



## **PUBLIC DISCLOSURE**

November 17, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Bank and Trust Company  
RSSD# 157856

501 Frisco Avenue  
Clinton, OK 73601

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri 64198

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

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

First Bank and Trust Company (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI).
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 20-quarter average NLTD ratio.
- A statistical sample of 98 motor vehicle loans selected from a universe of 189 loans originated between January 1, 2024, and December 31, 2024; and
- A statistical sample of 41 home mortgage loans selected from a universe of 51 loans originated between January 1, 2024, and December 31, 2024.

More weight was placed the bank's home mortgage lending based on the bank's portfolio composition and strategic focus on this product.

## **DESCRIPTION OF INSTITUTION**

First Bank and Trust Company is a community bank headquartered in Clinton, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Clinton Bancshares, Inc.
- The bank has total assets of \$57.0 million as of March 31, 2025.
- The bank operates out of its main office located in Clinton, Oklahoma and has no additional branch offices.

- The bank operates one cash-only automated teller machine located on-site at its main office.
- As shown in the table below, the bank's primary business focus is residential real estate and consumer lending.

**Table 1**

<b>Composition of Loan Portfolio as of June 30, 2025</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	41	0.2
Farmland	186	0.9
1- to 4-Family Residential Real Estate	11,857	59.4
Multifamily Residential Real Estate	0	0.0
Nonfarm Nonresidential Real Estate	742	3.7
Agricultural	100	0.5
Commercial and Industrial	2,868	14.4
Consumer	4,155	20.8
Other	0	0.0
Gross Loans	<b>19,949</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the CRA at its October 26, 2020, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## **DESCRIPTION OF ASSESSMENT AREA**

The bank's Western Oklahoma AA consists of Washita and Custer Counties in their entirety, along with two census tracts in Beckham County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA delineation remains unchanged from the bank's 2020 examination.
- The AA consists of one moderate-, six middle-, and six upper-income census tracts. At the prior evaluation, the AA consisted of two moderate-, five middle- and four upper-income census tracts. The census tract that the bank is in changed from a moderate- to a middle-income census tract since the previous examination.
- Based on the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranks fifteenth out of twenty-one FDIC-insured financial institutions operating in the AA, with a market share of 2.0 percent.
- To further augment the CRA evaluation, one interview with a member of the community was conducted to ascertain the credit needs of the communities, the responsiveness of the area banks in meeting those credit needs, and the

local economic conditions within the AA. The community member had knowledge of the local housing market and housing needs of the community. Additionally, a previously conducted interview with a community member who represented an organization focused on economic development within the AA was also referenced.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Western Oklahoma</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Western Oklahoma	63,927	61,847	(3.3)
Beckham County, OK	23,300	22,410	(3.8)
Custer County, OK	28,978	28,513	(1.6)
Washita County, OK	11,649	10,924	(6.2)
Non-MSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2020 U.S. Census Bureau Decennial Census All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.</i>			

- A community member noted that the AA needs a major industry to encourage people to stay in or move to the area to help stimulate the local economy.
- According to Data USA, the city of Clinton's 2023 population of 8,461 accounted for 13.8 percent of the three-county area's total population.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: Western Oklahoma</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Western Oklahoma	63,738	65,706	3.1
Beckham County, OK	70,142	61,832	(11.8)
Custer County, OK	58,817	69,596	18.3
Washita County, OK	64,115	62,336	(2.8)
Non-MSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.</i>			

- The AA has a larger portion of households living below the poverty level at 17.7 percent, compared to the statewide figure at 14.7 percent.

**Table 4**

Housing Cost Burden Assessment Area: Western Oklahoma						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Western Oklahoma	71.4	27.1	37.3	57.6	24.6	14.3
Beckham County, OK	63.1	19.4	29.5	61.8	22.9	17.1
Custer County, OK	76.4	39.6	45.7	57.7	31.0	12.4
Washita County, OK	69.0	17.0	28.1	49.5	17.2	14.2
Non-MSA Oklahoma	66.5	30.6	35.0	48.2	22.2	14.9
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4
<i>Cost Burden is housing cost that equals 30 percent or more of household income.  Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy  All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.</i>						

- The median housing value in the AA is \$127,575 and is higher compared to other nonmetropolitan (non-MSA) areas of the state at \$110,370. Similarly, the median age of the housing stock in the AA, at 49 years, is higher compared to other non-MSA areas of the state, at 39 years.
- A community member noted that housing stock in the area is low, and the community is in need of housing that is targeted towards moderate- and middle-income individuals and families.

**Table 5**

Unemployment Rates Assessment Area: Western Oklahoma					
Area	2020	2021	2022	2023	2024
Western Oklahoma	7.0	4.2	2.9	3.0	3.0
Beckham County, OK	9.3	5.4	3.2	3.6	3.2
Custer County, OK	5.8	3.5	2.7	2.7	2.9
Washita County, OK	6.6	4.3	3.0	3.0	2.9
Non-MSA Oklahoma	6.2	4.1	3.3	3.4	3.5
Oklahoma	6.3	4.0	3.0	3.2	3.3
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics  All data presented is at the county level and some values may be different than expected for this AA, which includes a partial county.</i>					

- Unemployment rates in the AA have declined from 2021 to 2023 after higher levels of unemployment in 2020. Recently, unemployment rates remained relatively stable, which is consistent with the non-MSA Oklahoma and statewide figures.
- The area's major employers include Bar-S Foods, Clinton Public Schools, the Oklahoma Department of Transportation (ODOT), and Doane Pet Care.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

The bank's overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a substantial majority of loans originated within the bank's AA, as well as reasonable geographic and borrower distributions.

**Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending considering performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, portfolio concentration, and area of operations in proximity to the bank's AA. The bank's NLTD ratio is reasonable. The bank's 20-quarter NLTD ratio was below the four similarly situated institutions, with ratios ranging from 53.0 percent to 96.6 percent. However, the bank's lower NLTD can be attributed to a larger dollar volume of pledged securities than the other similarly situated institutions.

A review of the bank's Uniform Bank Performance Report (UBPR) identified that the bank has a larger dollar volume of pledged securities compared to three similarly situated institutions, which indicates a limitation on lending. Additionally, the bank has experienced less loan demand after the closing of the hospital in Clinton, which was a major employer for the town and offered essential services.

**Table 6**

Comparative NLTD Ratios September 30, 2020 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			20-Quarter Average
<b>First Bank and Trust Company</b>	Clinton, OK	57,129	42.5
<b>Similarly Situated Institutions</b>			
First Bank of Thomas	Thomas, OK	54,708	53.0
Washita State Bank	Burns Flat, OK	47,330	68.3
Southwest Bank of Weatherford	Weatherford, OK	77,924	61.2
Bank 360	Cordell, OK	61,924	96.6

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a substantial majority of loans, by number and dollar, inside the AA.

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Motor Vehicle	88	89.8	1,227	82.0	10	10.2	269	18.0
Residential Loans	40	97.6	3,085	96.6	1	2.4	110	3.4
<b>Total Loans</b>	<b>128</b>	<b>92.1</b>	<b>4,311</b>	<b>91.9</b>	<b>11</b>	<b>7.9</b>	<b>379</b>	<b>8.1</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

## Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. While there was no home mortgage lending to borrowers in the moderate-income census tract, this is considered reasonable given the distance of the bank's branch to the census tract and the presence of other institutions in the area. The moderate-income census tract is located approximately 7.4 miles west of the bank and the eastern portion of the tract extends into the city of Weatherford. This creates a more competitive lending environment for the bank, as the institutions operating in Weatherford are also seeking to serve the needs of the area. Further, the single moderate-income census tract in the AA contains only 3.3 percent of the AA's owner-occupied units, which indicates limited lending opportunity.

A review of the dispersion of loans among the various census tracts throughout the AA did not reveal a conspicuous gap in lending.



**Table 8**

Distribution of 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Western Oklahoma					
Geographic Income Level	Bank Loans				Owner Occupied Units
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	3.3
Middle	13	32.5	674	21.8	42.9
Upper	27	67.5	2,411	78.2	53.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>3,085</b>	<b>100.0</b>	<b>100.0</b>
Source: 2024 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

### Motor Vehicle Lending

The geographic distribution of motor vehicle lending is reasonable. While there is no motor vehicle lending to borrowers in the moderate-income census tract, this is considered reasonable given the bank's distance from the moderate-income census tract and the competition the bank faces from institutions that operate in Weatherford. There are also several auto dealerships that operate in Weatherford, resulting in additional market competition for originating motor vehicle loans.

A review of the dispersion of loans among the various census tracts throughout the AA did not reveal a conspicuous gap in lending.

**Table 9**

Distribution of 2024 Motor Vehicle Lending By Income Level of Geography Assessment Area: Western Oklahoma					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	9.5
Middle	41	46.6	521	42.5	42.9
Upper	47	53.4	705	57.5	47.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1	0.1	
<b>Total</b>	<b>88</b>	<b>100.0</b>	<b>1,227</b>	<b>100.0</b>	<b>100.0</b>
Source: 2024 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

## **Lending to Borrowers of Different Income Levels**

This performance criterion evaluates the bank's lending to borrowers of different income levels. The bank's lending has a reasonable distribution among individuals of different income levels.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank's lending to low-income borrowers is comparable to the demographic figure and lending to moderate-income borrowers is above the demographic figure.

**Table 10**

Distribution of 2024 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Western Oklahoma					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	\$%	
Low	7	17.5	481	15.6	18.7
Moderate	11	27.5	796	25.8	14.9
Middle	10	25.0	632	20.5	18.5
Upper	12	30.0	1,176	38.1	47.9
Unknown	0	0.0	0	0.0	0.0
Total	40	100.0	3,085	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

### Motor Vehicle Lending

The borrower distribution of motor vehicle lending is excellent. The bank's lending to low-income borrowers is above the demographic figure and lending to moderate-income borrowers is also above the demographic figure.

