University, and Penn State Abington Campus.

Bucks County

Bucks County had a population of 626,583 residents as of the 2015 ACS Data. The county is located immediately northeast of Philadelphia and borders the Delaware River and New Jersey to the east. The county seat is Doylestown.

Due to its proximity to the Delaware River, along with other natural assets, tourism is important to Bucks County's economy, with visitors flocking to locations such as Doylestown, New Hope, Peddler's Village, Washington Crossing Historic Park, and Sesame Place.

Chester County

Chester County had a population of 509,797 residents as of the 2015 ACS Data, and is the wealthiest of the counties in this assessment area, with a median family income of $105,571 at the 2015 ACS Update. Eastern Chester County is home to many communities that comprise part of the affluent "Main Line" western suburbs outside of Philadelphia, while part of its southernmost portion is considered suburban Wilmington, along with southwest Delaware County. The county seat is the Borough of West Chester.

Chester County is home to West Chester University, Lincoln University and Cheyney University. Major employers include Vanguard Group, Inc., QVC Network, Inc., Siemens Medical Solutions USA, Inc. and Giant Food Stores.

Philadelphia County

Philadelphia County had a population of 1,555,072 as of the 2015 ACS Data, making it the most densely populated county in the assessment area. The county is located along the lower Delaware and Schuylkill Rivers, and includes the city of Philadelphia.

Philadelphia County is home to many large and prominent universities, including Temple University, The University of Pennsylvania, Drexel University, and Thomas Jefferson University, among others. Tourism is an important part of Philadelphia County's economy, due to its rich history and landmarks. Major employers in the city and county include the University of Pennsylvania, the School District of Philadelphia, Children's Hospital of Philadelphia, SEPTA, Temple University, and Comcast Corporation.

Delaware County

Delaware County had a population of 561,683 residents as of the 2015 ACS Data. Delaware County is adjacent to the city-county of Philadelphia, which is located to the east. The county seat is located in Media.

Colleges and universities located in Delaware County include Widener University, Villanova University, Swarthmore College, Haverford College, and Valley Forge Military Academy, among others. Large employers in the county include United Parcel Service, Inc., The Boeing Company, Prospect CCMC, LLC, and Villanova University.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. The unemployment rates have decreased in the assessment area during the evaluation period. Philadelphia County has the highest unemployment rate of the five counties in the assessment area, and exceeds both statewide and national levels. On the other hand, Chester County has the lowest rate, below the rest of the counties in the assessment area, the Commonwealth and the nation as a whole.

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)		
County	% 2017	% 2018
Bucks	4.2	3.7
Chester	3.6	3.2
Delaware	4.5	4.0
Montgomery	3.8	3.4
Philadelphia	6.2	5.5
Commonwealth of Pennsylvania	4.9	4.3
United States	4.4	3.9

Housing

According to 2015 ACS Data, the Philadelphia, PA assessment area contained nearly 1.7 million housing units, 60% of which were owner-occupied, 31% of which were rental units, and 9% of which were vacant. The overall occupancy rate in the assessment area (60%) was comparable to that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such tracts. According to the 2015 ACS Data, 4% of owner-occupied housing was located in low-income tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in both middle- and upper-income tracts (38%, respectively).

Of the total existing housing units, 73% were single-family units, 10% were two-to-four family units, 16% were multifamily units, and 1% were mobile homes. The median age of the housing stock was 61 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 54 years.

Data show that the price of housing in the assessment area is more expensive than in the Commonwealth overall. The 2015 ACS Data show that the median value of the housing stock in the assessment area was $244,580, which is appreciably higher than the median housing value in Pennsylvania ($166,000). The median housing value in low-income tracts was $80,582, and increased to $141,730 in moderate-income tracts. In the assessment area, housing values were considerably higher in middle- and upper-income tracts ($248,505 and $336,140), than in low- and moderate-income tracts ($80,582 and $141,730). In the assessment area, less than 15% of the total owner-occupied housing units were valued at less than $100 thousand, compared to Pennsylvania, where 26% of owner-occupied housing units were valued at less than $100 thousand.

Similarly, median gross rents (rent plus utilities) were more expensive in the assessment area than in Pennsylvania. Median gross rent in the Philadelphia, PA assessment area was $1,005, which compares unfavorably to that in the Commonwealth ($840) as a whole. Within the bank's Philadelphia, PA assessment area, nearly 51% of renters pay more than 30% of their income for housing in contrast to 46% in Pennsylvania.

Borrower Income Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. Of the total families in the assessment area, 22% were low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper-income. In the assessment area, 10% of families were living below the poverty level, compared to 9% in the Commonwealth overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC. Median family incomes for the two MDs included in the bank's assessment area for 2017 and 2018 are listed in the table below, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Metropolitan Division	Year	HUD-Adjusted Median Family Income	Low-Income (<50%)	Moderate-Income (50%-less than 80%)	Middle-Income (80%-less than 120%)	Upper-Income (120% or Greater)
Montgomery-Bucks-Chester Counties, PA MD	2017	$102,600	Less than $51,300	$51,300 - $82,079	$82,080 - $123,119	$123,120 or more
Philadelphia, PA MD	2017	$57,400	Less than $28,700	$28,700 - $45,919	$45,920 - $68,879	$68,880 or more
Montgomery-Bucks-Chester Counties, PA MD	2018	$107,900	Less than $53,950	$53,950 - $86,319	$86,320 - $129,479	$129,480 or more
Philadelphia, PA MD	2018	$61,700	Less than $30,850	$30,850 - $49,359	$49,360 - $74,039	$74,040 or more

Geographic Business and Farm Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such tracts. According to business data provided by Dun and Bradstreet in 2017, 4% of businesses in the Philadelphia, PA assessment area were located in low-income census tracts, and 17% were in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (36%) and upper-income census tracts (42%). Business demographic data also revealed that of the 174,584 businesses located in the assessment area in 2017, 90% were small businesses with gross annual revenues of $1 million or less.

Similarly, the percentage of total farms within designated census tracts is used as a proxy to estimate demand for small farm credit within such tracts. According to 2017 Dun & Bradstreet data, 1% of farms were located in low-income census tracts, and 14% were in moderate-income census tracts. The majority of farms (52%) were located in middle-income census tracts, and 32% were located in upper-income tracts. Demographic data also revealed that of the 1,115 farms in the assessment area, 94% were small farms with gross annual revenues of $1 million or less.

Using the 2018 Dun & Bradstreet data, the geographic distribution of businesses remained unchanged. In other words, 4% of businesses were located in the assessment area's low-income census tracts. An additional 17% of businesses were located in moderate-income census tracts, while the majority of businesses remained in middle-income census tracts (36%) and in upper-income census tracts (42%). Business demographic data revealed that of the 202,619 businesses in the assessment area in 2018, 91% were small businesses with gross annual revenues of $1 million or less.

Dun & Bradstreet data reveals that in 2018, 1% of farms were located in the assessment area's low-income census tracts, and less than 15% of farms were located in moderate-income census tracts. The majority of farms were located in middle-income census tracts (51%), with the remaining 33% of farms located in upper-income census tracts. Demographic data also revealed that of the 1,308 farms in the assessment area, 94% were small farms with gross annual revenues of $1 million or less.

The 2017 and 2018 assessment area demographics used to evaluate Univest's CRA performance in the Philadelphia, PA assessment area are detailed in the tables on the following pages.

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Assessment Area Demographics 2017								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1
Unknown-income	17	1.7	563	0.1	120	21.3	0	0.0
Total Assessment Area	**998**	**100.0**	**954,348**	**100.0**	**97,167**	**10.2**	**954,348**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3
Total Assessment Area	**1,661,031**	**990,304**	**100.0**	**59.6**	**522,312**	**31.4**	**148,415**	**8.9**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	6,864	3.9	6,124	3.9	707	4.1	33	2.8
Moderate-income	29,884	17.1	26,855	17.2	2,832	16.5	197	16.7
Middle-income	63,233	36.2	56,454	36.1	6,366	37.2	413	34.9
Upper-income	73,529	42.1	66,105	42.3	6,890	40.2	534	45.2
Unknown-income	1,074	0.6	742	0.5	327	1.9	5	0.4
Total Assessment Area	**174,584**	**100.0**	**156,280**	**100.0**	**17,122**	**100.0**	**1,182**	**100.0**
	Percentage of Total Businesses:		**89.5**			**9.8**		**0.7**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	12	1.1	11	1.1	1	1.4	0	0.0
Moderate-income	158	14.2	149	14.3	9	12.9	0	0.0
Middle-income	582	52.2	543	52.0	39	55.7	0	0.0
Upper-income	361	32.4	340	32.5	21	30.0	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	**1,115**	**100.0**	**1,045**	**100.0**	**70**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**93.7**			**6.3**		**0.0**

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1
Unknown-income	17	1.7	563	0.1	120	21.3	0	0.0
Total Assessment Area	**998**	**100.0**	**954,348**	**100.0**	**97,167**	**10.2**	**954,348**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3
Total Assessment Area	**1,661,031**	**990,304**	**100.0**	**59.6**	**522,312**	**31.4**	**148,415**	**8.9**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	8,159	4.0	7,392	4.0	717	4.1	50	3.0
Moderate-income	35,298	17.4	32,212	17.6	2,800	16.1	286	17.2
Middle-income	73,055	36.1	65,951	35.9	6,508	37.3	596	35.8
Upper-income	84,800	41.9	77,012	42.0	7,065	40.5	723	43.4
Unknown-income	1,307	0.6	942	0.5	355	2.0	10	0.6
Total Assessment Area	**202,619**	**100.0**	**183,509**	**100.0**	**17,445**	**100.0**	**1,665**	**100.0**
	Percentage of Total Businesses:		**90.6**		**8.6**			**0.8**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	13	1.0	13	1.1	0	0.0	0	0.0
Moderate-income	190	14.5	178	14.4	12	16.4	0	0.0
Middle-income	668	51.1	627	50.8	41	56.2	0	0.0
Upper-income	435	33.3	415	33.6	20	27.4	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	**1,308**	**100.0**	**1,235**	**100.0**	**73**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**94.4**		**5.6**			**0.0**

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses and farms of different sizes, including small businesses and farms;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;

- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses and farms;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in the Philadelphia, PA assessment area.

Lending Activity

Univest's lending levels in the Philadelphia, PA assessment area reflect excellent responsiveness to credit needs. During the evaluation period, lending activity in the Philadelphia, PA assessment area represented 64% of the bank's overall lending by number of loans, and 68% by dollar volume. During the evaluation period, Univest made 2,829 HMDA loans totaling $604 million, 1,096 small business loans totaling nearly $210 million, and 87 small farm loans totaling $11 million in the bank's Philadelphia, PA assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, good penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes, including small businesses and small farms.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending performance. Further, due to loan volumes, HMDA loans are given the most weight in determining the bank's overall borrower distribution of loans, followed by small business loans, and finally small farm loans.

Home-Mortgage Lending

Univest's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is good.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to 2015 ACS Data, 22% of families in the assessment area were low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper-income.

The following tables compare Univest's home-mortgage lending to aggregate home-mortgage lending levels, using median family income as a proxy for loan demand. The first table, used to evaluate 2017 lending, relies on 2015 ACS data to estimate demand for home-mortgage credit among both low- and moderate-income families. The second table, used to evaluate 2018 lending, relies on the 2015 ACS data along with the updated HMDA data, following requirements under Regulation C.

		Aggregate Comparison	
Univest Bank & Trust Co. **Philadelphia, PA Assessment Area** **Distribution of HMDA Loans by Borrower Income Level**			
Income Level	**%** **Families by Family Income Level** **(2015 ACS Data)**	**2017**	
		% **Univest**	**%** **Aggregate Lending**
Low	22.4	13.0	7.5
Moderate	17.2	18.7	16.5
Middle	19.3	19.7	20.4
Upper	41.1	39.3	40.5
Unknown	0.0	9.3	15.1
Total	**100**	**100**	**100**

		Aggregate Comparison	
Univest Bank & Trust Co. **Philadelphia, PA Assessment Area** **Distribution of HMDA Loans by Borrower Income Level**			
Income Level	**%** **Families by Family Income Level** **(2015 ACS Data)**	**2018**	
		% **Univest**	**%** **Aggregate Lending**
Low	22.4	13.0	8.3
Moderate	17.2	19.0	17.9
Middle	19.3	20.1	21.3
Upper	41.1	38.7	39.0
Unknown	0.0	9.2	13.5
Total	**100**	**100**	**100**

Lending to Low-Income Borrowers

Overall, Univest's lending to low-income borrowers was good.

Univest's lending in 2017 to low-income borrowers was good. In total, 13% of the bank's HMDA loans (182 loans) were originated to low-income borrowers, exceeding the aggregate lending level of 8%, but trailing the proxy of 22%. By loan category, Univest originated 12% of its home-purchase loans (89 loans), 10% of refinance loans (21 loans), 18% of home improvement loans (72 loans), and no multifamily loans to low-income borrowers. In comparison, aggregate lenders made 7% of home purchase loans, 7% of refinance loans, 10% of home improvement loans, and no multifamily loans to low-income borrowers in 2017.

In 2018, Univest's HMDA lending to low-income borrowers was good. In total, 13% of the bank's HMDA loans (186 loans) were originated to low-income borrowers. This exceeded the aggregate lending level of 8%, but trailed the proxy of 22%. By loan category, Univest originated 13% of its home purchase loans (93 loans), 13% of refinance loans (38 loans), 12% of home improvement loans (32 loans), 4% of multifamily loans (one loan), and no loans with purpose "not applicable" to low-income borrowers. By loan category, aggregate lenders made 8% of home purchase loans, 10% of refinance loans, 8% of home improvement loans, 1% of multifamily, and 2% of loans with purpose "not applicable" to low-income borrowers in 2018.

For both years, bank and aggregate levels were far below the proxy of low-income families, potentially indicating limited lending opportunities with the assessment area's low-income borrowers. This is substantiated when considering demographic information, which was introduced previously. As indicated, housing costs in the assessment area were notably higher than in the Commonwealth as a whole, presenting a significant barrier to potential low-income homebuyers. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Lending to Moderate-Income Borrowers

Overall, the bank's lending to moderate-income borrowers was excellent.

In 2017, Univest's overall lending to moderate-income borrowers was excellent. In total, 19% of the bank's HMDA loans (261 loans) were originated to moderate-income borrowers, exceeding both the aggregate lending level of 17% and proxy of 17%. By loan category, Univest originated 20% of its home-purchase loans (153 loans), 15% of refinance loans (32 loans), 19% of home improvement loans (76 loans), and no multifamily loans to moderate-income borrowers. By loan category, aggregate lenders made 18% of home purchase loans, 15% of refinance loans, 17% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

Univest's HMDA lending to moderate-income borrowers in 2018 was excellent. In total, 19% of the bank's HMDA loans (272 loans) were originated to moderate-income borrowers which, again exceeded both the aggregate lending level of 18% and proxy of 17%. By loan type, Univest originated 20% of home purchase loans (142 loans), 18% of refinance loans (55 loans), 19% of home improvement loans (51 loans), no multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers. By loan category, aggregate lenders made 19% of home purchase loans, 17% of refinance loans, 17% of home improvement loans, less than 1% of multifamily loans, and 3% of "not applicable" loans to moderate-income borrowers in 2018.

Small Business Lending

An analysis of Univest's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the Philadelphia, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business data, 174,584 businesses were operating in the assessment area in 2017, with 90% designated as small businesses. According to 2018 business demographics, there were 202,619 businesses located in the assessment area, with 91% designated as small businesses.

In 2017, the bank's borrower distribution of small business loans was adequate. In 2017, Univest originated 523 small business loans in the assessment area, aggregating $95 million. Of these loans, 33% were originated to small businesses. The bank's lending to small businesses is below the aggregate lending level of 49% to small businesses by all lenders in the assessment area, and is less than the proxy of 90%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2017, 57% of Univest's small business loans in the assessment area were extended in an amount of less than $100 thousand. Aggregate lending data for 2017 shows that 93% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2018, Univest's borrower distribution of small business loans was adequate. The bank originated 573 small business loans aggregating nearly $115 million in the assessment area. Of these loans, 30% were originated to small businesses, again below the aggregate lending level of 45% of loans to small businesses, and less than the proxy of 91%.

In 2018, 55% of Univest's small business loans were extended in an amount of $100 thousand or less. The 2018 aggregate lending data shows that 93% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. Because credit card loans are generally made in smaller amounts, this can skew aggregate small business data. As noted previously, amongst the top small business lenders in the assessment area are national lenders with large credit card portfolios. In fact, the top five CRA reporters in the assessment area were all credit card lenders, who together controlled over half of the CRA market. This is taken into account when drawing conclusions about the bank's small business lending.

Small Farm Lending

An analysis of Univest's distribution of loans to farms represents excellent penetration among farm customers of different sizes, including small farms. For purposes of this evaluation, small farm loans are defined as loans that have origination amounts of $500,000 of less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

The number of farms operating in the Philadelphia, PA assessment area is used as a proxy to estimate demand for farm credit in the assessment area. According to Dun & Bradstreet farm data, 1,115 farms were operating in the assessment area in 2017, with 94% designated as small farms reporting revenues of $1 million or less. In 2018, 1,308 farms were operating in the assessment area, with 94% designated as small farms.

In 2017, the bank's borrower distribution of small farm loans was excellent. In 2017, Univest originated 42 small farm loans in the assessment area, totaling just over $4.9 million. Of these loans, 95% were originated to small farms, thereby exceeding both aggregate lending of 62% and the proxy of 94%.

Small farm loans were further analyzed to determine the extent of loans originated in an amount of $100,000 or less, as such loans are generally commensurate with the needs of small farms. In 2017, 60% of the bank's loans were in amounts less than $100,000, as compared to aggregate lenders, who originated 81% of their small farm loans in amounts of $100,000 or less.

In 2018, Univest's borrower distribution of small farm loans was excellent. In 2018, the bank originated 45 small farm loans totaling $6.1 million. Of these, 100% were to small farms with revenues of $1 million or less. The bank's performance exceeded both aggregate lending performance of 61%, and the proxy of 94%.

In 2018, 53% of Univest's small farm loans were extended in an amount of $100 thousand or less. The 2018 aggregate lending data shows that 79% of small farm loans made in the assessment area were originated in an amount of $100 thousand or less.

Geographic Distribution of Lending

Overall, the geographic distribution of loans reflects good penetration throughout the Philadelphia, PA assessment area, including in low- and moderate-income census tracts. As mentioned earlier, HMDA loans were given the greatest amount of consideration in determining this conclusion, because of loan volume, followed by small business and then small farm loans.

Home-Mortgage Lending

Univest's geographic distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand is for home-mortgage credit in the tract.

According to the 2015 ACS Data, 4% of owner-occupied housing was located in low-income census tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (38%), and upper-income tracts (38%).

The tables below present the geographic distribution of Univest's HMDA lending in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area.

	Univest Bank & Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans		
		Aggregate Comparison	
		2017	
Income Level	**% Owner-Occupied Housing Units (2015 ACS Data)**	**% Univest Lending**	**% Aggregate Lending**
Low	4.0	3.0	2.8
Moderate	20.0	19.0	19.6
Middle	37.9	48.7	38.6
Upper	38.1	29.3	39.0
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

	Univest Bank & Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans		
		Aggregate Comparison	
		2018	
Income Level	**% Owner-Occupied Housing Units (2015 ACS Data)**	**% Univest Lending**	**% Aggregate Lending**
Low	4.0	3.5	2.9
Moderate	20.0	18.9	19.1
Middle	37.9	49.6	38.3
Upper	38.1	28.0	39.7
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

The geographic distribution of the bank's home-mortgage lending in low-income census tracts was good.

Univest's HMDA lending in low-income census tracts in 2017 was good. In 2017, the bank's lending level of 3% in low-income tracts (42 loans) met the aggregate lending level of 3% and was slightly below the owner-occupied housing proxy of 4%. Categorized by loan product type, Univest originated 4% of its home-purchase loans (31 loans), 2% of its refinance loans (five loans), 1% of its home improvement loans (three loans), and 16% of its multifamily loans (three loans) in low-income census tracts in 2017. In comparison, aggregate lenders made 3% of home-purchase loans, 2% of refinance loans, 4% of home-improvement loans, and 8% of multifamily loans in low-income tracts.

Univest's HMDA lending in low-income census tracts in 2018 was good. In 2018, the bank's lending level of 4% in low-income tracts (50 loans) exceeded the aggregate lending level of 3% and met the owner-occupied housing proxy of 4%. Categorized by loan product type, Univest originated 5% of its home-purchase loans (32 loans), 2% of its refinance loans (five loans), 3% of its home improvement loans (seven loans), 18% of its multifamily loans (five loans), and no loans with purpose "not applicable" in low-income census tracts in 2018. Aggregate lenders made 3% of home-purchase loans, 2% of refinance loans, 2% of home-improvement loans, 10% of multifamily loans, and 5% of loans with purpose "not applicable" in low-income census tracts in 2018.

Lending in Moderate-Income Census Tracts

The geographic distribution of the bank's home-mortgage lending in moderate-income census tracts was good.

Univest's lending in moderate-income census tracts in 2017 was good. In 2017, the bank's lending level of 19% in moderate-income tracts (265 loans) was slightly below both the aggregate lending level and the owner-occupied housing proxy, both of which were 20%. Categorized by loan product type, Univest originated 21% of its home-purchase loans (159 loans), 13% of its refinance loans (28 loans), 18% of its home-improvement loans (71 loans), and 37% of its multifamily loans (seven loans) in moderate-income census tracts in 2017. Aggregate lenders made 20% of home-purchase loans, 18% of refinance loans, 21% of home-improvement loans, and 34% of multifamily loans in moderate-income tracts.

Univest's lending in moderate-income census tracts in 2018 was good. In 2018, the bank's lending level of 19% (270 loans) met the aggregate lending level of 19% and was slightly below the owner-occupied housing proxy of 20%. Categorized by loan product type, Univest originated 21% of its home-purchase loans (147 loans), 17% of its refinance loans (50 loans), 17% of its home-improvement loans (47 loans), 29% of its multifamily loans (eight loans), and no loans with purpose "not applicable" in moderate-income census tracts in 2018. In contrast, aggregate lenders made 21% of home-purchase loans, 17% of refinance loans, 15% of home-improvement loans, 34% of multifamily loans and 30% of loans with purpose "not applicable" in moderate-income tracts in 2018.

Small Business Lending

The geographic distribution of Univest's small business loans reflects adequate penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on available business data, in 2017 and 2018, 4% of businesses in the assessment area were located in low-income census tracts. Similarly, Dun & Bradstreet data show that in 2017 and 2018, 17% of businesses were located in moderate-income census tracts. The remaining 79% of businesses were located in middle-income census tracts (36%), upper-income geographies (42%), and unknown-income census tracts (<1%).

