

## **PUBLIC DISCLOSURE**

March 31, 2025

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

The Ohio Valley Bank Company  
RSSD #498317

420 Third Avenue  
Gallipolis, Ohio 45631

Federal Reserve Bank of Cleveland

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

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

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## INSTITUTION'S CRA RATING

The Ohio Valley Bank Company is rated: **Outstanding**

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

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

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* was utilized to evaluate The Ohio Valley Bank Company (Ohio Valley) Community Reinvestment Act (CRA) Performance under Regulation BB. As an interstate bank Ohio Valley is subject to Section 109 of the Riegle-Neal Interstate Banking and Branching Efficiency Act.<sup>1</sup> The evaluation considered CRA performance context, including Ohio Valley's asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs. The following data was reviewed:

- Ohio Valley's eight quarter average net loan-to-deposit ratio.
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed-end) were analyzed from January 1, 2022, through December 31, 2023. Consumer (motor vehicle, other secured, other unsecured), home equity, and small business loans were analyzed from January 1, 2023, through December 31, 2023.

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<sup>1</sup> Section 109 of the Act prohibits a bank from establishing or acquiring a branch or branches outside its home state primarily for the purpose of deposit production.

- Based on the total loan volume by number and dollar amount, HMDA-reportable lending received the most weight, followed by consumer, home equity, and small business lending, respectively.
- In accordance with CRA examination procedures, the HMDA universe was reviewed,<sup>2</sup> and conclusions were reached in aggregate. The universe of home equity and consumer loans was used in this evaluation, and conclusions were reached in aggregate for consumer loans. A sample of small business loans was chosen based on the availability of revenue data. There was only enough volume to conduct a meaningful analysis of small business lending in Nonmetropolitan Ohio.
- Aggregated lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating Ohio Valley's lending performance in 2022 and 2023.
- Borrower distribution received more weight than geographic distribution based on the higher percentage of low- and moderate-income (LMI) families compared to LMI geographies in each AA.
- Lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, and upper-income borrowers were considered for each product, however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- Community development activities funded between March 1, 2022, through March 31, 2025, were assessed. Community development activities are comprised of community development loans, investments, and services.

As a full-service interstate bank, the scope of this evaluation includes a full-scope evaluation of at least one AA in each state where Ohio Valley has deposit-taking facilities. All three AAs received full-scope evaluations because each state only has one AA.

For the purpose of this evaluation, Ohio Valley has the following three CRA delineated AAs:

- Huntington-Ashland WV-KY-OH MSA #26580 (Huntington-Ashland) – Full-scope evaluation
  - Consists of the entireties of Cabell County in West Virginia and Lawrence County in Ohio (excluding Putnam and Wayne counties in West Virginia; and Boyd, Carter, and Greenup counties in Kentucky)
  - Lawrence County was added to the bank's AA when it opened a branch in Ironton, Ohio

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<sup>2</sup>HMDA data was reviewed since the bank's previous evaluation; however, only data for 2022 and 2023 is presented in this evaluation.

on August 22, 2022

- Nonmetropolitan Ohio – Full-scope evaluation
  - Consists of the entireties of Gallia, Jackson, Meigs, Pike, and Vinton counties
- Nonmetropolitan West Virginia – Full-scope evaluation
  - Consists of the entirety of Mason County

Nonmetropolitan Ohio was given the greatest weight in the evaluation, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount) followed by the Huntington-Ashland AA and Nonmetropolitan West Virginia, respectively. A detailed description of each full-scope AA is presented in subsequent sections of this performance evaluation.

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Three community contacts were conducted for this evaluation, one in each assessment area. Interviews were conducted with representatives from an emergency food assistance program, a local chamber of commerce, and an economic development corporation. These contacts operate inside Ohio Valley's AAs. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from these interviews helped establish context for the communities in which Ohio Valley operates and gathers information on its performance. More detailed information obtained from these contacts is included in the "Description of the Institution's Operations" section for each full-scope AA.

## DESCRIPTION OF INSTITUTION

Ohio Valley is an interstate community bank and is a banking subsidiary of Ohio Valley Banc Corp., both entities are headquartered in Gallipolis, Ohio. The bank's characteristics include:

- Ohio Valley has total assets of \$1.3 billion and total deposits of \$1.1 billion as of December 31, 2023. Ohio Valley has seen an 8.4% increase in total assets and a 6.4% increase in total deposits since the previous evaluation.
- Ohio Valley maintains its main office with a cash-only Automated Teller Machine (ATM), 13 branches with cash-only ATMs, and two drive-thru only branches with cash-only ATMs. All of Ohio Valley's ATMs are cash-only and will be referred to as ATMs throughout this report.
- In August 2022 Ohio Valley opened a branch in Lawrence County, Ohio (Huntington-

Ashland AA). The bank has not closed any branches since the previous evaluation. However, in June 2023 Ohio Valley relocated a branch with an ATM and a drive-up ATM to an existing branch less than one mile away (Nonmetropolitan Ohio).

- Ohio Valley maintains 22 stand-alone ATMs in its AAs. Since the previous evaluation, Ohio Valley closed five stand-alone ATMs in its AAs and one outside its delineated footprint in Putnam County (Huntington-Ashland MSA).
- Ohio Valley has a Loan Production Office in Athens, Ohio (Athens County) in an upper-income tract, which is outside the bank's delineated CRA footprint. Athens County is contiguous to Meigs and Vinton counties.
- Ohio Valley is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, home equity loans, motor vehicle loans, credit cards, agricultural, consumer and commercial loans.
- Ohio Valley's website, [www.ovbc.com](http://www.ovbc.com), and online and mobile banking supplements its branch and ATM networks. Customers can confirm balances, view what transactions have been posted, transfer funds between accounts, make a loan payment, activate/deactivate their debit card, make deposits, and manage overdraft opt-in settings with the bank's automated telephone system. Ohio Valley also offers customers online bill pay, Visa debit card, overdraft protection, financial calculators, and trust services.