**Table 11**

Distribution of 2024 Motor Vehicle Lending By Borrower Income Level					
Assessment Area: Western Oklahoma					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	\$%	
Low	45	51.1	469	38.2	23.1
Moderate	20	22.7	303	24.7	13.4
Middle	15	17.0	282	23.0	15.7
Upper	8	9.1	172	14.0	47.8
Unknown	0	0.0	0	0.0	0.0
Total	88	100.0	1,227	100.0	100.0

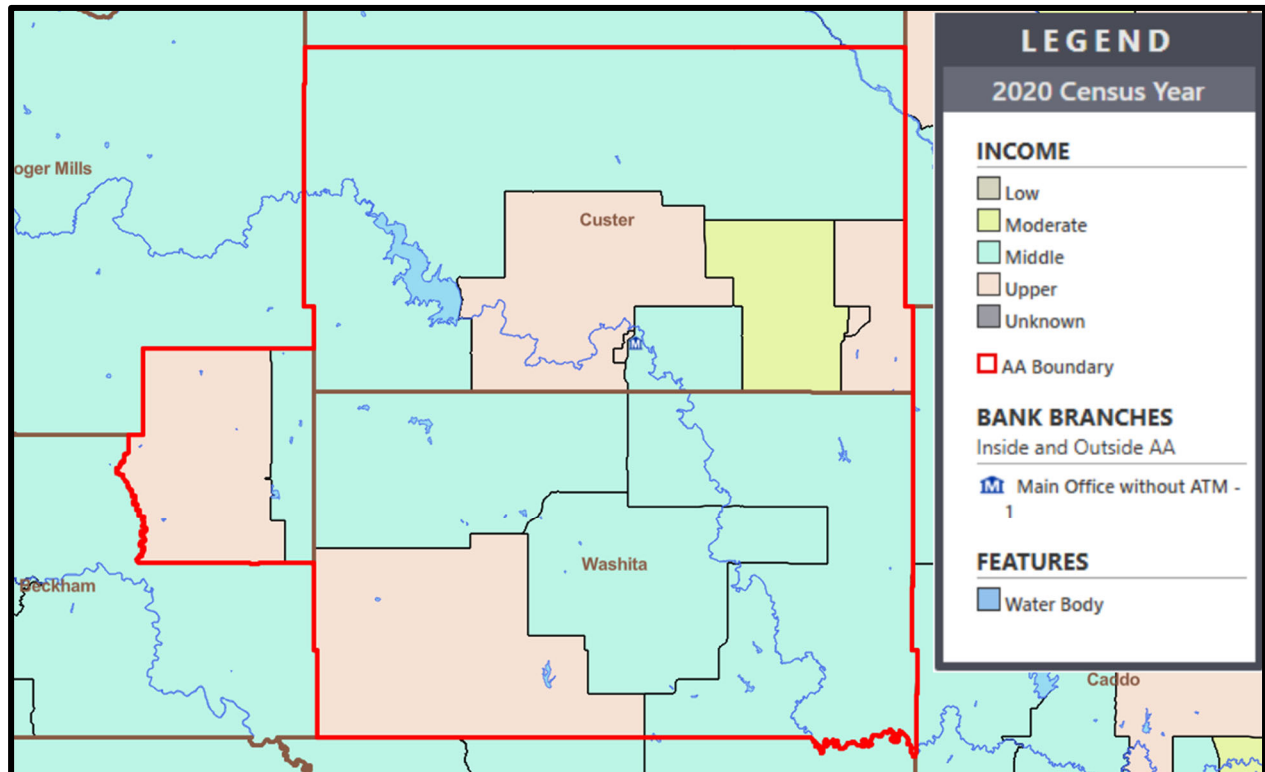
Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

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

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Table A-1  
Western Oklahoma AA



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2024 Western Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,445	18.7
Moderate	1	7.7	747	5.7	195	26.1	1,948	14.9
Middle	6	46.2	5,559	42.6	694	12.5	2,413	18.5
Upper	6	46.2	6,745	51.7	509	7.5	6,245	47.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13</b>	<b>100.0</b>	<b>13,051</b>	<b>100.0</b>	<b>1,398</b>	<b>10.7</b>	<b>13,051</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,336	444	3.3	19.0	1,504	64.4	388	16.6
Middle	11,177	5,809	42.9	52.0	2,972	26.6	2,396	21.4
Upper	11,518	7,298	53.9	63.4	2,462	21.4	1,758	15.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>25,031</b>	<b>13,551</b>	<b>100.0</b>	<b>54.1</b>	<b>6,938</b>	<b>27.7</b>	<b>4,542</b>	<b>18.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	205	9.2	184	9.3	20	9.9	1	2.3
Middle	1,104	49.7	967	48.9	110	54.5	27	62.8
Upper	912	41.1	825	41.8	72	35.6	15	34.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2,221</b>	<b>100.0</b>	<b>1,976</b>	<b>100.0</b>	<b>202</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>
Percentage of Total Businesses:				89.0		9.1		1.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	6.1	11	6.3	0	0.0	0	0.0
Middle	105	58.0	100	56.8	5	100.0	0	0.0
Upper	65	35.9	65	36.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>181</b>	<b>100.0</b>	<b>176</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				97.2		2.8		0.0
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## 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/assessment area.

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

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of 1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of 1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.