The tables below present Univest's small business geographic distribution in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the two years evaluated.

		Aggregate Comparison	
Univest Bank & Trust Co. **Philadelphia, PA Assessment Area** **Geographic Distribution of Small Business Loans**			
		2017	
Census Tract Income Level	**%** **Businesses By Tract Income Level** **(2015 ACS Data)**	**%** **Univest Lending**	**%** **Aggregate Lending**
Low	3.9	2.3	3.5
Moderate	17.1	13.0	16.0
Middle	36.2	63.7	36.2
Upper	42.1	21.0	42.6
Unknown	0.6	0.0	1.6
Total	**100**	**100**	**100**

		Aggregate Comparison	
Univest Bank & Trust Co. **Philadelphia, PA Assessment Area** **Geographic Distribution of Small Business Loans**			
		2018	
Census Tract Income Level	**%** **Businesses By Tract Income Level** **(2015 ACS Data)**	**%** **Univest Lending**	**%** **Aggregate Lending**
Low	4.0	1.9	3.6
Moderate	17.4	16.9	16.3
Middle	36.1	57.4	36.1
Upper	41.9	23.4	42.6
Unknown	0.6	0.3	1.5
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

Overall, small business lending in low-income tracts was adequate.

In 2017, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Univest originated 2% of its small business loans (twelve loans) in the assessment area's low-income census tracts. The bank's lending level lagged both the applicable business loan demand proxy of 4% and the aggregate small business lending level of 4%.

In 2018, the geographic distribution of the bank's small business lending in low-income census tracts mirrored the prior year's performance, and was considered adequate. Univest again originated 2% of its small business loans (eleven loans) in the assessment area's low-income census tracts. The bank's lending level was again below both the applicable business loan demand proxy of 4% and aggregate small business lending level of 4%.

Lending in Moderate-Income Census Tracts

Overall, small business lending in moderate-income tracts was adequate.

In 2017, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Univest originated 13% of its small business loans (68 loans) in the assessment area's moderate-income census tracts. The bank's lending level lagged both the applicable business loan demand proxy of 17% and the aggregate small business lending level of 16%.

In 2018, the geographic distribution of the bank's small business lending in moderate-income census tracts improved over the prior year's performance, and was considered good. Univest originated 17% of its small business loans (97 loans) in the assessment area's moderate-income census tracts. The bank's lending level met the applicable business loan demand proxy of 17% and exceeded the aggregate small business lending level of 16%.

Small Farm Lending

The geographic distribution of Univest's loans to farms represents excellent penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of farms in the assessment area by census tract type is used as a proxy for small farm loan demand. Generally, the greater the number of farms located in a tract, the greater the demand for small farm loans in the tract. Based on available business data in both 2017 and 2018, only 1% of the farms in the assessment area (12 farms in 2017, and 13 farms in 2018) were located in low-income tracts. In 2017, 14% of farms were located in moderate-income tracts (158 farms), and this percentage increased to 15% in 2018 (190 farms). In both years, the majority of farms were located in middle-income tracts (52% in 2017, and 51% in 2018), and upper-income tracts (32% in 2017, and 33% in 2018).

The tables on the following page present Univest's small farm geographic lending distribution, in comparison to applicable farm proxy and aggregate lending levels in the assessment area.

| | | Aggregate Comparison | |
| | % | 2017 | |
Census Tract Income Level	**Farms By Tract Income Level (2015 ACS Data)**	**% Univest Lending**	**% Aggregate Lending**
Low	1.1	0.0	0.0
Moderate	14.2	35.7	23.4
Middle	52.2	59.5	57.4
Upper	32.4	4.8	17.7
Unknown	0.2	0.0	1.5
Total	**100**	**100**	**100**

Table title: **Univest Bank & Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Farm Loans**

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Farm Loans			
Census Tract Income Level	**% Farms By Tract Income Level (2015 ACS Data)**	**Aggregate Comparison**	
		2018	
		% Univest Lending	**% Aggregate Lending**
Low	1.0	0.0	0.6
Moderate	14.5	42.2	29.2
Middle	51.1	53.3	48.3
Upper	33.3	4.4	19.1
Unknown	0.2	0.0	2.8
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

Geographic distribution of small farm loans in low-income census tracts was not analyzed due to the demographics of the assessment area. As mentioned previously, only 1% of farms were located in low-income tracts, and as seen in the tables above, neither Univest, nor aggregate lenders made small farm loans in such tracts.

Lending in Moderate-Income Census Tracts

Overall, Univest's small farm lending in moderate-income tracts was excellent.

In 2017, the geographic distribution of small farm loans was excellent. Univest made 36% of its small farm loans (15 loans) in moderate-income tracts, far exceeding both aggregate lenders (23%) and proxy (14%).

In 2018, Univest's geographic distribution of small farm lending was excellent. The bank originated 42% of its small farm loans (19 loans) in moderate-income census tracts, again exceeding both aggregate lending (29%) and proxy (15%).

Responsiveness to Credit Needs

Univest exhibits a good record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices.

As indicated previously, community contacts emphasized the need for flexible first-time homebuyer products, as well as small business start-up loans. As described below in the Innovative and/or Flexible Lending Practices section, Univest was successful in meeting both needs.

Univest has taken a lead role in support of affordable housing initiatives in the assessment area, as the participating lender in the Philadelphia Neighborhood Home Preservation Loan Program. The RRR program is an initiative of the City of Philadelphia and Philadelphia Redevelopment Authority, to help Philadelphia homeowners access low-interest loans to invest in their properties. During the evaluation period, all 32 of the loans made by Univest in this program were within the Philadelphia, PA assessment area.

Additionally, Univest participates in many other first-time homebuyer programs, and the bank's HMDA lending record shows good distribution to all borrowers, including to low- and moderate-income borrowers.

The Main Street Banking program is responsive to the unmet need of collaboration between financial institutions and the business community which was noted as a need by community contacts.

Innovative and/or Flexible Lending Practices

Univest makes extensive use of innovative and/or flexible lending practices in serving the Philadelphia, PA assessment area credit needs. Through a number of different programs, the bank made home-mortgage loans to low- and moderate-income borrowers, and small businesses and small farms during the evaluation period.

As mentioned previously, the home-mortgage credit needs of low- and moderate-income individuals and families often can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Philadelphia, PA assessment area, Univest participates in programs for first-time homebuyers through a variety of agencies, including: the FHA, the VA, the FSA, the PHFA, Fannie Mae and Freddie Mac. Additionally, the bank participates in specialized grant and lending programs with the FHLB Pittsburgh (First Front Door grant program), and a partnership between the City of Philadelphia and the Philadelphia Redevelopment Authority (RRR program). Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers.

In total, the bank made 235 home-purchase loans under the federal government programs, aggregating nearly $48 million, along with 67 FHLB First Front Door grants for $330 thousand, and 32 RRR loans totaling almost $550 thousand.

To address the credit needs of small businesses in its assessment area, Univest participates in the SBA loan program, and is a preferred SBA Express Lender. Additionally, through the SBA, Univest offers small business loans through its proprietary Main Street Banking program, which provides small business owners the opportunity to package products and services, which save them money, simplifying the product selection process.

By product type, Univest made the following loans in the Philadelphia, PA assessment area: 22 SBA loans totaling $12 million, and 243 Main Street Small Business loans totaling $9.1 million.

Community Development Lending

Univest makes a relatively high level of community development loans in the Philadelphia, PA assessment area. During the period evaluated, the bank reported 30 new loans totaling $35.9 million in the assessment area. This is a significant increase from the previous evaluation when the bank's fifteen community development loans totaled $2.3 million. Of the bank's overall community development lending by dollar volume, 49% was within the assessment area.

The bank made twenty-two new community development loans totaling $17.1 million that support affordable housing initiatives for low- and moderate-income individuals by providing 591 units of housing in the assessment area. Additionally, four loans totaling $12.5 million supported community services targeted to low- and moderate-income individuals, and the bank made four loans totaling $6.3 million in support of revitalization and stabilization initiatives within the assessment area.

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$	#	$	#	$	#	$	#	$
2017	4	8,803,720	1	19,048	0	0	0	0	5	8,822,768
2018	9	1,561,611	2	5,588,000	0	0	2	2,501,048	13	9,650,659
2019	9	6,738,852	1	6,920,000	0	0	2	3,764,890	12	17,423,742
Total	**22**	**17,104,183**	**4**	**12,527,048**	**0**	**0**	**4**	**6,265,938**	**30**	**35,897,169**

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

Volume of Investment and Grant Activity

Univest has a significant level of qualified community development investments and grants, occasionally in a leadership position. In total, the bank's qualified investments, grants, and donations in the Philadelphia, PA assessment area totaled $10.8 million. This represents a significant increase from the investment and grant level of $3.6 million at the previous evaluation. Of the bank's overall investments for the institution, 47% were within the Philadelphia, PA assessment area.

The vast majority of investments support affordable housing for low- and moderate-income borrowers via maturing investments in mortgage-backed securities totaling nearly $9.5 million. This total is comprised of fifty-nine home-mortgage loans in nine investments to low- and moderate-income individuals and/or geographies. Three of the nine mortgage-backed security investments were recognized in the previous evaluation and remained outstanding.

The bank also made numerous donations and grants totaling $1.2 million to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, $36 thousand supported affordable housing, over $1.1 million were to organizations that provide community services to low- and moderate-income individuals, $21 thousand supported economic development, and almost $40 thousand supported revitalization and stabilization efforts in the assessment area.

Finally, Univest made in-kind donations to local non-profit organizations totaling nearly $128 thousand to organizations that routinely provide affordable housing ($77 thousand) and economic development activity activities ($50 thousand) in the assessment area.

The following table presents the investment and grant activity for the Philadelphia, PA assessment area.

Univest Bank & Trust Co. Philadelphia, PA Assessment Area Qualified Investments				
CD Category	**DONATIONS $**	**INVESTMENTS $**	**IN-KIND DONATIONS $**	**TOTALS $**
Affordable Housing	$6,000	9,481,136	77,193	9,594,329
Community Services	1,124,085	0	0	1,124,085
Economic Development	21,145	0	50,420	71,565
Revitalization & Stabilization	39,500	0	0	9,500
Totals	**1,220,730**	**9,481,136**	**127,613**	**10,829,479**

Responsiveness to Credit and Community Development Needs

Univest's investments exhibit good responsiveness to credit and community development needs of the assessment area. Qualified investments increased significantly since the previous evaluation. Additionally, as noted in the table above, nearly ninety percent of the bank's investment dollars in this assessment area addressed affordable housing needs, a pronounced community need in the Philadelphia, PA assessment area, as indicated through community contact interviews.

Community Development Initiatives

Univest makes occasional use of innovative and/or complex investments to support community development initiatives. In the Philadelphia, PA assessment area, the bank provides in-kind donations of office space to local organizations that provide community and economic development services benefiting low- and moderate-income people within the assessment area.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;

- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services

Performance under the service test is assessed as high satisfactory in the assessment area.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas.

During the review period, Univest operated 31 full-service branches in the Philadelphia, PA assessment area. Using the 2015 ACS Data, one branch (3%) is located in a low-income census tract, seven branches (23%) are located in moderate-income census tracts, fourteen branches (45%) are located in middle-income census tracts, and nine branches (29%) are located in upper-income tracts. The following table details the locations of the bank's branches with comparison to the 2015 ACS population demographics, and shows that branches are proximate to areas where the majority of the population resides.

Univest Bank & Trust Co. Retail Branch Distribution Philadelphia, PA Assessment Area 2015 ACS Data			
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Percent of Population**
Low-income	1	3.2	7.1
Moderate-income	7	22.6	24.8
Middle-income	14	45.2	34.8
Upper-income	9	29.0	32.9
Unknown-income	0	0.0	0.4
Totals	**31**	**100.0**	**100.0**

ATMs are available at all branch locations, which provides electronic access to banking services. To supplement traditional banking services, Univest provides online banking services, telephone banking services and a smart phone mobile banking application that includes mobile deposit capture capabilities. Using online banking services, bank customers can pay bills, open accounts and apply for loan products via the bank's website at https://www.univest.net.

Changes in Branch Locations

Univest's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. Within the Philadelphia, PA assessment area, three branches have been closed since the previous evaluation. Of the three branch closures, two were located in moderate-income census tracts, and one was in a middle-income geography.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences the bank's assessment area, particularly low- and moderate-income census tracts or individuals.

As mentioned above, all of Univest's branches in the assessment area include ATMs. Of the 31 branches in the assessment area, 25 (81%) have drive-through facilities[8]. All branches operate Monday through Friday, with all but three having extended hours on Thursday and/or Friday (until 6:00 p.m.) and Saturday until 1:00 p.m.[9]. Each of the three branches that do not offer extended Friday evening or Saturday morning hours are located in moderate-income census tracts. In addition, 28 (90%) of the bank's 31 branches offer Saturday morning hours[10]. It is noted, however, that each of the three branches without Saturday hours provide extended lobby and drive-through hours on Friday.

Bank Products

Univest provides the following products with reduced, (or no) fees, and/or or minimum balance requirements that provide greater access to banking services for low- and moderate-income customers, and small businesses.

- Basic checking: This checking account is a consumer account with no minimum daily balance requirement, no monthly service fee, and no fee for paper statements.
- The bank also offers a Small Business Checking account for small businesses with limited transaction activity. The account offers 200 free transaction items, with no monthly service charge, and no monthly minimum balance. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

Univest provides a relatively high level of community development services in the Philadelphia, PA assessment area.

Over the evaluation period, many bank officers and employees provided qualified community development services, providing technical assistance to community development organizations, and serving in various capacities on boards and board-level committees. Some notable examples include:

- A bank officer serves on the Financial Wellness Subcommittee of The Urban Affairs Coalition's Community and Economic Development Committee. The financial wellness subcommittee aims to empower Philadelphians to achieve financial stability through innovative educational programming and advocate for more equitable financial management policies.

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[8] Drive-through facilities are not available at the Chestnut Hill, Fairmount, Mt. Airy, South Philadelphia, University City branches due to limitations in the physical locations. Drive-through facilities are not offered at the Souderton branch, as a drive-through ATM was installed in the drive-through lane.

[9] The Fairmount, South Philadelphia and University City branches close at 5:00 pm on Friday, and 12:00 noon on Saturday.

[10] The Souderton, Westchester, and Willow Grove branches do not offer Saturday morning hours.

- A bank officer and bank employee serve on the board and as a committee member of the Community Lenders Community Development Corporation which provides the financing of and investment in housing and community development activities to serve low- and moderate-income individuals and geographies.
- Two bank officers serve as board members of Habitat for Humanity in Bucks and Chester Counties. The organization is a non-profit organization that relies on the community to help build homes for low-income families living in the community.
- Two bank officers serve on the board of the Keystone Opportunity Center which provides affordable housing and community services targeted to low- and moderate-income individuals.
- A bank officer serves on the board of ACLAMO Family Centers. The organization provides educational programs, social services and health access to Latino and other low-income residents by empowering them to succeed and become productive member of society.

LANCASTER, PA ASSESSMENT AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Univest's Lancaster, PA assessment area consists of the entirety of Lancaster County, which comprises the Lancaster, PA MSA. Using 2015 ACS Data, the assessment area's population was 530,216.

For the purposes of assessing Univest's CRA performance in the Commonwealth of Pennsylvania, the Lancaster assessment area was weighted second, just behind the Philadelphia, PA assessment area. Of the bank's total loans, 28% of loans by number, and 22% of loans by dollar amount can be attributed to the Lancaster, PA assessment area. Univest operates five branches in the Lancaster assessment area which hold $264 million in deposits, or 6% of the bank's total deposits as of June 30, 2019. Univest also operates one limited service facility in the Lancaster, PA assessment area.

Univest's CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

As of the 2015 ACS Data, there were 98 census tracts in the bank's Lancaster, PA assessment area, six of which were designated as low-income (6%), 14 of which were moderate-income (14%), 67 of which were middle-income (68%), and 11 of which were upper-income tracts (11%). All six low-income tracts and eight of the moderate-income tracts were located in the city of Lancaster, the largest urban center in the assessment area.

A map of the Lancaster, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Summary of Deposits, as of June 30, 2019, there were 22 depository institutions operating in Univest's Lancaster assessment area. These institutions collectively operated 182 branches maintaining nearly $12 billion in deposits. Univest, with five branches, ranked thirteenth with $264 million in deposits, or just over 2% of the retail deposit market. Fulton Bank, N.A. led the market with 28% of the deposit market share, followed by Branch Banking and Trust Company (BB&T), with 17% of deposits, and PNC Bank, N.A., with 12% deposit market share.

Univest reports home-mortgage loans pursuant to HMDA, and was therefore compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. According to 2017 data, there were 348 HMDA reporters in the assessment area, which originated or purchased a total of 13,459 HMDA loans in the assessment area. Univest ranked nineteenth, with 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 10% of the market, followed by Residential Mortgage Services, Inc. with just under 6%, and Fulton Bank, N.A. with nearly 5% of the HMDA market.

According to 2018 aggregate HMDA data, 15,659 home-mortgage loans were collectively originated or purchased by 369 HMDA institutions in the assessment area. Univest ranked fourteenth, with under 2% of the HMDA market. Fulton Bank, N.A. is the largest HMDA reporter in the bank's Lancaster assessment area, reporting 9% of all such loans followed by Wells Fargo Bank, N.A. with over 7%, and Members 1st Federal Credit Union, with just under 7% of all loans originated and purchased.

Similarly, the institution reports its small business and small farm loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2017 data, there were 92 small business and small farm reporters in the assessment area, originating or purchasing 11,500 small business and small farm loans in the assessment area. Univest ranked eighth, with nearly 6% of the market. U.S. Bank, N.A., led the market with 11% market share, followed by PNC Bank, N.A., and American Express Bank, FSB, both, with 10% of the market.

According to aggregate CRA data, the assessment area had a total of 94 small business and small farm reporters in 2018, who collectively originated or purchased 12,423 small business and small farm loans in the bank's Lancaster assessment area. Again, Univest ranked eighth, with 5% of the market. BB&T led the market, with 12% of small business and small farm loans, followed by American Express National Bank, with nearly 11% market share, and U.S. Bank, N.A. with 10% of all loans originated and purchased.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national or regional credit card originators. More specifically, in 2018, the seven institutions ahead of Univest in market share were all national or regional credit card originators[11], and these banks collectively held 61% of the small business and small farm market in the Lancaster, PA assessment area.

To supplement economic, demographic and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Lancaster, PA assessment area. One interview was held with an agency focused on affordable housing, and the other was held with an agency focused on economic and small business development within the assessment area. The need for affordable housing was identified as a primary credit need by both interviewees. In addition, contacts indicated that while jobs are plentiful and growing, as the assessment area's aging populations retires, transportation to job sites and skilled workforce development are two community needs that would assist in filling these open positions.

Economic Characteristics

Lancaster County, Pennsylvania is located in the south central part of the Commonwealth of Pennsylvania, situated approximately 30 miles southeast of Harrisburg, and 70 miles west of Philadelphia. As mentioned earlier, the county comprises the entire Lancaster, PA MSA.

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[11]The top seven small business and small farm reporters in 2018 were BB&T; American Express National Bank; U.S. Bank, N.A.; Chase Bank USA, N.A.; PNC Bank, N.A.; Citibank, N.A.; and Capital One Bank USA, N.A.

According to the Moody's Analytics Precis Report as of May 2019, the regional economy is in a mid-expansion mode, and is exhibiting signs of fatigue. The labor market has weakened, and growth has slowed significantly, falling below the Pennsylvania and U.S. averages for the first time since 2011. The jobless rate is at a multi-decade low of 3%, and as indicated by community contacts, some firms are experiencing difficulties in finding qualified workers. At the time of the Moody's report, only two-fifths of private industries were adding workers. Education and healthcare segments are healthier, but the core manufacturing industry has softened, likely due to lower hourly earnings. The rise of e-commerce and the need for more warehouses has played a role in the addition of logistics jobs, due to Lancaster County's ideal location, in the middle of the Baltimore-Wilmington-Philadelphia travel corridor. However, small additions in logistics and flat factory payrolls are forecasted.

Healthcare facilities and higher education institutions are important employers and sources of labor demand and supply as the expansion matures. An aging and steadily growing population is driving demand for medical care. Lancaster County has consistently had one of the fastest growing populations in Pennsylvania, and that is not expected to change any time soon.

Economic strengths of the Lancaster, PA assessment area's economy include its proximity to Baltimore, Philadelphia and Wilmington, strong and increasing population trends, and a well-diversified economy for its size. Challenges include reliance on traditional manufacturing, low per-capita income and education levels, and low worker productivity.

Education and health services represent the largest industry segment in the Lancaster, PA assessment area, contributing 18% of total jobs. Other important job segments include manufacturing (15%), retail trade (12%), and professional and business services and leisure and hospitality services (both 10%). Major employers in the assessment include Lancaster General Hospital and Medical Group, Chartwell Staffing Services Inc., Dart Container Company, and Turkey Hill Company, Inc.

The seasonally unadjusted unemployment rate[12] for the assessment area is presented in the following table, in comparison with the rates for the Commonwealth of Pennsylvania and the nation as a whole. The unemployment rates have decreased in the assessment area during the evaluation period, and the unemployment rate in Lancaster County is significantly lower than that in the Commonwealth of Pennsylvania, and the nation as a whole.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)		
County	**% 2017**	**% 2018**
Lancaster	3.8	3.4
Commonwealth of Pennsylvania	4.9	4.3
United States	4.4	9

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[12] Source: United States Department of Labor, Bureau of Labor Statistics

Housing

According to 2015 ACS data, the Lancaster, PA assessment area contained 205,587 total housing units, 65% of which were owner-occupied, 30% of which were rental units, and 5% of which were vacant. The overall occupancy rate in the assessment area (65%) was higher than in the Commonwealth of Pennsylvania (61%). It is noteworthy that the vacancy rate in Lancaster County (5%) is considerably lower than that in the Commonwealth as a whole (11%), and can be attributed to the recent economic expansion and population in-flow trends into the county.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such tracts. According to 2015 ACS data, less than 2% of owner-occupied housing was located in low-income tracts, and 9% was located in moderate-income tracts. The vast majority of owner-occupied housing was located in middle-income tracts (76%), and the remaining 14% was located in upper-income tracts.

Of the total existing housing units, 76% were single-family units, 8% were two-to-four family units, 12% were multifamily units, and 4% were mobile homes. The median age of the housing stock was 47 years, which compares favorably to the Commonwealth of Pennsylvania, where the median age of housing is 54 years.

Data show that the price of housing in the assessment area is more expensive than in the Commonwealth overall. The 2015 ACS data show that the median value of the housing stock in the assessment area was $189,229, which is higher than the median housing value in Pennsylvania ($166,000). The median housing value in the assessment area's low-income tracts was $85,882, and increased to $114,714 in moderate-income tracts. Housing values were considerably higher in middle- and upper-income tracts ($193,421 and $229,686, respectively). In the assessment area, only 13% of the total owner-occupied housing units were valued at less than $100 thousand, making housing very expensive for potential homebuyers, compared to in the Commonwealth as a whole, where 26% were valued at less than $100 thousand.

Similarly, median gross rents were more expensive in the assessment area than in Pennsylvania. Median gross rent (rent plus utilities) in the Lancaster, PA assessment area was $909, which compares unfavorably to that in the Commonwealth as a whole ($840). Within the bank's Lancaster assessment area, nearly 49% of renters pay more than 30% of their income for housing in contrast to 46% in Pennsylvania.

Borrower Income Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. Of the total families in the assessment area, 18% were low-income, 19% were moderate-income, 23% were middle-income, and nearly 40% were upper-income. In the assessment area, 7% of families were living below the poverty level, compared to 9% in the Commonwealth overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified upon HUD annually-adjusted median family income data made available by the FFIEC. The assessment area's median family incomes for 2017 and 2018 are listed in the table below, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	HUD- Adjusted Median Family Income	Low-Income (<50%)	Moderate-Income (50%-less than 80%)	Middle-Income (80%-less than 120%)	Upper-Income (120% or Greater)
2017	$71,100	Less than $35,550	$35,550 - $56,879	$56,880 - $85,319	$85,320 or more
2018	$73,800	Less than $36,900	$36,900 - $59,039	$59,040 - $88,559	$88,560 or more

Geographic Business and Farm Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such tracts. According to business data provided by Dun and Bradstreet in 2017, 4% of businesses in the Lancaster, PA assessment area were located in low-income census tracts, and 10% were in moderate-income census tracts. The vast majority of businesses were located in middle-income census tracts (74%), and 12% of businesses were located in upper-income census tracts. Business demographic data also revealed that of the 21,126 businesses located in the assessment area in 2017, 89% were small businesses with gross annual revenues of $1 million or less.

Similarly, the percentage of total farms within designated census tracts is used as a proxy to estimate demand for small farm credit within such tracts. According to business data provided by Dun & Bradstreet in 2017, only one farm was located in a low-income census tract, and eight were in moderate-income census tracts (less than 1%). The vast majority of farms were located in middle-income census tracts (89%), and 10% were located in upper-income census tracts. Demographic data also revealed that of the 1,022 farms in the assessment area, 96% were small farms with gross annual revenues of $1 million or less.

Using the 2018 Dun & Bradstreet data, 4% of businesses were located in the assessment area's low-income census tracts. An additional 11% of businesses were located in moderate-income census tracts, while the majority of businesses remained in middle-income census tracts (74%). The remaining 12% of businesses were located in upper-income census tracts. Business demographic data also revealed that of the 24,426 businesses in the assessment area in 2018, 90% were small businesses with gross annual revenues of $1 million or less.

Dun & Bradstreet data reveals that in 2018, three farms were located in low-income census tracts, and six farms were located in moderate-income census tracts (less than 1%). The vast majority of farms were located in middle-income census tracts (90%), with the remaining 10% of farms located in upper-income census tracts. Demographic data also revealed that of the 1,069 farms in the assessment area, 96% were small farms with gross annual revenues of $1 million or less.

The 2017 and 2018 demographics used in evaluating Univest's performance under the CRA in the Lancaster, PA assessment area are detailed in the tables on the following pages.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Assessment Area Demographics 2017							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**98**	**100.0**	**137,133**	**100.0**	**9,994**	**7.3**	**137,133**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**205,587**	**134,548**	**100.0**	**65.4**	**60,782**	**29.6**	**10,257**	**5.0**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	824	3.9	715	3.8	104	4.7	5	2.5
Moderate-income	2,178	10.3	1,872	10.0	288	13.1	18	9.1
Middle-income	15,648	74.1	13,921	74.3	1,573	71.4	154	77.8
Upper-income	2,476	11.7	2,217	11.8	238	10.8	21	10.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**21,126**	**100.0**	**18,725**	**100.0**	**2,203**	**100.0**	**198**	**100.0**
	Percentage of Total Businesses:		**88.6**		**10.4**			**0.9**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1	0.1	1	0.1	0	0.0	0	0.0
Moderate-income	8	0.8	8	0.8	0	0.0	0	0.0
Middle-income	913	89.3	876	89.4	37	88.1	0	0.0
Upper-income	100	9.8	95	9.7	5	11.9	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,022**	**100.0**	**980**	**100.0**	**42**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**95.9**		**4.1**			**0.0**

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Univest Bank & Trust Co. Lancaster, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**98**	**100.0**	**137,133**	**100.0**	**9,994**	**7.3**	**137,133**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**205,587**	**134,548**	**100.0**	**65.4**	**60,782**	**29.6**	**10,257**	**5.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	975	4.0	874	4.0	95	4.2	6	2.5
Moderate-income	2,653	10.9	2,329	10.6	301	13.4	23	9.5
Middle-income	17,963	73.5	16,171	73.7	1,603	71.3	189	77.8
Upper-income	2,835	11.6	2,562	11.7	248	11.0	25	10.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**24,426**	**100.0**	**21,936**	**100.0**	**2,247**	**100.0**	**243**	**100.0**
	Percentage of Total Businesses:		**89.8**		**9.2**			**1.0**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	3	0.3	3	0.3	0	0.0	0	0.0
Moderate-income	6	0.6	6	0.6	0	0.0	0	0.0
Middle-income	958	89.6	919	89.5	39	92.9	0	0.0
Upper-income	102	9.5	99	9.6	3	7.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,069**	**100.0**	**1,027**	**100.0**	**42**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.1**		**3.9**			**0.0**

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses and farms of different sizes, including small businesses and farms;

- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses and farms;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in the Lancaster, PA assessment area.

Lending Activity

Univest's lending levels in the Lancaster, PA assessment area reflect good responsiveness to credit needs. During the evaluation period, lending activity in the Lancaster, PA assessment area represented 28% of the bank's overall lending by number of loans, and 22% by dollar volume. During the evaluation period, Univest made 464 HMDA loans totaling just over $88 million, 380 small business loans totaling nearly $60 million, and 948 small farm loans totaling $114 million.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, excellent penetration among individuals of different income levels, including low- and moderate-income individuals, farms of different sizes, including small farms, and businesses of different sizes, including small businesses.

For the Lancaster, PA assessment area, small farm loans were weighted most heavily in the analysis, followed by HMDA loans and small business loans, based on the number and dollar amount of such loans in 2017 and 2018.

Finally, it is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending test performance, given that the assessment area has only six low-income tracts, and fourteen moderate-income tracts.

Home-Mortgage Lending

Univest's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is excellent.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to 2015 ACS data, 18% of families in the assessment area were low-income, 19% were moderate-income, 23% were middle-income, and 39% were upper-income.

The following tables compare Univest's home-mortgage lending to aggregate home-mortgage lending levels, using median family income as a proxy for loan demand. The first table, used to evaluate 2017 lending, relies on 2015 ACS data to estimate demand for home-mortgage credit among both low- and moderate-income families. The second table, used to evaluate 2018 lending, relies on the 2015 ACS data along with the updated HMDA data, following requirements under Regulation C.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
	% Families by Family Income Level (2015 ACS Data)	2017	
Income Level		% Univest Lending	% Aggregate Lending
Low	18.3	13.1	6.8
Moderate	19.2	28.6	20.2
Middle	23.1	22.6	24.8
Upper	39.4	21.6	33.9
Unknown	0.0	14.1	14.3
Total	**100**	**100**	**100**

Univest Bank & Trust Co. Lancaster, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
	% Families by Family Income Level (2015 ACS Data)	2018	
Income Level		% Univest Lending	% Aggregate Lending
Low	18.3	9.8	6.7
Moderate	19.2	35.8	22.2
Middle	23.1	15.8	23.9
Upper	39.4	26.0	35.7
Unknown	0.0	12.5	11.5
Total	**100**	**100**	**100**

Lending to Low-Income Borrowers

Overall, Univest's lending to low-income borrowers was good.

Univest's lending in 2017 to low-income borrowers was good. In total, 13% of the bank's HMDA loans (twenty-six loans) were originated to low-income borrowers, exceeding the aggregate lending level of 7%, but trailing the proxy of 18%. By loan type, Univest originated 17% of its home-purchase loans (twenty-two loans), 10% of refinance loans (four loans), no home improvement loans, and no multifamily loans to low-income borrowers. In comparison, aggregate lenders made 7% of home purchase loans, 7% of refinance loans, 7% of home improvement loans, and no multifamily loans to low-income borrowers in 2017.

In 2018, Univest's HMDA lending to low-income borrowers was good. In total, 10% of the bank's HMDA loans (twenty-six loans) were originated to low-income borrowers. This exceeded the aggregate lending level of 7%, but trailed the proxy of 18%. By loan category, Univest originated 12% of its home purchase loans (seventeen loans), 8% of refinance loans (five loans), 7% of home improvement loans (two loans), no multifamily loans, and no loans with purpose "not applicable" to low-income borrowers. By loan category, aggregate lenders made 7% of home purchase loans, 8% of refinance loans, 6% of home improvement, no multifamily, and 1% of loan purpose "not applicable" loans to low-income borrowers in 2018.

Lending to Moderate-Income Borrowers

Overall, the bank's lending to moderate-income borrowers was excellent.

In 2017, Univest's overall lending to moderate-income borrowers was excellent. In total, 29% of the bank's HMDA loans (fifty-seven loans) were originated to moderate-income borrowers, exceeding both the aggregate lending level of 20% and proxy of 19%. By loan type, Univest originated 29% of its home-purchase loans (thirty-nine loans), 28% of refinance loans (eleven loans), 33% of home improvement loans (seven loans), and no multifamily loans to moderate-income borrowers. Aggregate lenders made 23% of home purchase loans, 16% of refinance loans, 17% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

Univest's HMDA lending to moderate-income borrowers in 2018 was excellent. In total, 36% of the bank's HMDA loans (ninety-five loans) were originated to moderate-income borrowers, which again exceeded both the aggregate lending level of 22% and proxy of 19%. By loan category, Univest originated 40% of home purchase loans (fifty-nine loans), 31% of refinance loans (twenty loans), 28% of home improvement loans (eight loans), 10% of multifamily loans (one loan), and no loans with purpose "not applicable" to moderate-income borrowers. Comparatively, aggregate lenders made 25% of home purchase loans, 22% of refinance loans, 17% of home improvement loans, 2% of multifamily loans, and 1% of loan purpose "not applicable" loans to moderate-income borrowers in 2018.

Small Farm Lending

An analysis of Univest's distribution of loans to farms reflects excellent penetration among farm customers of different sizes, including small farms. For purposes of this evaluation, small farm loans are defined as loans that have origination amounts of $500 thousand or less, and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers. Small farm loans are further analyzed to identify those loans to farms with gross annual revenues of $1 million or less, namely small farms.

The number of farms operating in the Lancaster, PA assessment area is used as a proxy to estimate demand for farm credit in the assessment area. According to available Dun & Bradstreet farm data, 1,022 farms were operating in the assessment area in 2017, with 96% designated as small farms reporting revenues of $1 million or less. In 2018, 1,069 farms were operating in the assessment area, with 96% designated as small farms.

In 2017, Univest's borrower distribution of small farm loans was excellent.

In 2017, the bank originated 477 small farm loans in the assessment area, aggregating over $56 million. Of these loans, 98% were originated to small farms with revenues of $1 million or less. The bank's 2017 lending to small farms exceeded the aggregate lending level of 82% to small farm loans by all lenders in the assessment area, and is greater than the proxy of 96%.

Small farm loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller farms, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller farms. In 2017, 64% of Univest's small farm loans in the assessment area were extended in an amount of less than $100 thousand. Aggregate lending data for 2017 is relatively consistent, and shows that 69% of small farm loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2018, Univest's borrower distribution of small farm loans was excellent. In 2018, the bank originated 471 small farm loans aggregating almost $58 million in the assessment area. Of these loans, 99% were originated to small farms with revenues of $1 million or less. This exceeded the aggregate lending level of 85%, and exceeded the lending proxy of 96%.

In 2018, 63% of Univest's small farm loans were extended in an amount of $100 thousand or less. The 2018 aggregate lending data shows that 69% of small farm loans made in the assessment area were originated in an amount of $100 thousand or less.

Small Business Lending

An analysis of Univest's borrower distribution of small business loans reflects excellent penetration among business customers of different sizes including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the Lancaster, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business data, 21,126 businesses were operating in the assessment area in 2017, with 89% designated as small businesses. According to 2018 business demographics, there were 24,426 businesses located in the assessment area, with 90% designated as small businesses.

In 2017, the bank's borrower distribution of small business loans was excellent. In 2017, Univest originated 173 small business loans aggregating $28 million in the assessment area. Of those small business loans, 81% were originated to small businesses. This performance is far above aggregate lenders, who originated 51% of small business loans to small businesses, but is less than the proxy of 89%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2017, 60% of Univest's small business loans in the assessment area were extended in an amount of less than $100 thousand. Aggregate lending data for 2017 shows that 89% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2018, Univest's borrower distribution of small business loans was excellent. The bank originated 207 small business loans aggregating $32 million in the assessment area. Of these loans, 90% were originated to small businesses, again, exceeding the aggregate lending level of 50% of loans to small businesses, and is equal to the lending proxy of 90%.

In 2018, 65% of Univest's small business loans were extended in an amount of $100 thousand or less. The 2018 aggregate lending data shows that 90% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. As noted previously, credit card loans are generally in smaller dollar amounts, which can skew aggregate small business loan data. Also noted previously, amongst the top small business lenders in the assessment area are large regional, and national lenders with large credit card portfolios, and this is taken into account when drawing conclusions about the bank's small business lending.

Geographic Distribution of Lending

Overall, the geographic distribution of loans reflects adequate penetration throughout the Lancaster, PA assessment area, including in low- and moderate-income census tracts.

Small Farm Lending

The geographic distribution of small farm lending was not performed in the Lancaster, PA assessment area due to the demographics of the area. According to Dun & Bradstreet data, less than 1% of farms in the assessment area are located in low-income census tracts in 2017 or 2018, rendering geographic distribution of very little value. The reported data reveal that in 2017, one of the assessment area's 1,022 farms was located in a low-income census tract, while three of the assessment area's 1,069 farms were located in a low-income census tract in 2018.

Similar trends were seen in moderate-income census tracts. In 2017, Dun & Bradstreet data show that eight of the assessment area's 1,022 farms (<1%) were located in moderate-income tracts. In 2018, Dun & Bradstreet data show that six of the 1,069 farms (<1%) were located in moderate-income tracts.

Not surprisingly, very little small farm lending took place in these tracts, either from the bank perspective, or from aggregate lenders in the assessment area. Consequently, geographic distribution analysis of small farm loans would not prove fruitful in this assessment area.

Data on the bank's small farm lending is included in Appendix D, for reference.

The table below presents Univest's small farm lending distribution for 2017 and 2018 in comparison to applicable proxies for each year evaluated, along with the aggregate lending levels in the assessment area.

Home-Mortgage Lending

Univest's geographic distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand is for home-mortgage credit in the tract.

According to 2015 ACS data, 2% of owner-occupied housing was located in low-income census tracts, and 9% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (76%), and upper-income tracts (14%).

The tables on the following page present the geographic distribution of Univest's HMDA lending in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Geographic Distribution of HMDA Loans			
		Aggregate Comparison	
	% Owner-Occupied Housing Units (2015 ACS Data)	**2017**	
Income Level		**% Univest Lending**	**% Aggregate Lending**
Low	1.6	8.0	2.3
Moderate	8.8	8.0	11.3
Middle	76.1	81.9	72.9
Upper	13.5	2.0	13.5
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Univest Bank & Trust Co. Lancaster, PA Assessment Area Geographic Distribution of HMDA Loans			
		Aggregate Comparison	
	% Owner-Occupied Housing Units (2015 ACS Data)	**2018**	
Income Level		**% Univest Lending**	**% Aggregate Lending**
Low	1.6	3.4	2.3
Moderate	8.8	6.4	10.6
Middle	76.1	89.1	73.5
Upper	13.5	1.1	13.6
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

The geographic distribution of the bank's home-mortgage lending in low-income census tracts was excellent.

Univest's lending in low-income census tracts in 2017 was excellent. In 2017, the bank's lending level of 8% in low-income tracts (sixteen loans) exceeded both the aggregate lending level of 2% and the owner-occupied housing proxy of 2%. Categorized by loan product type, Univest originated 8% of its home-purchase loans (ten loans), 8% of its refinance loans (three loans), no home improvement loans, and 50% of its multifamily loans (three loans) in low-income census tracts in 2017. In comparison, aggregated lenders originated 2% of home-purchase loans, 2% refinance loans, 2% of home-improvement loans, and 13% of multifamily loans in low-income tracts.

Univest's HMDA lending in low-income census tracts in 2018 was again considered to be excellent. In 2018, the bank's lending level of 3% in low-income tracts (nine loans) exceeded both the aggregate lending level of 2% and the owner-occupied housing proxy of 2%. Categorized by loan product type, Univest originated 5% of its home-purchase loans (seven loans), 2% of its refinance loans (one loan), no home improvement loans, 10% of its multifamily loans (one loan), and no loans with purpose "not applicable" in low-income census tracts in 2018. In contrast, aggregate lenders made 3% of home-purchase loans, 2% of refinance loans, 1% of home-improvement loans, 13% of multifamily loans, and 3% of loans with purpose "not applicable" in low-income census tracts.

Lending in Moderate-Income Census Tracts

The geographic distribution of the bank's home-mortgage lending in moderate-income census tracts was good.

Univest's lending in moderate-income census tracts in 2017 was good. In 2017, the bank's lending level of 8% in moderate-income tracts (sixteen loans) was below both the aggregate lending level of 11% and the owner-occupied housing proxy of 9%. Categorized by loan product type, Univest originated 11% of its home-purchase loans (fourteen loans), 5% of its refinance loans (two loans), no home-improvement loans, and no multifamily loans in moderate-income census tracts in 2017. Aggregate lenders made 13% of home-purchase loans, 9% of refinance loans, 7% of home-improvement loans, and 20% of multifamily loans in moderate-income tracts.

Univest's lending in moderate-income census tracts in 2018 was good. In 2018, the bank's lending level of 6% (seventeen loans) was again below both the aggregate lending level of 11% and the owner-occupied housing proxy of 9%. Categorized by loan product type, Univest originated 5% of its home-purchase loans (seven loans), 11% of its refinance loans (seven loans), 7% of its home improvement loans (two loans), 10% of its multifamily loans (one loan), and no loans with purpose "not applicable" in moderate-income census tracts in 2018. In 2018, aggregate lenders made 13% of home-purchase loans, 8% of refinance loans, 7% of home-improvement loans, 20% of multifamily loans, and 18% of purpose "not applicable" loans in moderate-income census tracts.

Small Business Lending

The geographic distribution of Univest's loans to businesses reflects poor penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on available business data, in 2017 4% of the assessment area's businesses were located in low-income census tracts, and 10% were located in moderate-income tracts. The remaining businesses were located in middle-income census tracts (74%), and upper-income tracts (12%).

Very little change was noted using 2018 data. Dun & Bradstreet data show that in 2018, 4% of the assessment area's businesses were located in low-income census tracts, and 11% were located in moderate-income census tracts. The remaining businesses were located in middle-income census tracts (74%), and upper-income geographies (12%).

The tables below present Univest's small business geographic lending distribution in comparison to the applicable business proxy and aggregate lending levels in the assessment area.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
Census Tract Income Level	**%** **Businesses By Tract Income Level** **(2015 ACS Data)**	**2017**	
		% **Univest Lending**	**%** **Aggregate Lending**
Low	3.9	0.6	3.3
Moderate	10.3	0.0	9.4
Middle	74.1	96.5	75.4
Upper	11.7	2.9	11.0
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Univest Bank & Trust Co. Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
Census Tract Income Level	**%** **Businesses By Tract Income Level** **(2015 ACS Data)**	**2018**	
		% **Univest Lending**	**%** **Aggregate Lending**
Low	4.0	1.4	3.1
Moderate	10.9	1.4	9.2
Middle	73.5	92.8	74.7
Upper	11.6	4.3	12.2
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

Overall, small business lending in low-income tracts was poor.

In 2017, the geographic distribution of the bank's small business lending in low-income census tracts was poor. Univest originated less than 1% of its small business loans (one loan) in a low-income census tract. The bank's lending level lagged both the applicable business loan demand proxy of 4% and the aggregate small business lending level of 3%.

In 2018, the geographic distribution of the bank's small business lending in low-income census tracts was similar, and was considered poor. Univest originated 1% of its small business loans (three loans) in low-income census tracts. The bank's lending level was again below both the applicable business loan demand proxy of 4% and aggregate small business lending level of 3%.

Lending in Moderate-Income Census Tracts

Overall, small business lending in moderate-income tracts was poor.

In 2017, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. Univest originated no small business loans in the assessment area's moderate-income census tracts. The bank's lending level lagged both the applicable business loan demand proxy of 10% and the aggregate small business lending level of 9%.

In 2018, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. Univest originated 1% of its small business loans (three loans) in the assessment area's moderate-income census tracts. The bank's lending level was below the applicable business loan demand proxy of 11% and lagged behind the aggregate small business lending level of 9%.

Responsiveness to Credit Needs

Univest exhibits a good record of servicing the credit needs of low-income individuals and areas, and very small businesses, consistent with safe and sound banking practices.

Affordable housing was identified as an important credit need by community contacts, and the bank's HMDA lending record shows that home-mortgage credit is being extended throughout the Lancaster, PA assessment area. As detailed earlier, the bank is successfully reaching low- and moderate-income borrowers. Additionally, Univest uses special lending programs to reach first-time homebuyers, and small businesses, and a total of six flexible products were used within the assessment area, as discussed below. Finally, the bank made over $8 million in community development loans, over 80% of which supported affordable housing.

Innovative and/or Flexible Lending Practices

Univest makes limited use of innovative and/or flexible lending practices in serving the Lancaster assessment area's credit needs. As discussed earlier, in an effort to address the credit needs of low- and moderate-income borrowers, the bank participates in programs for first-time homebuyers through the FHA, and the VA. During the review period, the bank originated three FHA loans (aggregating $649 thousand), and two USDA loans (aggregating $351 thousand). In total, flexible mortgage lending in the Lancaster, PA assessment area totaled $1 million.

The credit needs of small businesses can be addressed more effectively by alternative products. In an effort to address the credit needs of such borrowers in the bank's assessment areas, Univest participates in several Small Business Administration (SBA) lending programs. However, no SBA loans were reported by the bank in the Lancaster, PA assessment area.

Finally, Univest made one loan under their proprietary Main Street banking product targeted to small businesses, totaling just under $3 thousand.

Community Development Lending

Univest makes an adequate level of community development loans in the Lancaster assessment area. During the period evaluated, the bank made nine new community development loans, totaling nearly $8.5 million in the assessment area. As seen in the table below, seven of the loans, totaling $6.9 million (81%) support affordable housing initiatives for low- and moderate-income individuals, by providing 176 units of housing in the Lancaster, PA assessment area. In addition, the bank extended two community development loans in the assessment area to support economic development through the financing of small businesses or farms, totaling $1.6 million (19%). Of the bank's overall community development lending for the institution by dollar, 12% were within the Lancaster, PA assessment area. The bank's performance represents a significant increase from the previous evaluation when Univest originated one community development loan totaling $2 million in the assessment area for economic development.

	Univest Bank & Trust Co. Lancaster, PA Assessment Area Community Development Lending									
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$	#	$	#	$	#	$	#	$
2017	0	0	0	0	0	0	0	0	0	0
2018	1	550,000	0	0	0	0	0	0	1	550,000
2019	6	6,336,250	0	0	2	1,600,000	0	0	8	7,936,250
Total	7	6,886,250	0	0	2	1,600,000	0	0	9	8,486,250

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as low satisfactory.

Volume of Investment and Grant Activity

Univest has an adequate level of qualified community development investments, donations and grants. During the current evaluation, qualified investments, grants, and donations totaled $3.9 million in the Lancaster, PA assessment area, representing 17% of the bank's overall investment and grant activity. This represents a substantial increase from the investment and grant level of a little more than $1 thousand at the previous evaluation.

The vast majority of investments in this assessment area support affordable housing for low- and moderate-income individuals. Univest's qualified community development investments during the evaluation period consisted of $3.7 million in mortgage backed securities investments; comprised of 23 home loans in 7 new investments.

Additionally, the bank made $136 thousand in grants and donations, six for community services to low- and moderate-income individuals ($113,000), four for affordable housing ($13,000), three for revitalization efforts ($2,500), and two for economic development ($7,500).

The following table presents investment and grant activity for the Lancaster, PA assessment area.

CD Category	DONATIONS $	INVESTMENTS $	IN-KIND DONATIONS $	TOTALS $
Univest Bank & Trust Co. Lancaster, PA Assessment Area Qualified Investments				
Affordable Housing	13,000	3,742,158	0	3,755,158
Community Services	113,000	0	0	113,000
Economic Development	7,500	0	0	7,500
Revitalization & Stabilization	2,500	0	0	2,500
Totals	**136,000**	**3,742,158**	**0**	**3,878,158**

Responsiveness to Credit and Community Development Needs

Univest's investments exhibit good responsiveness to credit and community development needs of the assessment area.

Both community contacts noted a primary need for affordable housing in the assessment area. Univest's qualified investments in mortgage-backed security loan pools targeted affordable housing supported efforts to address affordable housing needs during the evaluation period. As indicated in the table above, these investments represent 97% of total investment activity in the assessment area.

<u>**Community Development Initiatives**</u>

Univest makes rare use of innovative and/or complex investments to support community development initiatives.

As previously noted, the vast majority of investment dollars consisted of mortgage-backed securities investments, which were supplemented with donations and grants which supported community development organizations in the Lancaster, PA assessment area. Neither investment type is particularly innovative or complex transaction types.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

<u>**Accessibility of Delivery Systems**</u>

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. During the review period, Univest operated five full-service branches in the Lancaster, PA assessment area. No full-service branches were located in low- or moderate-income tracts, while four branches (80%) were located in middle-income tracts, and one branch (20%) was located in an upper-income census tract. Additionally, Univest operated one limited-service office, located in a middle-income tract.

The following table details the location of the bank's branches with comparison to 2015 ACS population demographics, and shows that the branches are generally proximate to areas where the majority of the population resides.

Univest Bank & Trust Co. Lancaster, PA Assessment Area Retail Branch Distribution			
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Percent of Population**
Low-income	0	0.0	4.3
Moderate-income	0	0.0	10.6
Middle-income	4	80.0	73.6
Upper-income	1	20.0	11.6
Unknown-income	0	0.0	0.0
Totals	**5**	**100**	**100**

All five of Univest's full-service branch locations are equipped with ATMs which provide electronic access to banking services.

To supplement traditional retail banking services, Univest provides online banking services, telephone banking services and mobile banking through the bank's mobile application. In addition, Univest provides mobile wallet pay through acceptance programs with digital vendors. Using online banking services, bank customers can pay bills, open accounts and apply for loan products via the bank's website, at https://www.univest.net.

Changes in Branch Locations

Univest's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

The bank completed two branch openings in the assessment area since the previous CRA evaluation, both located in middle-income census tracts. The Georgetown branch opened immediately following the prior evaluation (September, 2017) and the Intercourse branch was established in March, 2018.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts or individuals.

All of Univest's full-service branches in the Lancaster, PA assessment area include ATMs, and all but one provide drive-through services[13]. All branches operate Monday through Friday, with extended hours on Thursday and/or Friday. Additionally, all five branches in the assessment area offer Saturday morning hours.

Bank Products

Univest provides the following products with reduced (or no) fees, and/or minimum balance requirements that provide greater access to banking services for low- and moderate-income customers, and small businesses.

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[13]Drive-through facilities are not available at the Georgetown branch due to limitations in the physical location.

- Basic checking: This checking account is a consumer account with no minimum daily balance requirement, no monthly service fee, and no fee for paper statements.
- The bank also offers a Small Business Checking account for small businesses with limited transaction activity. The account offers 200 free transaction items, with no monthly service charge, and no monthly minimum balance. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

Univest provides an adequate level of community development services in this assessment area. An employee serves on the Board of Directors of the Schreiber Center for Pediatric Development, which provides outpatient care to special needs children in the assessment area. Given the organization's mission to serve its constituents without regard to the ability to pay, many clients are low- or moderate-income individuals without insurance coverage to pay for the services. In addition to the bank employee who serves on the Board, other bank employees provided qualified community development service work with the organization.

Additionally, three employees provided qualified community development services through COBYs Family Services, a nonprofit that provides foster care, adoption, family counseling and other community services to at-risk members of the assessment area.

At the previous evaluation, no community development service activities were reported in the Lancaster, PA assessment area.

ALLENTOWN, PA ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Allentown, PA assessment area was conducted. During the evaluation period, lending activity in this assessment area represented 6% of the bank's overall lending by number of loans, and by dollar amount. The assessment area accounted for over $40 million in deposits, or 1% of the bank's total deposits as of June 30, 2019. Univest operated two branches in the assessment area, as well as one limited service facility. For purposes of assessing the institution's overall performance, greater weight was given to the bank's performance in the full-scope review assessment areas, particularly in the Commonwealth of Pennsylvania, where the majority of the bank's operations are located.

The bank's performance in the Allentown, PA assessment area generally is consistent with its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the Appendices. Conclusions regarding performance are as follows:

Assessment Area	Lending	Investment	Service
Allentown, PA Assessment Area	Consistent	Consistent	Consistent

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's Allentown, PA assessment area consists of Lehigh and Northampton counties, which are part of the larger Allentown-Bethlehem-Easton, PA MSA[14]. At the previous evaluation, Univest operated one branch in the assessment area, located in Allentown (Lehigh County), in an upper-income census tract. The bank opened its second full-service branch in the assessment area in October 2017. The branch is located in Bethlehem (Northampton County), in a moderate-income census tract. As a result of the branch addition, the bank expanded its assessment area to include Northampton County.

According to 2015 ACS Data, the assessment area consisted of 144 census tracts, 15 of which were designated as low-income (10%), 28 of which were moderate-income (19%), 62 of which were middle-income (43%), and 39 of which were upper-income (27%). All of the low-income census tracts, and the vast majority of the moderate-income tracts are clustered around the cities of Allentown (Lehigh County), and the cities of Bethlehem and Easton (Northampton County). Twenty-nine percent of the assessment area's population resided within the low- and moderate-income census tracts in the assessment area. According to 2015 ACS data, the assessment area had a population of 656,372, and both counties were considered to be urban. The Allentown, PA assessment area is the second-most highly populated assessment area of Univest's footprint (following the Philadelphia, PA assessment area.)

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[14]In addition to Lehigh and Northampton counties, the Allentown-Bethlehem-Easton, PA MSA also includes Carbon County, PA and Warren County, NJ.

Univest's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Summary of Deposits, as of June 30, 2019, there were 24 depository institutions operating in Lehigh and Northampton counties. These institutions maintain a total of 192 branches holding nearly $14 billion in deposits. Univest ranked twenty-third, with over $40 million in deposits, and less than 1% of the retail deposit market. Wells Fargo Bank, N.A. has a strong presence in the market, ranking first, with 23% of the market, followed by BB&T, with 14% of the market, and Lafayette Ambassador Bank, with 9%.

Similarly, Univest was a minor player in the HMDA market, holding less than 1% of the market in both 2017 and 2018. In 2017, a total of 435 HMDA reporters originated or purchased a total of 18,164 HMDA loans. Univest ranked twenty-fourth in the HMDA market. Wells Fargo, N.A. led the market with 13% of loans, followed by American Neighborhood Mortgage Acceptance Company, LLC (5%) and Quicken Loans (4%).

In 2018, 450 HMDA reporters originated or purchased 19,271 HMDA loans. Univest ranked thirty-eighth. Once again, Wells Fargo Bank, N.A. and American Neighborhood Mortgage Acceptance Company, LLC led the market (11% and 4%), followed by Caliber Home Loans, Inc. (4%).

With regard to small business and small farm lending, Univest ranked twenty-seventh out of 112 CRA data reporters in 2017, with less than 1% of the market. American Express Bank, FSB ranked first with 2,310 of the 12,330 small business and small farm loans (19%), followed by PNC Bank, N.A. (9%), and Wells Fargo Bank, N.A. (9%).

In 2018, the bank's small business and small farm lending increased by number, but Univest still maintained less than 1% of the market. In 2018, 104 small business and small farm reporters originated or purchased 12,746 loans. The market was led by American Express National Bank, Wells Fargo Bank, N.A., and Chase Bank USA, N.A. (18%, 10% and 10%, respectively).

According to Moody's Analytics, leading industries in the assessment area include education and health services (21%), professional and business services (13%), retail trade and government sectors (both 11%). The largest employers are Lehigh Valley Health Network, St. Luke's University Health Network, Air Products and Chemicals, and Sands Bethworks Gaming, LLC.

An interview was conducted with a community development representative to provide perspective on the credit needs in the Allentown, PA assessment area. This information was supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, who represented an economic development organization, the most noteworthy credit need in the assessment area is quality housing for first-time homebuyers. The contact noted that the age and quality of the available housing stock is not desirable, and new construction typically consists of higher-value homes that are not within reach of most younger and first-time homebuyers. Additionally, the contact indicated that while jobs in the Lehigh Valley are plentiful, employers face challenges in finding enough qualified employee candidates.

Tables showing the assessment area demographics of the Allentown, PA assessment area in 2017 and 2018 are contained on the following pages.

Univest Bank & Trust Co. Allentown, PA Assessment Area Assessment Area Demographics 2017							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	15	10.4	12,417	7.4	4,458	35.9	35,200	20.9
Moderate-income	28	19.4	29,071	17.3	4,841	16.7	30,288	18.0
Middle-income	62	43.1	68,484	40.7	3,245	4.7	35,643	21.2
Upper-income	39	27.1	58,300	34.6	1,465	2.5	67,141	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**144**	**100.0**	**168,272**	**100.0**	**14,009**	**8.3**	**168,272**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	22,890	5,691	3.3	24.9	13,825	60.4	3,374	14.7
Moderate-income	51,176	23,505	13.8	45.9	23,390	45.7	4,281	8.4
Middle-income	108,733	74,314	43.6	68.3	28,334	26.1	6,085	5.6
Upper-income	81,511	66,742	39.2	81.9	11,086	13.6	3,683	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**264,310**	**170,252**	**100.0**	**64.4**	**76,635**	**29.0**	**17,423**	**6.6**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1,593	6.3	1,398	6.2	185	7.9	10	4.1
Moderate-income	4,076	16.1	3,602	15.9	445	19.1	29	11.8
Middle-income	10,455	41.4	9,478	41.8	865	37.0	112	45.5
Upper-income	9,154	36.2	8,219	36.2	840	36.0	95	38.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**25,278**	**100.0**	**22,697**	**100.0**	**2,335**	**100.0**	**246**	**100.0**
	Percentage of Total Businesses:		**89.8**		**9.2**		**1.0**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	2	0.6	2	0.6	0	0.0	0	0.0
Moderate-income	13	4.0	13	4.1	0	0.0	0	0.0
Middle-income	157	48.8	154	48.9	3	42.9	0	0.0
Upper-income	150	46.6	146	46.3	4	57.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**322**	**100.0**	**315**	**100.0**	**7**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**97.8**		**2.2**		**0.0**	

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Univest Bank & Trust Co. Allentown, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	15	10.4	12,417	7.4	4,458	35.9	35,200	20.9
Moderate-income	28	19.4	29,071	17.3	4,841	16.7	30,288	18.0
Middle-income	62	43.1	68,484	40.7	3,245	4.7	35,643	21.2
Upper-income	39	27.1	58,300	34.6	1,465	2.5	67,141	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**144**	**100.0**	**168,272**	**100.0**	**14,009**	**8.3**	**168,272**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	22,890	5,691	3.3	24.9	13,825	60.4	3,374	14.7
Moderate-income	51,176	23,505	13.8	45.9	23,390	45.7	4,281	8.4
Middle-income	108,733	74,314	43.6	68.3	28,334	26.1	6,085	5.6
Upper-income	81,511	66,742	39.2	81.9	11,086	13.6	3,683	4.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**264,310**	**170,252**	**100.0**	**64.4**	**76,635**	**29.0**	**17,423**	**6.6**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	2,008	6.7	1,800	6.6	190	7.9	18	5.6
Moderate-income	4,936	16.5	4,435	16.3	459	19.1	42	13.2
Middle-income	12,091	40.4	11,046	40.6	897	37.3	148	46.4
Upper-income	10,889	36.4	9,919	36.5	859	35.7	111	34.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**29,924**	**100.0**	**27,200**	**100.0**	**2,405**	**100.0**	**319**	**100.0**
	Percentage of Total Businesses:		**90.9**		**8.0**		**1.1**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	2	0.6	2	0.6	0	0.0	0	0.0
Moderate-income	16	4.4	16	4.5	0	0.0	0	0.0
Middle-income	186	51.5	184	51.7	1	25.0	1	100.0
Upper-income	157	43.5	154	43.3	3	75.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**361**	**100.0**	**356**	**100.0**	**4**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**98.6**		**1.1**		**0.3**	

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in this assessment area is consistent with the institution's lending, investment, and service test performance, and the overall performance overall in the state.

LENDING TEST

The bank's lending in this assessment area is consistent with the bank's lending levels in full-scope review assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans, home-mortgage loans were provided more weight in determining this overall conclusion, followed by small business loans. No small farm loans were made within the Allentown, PA assessment area.

Home-Mortgage Lending

During 2017, Univest originated 164 HMDA loans in the Allentown, PA assessment area, aggregating $27 million. The bank's HMDA lending to low- (9%) and moderate-income borrowers (26%) is below the proxy of low-income families (21%), but above the proxy of moderate-income families (18%). Univest's lending to low-income borrowers matched aggregate lending to low-income borrowers (9%), and exceeded aggregate lending to moderate-income borrowers (19%). Geographic distribution of HMDA loans outperformed both the proxy of owner-occupied housing in such tracts and aggregate lending levels. In total, 6% of the bank's loans were made in low-income geographies and 20% were made in moderate-income geographies. This performance significantly outperformed the proxy of owner-occupied housing in such tracts (3% and 14%, respectively), and the aggregate lending levels (4% and 15% respectively).

During 2018, Univest originated 115 HMDA loans in the Allentown, PA assessment area, aggregating $23 million. The bank's HMDA lending to low- and moderate-income borrowers (4% and 20% respectively) is below the proxy of low-income families (21%), but exceeds the proxy of moderate-income families (18%). Similarly, the bank's HMDA lending was below aggregate lending levels of low-income borrowers (9%), and exceeded aggregate lending levels of moderate-income borrowers (19%). From a geographic distribution standpoint, the bank made 3% of HMDA loans in low-income geographies, and 11% in moderate-income geographies. This geographic distribution was below the proxy of owner-occupied housing in such tracts (3% and 14% respectively), and aggregate lending levels in low-income tracts (5%), and in moderate-income tracts (16%).

Small Business Lending

In 2017, Univest originated 47 small business loans aggregating $8 million in the Allentown, PA assessment area. Of these loans, 21% were originated to small businesses, which was below the aggregate lending level of 51% to small business by all lenders in the assessment area, and below the proxy of 90%. From a geographic perspective, 6% of the bank's small business loans were originated in low-income census tracts. The bank's lending met both the proxy (6%) and aggregate lending levels (6%) for businesses located in low-income geographies. Univest's lending in moderate-income geographies (13%) was below both the proxy (16%) and aggregate lending levels in moderate-income tracts (16%).

In 2018, Univest originated 57 small business loans aggregating $17 million in the Allentown, PA assessment area. Of these loans, 23% were originated to small businesses, which was below the aggregate lending level of 48% to small businesses by all lenders in the assessment area, and below the proxy of 91%. From a geographic perspective 12% of the bank's small business loans were originated in low-income census tracts. The bank's lending again, exceeded both the proxy (7%) and aggregate lending levels (6%) for businesses located in low-income geographies. Univest's lending in moderate-income geographies (14%) was below both the proxy (17%) and aggregate lending levels in moderate-income tracts (16%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank offers several mortgage products for first-time home-buyers through participating in guaranteed loan programs for first-time homebuyers. Within the assessment area during the review period, the bank originated 90 loans totaling $16.7 million through government programs (FHA, VA, FNMA, FSA/RHS and PHFA programs), and 10 grants totaling $47 thousand (First Front Door-FHLB) in the assessment area.

In addition, Univest is a preferred lender with the Small Business Administration (SBA) lending programs. Univest originated seven loans totaling $1.1 million during the evaluation period in this assessment area. Further, the bank's Main Street Banking program targets small business owners with small dollar lending requests ($100,000 or less). During the evaluation period, Univest originated seven loans of this type totaling $204 thousand in the assessment area.

As indicated in the table below, Univest made five new community development loans totaling $25.4 million in this assessment area. Two loans totaling over $18 million (73%) supported revitalization or stabilization efforts in the assessment area, one loan totaling $5 million (20%) supported economic development, one loan (6%) contributed to services for low- and moderate-income families, and one loan (2%) supported affordable housing initiatives for low- and moderate-income individuals, by providing 44 units of housing in the assessment area. Of the bank's overall community development lending 34% by dollar amount was within the Allentown, PA assessment area.

	Univest Bank & Trust Co. Allentown, PA Assessment Area Community Development Lending									
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	$	#	$	#	$	#	$	#	$
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	1	1,500,000	1	5,000,000	0	0	2	6,500,000
2019	1	397,000	0	0	0	0	2	18,500,000	3	18,897,000
Total	**1**	**397,000**	**1**	**1,500,000**	**1**	**5,000,000**	**2**	**18,500,000**	**5**	**25,397,000**

INVESTMENT TEST

The bank's investment performance in the Allentown, PA assessment area is consistent with that in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments, grants, and donations for the Allentown, PA assessment area totaled over $5.2 million, and increased significantly since the previous evaluation when investments totaled $51 thousand. Of the bank's overall investments for the institution, 23% were within the Allentown, PA assessment area.

Of the investments, over $4.9 million consisted of mortgage-backed security investments, comprised of 31 home loans in 10 new investments. Additionally, the bank made $288 thousand in grants and donations, supporting affordable housing ($103 thousand), community services to low- and moderate-income individuals ($185 thousand), and economic development ($100).

The following table presents investment and grant activity for the Allentown, PA assessment area.

CD Category	DONATIONS $	INVESTMENTS $	IN-KIND DONATIONS $	TOTALS $
	Univest Bank & Trust Co. **Allentown, PA Assessment Area** **Qualified Investments**			
Affordable Housing	103,000	4,957,826	0	5,060,826
Community Services	185,175	0	0	185,175
Economic Development	100	0	0	100
Revitalization & Stabilization	0	0	0	0
Totals	**288,275**	**4,957,826**	**0**	**5,246,101**

SERVICE TEST

The bank's service performance in the Allentown, PA assessment area is consistent with the bank's service test performance overall. In October 2017, the bank opened a branch location in Bethlehem, PA, bringing the total number of branches in this assessment area to two. The new branch is located in a moderate-income census tract, and the previously existing branch in Allentown is located in an upper-income tract. Additionally, the bank operates a limited-service branch in Allentown, PA.

Retail banking services offered through the two branches in the assessment area were consistent with those offered in the full-scope review areas. In addition, the bank conducted community development services, with bank staff participating as board members of community development organizations in the Allentown, PA assessment area, and providing first-time homebuyer seminars within the assessment area.

READING, PA ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Reading, PA assessment area was conducted. During the evaluation period, lending activity in the Reading, PA assessment area represented less than 1% of the bank's overall lending by number of loans and 1% by dollar amount. None of the bank's branches, nor any deposits as of June 30, 2019, were located in the Reading, PA assessment area. For purposes of assessing the institution's overall performance, greater weight was given to the bank's performance in the full-scope review assessment areas, particularly in the Commonwealth of Pennsylvania, where the majority of the bank's operations are located.

The bank's performance in the Reading, PA assessment area generally is below its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the Appendices. Conclusions regarding performance are as follows:

Assessment Area	Lending	Investment	Service
Reading, PA Assessment Area	Below	Below	Below

DESCRIPTION OF INSTITUTION'S OPERATIONS

Univest does not operate a physical branch location in the Reading, PA assessment area; however, due to its proximity to the Lancaster, Allentown, and Philadelphia, PA MSA assessment areas, the bank has chosen to designate the Reading MSA as a separate assessment area. The assessment area consists of Berks County, PA, which encompasses the entire Reading MSA. The Berks county seat is located in Reading, Pennsylvania.

According to 2015 ACS Data, the assessment area consisted of 90 census tracts, 19 of which were designated as low-income (21%), seven of which were moderate-income (8%), 48 of which were middle-income (53%), and 16 of which were upper-income (18%). All of the low- and moderate-income census tracts are clustered around the city of Reading and surrounding townships. Twenty-one percent of the assessment area's population resided within the low- and moderate-income census tracts in the assessment area, and according to 2015 ACS Data, the assessment area had a population of 413,965.

Univest's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Summary of Deposits, as of June 30, 2019, there were 17 depository institutions operating in Berks County. These institutions maintained a total of 115 branches holding well over $16 billion in deposits. Univest was not included in this report due to the lack of a physical branch location in the assessment area. Santander Bank, N.A. had a strong presence in the market, ranking first, with 35% of the market, followed by Customers Bank, with 26% of the market, and Wells Fargo Bank, N.A., with 10%.

As indicated previously, Univest was a minor player in the HMDA market, holding less than 1% of the market in both 2017 and 2018. In 2017, Univest ranked fifty-ninth, originating 22 of the market's 10,692 HMDA loans. Wells Fargo Bank, N.A. led the market with 11%, followed by Mortgage America with 7%, and Quicken Loans with 4% of HMDA originations and purchases.

Similarly, in 2018, Univest ranked sixty-third, originating 24 of the market's 11,455 loans. Again, Wells Fargo Bank, N.A. ranked first with 10% of the market, and Mortgage America, Inc. ranked second with 6% of the market. Fulton Bank, N.A. was third with 5% of the HMDA market.

With regard to small business and small farm lending, Univest ranked forty-second, with less than 1% of the market. In 2017, 100 small business and small farm reporters originated or purchased 6,624 CRA loans. American Express Bank, FSB led the small business and small farm market with 14% of the market, followed by US Bank, N.A. with 10%, and Capital One Bank USA, N.A. with nearly 8%.

In 2018, the bank's small business and small farm lending remained the same, and the bank maintained less than 1% of the market. In 2018, a total of 89 small business and small farm reporters originated or purchased 7,001 CRA loans. Univest ranked fortieth, with five such loans. Again, American Express National Bank led the market with 14% of loans, followed by Chase Bank USA, N.A. with 9%, and US Bank, N.A. with 8%.

According to Moody's Analytics, leading industries in the Reading assessment area include manufacturing (18%), education and health services (17%), and professional and business services (14%). The largest employers are East Penn Manufacturing Co., Inc., Tower Health, and Carpenter Technology Corporation.

An interview was conducted with a community development representative to provide perspective on the credit needs in the Reading, PA assessment area. This information was supplemented with demographic and economic data pertinent to the assessment area. According to the contact, who represented a local community foundation, the most noteworthy credit needs in the Reading assessment area are economic development and the revitalization and stabilization of downtown Reading, to support the influx of young and well-educated individuals moving into the area.

Tables showing the assessment area demographics of the Reading, PA assessment area in 2017 and 2018 are contained on the following pages.

Univest Bank & Trust Co. Reading, PA Assessment Area Assessment Area Demographics 2017							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**90**	**100.0**	**105,998**	**100.0**	**10,866**	**10.3**	**105,998**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	26,174	7,843	7.1	30.0	14,304	54.6	4,027	15.4
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**164,853**	**110,223**	**100.0**	**66.9**	**43,089**	**26.1**	**11,541**	**7.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1,328	9.0	1,169	8.9	153	10.3	6	2.9
Moderate-income	728	4.9	625	4.8	99	6.6	4	1.9
Middle-income	8,743	59.2	7,724	59.1	882	59.2	137	66.2
Upper-income	3,968	26.9	3,553	27.2	355	23.8	60	29.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**14,767**	**100.0**	**13,071**	**100.0**	**1,489**	**100.0**	**207**	**100.0**
	Percentage of Total Businesses:		**88.5**		**10.1**			**1.4**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	421	82.1	409	82.0	12	85.7	0	0.0
Upper-income	91	17.7	89	17.8	2	14.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**513**	**100.0**	**499**	**100.0**	**14**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**97.3**		**2.7**			**0.0**

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Univest Bank & Trust Co. Reading, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**90**	**100.0**	**105,998**	**100.0**	**10,866**	**10.3**	**105,998**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	26,174	7,843	7.1	30.0	14,304	54.6	4,027	15.4
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**164,853**	**110,223**	**100.0**	**66.9**	**43,089**	**26.1**	**11,541**	**7.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1,517	9.1	1,361	9.1	146	9.8	10	4.2
Moderate-income	863	5.2	766	5.1	92	6.2	5	2.1
Middle-income	9,826	58.7	8,768	58.4	904	60.7	154	65.3
Upper-income	4,545	27.1	4,130	27.5	348	23.4	67	28.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**16,751**	**100.0**	**15,025**	**100.0**	**1,490**	**100.0**	**236**	**100.0**
		Percentage of Total Businesses:	**89.7**		**8.9**			**1.4**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	1	0.2	1	0.2	0	0.0	0	0.0
Middle-income	456	81.1	443	81.0	13	86.7	0	0.0
Upper-income	104	18.5	102	18.6	2	13.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**562**	**100.0**	**547**	**100.0**	**15**	**100.0**	**0**	**0.0**
		Percentage of Total Farms:	**97.3**		**2.7**			**0.0**

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in this assessment area is below the institution's lending, investment, and service test performance, as well as the overall performance in the state.

LENDING TEST

The bank's lending in this assessment area is below the bank's lending performance in full-scope review assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans, home-mortgage loans were provided the most weight in making this determination. Small business and small farm loans were not considered, due to very low loan volumes. However, lending data for these loan types is included in Appendix D, for informational purposes.

Home-Mortgage Lending

During 2017, Univest originated 22 HMDA loans in the Reading, PA assessment area, aggregating nearly $5 million. The bank's HMDA lending to low- (9%) and moderate-income borrowers (23%) is below the proxy of low-income families (21%), and above the proxy of moderate-income families (17%). Univest's lending to low- and moderate-income borrowers exceeded aggregate lending to both low- and moderate-income borrowers (8% and 21%, respectively). From a geographic distribution standpoint, the bank made 5% of HMDA loans in low-income geographies, and 0% in moderate-income geographies. This geographic distribution was below the proxy of owner-occupied housing in such tracts (7% and 4% respectively). The bank's lending matched aggregate lending levels in low-income tracts (5%), and was below aggregate lending levels in moderate-income census tracts (4%).

During 2018, Univest originated 24 HMDA loans in the Reading, PA assessment area, aggregating $5 million. The bank's HMDA lending to low- and moderate-income borrowers (4% and 8%, respectively) is below both the proxy of low- and moderate-income income families (21% and 17%, respectively), and aggregate lending levels of low- and moderate-income borrowers (8% and 22%, respectively). From a geographic distribution standpoint, the bank made 8% of HMDA loans in low-income geographies, and 0% in moderate-income geographies. This geographic distribution outperformed both the proxy of owner-occupied housing and aggregate lending levels in low-income tracts (7% and 6%, respectively), but was below both the proxy of owner-occupied housing and aggregate lending levels in moderate-income census tracts (4% and 5%, respectively).

Innovative and/or Flexible Lending Practices and Community Development Lending

Within the assessment area during the review period, the bank originated four guaranteed loans targeted to first-time homebuyers totaling $723 thousand through FHA, VA, and FSA/RHS programs, and one First Front Door grant totaling $5 thousand in the assessment area. At the previous evaluation, no loans were reported of this type in the assessment area.

Though Univest is a preferred lender with the SBA, no SBA loans were reported by the bank in this assessment area.

Additionally, Univest made four new community development loans totaling $2.4 million in this assessment area. Of the bank's overall community development lending, 3% by dollar volume was made within the Reading, PA assessment area.

As indicated in the table below, one loan totaling over $1.6 million (71%) supported revitalization and stabilization efforts in the assessment area, one loan totaling $500 thousand (21%) supported economic development, and two loans totaling $200 thousand (9%) supported affordable housing initiatives for low- and moderate-income individuals, by providing 64 units of housing in the Reading assessment area.

Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$	#	$	#	$	#	$	#	$
2017	0	0	0	0	0	0	0	0	0	0
2018	1	51,463	0	0	0	0	1	1,650,000	2	1,701,463
2019	1	150,000	0	0	1	500,000	0	0	2	650,000
Total	**2**	**201,463**	**0**	**0**	**1**	**500,000**	**1**	**1,650,000**	**4**	**2,351,463**

Univest Bank & Trust Co. — Reading, PA Assessment Area — Community Development Lending

INVESTMENT TEST

The bank's investment performance in the Reading, PA assessment area is below that in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments, grants, and donations for the Reading, PA assessment area totaled over $1.2 million, and has increased significantly, as there were no reported qualified community development investments for the assessment area at the previous CRA evaluation. Of the bank's overall investments for the institution, 5% were within the Reading, PA assessment area.

Of the investments in the assessment area, $1.2 million consisted of mortgage-backed security investments, comprised of nine home loans in four new investments. Additionally, the bank made ten investments totaling $41 thousand, all of which supported activities for the provision of community services to low- and moderate-income individuals and geographies in the assessment area.

The following table presents investment and grant activity in the Reading, PA assessment area.

CD Category	DONATIONS $	INVESTMENTS $	IN-KIND DONATIONS $	TOTALS
Affordable Housing	0	1,206,450	0	1,206,450
Community Services	40,553	0	0	40,553
Economic Development	0	0	0	0
Revitalization & Stabilization	0	0	0	0
Totals	**40,553**	**1,206,450**	**0**	**1,247,003**

Univest Bank & Trust Co. — Reading, PA Assessment Area — Qualified Investments

SERVICE TEST

The bank's service performance in the Reading, PA assessment area is below the bank's service test performance overall. The bank does not currently operate any branches in this assessment area, and therefore the retail service components of the service test were not considered in the analysis. Although the bank does not operate a branch in Berks County, an employee serves on the board for the Greater Berks Food Bank.

STATE OF NEW JERSEY /
OCEAN CITY, NJ ASSESSMENT AREA
FULL-SCOPE REVIEW

STATE RATING

Performance Test	Performance Level
Lending	Needs to Improve
Investment	Low Satisfactory
Service	Low Satisfactory
Overall	Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the state rating include the following:

- Lending levels reflect adequate responsiveness to assessment area credit needs;
- The distribution of borrowers reflects, given the product lines offered, poor penetration among customers of different income levels;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The bank exhibits a poor record of serving the credit needs of low-income individuals and areas and very small businesses;
- The bank makes little use of innovative and/or flexible lending practices;
- The bank makes a low level of community development loans;
- The bank has an adequate level of qualified community development investments and grants; and
- The bank provides a limited level of community development services.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Ocean City, NJ assessment area, which was evaluated using full-scope review procedures. Univest's one branch location in the Ocean City, NJ assessment area (located in Ocean City, NJ) is its only branch presence in New Jersey.

Univest's CRA performance in New Jersey was evaluated for the period from September 12, 2017 through January 13, 2020. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans and other loans that qualified as community development loans. Due to low loan volumes (only eleven small business loans were made in 2017 and 2018), small business loans were not included in the lending analysis, as they would not be sufficient to provide a meaningful analysis, and would not have had a significant effect on the bank's overall performance in the Ocean City, NJ assessment area. Further, Univest originated no small farm loans within the assessment area. However, data on small business and small farm loans is included in Appendix D, for contextual purposes.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Univest's Ocean City, NJ assessment area consists of Cape May County, which is located in the Ocean City, NJ MSA, situated along the southeastern coast of New Jersey. According to 2015 ACS Data, the county had a population of 95,805 is considered the second least populated county in New Jersey, and is the least populated assessment area in the Univest footprint.

For the purposes of assessing Univest's overall CRA performance, the least amount of weight was given to performance in the Ocean City, NJ assessment area, due to its limited presence in the assessment area and the state, and the low volume of HMDA and small business loans made in the assessment area. In total, loans made in the Ocean City, NJ assessment area accounted for 1% of the bank's total loans by number, and 3% by dollar volume. Univest operates one branch in this assessment area, which holds $43 million in deposits, accounting for 1% of the bank's total deposits as of June 30, 2019.

Univest's CRA performance in this assessment area was evaluated in terms of the demographic and economic business context in which the bank operates, which is discussed below.

Per 2015 ACS Data, Cape May County was comprised of 33 census tracts, including one low-income census tract (3%), five moderate-income census tracts (15%), eighteen middle-income census tracts (55%), eight upper-income census tracts (24%), and one tract for which income level was unknown (3%). The low-income census tract is located along the lower southeastern coastline in the city of Wildwood, NJ. The moderate-income tracts are located in clusters surrounding Wildwood in the lower southeastern border of the county, Villas along the county's southwestern border, in Woodbine in central Cape May County, and along the northeastern shore of Ocean City, New Jersey.

A map of the Ocean City, NJ assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Summary of Deposits as of June 30, 2019, there were ten depository institutions operating branches in Cape May County. These institutions maintained a total of 46 branches, holding just over $3 billion in deposits. Univest, with one branch, ranked ninth, with $43 million in deposits, or 1% of the retail deposit market. Sturdy Savings Bank held the largest share of deposits with 22% of the market. TD Bank, N.A., ranked second with a market share of 18%, and OceanFirst Bank, N.A. ranked third, with 17% of the market.

Univest reports home-mortgage loans pursuant to HMDA, and therefore, HMDA lending was compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. According to 2017 aggregate data, there were a total of 338 HMDA reporters that originated or purchased 6,033 loans in the Ocean City, NJ assessment area. Univest was tied for forty-third, with less than 1% of the market. Wells Fargo Bank, N.A. led the market with 12% of HMDA market share, followed by CIT Group / Sales Financing Inc., with 5%, and JP Morgan Chase Bank, N.A., with 4% of the HMDA loan market.

According to 2018 aggregate HMDA data, 6,276 loans were collectively originated by 343 institutions in the assessment area. Univest tied for thirty-third, with less than 1% of the HMDA market. Wells Fargo Bank, N.A. led the market with 12% of all such loans, followed by Caliber Home Loans, Inc., with nearly 5% of the market, and OceanFirst Bank, with 4% of the HMDA market-share.

Similarly, the institution reports its small business and small farm loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. Though CRA-reportable loans were not included in the analysis of the bank's performance due to low volume, market share information is included below for contextual purposes. According to 2017 data, there were 71 small business and small farm reporters in the assessment area, originating or purchasing 3,117 small business and small farm loans in the assessment area. Univest ranked twenty-sixth, with less than 1% of the market. American Express Bank, FSB led the market with 21% market share, followed by PNC Bank, N.A., with nearly 9% of the market, and Capital One Bank USA, N.A. with 8%.

According to aggregate CRA data, the assessment area had a total of 75 small business and small farm reporters in 2018, who collectively originated or purchased 3,121 small business and small farm loans in the assessment area. Univest tied for thirty-second, with less than 1% of the market. American Express National Bank again led the market with 22% of all such loans reported, followed by Citibank, N.A., and Chase Bank USA, N.A., both with 9% of the market.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators. More specifically, in 2018, American Express National Bank, Citibank, N.A., and Chase Bank USA, N.A. were the top three CRA lenders, collectively holding 40% of the market share in the assessment area.

To supplement the demographic and economic data for the Ocean City, NJ assessment area, two interviews were conducted with local community organizations to provide perspective on the credit needs of the assessment area in which Univest operates. One interview was held with an economic development agency, and the other was with an affordable housing organization. Contacts identified affordable housing, small business development (along the Ocean City Boardwalk), public transportation, and financial literacy and budgeting education as areas in need of attention in the assessment area.

Economic Characteristics

Cape May County is located in the southernmost part of the State of New Jersey, and borders Atlantic County to the northeast, and Cumberland County, NJ to the northwest. The counties of Kent and Sussex in Delaware are situated on the western border of Cape May County, separated by the Delaware Bay. The county is a tourist destination in the summer due to its beaches and location between the Delaware Bay and the Atlantic Ocean. Cape May Court House is the county seat. Based on information provided by the Cape May County Chamber of Commerce, it is estimated that the county swells to over 750 thousand people in the height of the summer season, despite the much smaller year-round population of less than 100 thousand residents.

According to the Moody's Analytics Precis Report as of September 2019, the economy of the Ocean City, NJ is in a mid-expansion mode, fueled by a notable increase in payroll employment in the first three quarters of 2019. Tourism remains an important driver of the economy, with the leisure and hospitality and retail trade sectors playing leading roles in the area. The main strengths of the assessment area's economy are proximity to northeast population centers and its well-developed summer tourism industry. Challenges include a declining population, as local seniors migrate to lower-cost southern retirement locations, a highly seasonal labor market, a concentration of low-paying industries and high business costs, and low educational attainment among residents. It is noteworthy that average hourly earnings are the lowest in New Jersey.

Leading industries in the Ocean City, NJ assessment area include leisure and hospitality services (27%), government (19%), retail trade (16%), and education and health services (11%). The largest employers are Morey Organization, LLC, the U.S. Coast Guard, Cape Regional Medical Center, Acme Markets, and Wawa.

According to the Bureau of Labor and Statistics[15], area unemployment rates are notably higher in the assessment area than in both New Jersey and the nation as a whole, as seen in the following table.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)		
County	**% 2017**	**% 2018**
Cape May	9.2	8.4
State of New Jersey	4.6	4.1
United States	4.4	3.9

Housing

According to 2015 ACS data, the Ocean City, NJ assessment area contained 98,747 total housing units, of which 31% were owner-occupied, 10% were rental units, and 59% were vacant. The overall occupancy rate in the assessment area (31%) was significantly lower than in the State of New Jersey as a whole (57%). The high housing vacancy rate may be attributed to the high number of secondary residence homes and the summer rental market within the assessment area.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such tracts. According to the 2015 ACS data, 3% of owner-occupied housing was located in low-income tracts, and 15% was located in moderate-income tracts. Additionally, 61% were located in middle-income tracts, and 21% were located in upper-income tracts.

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[15]Source: United States Department of Labor, Bureau of Labor Statistics

Single family units comprised 70% of the total housing units in the assessment area, while two-to-four family units comprised 15%, multifamily units comprised 11%, and mobile homes comprised 3%. The median age of the housing stock was 46 years. The median age of housing stock in the assessment area is reasonably similar to that in the State of New Jersey as a whole, at 49 years.

According to 2015 ACS data, the median housing value in the assessment area was $299,668, and is slightly lower than the median housing value in New Jersey as a whole ($315,900). The median housing value in low-income tracts was $237,629, and increased to $247,920 in moderate-income tracts, and $284,283 in middle-income tracts. Housing values were considerably higher in upper-income tracts at $446,739. Finally, based on 2015 ACS data, only 6% of the assessment area's housing units were valued at less than $100 thousand, making housing affordability comparable to New Jersey as a whole, where also, 6% of housing units were valued at less than $100,000.

It is noteworthy that housing affordability in this assessment area compared unfavorably to that in the bank's other assessment areas. As discussed in each assessment area's description, median housing values were lower in all four of Univest's other assessment areas, and differences in the percentage of housing valued at less than $100 thousand were even more dramatic. More specifically, while only 6% of housing was valued at $100 thousand or less in the Ocean City, NJ assessment area, measures were considerably higher, indicating greater affordability, in the Philadelphia, PA (15%), Lancaster, PA (13%), Allentown, PA (13%) and Reading, PA (20%) assessment areas.

Median gross rents were slightly more affordable in the assessment area than in New Jersey. Using 2015 ACS data, median gross rent (rent plus utilities) in the assessment area was $1,038, with 53% of renters paying more than 30% of their income for housing. Comparatively, the median rent in New Jersey was higher at $1,192, with 51% of renters paying more than 30% of their income for housing.

Borrower Income Data

2015 ACS Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. Of the total families in the assessment area, 20% were designated as low-income, 19% were moderate-income, 21% were middle-income, and 40% were upper-income. In the assessment area, families living below the poverty level represented 7% of total families, which was comparable to 8% in the State of New Jersey overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC.

The assessment area's HUD-adjusted median family incomes for 2017 and 2018 are listed in the table below, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	HUD Adjusted Median Family Income	Low Income (<50%)	Moderate Income (50%-less than 80%)	Middle Income (80%-less than 120%)	Upper Income (120% or Greater)
2017	$73,400	Less than $36,700	$36,700 - $58,719	$58,720 - $88,079	$88,080 or more
2018	$78,700	Less than $39,350	$39,350 - $62,959	$62,960 - $94,439	$94,440 or more

The 2017 and 2018 demographics used in evaluating Univest's performance under CRA in the Ocean City, NJ assessment area are detailed in the tables on the following pages.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Assessment Area Demographics 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	995	3.8	304	30.6	5,154	19.9
Moderate-income	5	15.2	4,273	16.5	384	9.0	4,933	19.0
Middle-income	18	54.5	15,437	59.5	952	6.2	5,525	21.3
Upper-income	8	24.2	5,241	20.2	168	3.2	10,334	39.8
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	33	100.0	25,946	100.0	1,808	7.0	25,946	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,936	933	3.0	15.7	825	13.9	4,178	70.4
Moderate-income	19,333	4,698	15.3	24.3	2,398	12.4	12,237	63.3
Middle-income	48,311	18,605	60.6	38.5	4,953	10.3	24,753	51.2
Upper-income	25,167	6,447	21.0	25.6	1,553	6.2	17,167	68.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	98,747	30,683	100.0	31.1	9,729	9.9	58,335	59.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	283	5.5	250	5.3	32	8.1	1	1.6
Moderate-income	763	14.8	700	14.9	52	13.2	11	17.5
Middle-income	2,966	57.6	2,709	57.8	222	56.3	35	55.6
Upper-income	1,135	22.1	1,031	22.0	88	22.3	16	25.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,147	100.0	4,690	100.0	394	100.0	63	100.0
	Percentage of Total Businesses:		91.1			7.7		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	1.5	1	1.6	0	0.0	0	0.0
Moderate-income	6	9.0	6	9.4	0	0.0	0	0.0
Middle-income	50	74.6	47	73.4	3	100.0	0	0.0
Upper-income	10	14.9	10	15.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	67	100.0	64	100.0	3	100.0	0	0.0
	Percentage of Total Farms:		95.5			4.5		0.0

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	995	3.8	304	30.6	5,154	19.9
Moderate-income	5	15.2	4,273	16.5	384	9.0	4,933	19.0
Middle-income	18	54.5	15,437	59.5	952	6.2	5,525	21.3
Upper-income	8	24.2	5,241	20.2	168	3.2	10,334	39.8
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**33**	**100.0**	**25,946**	**100.0**	**1,808**	**7.0**	**25,946**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	5,936	933	3.0	15.7	825	13.9	4,178	70.4
Moderate-income	19,333	4,698	15.3	24.3	2,398	12.4	12,237	63.3
Middle-income	48,311	18,605	60.6	38.5	4,953	10.3	24,753	51.2
Upper-income	25,167	6,447	21.0	25.6	1,553	6.2	17,167	68.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**98,747**	**30,683**	**100.0**	**31.1**	**9,729**	**9.9**	**58,335**	**59.1**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	329	5.4	297	5.3	30	7.5	2	2.4
Moderate-income	913	14.9	843	14.9	54	13.4	16	19.3
Middle-income	3,529	57.5	3,247	57.5	236	58.7	46	55.4
Upper-income	1,362	22.2	1,261	22.3	82	20.4	19	22.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**6,133**	**100.0**	**5,648**	**100.0**	**402**	**100.0**	**83**	**100.0**
	Percentage of Total Businesses:		**92.1**		**6.6**			**1.4**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	1	1.2	1	1.3	0	0.0	0	0.0
Moderate-income	4	4.9	4	5.2	0	0.0	0	0.0
Middle-income	58	71.6	54	70.1	4	100.0	0	0.0
Upper-income	18	22.2	18	23.4	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**81**	**100.0**	**77**	**100.0**	**4**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**95.1**		**4.9**			**0.0**

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;

- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers[16];
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts[17];
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated needs to improve in the Ocean City, NJ assessment area.

Lending Activity

Univest's lending levels in the Ocean City assessment area reflect adequate responsiveness to credit needs, given its extremely limited presence in the assessment area. During the evaluation period, lending activity in the Ocean City assessment area represented 1% of the bank's overall lending by number of loans, and 3% by dollar volume. Through its single branch location in the Ocean City, NJ assessment area, Univest made 53 HMDA loans totaling $28 million, and 11 small business loans totaling $2.8 million. No small farm loans were originated by Univest in this assessment area.

Borrower Distribution of Lending

The borrower distribution of HMDA loans reflects poor penetration among individuals of different income levels, including low- and moderate-income individuals. As mentioned previously, small business and small farm loans were not included in this analysis due to very low loan volumes, which would not have had a significant effect on the bank's overall performance in this assessment area. However, data on small business and small farm loans is included for reference in Appendix D.

Finally, it is noted that borrower distribution is given more weight than geographic distribution in this assessment area, in driving lending test performance. The demographics of the Ocean City, NJ assessment area limit the value of geographic distribution analysis, given that there are only six low- and moderate-income census tracts within the assessment area.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified upon annually-adjusted family income data made available by FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families.

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[16] Borrower distribution of small business and small farm loans is not included in the analysis for the Ocean City, NJ assessment area due to low loan volumes.

[17] Geographic distribution of small business and small farm loans is not included in the analysis for the Ocean City, NJ assessment area due to low loan volumes.

As noted previously, 2015 ACS data showed 20% of families were categorized as low-income, 19% were moderate-income, 21% were middle-income, and 40% were upper-income. The fact that 39% of families in the assessment area were designated as low- or moderate-income indicates a need for affordable rental housing and home-mortgage credit among this segment of the population.

The following tables compare Univest's home-mortgage lending to the aggregate home-mortgage lending levels, using median family income as a proxy for loan demand.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
Income Level	**% Families by Family Income Level (2015 ACS Data)**	**2017**	
		% Univest Lending	**% Aggregate Lending**
Low	19.9	5.0	2.9
Moderate	19.0	5.0	7.7
Middle	21.3	5.0	12.6
Upper	39.8	75.0	66.9
Unknown	0.0	10.0	9.9
Total	**100**	**100**	**100**

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
Income Level	**% Families by Family Income Level (2015 ACS Data)**	**2018**	
		% Univest Lending	**% Aggregate Lending**
Low	19.9	3.0	3.6
Moderate	19.0	3.0	8.6
Middle	21.3	15.2	12.7
Upper	39.8	60.6	63.6
Unknown	0.0	18.2	11.4
Total	**100**	**100**	**100**

Lending to Low-Income Borrowers

Overall, Univest's lending to low-income borrowers was poor.

Univest's HMDA lending in 2017 to low-income borrowers was poor. In total, 5% of HMDA loans were originated to low-income borrowers (one loan), exceeding the aggregate lending level of 3% to low-income families. Both the bank and aggregate lenders fell far short of the proxy of 20% of low-income families. The bank's single loan originated to a low-income borrower was a home improvement loan. Aggregate lenders originated 2% of home purchase loans, 4% of refinance loans, 6% of home improvement loans, and no multifamily loans to low-income borrowers in 2017.

Univest's HMDA lending in 2018 to low-income borrowers was poor. In total, 3% of HMDA loans were originated to low-income borrowers (again, one loan), just below the aggregate lending level of almost 4% to low-income families. Again, both the bank and aggregate lenders were significantly below the proxy of 20%, though aggregate levels rose slightly from the prior year. By product type, Univest's single loan to a low-income borrower was a home-improvement loan. By contrast, aggregate lenders originated 3% of home purchase loans, 6% of refinance loans, 4% of home improvement, no multifamily, and 1% of purpose "not applicable" loans to low-income borrowers in 2018.

For both years, bank and aggregate lending levels were far below the proxy of low-income families, potentially indicating limited lending opportunities to the assessment area's low-income borrowers. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes, housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs. Taken together, these factors can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Lending to Moderate-Income Borrowers

Overall, the bank's lending to moderate-income borrowers was poor.

In 2017, the bank's lending to moderate-income borrowers was poor. In total, 5% of HMDA loans were originated to moderate-income borrowers in the assessment area (one loan). This is below the aggregate lending level of 8%, and significantly below the proxy of moderate-income families (19%). By product type, the bank made one refinance loan (25%) and no home purchase, home improvement loans, or multifamily loans to moderate-income borrowers. By comparison, aggregate lenders made 7% of home purchase loans, 8% of refinance loans, 12% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

Univest's lending in 2018 to moderate-income borrowers was also poor. In total, 3% of the bank's HMDA loans were originated to moderate-income borrowers in the assessment area (one loan), which was below the aggregate lending level of 9%, and significantly below the proxy of 19%. By product type, Univest made one home improvement loan (17%), and no home purchase, refinance loans, multifamily loans, or loan purpose "not applicable" loans to moderate-income borrowers in 2018. By comparison, aggregate lenders originated 7% of home purchase loans, 12% of refinance loans, 15% of home improvement loans, no multifamily loans, and 1% of loans with purpose "not applicable" to moderate-income borrowers in 2018.

Geographic Distribution of Lending

Overall, the geographic distribution of loans reflects adequate penetration throughout the Ocean City, NJ assessment area, taking into consideration the bank's business strategy and the demographic and economic characteristics of the assessment area. Analyses of small business and small farm loans are not included in this evaluation, as the small loan volumes would not have yielded a meaningful conclusion. However, data on small business and small farm loans is included for reference in Appendix D.

As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to the 2015 ACS Data, 3% of owner-occupied housing was located in low-income census tracts, and 15% was located in moderate-income census tracts. The majority of owner-occupied housing was located in middle-income tracts (61%), and upper-income tracts (21%).

The tables below present Univest's HMDA lending distribution in 2017 and 2018, in comparison to the applicable owner-occupied housing proxies, and the aggregate lending levels in the assessment area.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Geographic Distribution of HMDA Loans			
	% Owner-Occupied Housing Units (2015 ACS Data)	Aggregate Comparison	
Income Level		2017	
		% Univest Lending	% Aggregate Lending
Low	3.0	5.0	4.4
Moderate	15.3	20.0	19.3
Middle	60.6	45.0	51.0
Upper	21.0	30.0	25.3
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Geographic Distribution of HMDA Loans			
	% Owner-Occupied Housing Units (2015 ACS Data)	Aggregate Comparison	
Income Level		2018	
		% Univest Lending	% Aggregate Lending
Low	3.0	6.1	4.6
Moderate	15.3	12.1	19.6
Middle	60.6	39.4	49.0
Upper	21.0	42.4	26.8
Unknown	0.0	0.0	0.0
Total	**100**	**100**	**100**

Lending in Low-Income Census Tracts

Because only one low-income census tract was reported using 2015 ACS data, geographic distribution in low-income geographies was not analyzed, as performance results would not prove to be meaningful in this assessment area.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was adequate.

It is noteworthy that there were only five moderate-income census tracts in the assessment area in both years under review, and this fact was taken into consideration in developing performance conclusions.

Univest's lending in moderate-income census tracts in 2017 was good. In 2017, 20% of the bank's HMDA loans (four loans) were made in moderate-income census tracts, which exceeds both the performance of the aggregate (19%) and the proxy of owner-occupied units in moderate-income tracts (15%). By product type, four home purchase loans (33%), and no refinance loans, home improvement loans, or multifamily loans were made in moderate-income census tracts. In comparison, aggregate lenders made 20% of home purchase loans, 17% of refinance loans, 17% of home improvement loans, and no multifamily loans in moderate-income tracts in 2017.

For 2018, the bank's lending in moderate-income census tracts was adequate. In 2018, 12% of the bank's loans (four loans) were made in moderate-income census tracts, which is below aggregate lending levels (20%) and the proxy (12%). By product type, four of the bank's home purchase loans (25%), and no refinance, home improvement, multifamily or loan purpose "not applicable" loans were made in moderate-income tracts in 2018. In contrast, aggregate lenders made 22% of home-purchase loans, 16% of refinance loans, 10% of home-improvement loans, 44% of multifamily loans, and 28% of loan purpose "not applicable" loans in moderate-income census tracts.

Responsiveness to Credit Needs

Univest exhibits a poor record of servicing the credit needs of the most economically disadvantaged areas of its assessment area, including low-income borrowers and very small businesses, consistent with safe and sound banking practices. As noted previously, community contacts noted a particular need for affordable housing in the Ocean City, NJ assessment area, which was also highlighted when considering demographic housing data. These needs were not fully addressed through the bank's retail HMDA lending, nor through innovative or flexible lending products or community development lending, as explained below.

Innovative and/or Flexible Lending Practices

Univest makes little use of innovative and/or flexible lending practices in serving the assessment area's credit needs. The bank offers several mortgage products and participates in programs for first-time homebuyers through the FHA, and the VA, among many others. During the review period, the bank originated one FHA loan totaling $368 thousand in the assessment area. At the previous evaluation, no loans of this type were reported by the bank for the Ocean City, NJ assessment area.

As mentioned earlier, the credit needs of small businesses can be addressed more effectively by alternative products. In an effort to address the credit needs of such borrowers in the bank's assessment areas, Univest is a preferred lender with the SBA. In addition, Univest offers small business loans through its proprietary Main Street Banking program, where small dollar loans up to $100 thousand can be handled at the local branch. Univest did not originate any loans under the SBA or Main Street Banking programs in the assessment area during the evaluation period.

Community Development Lending

Univest makes a low level of community development loans in the assessment area. As noted in the table below, the bank made one new community development loan, totaling just under $1.7 million in the Ocean City assessment area. The community development loan supported revitalization and stabilization efforts in the assessment area.

The bank's performance represents an increase from the previous evaluation when Univest no community development loans were reported by the institution for the assessment area.

	Univest Bank & Trust Co. Community Development Lending - Ocean City Assessment Area									
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$	#	$	#	$	#	$	#	$
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	1	1,650,000	1	1,650,000
2019	0	0	0	0	0	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**1,650,000**	**1**	**1,650,000**

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as low satisfactory.

Volume of Investment and Grant Activity

Univest has an adequate level of qualified community development investments, donations and grants. During the current evaluation, investments, grants, and donations totaled $1.7 million in the Ocean City, NJ assessment area. This is a significant increase in investments from the bank's previous CRA evaluation, where qualified investments in the assessment area totaled less than $1 thousand. Of the bank's overall investments, 7% were made within the Ocean City, NJ assessment area.

The vast majority of investments in this assessment area support affordable housing for low- and moderate-income individuals. More specifically, the bank made nearly $1.7 million in mortgage-backed securities investments, which funded 10 homes through six new investments.

Additionally, as indicated in the table below, the bank made a total of six grants and donations totaling $20 thousand. Two donations totaling over $12 thousand were made to organizations that support affordable housing initiatives, and four donations totaling over $7 thousand provided community services that benefitted low- and moderate-income people and neighborhoods within its assessment area.

The following table presents investment, grant and donation activity for the Ocean City, NJ assessment area.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Qualified Investments				
CD Category	**DONATIONS $**	**INVESTMENTS $**	**IN-KIND DONATIONS $**	**TOTALS $**
Affordable Housing	12,500	1,680,032	0	1,692,532
Community Services	7,625	0	0	7,625
Economic Development	0	0	0	0
Revitalization & Stabilization	0	0	0	0
Totals	**20,125**	**1,680,032**	**0**	**1,700,157**

Responsiveness to Credit and Community Development Needs

Univest exhibits good responsiveness to credit and community development needs of the assessment area. Community contacts noted a need for affordable housing in the assessment area. Univest's qualified investments in mortgage-backed security loan pools, and donations targeted to affordable housing in the assessment area supported this enumerated community need.

Community Development Initiatives

Univest makes rare use of innovative and/or complex investments to support community development initiatives. Investments in the Ocean City, NJ assessment area consisted of six mortgage-backed security investments and six donations/grants targeted to affordable housing and the provision of services to low-income individuals in the assessment area. These activities are not considered to be particularly innovative or complex.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;

- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the Ocean City assessment area.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank's geographies and individuals of different income levels in the Ocean City, NJ assessment area. Univest operates one full-service branch in the Ocean City assessment area, which is located in a moderate-income tract. The following table details the location of the branch in comparison to 2015 ACS population demographics, and shows that the branch is located in a moderate-income area, which is proximate to where seventeen percent of the assessment area's population resides.

Univest Bank & Trust Co. Retail Branch Distribution Ocean City, NJ Assessment Area 2015 ACS Data			
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Percent of Population**
Low-income	0	0.0	4.1
Moderate-income	1	100.0	17.3
Middle-income	0	0.0	59.1
Upper-income	0	0.0	19.5
Unknown-income	0	0.0	0.0
Totals	**1**	**0.0**	**100.0**

The branch includes a cash dispense-only ATM, which provides electronic access to funds and to banking services. To supplement traditional retail banking services, Univest provides online banking services, telephone banking services, and mobile banking through the bank's smart phone application. In addition, Univest provides mobile wallet pay through acceptance programs with digital vendors, and bank customers can pay bills, open accounts and apply for loan products via the bank's website, at https://www.univest.net.

Changes in Branch Locations

The bank did not open or close any branches during the evaluation period within the Ocean City, NJ assessment area, and therefore this component of the service test was not considered in this assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income census tracts or individuals. The single branch in the assessment area includes a walk-up ATM and drive-through facility. The branch operates Monday through Friday from 9 a.m. to 5 p.m., and offers extended Saturday hours during the summer season which runs from Memorial Day to Labor Day.

The need for extended branch hours during the summer months can be correlated to the large influx of tourists that visit the beach communities. As mentioned previously, the population of the county swells to over 750 thousand in the height of the summer season, compared to the nearly 96 thousand people living in the county year-round.

Bank Products

Univest offers a Basic Checking deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's basic checking account is a consumer account with no minimum daily balance requirement, no monthly service fee, and no fee for paper statements. The bank also offers a Small Business Checking account for small businesses with limited transaction activity. The account offers 200 free transaction items, with no monthly service charge, and no monthly minimum balance. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

Univest provides a limited level of community development services in this assessment area. Of note, a bank employee serves as a Board Member for Big Brothers Big Sisters of Atlantic & Cape May Counties. At the previous evaluation, no submission of community development services was received for consideration.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
9/12/17 - 1/13/20			
Financial Institution		**Products Reviewed**	
Univest Bank and Trust Co.		HMDA	
		Small Business	
		Small Farm	
Affiliates	**Affiliate Relationship**	**Products Reviewed**	
N/A	N/A	N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	**Type of Examination**	**Branches Visited[18]**	**Other Information**
Philadelphia, PA Assessment Area	Full-Scope	N/A	No geographic distribution for small farm loans in low-income census tracts due to demographics.
Lancaster, PA Assessment Area	Full-Scope	N/A	No geographic distribution analysis for small farm loans due to demographics.
Allentown, PA Assessment Area	Limited-Scope	N/A	No small farm loans were made in the assessment area.
Reading, PA Assessment Area	Limited-Scope	N/A	Small business lending not included in analysis due to low volume. Small farm lending not included in analysis, as no such loans were made in 2018, and only one loan was made in 2018. Retail service components not included in Service Test analysis, as the bank does not have a physical branch presence in the assessment area.
Ocean City, NJ Assessment Area	Full-Scope	N/A	No small business lending included due to low volume. No small farm lending included, as no such loans were made in this assessment area. No geographic distribution analysis in low-income census tracts due to demographics.

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[18]No branch visits were performed in accordance with the scoping process for this evaluation. The institution's CRA Public File was reviewed electronically.

CRA APPENDIX B: SUMMARY OF STATE RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania				Satisfactory
Philadelphia, PA Assessment Area	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Lancaster, PA Assessment Area	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Allentown, PA Assessment Area	Consistent	Consistent	Consistent	Consistent
Reading, PA Assessment Area	Below	Below	Below	Below
State of New Jersey				Satisfactory
Ocean City, NJ Assessment Area	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve

CRA APPENDIX C: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or 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 its 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: All Agencies have adopted the following language.
(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) 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;
(4) Activities that revitalize or stabilize-
    (i) Low-or moderate-income geographies;
    (ii) Designated disaster areas; or
    (iii)Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
        A. Rates of poverty, unemployment, and population loss; or
        B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or
(5) Loans, investments, and services that-
    (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
    (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
    (iii)Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

Full-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (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 under the lending, investment, and service tests 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) and the Thrift Financial Reporting (TFR) 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 Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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.

CRA APPENDIX D: SMALL BUSINESS AND SMALL FARM LOAN DISTRIBUTION TABLES

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA MSA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	12	2.3	3,666	3.9	0	0.0	0	0.0
Moderate	68	13.0	15,253	16.1	15	35.7	1,516	30.7
Middle	333	63.7	56,935	59.9	25	59.5	3,177	64.4
Upper	110	21.0	19,117	20.1	2	4.8	240	4.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**523**	**100.0**	**94,971**	**100.0**	**42**	**100.0**	**4,933**	**100.0**
By Revenue								
Total $1 Million or Less	172	32.9	35,706	37.6	40	95.2	4,133	83.8
Over $1 Million	255	48.8	55,973	58.9	2	4.8	800	16.2
Not Known	96	18.4	3,292	3.5	0	0.0	0	0.0
Total	**523**	**100.0**	**94,971**	**100.0**	**42**	**100.0**	**4,933**	**100.0**
By Loan Size								
$100,000 or less	296	56.6	13,128	13.8	25	59.5	1,011	20.5
$100,001 - $250,000	114	21.8	19,737	20.8	11	26.2	1,745	35.4
$250,001 - $1 Million (Bus)-$500k (Farm)	113	21.6	62,106	65.4	6	14.3	2,177	44.1
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**523**	**100.0**	**94,971**	**100.0**	**42**	**100.0**	**4,933**	**100.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	79	45.9	4,118	11.5	25	62.5	1,011	24.5
$100,001 - $250,000	44	25.6	8,335	23.3	11	27.5	1,745	42.2
$250,001 - $1 Million (Bus)- $500k (Farm)	49	28.5	23,253	65.1	4	10.0	1,377	33.3
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**172**	**100.0**	**35,706**	**100.0**	**40**	**100.0**	**4,133**	**100.0**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	11	1.9	3,331	2.9	0	0.0	0	0.0
Moderate	97	16.9	20,508	17.9	19	42.2	2,532	41.5
Middle	329	57.4	60,616	52.8	24	53.3	3,515	57.6
Upper	134	23.4	30,027	26.2	2	4.4	60	1.0
Unknown	2	0.3	305	0.3	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**573**	**100.0**	**114,787**	**100.0**	**45**	**100.0**	**6,107**	**100.0**
By Revenue								
Total $1 Million or Less	171	29.8	39,238	34.2	45	100.0	6,107	100.0
Over $1 Million	297	51.8	72,113	62.8	0	0.0	0	0.0
Not Known	105	18.3	3,436	3.0	0	0.0	0	0.0
Total	**573**	**100.0**	**114,787**	**100.0**	**45**	**100.0**	**6,107**	**100.0**
By Loan Size								
$100,000 or less	316	55.%	13,885	12.1	24	53.3	1,139	18.7
$100,001 - $250,000	104	18.2	18,038	15.7	12	26.7	1,795	29.4
$250,001 - $1 Million (Bus)-$500k (Farm)	153	26.7	82,864	72.2	9	20.0	3,173	52.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**573**	**100.0**	**114,787**	**100.0**	**45**	**100.0**	**6,107**	**100.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	75	43.9	3,799	9.7	24	53.3	1,139	18.7
$100,001 - $250,000	36	21.1	6,342	16.2	12	26.7	1,795	29.4
$250,001 - $1 Million (Bus)- $500k (Farm)	60	35.1	29,097	74.2	9	20.0	3,173	52.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**171**	**100.0**	**39,238**	**100.0**	**45**	**100.0**	**6,107**	**100.0**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
	By Tract Income							
Low	1	0.6	600	2.1	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	167	96.5	25,839	91.5	460	96.4	54,291	96.2
Upper	5	2.9	1,813	6.4	17	3.6	2,125	3.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**173**	**100.0**	**28,252**	**100.0**	**477**	**100.0**	**56,416**	**100.0%**
	By Revenue							
Total $1 Million or Less	140	80.9	19,851	70.3	468	98.1	54,332	96.3
Over $1 Million	32	18.5	8,376	29.6%	9	1.9	2,084	3.7
Not Known	1	0.6	25	0.1	0	0.0	0	0.0
Total	**173**	**100.0**	**28,252**	**100.0**	**477**	**100.0**	**56,416**	**100.0**
	By Loan Size							
$100,000 or less	104	60.1	5,027	17.8	307	64.4	13,909	24.7
$100,001 - $250,000	33	19.1	5,501	19.5	107	22.4	18,842	33.4
$250,001 - $1 Million (Bus)-$500k (Farm)	36	20.8	17,724	62.7	63	13.2	23,665	41.9
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**173**	**100.0**	**28,252**	**100.0**	**477**	**100.0**	**56,416**	**100.0**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	91	65.0	4,210	21.2	306	65.4	13,809	25.4
$100,001 - $250,000	24	17.1	4,091	20.6	101	21.6	17,742	32.7
$250,001 - $1 Million (Bus)- $500k (Farm)	25	17.9	11,550	58.2	61	13.0	22,781	41.9
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**140**	**100.0**	**19,851**	**100.0**	**468**	**100.0**	**54,332**	**100.0**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	3	1.4	840	2.6	0	0.0	0	0.0
Moderate	3	1.4	1,200	3.8	0	0.0	0	0.0
Middle	192	92.8	28,325	89.3	461	97.9	56,654	98.0
Upper	9	4.3	1,367	4.3	10	2.1	1,149	2.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**207**	**100.0**	**31,732**	**100.0**	**471**	**100.0**	**57,803**	**100.0**
By Revenue								
Total $1 Million or Less	187	90.3	24,276	76.5	467	99.2	56,863	98.4
Over $1 Million	20	9.7	7,456	23.5	4	0.8	940	1.6
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**207**	**100.0**	**31,732**	**100.0**	**471**	**100.0**	**57,803**	**100.0**
By Loan Size								
$100,000 or less	135	65.2	5,530	17.4	298	63.3	13,995	24.2
$100,001 - $250,000	28	13.5	4,883	15.4	95	20.2	16,580	28.7
$250,001 - $1 Million (Bus)-$500k (Farm)	44	21.3	21,319	67.2	78	16.6	27,228	47.1
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**207**	**100.0**	**31,732**	**100.0**	**471**	**100.0**	**57,803**	**100.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	131	70.1	5,253	21.6	296	63.4	13,805	24.3
$100,001 - $250,000	24	12.8	4,158	17.1	95	20.3	16,580	29.2
$250,001 - $1 Million (Bus)- $500k (Farm)	32	17.1	14,865	61.2	76	16.3	26,478	46.6
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**187**	**100.0**	**24,276**	**100.0**	**467**	**100.0**	**56,863**	**100.0**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	3	6.4	369	4.5	0	0.0	0	0.0
Moderate	6	12.8	2,133	26.3	0	0.0	0	0.0
Middle	10	21.3	2,830	34.9	0	0.0	0	0.0
Upper	28	59.6	2,785	34.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**47**	**100.0**	**8,117**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Revenue								
Total $1 Million or Less	10	21.3	2,138	26.3	0	0.0	0	0.0
Over $1 Million	33	70.2	5,860	72.2	0	0.0	0	0.0
Not Known	4	8.5	119	1.5	0	0.0	0	0.0
Total	**47**	**100.0**	**8,117**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size								
$100,000 or less	32	68.1	1,351	16.6	0	0.0	0	0.0
$100,001 - $250,000	7	14.9	1,292	15.9	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	8	17.0	5,474	67.4	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**47**	**100.0**	**8,117**	**100.0**	**0**	**0.0**	**0**	**0.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	5	50.0	283	13.2	0	0.0	0	0.0
$100,001 - $250,000	3	30.0	480	22.5	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	2	20.0	1,375	64.3	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**10**	**100.0**	**2,138**	**100.0**	**0**	**0.0**	**0**	**0.0**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
	By Tract Income							
Low	7	12.3	3,529	20.3	0	0.0	0	0.0
Moderate	8	14.0	2,749	15.8	0	0.0	0	0.0
Middle	19	33.3	6,347	36.5	0	0.0	0	0.0
Upper	23	40.4	4,764	27.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**57**	**100.0**	**17,389**	**100.0**	**0**	0.0	**0**	0.0
	By Revenue							
Total $1 Million or Less	13	22.8	2,106	12.1	0	0.0	0	0.0
Over $1 Million	42	73.7	15,208	87.5	0	0.0	0	0.0
Not Known	2	3.5	75	0.4	0	0.0	0	0.0
Total	**57**	**100.0**	**17,389**	**100.0**	**0**	0.0	**0**	0.0
	By Loan Size							
$100,000 or less	21	36.8	934	5.4	0	0.0	0	0.0
$100,001 - $250,000	10	17.5	1,809	10.4	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	26	45.6	14,646	84.2	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**57**	**100.0**	**17,389**	**100.0**	**0**	0.0	**0**	0.0
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	6	46.2	285	13.5	0	0.0	0	0.0
$100,001 - $250,000	3	23.1	442	21.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	4	30.8	1,379	65.5	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**13**	**100.0**	**2,106**	**100.0**	**0**	0.0	**0**	0.0

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	40.0	220	19.2	0	0.0	0	0.0
Upper	3	60.0	927	80.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**1,147**	**100.0**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	4	80.0	997	86.9	0	0.0	0	0.0
Over $1 Million	1	20.0	150	13.1	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**1,147**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	3	60.0	122	10.6	0	0.0	0	0.0
$100,001 - $250,000	1	20.0	150	13.1	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	1	20.0	875	76.3	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**1,147**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	3	75.0	122	12.2	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	1	25.0	875	87.8	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**997**	**100.0**	**0**	0.0	**0**	0.0

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	100.0	1,345	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	100.0	250	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,345**	**100.0%**	**1**	**100.0**	**250**	**100.0**
By Revenue								
Total $1 Million or Less	2	50.0	920	68.4	1	100.0	250	100.0
Over $1 Million	2	50.0	425	31.6	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,345**	**100.0%**	**1**	**100.0%**	**250**	**100.0**
By Loan Size								
$100,000 or less	1	25.0	20	1.5	0	0.0	0	0.0
$100,001 - $250,000	1	25.0	125	9.3	1	100.0	250	100.0
$250,001 - $1 Million (Bus)-$500k (Farm)	2	50.0	1,200	0.0	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,345**	**100.0%**	**1**	**100.0**	**250**	**100.0**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	1	50.0	20	2.2	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	1	100.0	250	100.0
$250,001 - $1 Million (Bus)- $500k (Farm)	1	50.0	900	97.8	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**920**	**100.0**	**1**	**100.0**	**250**	**100.0**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
	By Tract Income							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	5	55.6	1,838	74.6	0	0.0	0	0.0
Upper	4	44.4	625	25.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**2,463**	**100.0**	**0**	**0.0**	**0**	**0.0**
	By Revenue							
Total $1 Million or Less	5	55.6	1,916	77.8	0	0.0	0	0.0
Over $1 Million	4	44.4	547	22.2	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**2,463**	**100.0**	**0**	**0.0**	**0**	**0.0**
	By Loan Size							
$100,000 or less	3	33.3	300	12.2	0	0.0	0	0.0
$100,001 - $250,000	4	44.4	763	31.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	2	22.2	1,400	56.8	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**2,463**	**100.0**	**0**	**0.0**	**0**	**0.0**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	1	20.0	100	5.2	0	0.0	0	0.0
$100,001 - $250,000	2	40.0	416	21.7	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	2	40.0	1,400	73.1	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**1,916**	**100.0**	**0**	**0.0**	**0**	**0.0**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	100.0	356	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Tract Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**356**	**100.0%**	**0**	0.0	**0**	0.0
By Revenue								
Total $1 Million or Less	2	100.0	356	100.0	0	0.0	0	0.0
Over $1 Million	0	0.0	0	0.0	0	0.0	0	0.0
Not Known	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**356**	**100.0%**	**0**	0.0	**0**	0.0
By Loan Size								
$100,000 or less	1	50.0	100	28.1	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)-$500k (Farm)	1	50.0	256	71.9	0	0.0	0	0.0
Over $1 Million (Bus)-$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**356**	**100.0**	**0**	0.0	**0**	0.0
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	1	50.0	100	28.1	0	0.0	0	0.0
$100,001 - $250,000	0	0.0	0	0.0	0	0.0	0	0.0
$250,001 - $1 Million (Bus)- $500k (Farm)	1	50.0	256	71.9	0	0.0	0	0.0
Over $1 Million (Bus) -$500k (Farm)	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0%**	**356**	**100.0**	**0**	0.0	**0**	0.0

CRA APPENDIX E: HMDA LOAN DISTRIBUTION TABLES

2017 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	31	4.1	7,575	4.5	89	11.8	12,855	7.6
Moderate	159	21.0	26,384	15.6	153	20.2	27,166	16.1
Middle	345	45.6	74,118	43.9	136	18.0	28,247	16.7
Upper	221	29.2	60,805	36.0	309	40.9	82,574	48.9
Unknown	0	0.0	0	0.0	69	9.1	18,040	10.7
Total	**756**	**100.0**	**168,882**	**100.0**	**756**	**100.0**	**168,882**	**100.0**
Refinance								
Low	5	2.3	1,863	3.2	21	9.5	2,498	4.3
Moderate	28	12.7	5,464	9.5	32	14.5	5,590	9.7
Middle	111	50.5	25,110	43.6	46	20.9	8,966	15.6
Upper	76	34.5	25,103	43.6	104	47.3	35,419	61.6
Unknown	0	0.0	0	0.0	17	7.7	5,067	8.8
Total	**220**	**100.0**	**57,540**	**100.0**	**220**	**100.0**	**57,540**	**100.0**
Home Improvement								
Low	3	0.7	345	1.3	72	17.9	2,744	10.1
Moderate	71	17.6	5,459	20.1	76	18.9	4,149	15.2
Middle	221	54.8	12,218	44.9	93	23.1	4,075	15.0
Upper	108	26.8	9,202	33.8	137	34.0	11,331	41.6
Unknown	0	0.0	0	0.0	25	6.2	4,925	18.1
Total	**403**	**100.0**	**27,224**	**100.0**	**403**	**100.0**	**27,224**	**100.0**
Multi-Family								
Low	3	15.8	2,186	9.4	0	0.0	0	0.0
Moderate	7	36.8	3,179	13.6	0	0.0	0	0.0
Middle	4	21.1	11,617	49.8	0	0.0	0	0.0
Upper	5	26.3	6,363	27.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	19	100.0	23,345	100.0
Total	**19**	**100.0**	**23,345**	**100.0**	**19**	**100.0**	**23,345**	**100.0**
HMDA Totals								
Low	42	3.0	11,969	4.3	182	13.0	18,097	6.5
Moderate	265	19.0	40,486	14.6	261	18.7	36,905	13.3
Middle	681	48.7	123,063	44.4	275	19.7	41,288	14.9
Upper	410	29.3	101,473	36.6	550	39.3	129,324	46.7
Unknown	0	0.0	0	0.0	130	9.3	51,377	18.5
Total	**1,398**	**100.0**	**276,991**	**100.0**	**1,398**	**100.0**	**276,991**	**100.0**

2018 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	32	4.5	5,330	3.2	93	13.0	14,083	8.5
Moderate	147	20.6	28,664	17.4	142	19.9	27,023	16.4
Middle	326	45.7	74,474	45.1	153	21.5	33,360	20.2
Upper	208	29.2	56,561	34.3	257	36.0	69,285	42.0
Unknown	0	0.0	0	0.0	68	9.5	21,278	12.9
Total	**713**	**100.0**	**165,029**	**100.0**	**713**	**100.0**	**165,029**	**100.0**
Refinance								
Low	5	1.7	723	1.1	38	12.6	4,415	6.5
Moderate	50	16.6	8,817	12.9	55	18.2	8,784	12.9
Middle	152	50.3	27,370	40.1	49	16.2	8,972	13.2
Upper	95	31.5	31,307	45.9	140	46.4	42,846	62.8
Unknown	0	0.0	0	0.0	20	6.6	3,200	4.7
Total	**302**	**100.0**	**68,217**	**100.0**	**302**	**100.0**	**68,217**	**100.0**
Home Improvement								
Low	7	2.6	425	1.8	32	11.8	1,493	6.2
Moderate	47	17.3	3,243	13.5	51	18.8	3,266	13.6
Middle	154	56.6	13,348	55.5	56	20.6	4,457	18.5
Upper	64	23.5	7,040	29.3	117	43.0	13,209	54.9
Unknown	0	0.0	0	0.0	16	5.9	1,631	6.8
Total	**272**	**100.0**	**24,056**	**100.0**	**272**	**100.0**	**24,056**	**100.0**
Multi-Family								
Low	5	17.9	2,626	4.3	1	3.6	356	0.6
Moderate	8	28.6	44,734	74.0	0	0.0	0	0.0
Middle	11	39.3	8,455	14.0	3	10.7	915	1.5
Upper	4	14.3	4,652	7.7	1	3.6	688	1.1
Unknown	0	0.0	0	0.0	23	82.1	58,508	96.8
Total	**28**	**100.0**	**60,467**	**100.0**	**28**	**100.0**	**60,467**	**100.0**
Other Purpose LOC								
Low	0	0.0	0	0.0	17	18.7	737	10.2
Moderate	11	12.1	630	8.7	20	22.0	1,557	21.5
Middle	54	59.3	4,248	58.7	17	18.7	1,542	21.3
Upper	26	28.6	2,357	32.6	33	36.3	3,176	43.9
Unknown	0	0.0	0	0.0	4	4.4	223	3.1
Total	**91**	**100.0**	**7,235**	**100.0**	**91**	**100.0**	**7,235**	**100.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%				
	Other Purpose Closed/Exempt							
Low	1	4.0	146	6.0	5	20.0	157	6.4
Moderate	7	28.0	767	31.4	4	16.0	84	3.4
Middle	13	52.0	912	37.3	9	36.0	1,291	52.8
Upper	4	16.0	619	25.3	6	24.0	880	36.0
Unknown	0	0.0	0	0.0	1	4.0	32	1.3
Total	**25**	**100.0**	**2,444**	**100.0**	**25**	**100.0**	**2,444**	**100.0**
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	HMDA Totals							
Low	50	3.5	9,250	2.8	186	13.0	21,241	6.5
Moderate	270	18.9	86,855	26.5	272	19.0	40,714	12.4
Middle	710	49.6	128,807	39.3	287	20.1	50,537	15.4
Upper	401	28.0	102,536	31.3	554	38.7	130,084	39.7
Unknown	0	0.0	0	0.0	132	9.2	84,872	25.9
Total	**1,431**	**100.0**	**327,448**	**100.0**	**1,431**	**100.0**	**327,448**	**100.0**

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2017 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	10	7.5	721	3.1	22	16.5	3,565	15.4
Moderate	14	10.5	1,205	5.2	39	29.3	6,265	27.0
Middle	107	80.5	20,754	89.6	33	24.8	5,631	24.3
Upper	2	1.5	494	2.1	29	21.8	6,662	28.7
Unknown	0	0.0	0	0.0	10	7.5	1,051	4.5
Total	**133**	**100.0**	**23,174**	**100.0**	**133**	**100.0**	**23,174**	**100.0**
	Refinance							
Low	3	7.7	301	4.6	4	10.3	436	6.7
Moderate	2	5.1	189	2.9	11	28.2	2,193	33.5
Middle	32	82.1	5,892	90.0	6	15.4	1,228	18.8
Upper	2	5.1	164	2.5	8	20.5	1,225	18.7
Unknown	0	0.0	0	0.0	10	25.6	1,464	22.4
Total	**39**	**100.0**	**6,546**	**100.0**	**39**	**100.0**	**6,546**	**100.0**
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	7	33.3	432	23.3
Middle	21	100.0	1,857	100.0	6	28.6	301	16.2
Upper	0	0.0	0	0.0	6	28.6	324	17.4
Unknown	0	0.0	0	0.0	2	9.5	800	43.1
Total	**21**	**100.0**	**1,857**	**100.0**	**21**	**100.0**	**1,857**	**100.0**
	Multi-Family							
Low	3	50.0	4,254	78.3	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	3	50.0	1,180	21.7	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	6	100.0	5,434	100.0
Total	**6**	**100.0**	**5,434**	**100.0**	**6**	**100.0**	**5,434**	**100.0**
	HMDA Totals							
Low	16	8.0	5,276	14.3	26	13.1	4,001	10.8
Moderate	16	8.0	1,394	3.8	57	28.6	8,890	24.0
Middle	163	81.9	29,683	80.2	45	22.6	7,160	19.3
Upper	4	2.0	658	1.8	43	21.6	8,211	22.2
Unknown	0	0.0	0	0.0	28	14.1	8,749	23.6
Total	**199**	**100.0**	**37,011**	**100.0**	**199**	**100.0**	**37,011**	**100.0**

2018 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	7	4.8	665	2.1	17	11.6	2,855	9.1
Moderate	7	4.8	658	2.1	59	40.4	11,674	37.3
Middle	129	88.4	29,355	93.7	19	13.0	4,191	13.4
Upper	3	2.1	653	2.1	35	24.0	9,806	31.3
Unknown	0	0.0	0	0.0	16	11.0	2,805	9.0
Total	**146**	**100.0**	**31,331**	**100.0**	**146**	**100.0**	**31,331**	**100.0**
	Refinance							
Low	1	1.6	56	0.5	5	7.8	398	3.5
Moderate	7	10.9	723	6.3	20	31.3	2,607	22.8
Middle	56	87.5	10,668	93.2	13	20.3	2,239	19.6
Upper	0	0.0	0	0.0	19	29.7	5,666	49.5
Unknown	0	0.0	0	0.0	7	10.9	537	4.7
Total	**64**	**100.0**	**11,447**	**100.0**	**64**	**100.0**	**11,447**	**100.0**
	Home Improvement							
Low	0	0.0	0	0.0	2	6.9	200	10.6
Moderate	2	6.9	339	18.0	8	27.6	332	17.6
Middle	27	93.1	1,547	82.0	8	27.6	320	17.0
Upper	0	0.0	0	0.0	9	31.0	708	37.5
Unknown	0	0.0	0	0.0	2	6.9	326	17.3
Total	**29**	**100.0**	**1,886**	**100.0**	**29**	**100.0**	**1,886**	**100.0**
	Multi-Family							
Low	1	10.0	880	17.3	0	0.0	0	0.0
Moderate	1	10.0	172	3.4	1	10.0	172	3.4
Middle	8	80.0	4,041	79.3	0	0.0	0	0.0
Upper	0	0.0	0	0.0	1	10.0	263	5.2
Unknown	0	0.0	0	0.0	8	80.0	4,658	91.5
Total	**10**	**100.0**	**5,093**	**100.0**	**10**	**100.0**	**5,093**	**100.0**
	Other Purpose LOC							
Low	0	0.0	0	0.0	2	13.3	200	16.9
Moderate	0	0.0	0	0.0	6	40.0	236	19.9
Middle	15	100.0	1,186	100.0	2	13.3	125	10.5
Upper	0	0.0	0	0.0	5	33.3	625	52.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**15**	**100.0**	**1,186**	**100.0**	**15**	**100.0**	**1,186**	**100.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	100.0%	180	100.0%
Middle	1	100.0%	180	100.0%	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	1	100.0%	180	100.0%	1	100.0%	180	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	9	3.4	1,601	3.1	26	9.8	3,653	7.1
Moderate	17	6.4	1,892	3.7	95	35.8	15,201	29.7
Middle	236	89.1	46,977	91.9	42	15.8	6,875	13.4
Upper	3	1.1	653	1.3	69	26.0	17,068	33.4
Unknown	0	0.0	0	0.0	33	12.5	8,326	16.3
Total	265	100.0	51,123	100.0	265	100.0	51,123	100.0

2017 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	7	5.8	704	3.3	12	9.9	1,310	6.2
Moderate	23	19.0	2,918	13.9	38	31.4	5,271	25.0
Middle	55	45.5	9,478	45.0	31	25.6	5,537	26.3
Upper	36	29.8	7,948	37.8	37	30.6	8,463	40.2
Unknown	0	0.0	0	0.0	3	2.5	467	2.2
Total	**121**	**100.0**	**21,048**	**100.0**	**121**	**100.0**	**21,048**	**100.0**
	Refinance							
Low	0	0.0	0	0.0	2	8.0	248	5.6
Moderate	6	24.0	514	11.6	4	16.0	431	9.7
Middle	9	36.0	1,421	32.1	5	20.0	750	17.0
Upper	10	40.0	2,488	56.3	13	52.0	2,719	61.5
Unknown	0	0.0	0	0.0	1	4.0	275	6.2
Total	**25**	**100.0**	**4,423**	**100.0**	**25**	**100.0**	**4,423**	**100.0**
	Home Improvement							
Low	2	11.1	219	11.7	0	0.0	0	0.0
Moderate	3	16.7	202	10.8	1	5.6	45	2.4
Middle	3	16.7	190	10.2	2	11.1	297	15.9
Upper	10	55.6	1,259	67.3	14	77.8	1,328	71.0
Unknown	0	0.0	0	0.0	1	5.6	200	10.7
Total	**18**	**100.0**	**1,870**	**100.0**	**18**	**100.0**	**1,870**	**100.0**
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	HMDA Totals							
Low	9	5.5	923	3.4	14	8.5	1,558	5.7
Moderate	32	19.5	3,634	13.3	43	26.2	5,747	21.0
Middle	67	40.9	11,089	40.6	38	23.2	6,584	24.1
Upper	56	34.1	11,695	42.8	64	39.0	12,510	45.8
Unknown	0	0.0	0	0.0	5	3.0	942	3.4
Total	**164**	**100.0**	**27,341**	**100.0**	**164**	**100.0**	**27,341**	**100.0**

2018 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

	HMDA							
	By Tract Income				**By Borrower Income**			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Purchase							
Low	1	1.2	610	3.5	2	2.5	263	1.5
Moderate	9	11.1	1,072	6.1	19	23.5	3,157	17.9
Middle	40	49.4	9,847	55.7	21	25.9	3,585	20.3
Upper	31	38.3	6,140	34.8	36	44.4	9,780	55.4
Unknown	0	0.0	0	0.0	3	3.7	884	5.0
Total	**81**	**100.0**	**17,669**	**100.0**	**81**	**100.0**	**17,669**	**100.0**
	Refinance							
Low	0	0.0	0	0.0	1	7.1	137	4.4
Moderate	1	7.1	125	4.0	2	14.3	275	8.8
Middle	10	71.4	2,331	74.9	4	28.6	852	27.4
Upper	3	21.4	656	21.1	6	42.9	1,468	47.2
Unknown	0	0.0	0	0.0	1	7.1	380	12.2
Total	**14**	**100.0**	**3,112**	**100.0**	**14**	**100.0**	**3,112**	**100.0**
	Home Improvement							
Low	1	10.0	210	19.8	1	10.0	20	1.9
Moderate	1	10.0	70	6.6	1	10.0	117	11.0
Middle	5	50.0	445	41.9	2	20.0	293	27.6
Upper	3	30.0	337	31.7	4	40.0	407	38.3
Unknown	0	0.0	0	0.0	2	20.0	225	21.2
Total	**10**	**100.0**	**1,062**	**100.0**	**10**	**100.0**	**1,062**	**100.0**
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	50.0	515	49.3	0	0.0	0	0.0
Middle	1	50.0	530	50.7	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	1,045	100.0
Total	**2**	**100.0**	**1,045**	**100.0**	**2**	**100.0**	**1,045**	**100.0**
	Other Purpose LOC							
Low	1	14.3	60	19.1	0	0.0	0	0.0
Moderate	1	14.3	74	23.6	0	0.0	0	0.0
Middle	0	0.0	0	0.0	4	57.1	140	44.6
Upper	5	71.4	180	57.3	3	42.9	174	55.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**7**	**100.0**	**314**	**100.0**	**7**	**100.0**	**314**	**100.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	100.0	16	100.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	1	100.0	16	100.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**1**	**100.0**	**16**	**100.0**	**1**	**100.0**	**16**	**100.0**
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	HMDA Totals							
Low	3	2.6	880	3.8	4	3.5	420	1.8
Moderate	13	11.3	1,856	8.0	23	20.0	3,565	15.4
Middle	56	48.7	13,153	56.7	31	27.0	4,870	21.0
Upper	43	37.4	7,329	31.6	49	42.6	11,829	50.9
Unknown	0	0.0	0	0.0	8	7.0	2,534	10.9
Total	**115**	**100.0**	**23,218**	**100.0**	**115**	**100.0**	**23,218**	**100.0**

2017 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	6.7	500	14.6	2	13.3	357	10.4
Moderate	0	0.0	0	0.0	3	20.0	576	16.8
Middle	10	66.7	1,941	56.8	3	20.0	419	12.3
Upper	4	26.7	978	28.6	6	40.0	1,567	45.8
Unknown	0	0.0	0	0.0	1	6.7	500	14.6
Total	**15**	**100.0**	**3,419**	**100.0**	**15**	**100.0**	**3,419**	**100.0**
Refinance								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	2	100.0	736	100.0	2	100.0	736	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**736**	**100.0**	**2**	**100.0**	**736**	**100.0**
Home Improvement								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	2	40.0	34	6.7
Middle	4	80.0	308	60.4	2	40.0	274	53.7
Upper	1	20.0	202	39.6	1	20.0	202	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**5**	**100.0**	**510**	**100.0**	**5**	**100.0**	**510**	**100.0**
Multi-Family								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
HMDA Totals								
Low	1	4.5	500	10.7	2	9.1	357	7.7
Moderate	0	0.0	0	0.0	5	22.7	610	13.1
Middle	14	63.6	2,249	48.2	5	22.7	693	14.9
Upper	7	31.8	1,916	41.1	9	40.9	2,505	53.7
Unknown	0	0.0	0	0.0	1	4.5	500	10.7
Total	**22**	**100.0**	**4,665**	**100.0**	**22**	**100.0**	**4,665**	**100.0**

2018 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	10.0	80	4.2	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	10.0	128	6.7
Middle	5	50.0	787	41.1	3	30.0	440	23.0
Upper	4	40.0	1,048	54.7	5	50.0	1,267	66.2
Unknown	0	0.0	0	0.0	1	10.0	80	4.2
Total	**10**	**100.0**	**1,915**	**100.0**	**10**	**100.0**	**1,915**	**100.0**
Refinance								
Low	1	25.0	47	9.3	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	50.0	353	69.9	2	50.0	358	70.9
Upper	1	25.0	105	20.8	1	25.0	100	19.8
Unknown	0	0.0	0	0.0	1	25.0	47	9.3
Total	**4**	**100.0**	**505**	**100.0**	**4**	**100.0**	**505**	**100.0**
Home Improvement								
Low	0	0.0	0	0.0	1	16.7	35	3.3
Moderate	0	0.0	0	0.0	1	16.7	25	2.4
Middle	4	66.7	985	92.9	1	16.7	40	3.8
Upper	2	33.3	75	7.1	3	50.0	960	90.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**6**	**100.0**	**1,060**	**100.0**	**6**	**100.0**	**1,060**	**100.0**
Multi-Family								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1	50.0	656	52.2	0	0.0	0	0.0
Upper	1	50.0	600	47.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	2	100.0	1,256	100.0
Total	**2**	**100.0**	**1,256**	**100.0**	**2**	**100.0**	**1,256**	**100.0**
Other Purpose LOC								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	2	100.0	254	100.0	2	100.0	254	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**2**	**100.0**	**254**	**100.0**	**2**	**100.0**	**254**	**100.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%				
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	HMDA Totals							
Low	2	8.3	127	2.5	1	4.2	35	0.7
Moderate	0	0.0	0	0.0	2	8.3	153	3.1
Middle	12	50.0	2,781	55.7	6	25.0	838	16.8
Upper	10	41.7	2,082	41.7	11	45.8	2,581	51.7
Unknown	0	0.0	0	0.0	4	16.7	1,383	27.7
Total	**24**	**100.0**	**4,990**	**100.0**	**24**	**100.0**	**4,990**	**100.0**

2017 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	33.3	1,206	14.4	0	0.0	0	0.0
Middle	5	41.7	1,406	16.7	1	8.3	100	1.2
Upper	3	25.0	5,790	68.9	10	83.3	8,126	96.7
Unknown	0	0.0	0	0.0	1	8.3	176	2.1
Total	**12**	**100.0**	**8,402**	**100.0**	**12**	**100.0**	**8,402**	**100.0**
Refinance								
Low	1	25.0	372	29.6	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	25.0	200	15.9
Middle	2	50.0	585	46.5	0	0.0	0	0.0
Upper	1	25.0	300	23.9	3	75.0	1,057	84.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**4**	**100.0**	**1,257**	**100.0**	**4**	**100.0**	**1,257**	**100.0**
Home Improvement								
Low	0	0.0	0	0.0	1	25.0	6	0.4
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2	50.0	106	7.2	0	0.0	0	0.0
Upper	2	50.0	1,363	92.8	2	50.0	125	8.5
Unknown	0	0.0	0	0.0	1	25.0	1,338	91.1
Total	**4**	**100.0**	**1,469**	**100.0**	**4**	**100.0**	**1,469**	**100.0**
Multi-Family								
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
HMDA Totals								
Low	1	5.0	372	3.3	1	5.0	6	0.1
Moderate	4	20.0	1,206	10.8	1	5.0	200	1.8
Middle	9	45.0	2,097	18.8	1	5.0	100	0.9
Upper	6	30.0	7,453	67.0	15	75.0	9,308	83.6
Unknown	0	0.0	0	0.0	2	10.0	1,514	13.6
Total	**20**	**100.0**	**11,128**	**100.0**	**20**	**100.0**	**11,128**	**100.0**

2018 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	6.3	120	1.2	0	0.0	0	0.0
Moderate	4	25.0	849	8.2	0	0.0	0	0.0
Middle	5	31.3	3,671	35.6	2	12.5	296	2.9
Upper	6	37.5	5,675	55.0	9	56.3	5,703	55.3
Unknown	0	0.0	0	0.0	5	31.3	4,316	41.8
Total	**16**	**100.0**	**10,315**	**100.0**	**16**	**100.0**	**10,315**	**100.0**
	Refinance							
Low	0	0.0	0	0.0	1	11.1	79	2.4
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	44.4	1,219	36.7	3	33.3	570	17.2
Upper	5	55.6	2,099	63.3	5	55.6	2,669	80.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**9**	**100.0**	**3,318**	**100.0**	**9**	**100.0**	**3,318**	**100.0**
	Home Improvement							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	16.7	25	0.8
Middle	4	66.7	448	15.2	0	0.0	0	0.0
Upper	2	33.3	2,509	84.8	5	83.3	2,932	99.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**6**	**100.0**	**2,957**	**100.0**	**6**	**100.0**	**2,957**	**100.0**
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**	**0**	**0.0**
	Other Purpose LOC							
Low	1	50.0	50	27.2	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	1	50.0	134	72.8	1	50.0	50	27.2
Unknown	0	0.0	0	0.0	1	50.0	134	72.8
Total	**2**	**100.0**	**184**	**100.0**	**2**	**100.0**	**184**	**100.0**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

| Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	Loan Purpose Not Applicable							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	0	0.0	0	0.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total	**0**	0.0	**0**	0.0	**0**	0.0	**0**	0.0
	HMDA Totals							
Low	2	6.1	170	1.0	1	3.0	79	0.5
Moderate	4	12.1	849	5.1	1	3.0	25	0.1
Middle	13	39.4	5,338	31.8	5	15.2	866	5.2
Upper	14	42.4	10,417	62.1	20	60.6	11,354	67.7
Unknown	0	0.0	0	0.0	6	18.2	4,450	26.5
Total	**33**	**100.0**	**16,774**	**100.0**	**33**	**100.0**	**16,774**	**100.0**

CRA APPENDIX F: ASSESSMENT AREA MAPS

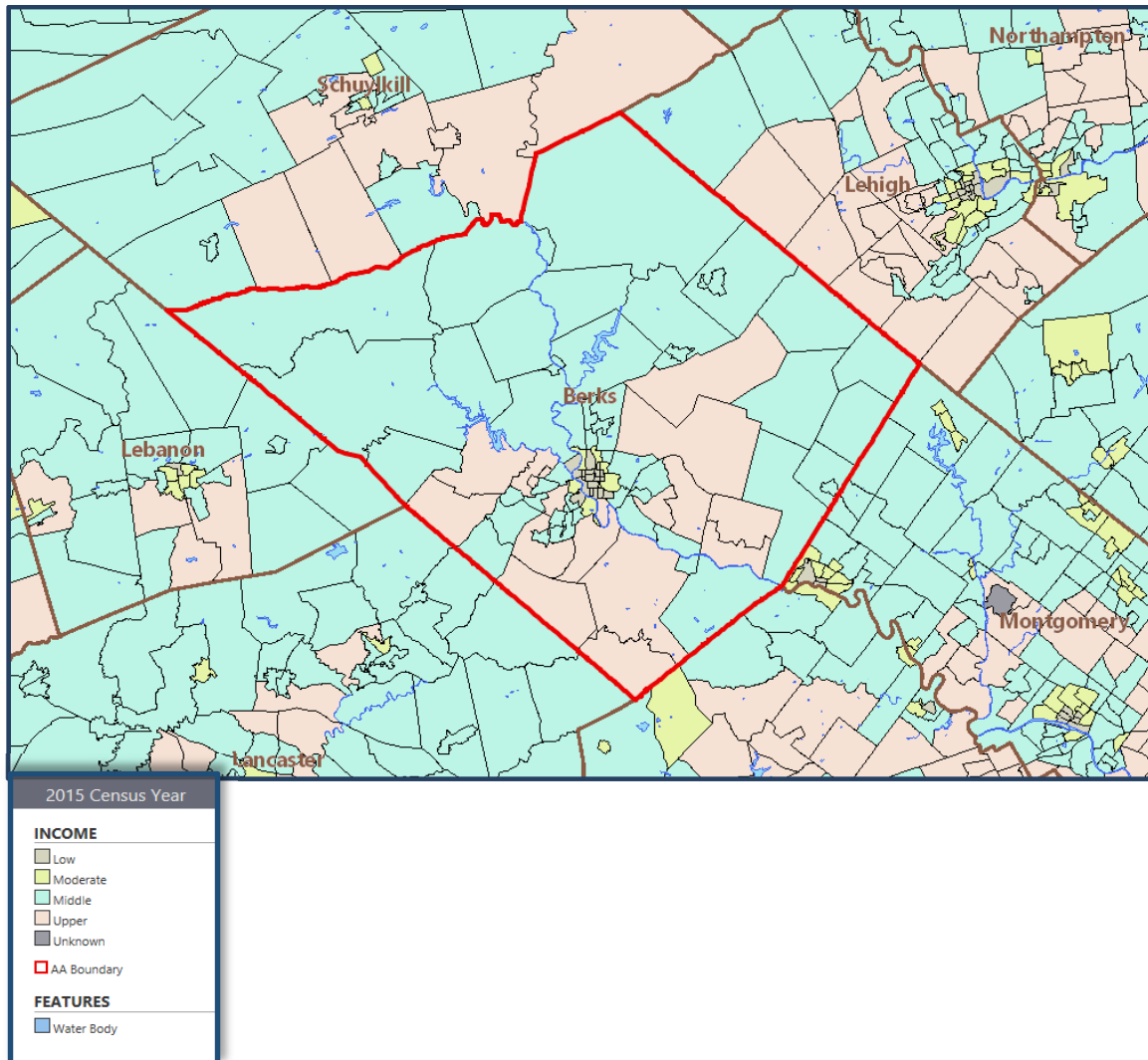**Philadelphia, PA MSA Assessment Area (2015 ACS Data)**
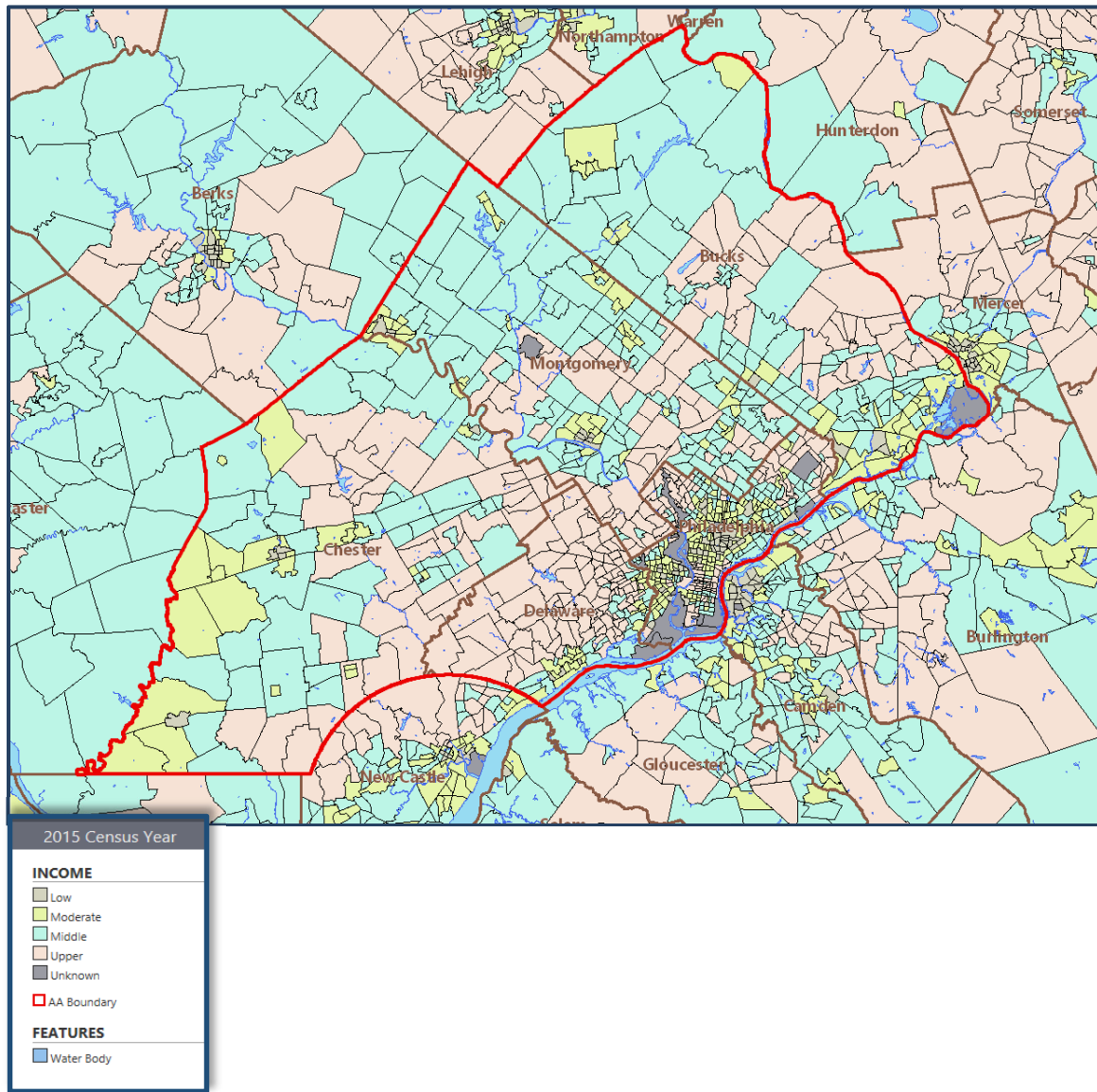
Lancaster, PA MSA Assessment Area (2015 ACS Data)
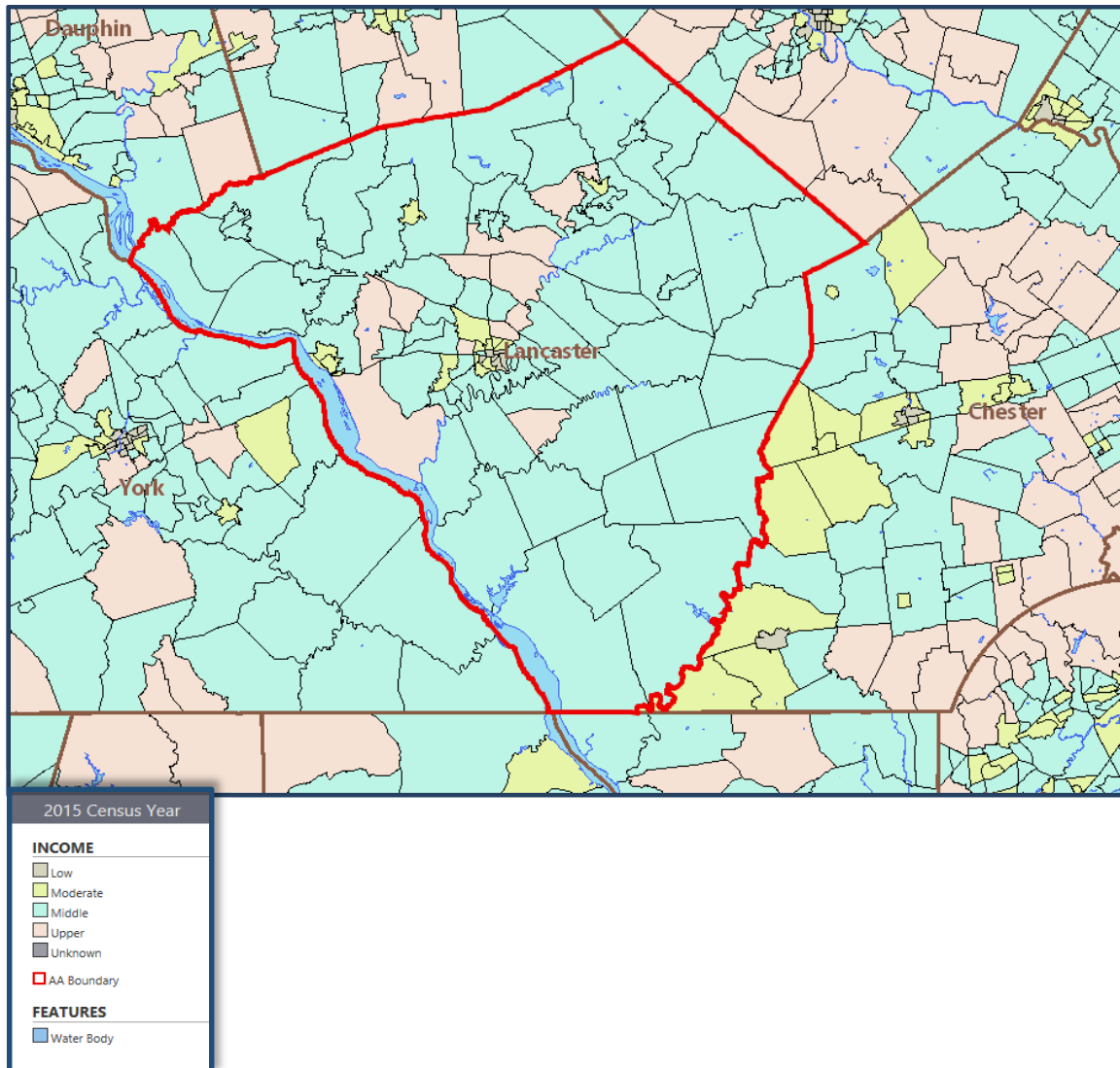
Allentown, PA MSA Assessment Area (2015 ACS Data)
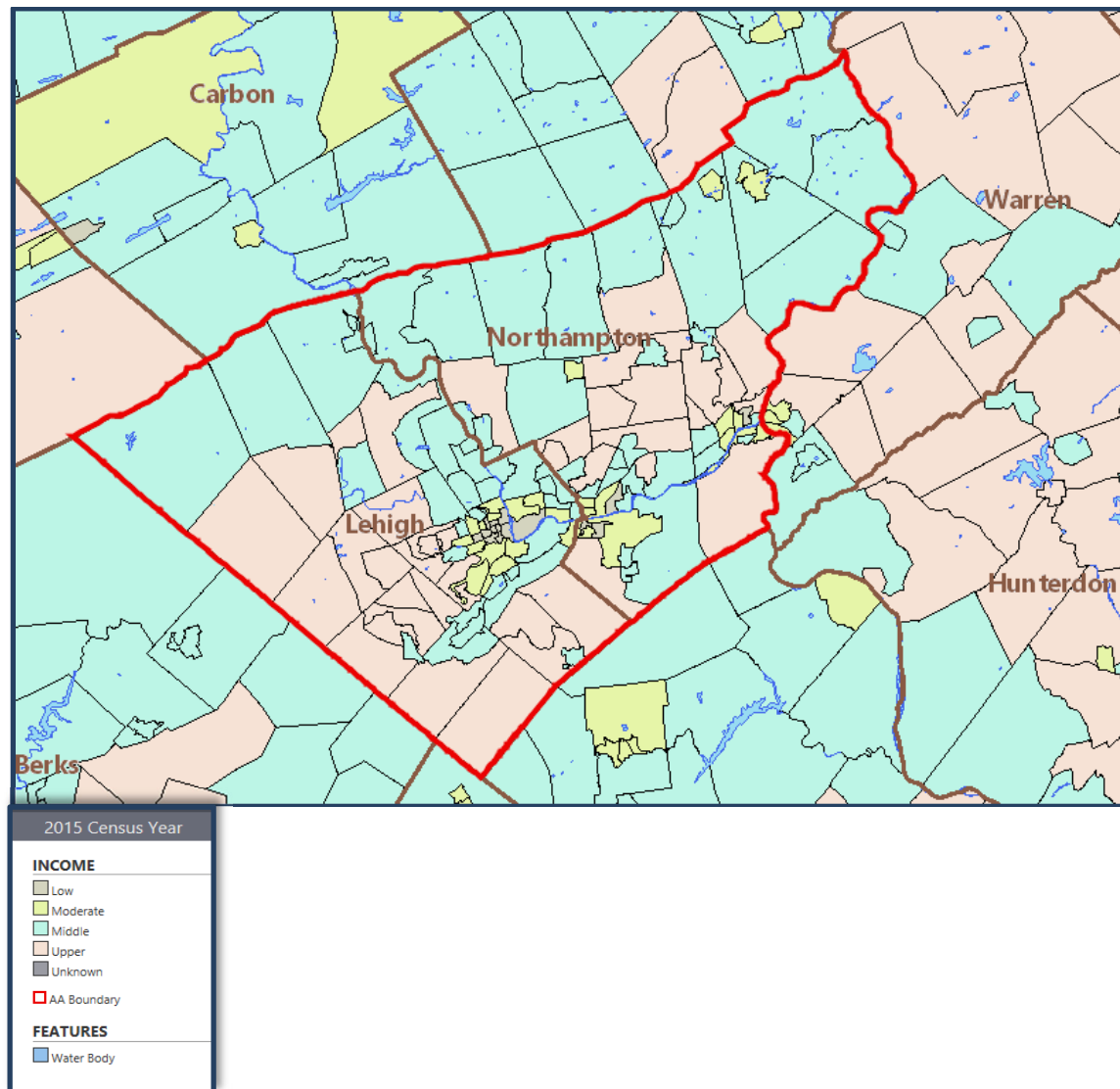
Reading, PA MSA Assessment Area (2015 ACS Data)

Ocean City, NJ MSA Assessment Area (2015 ACS Data)