The following table shows the bank's loan portfolio composition as of December 31, 2023. Ohio Valley's primary business focus is real estate.

COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2023		12/31/2022		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	62,337	7.0%	33,205	4.1%	87.7%
Secured by One- to Four- Family Dwellings	351,674	39.5%	320,967	39.7%	9.6%
Other Real Estate: Farmland	18,607	2.1%	22,642	2.8%	-17.8%
Multifamily	56,553	6.4%	57,902	7.2%	-2.3%
Nonfarm nonresidential	185,396	20.8%	175,006	21.7%	5.9%
Commercial and Industrial	86,718	9.7%	85,159	10.5%	1.8%
Loans to Individuals	127,512	14.3%	112,071	13.9%	13.8%
Agricultural Loans	1,112	0.1%	1,071	0.1%	3.8%
<b>Total</b>	<b>\$889,909</b>	<b>100.00%</b>	<b>\$808,023</b>	<b>100.00%</b>	<b>10.1%</b>

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

Ohio Valley's investment portfolio as of December 31, 2023, was \$279.7 million, which represents 20.9% of total assets. U.S. Treasury and Agency securities accounted for 58.0% of total investments while interest-bearing bank balances and municipal bonds accounted for 39.1% and 2.9%, respectively of the remaining total investments. There are no known legal, financial or other factors

impending Ohio Valley's ability to help meet the credit needs of its communities.

Ohio Valley was rated Outstanding under the CRA at its previous evaluation conducted February 28, 2022. The lending test was rated Satisfactory, and the community development test was rated Outstanding.



## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Ohio Valley's overall CRA performance is rated Outstanding. Overall performance is Outstanding in Ohio and Huntington-Ashland and Satisfactory in West Virginia.

Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

### LENDING TEST

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

As discussed earlier, Ohio Valley's performance in Nonmetropolitan Ohio had the greatest impact on the overall lending performance. Lending performance is Satisfactory in Ohio, Huntington-Ashland, and West Virginia.

### Loan-to-Deposit Ratio

A financial institution's loan-to-deposit (LTD) ratio is evaluated to determine the reasonableness of lending in light of performance context, such as Ohio Valley's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated FDIC-insured institutions (custom peer group). The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	Total Assets as of 12/31/2023 \$(000)	NLTD Ratio (%)
		8 – Quarter Average*
Ohio Valley Bank Company	\$1,337,295	81.7
<b>Similarly Situated Institutions</b>	<b>\$(000)</b>	<b>Custom Peer Ratio</b>
Putnam City Bank	\$607,935	66.6
Unified Bank	\$813,438	72.0
Vinton City Bank	\$1,397,633	75.3
<b>Quarterly LTD Ratio Average Since the Previous Evaluation</b>		<b>71.3</b>
* March 31, 2022 - December 31, 2023		

During this period of time, Ohio Valley's LTD ratio averaged 81.7%, compared to the peer ratio at 71.3%. According to bank management, Ohio Valley's LTD ratio exceeded peer ratios because Ohio Valley is primarily a retail bank that has experienced modest loan growth in this elevated interest rate environment and maintained steady deposit growth. Given these factors, Ohio Valley's LTD ratio is considered reasonable.

#### Assessment Area Concentration

During the evaluation period, Ohio Valley's lending was analyzed to determine the volume of lending inside and outside the AA. Of the bank's total lending, from January 1, 2022, to December 31, 2023, 72.1% by volume and 67.4% by dollar amount were made inside the AA. Therefore, a majority of loans and other lending-related activities are in the AA.

### Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Consumer	1,434	69.2	\$27,854	62.7	638	30.8	\$16,584	37.3
<b>Total Consumer related</b>	<b>1,434</b>	<b>69.2</b>	<b>\$27,854</b>	<b>62.7</b>	<b>638</b>	<b>30.8</b>	<b>\$16,584</b>	<b>37.3</b>
Home Purchase - Conventional	353	75.9	\$64,235	69.1	112	24.1	\$28,674	30.9
Refinancing	104	81.9	\$14,264	72.2	23	18.1	\$5,504	27.8
Home Improvement	18	100.0	\$1,850	100.0	0	0.0	\$0	0.0
Multi-Family Housing	11	64.7	\$10,689	51.1	6	35.3	\$10,211	48.9
Other Purpose Closed-End	19	79.2	\$2,338	82.4	5	20.8	\$498	17.6
<b>Total HMDA related</b>	<b>505</b>	<b>77.6</b>	<b>\$93,376</b>	<b>67.5</b>	<b>146</b>	<b>22.4</b>	<b>\$44,887</b>	<b>32.5</b>
Home Equity	177	89.8	\$14,368	90.4	20	10.2	\$1,531	9.6
<b>Total Non-HMDA</b>	<b>177</b>	<b>89.8</b>	<b>\$14,368</b>	<b>90.4</b>	<b>20</b>	<b>10.2</b>	<b>\$1,531</b>	<b>9.6</b>
Small Business	48	57.8	\$6,879	53.2	35	42.2	\$6,039	46.8
<b>Total Small Bus. related</b>	<b>48</b>	<b>57.8</b>	<b>\$6,879</b>	<b>53.2</b>	<b>35</b>	<b>42.2</b>	<b>\$6,039</b>	<b>46.8</b>
<b>TOTAL LOANS</b>	<b>2,164</b>	<b>72.1</b>	<b>\$142,477</b>	<b>67.4</b>	<b>839</b>	<b>27.9</b>	<b>\$69,041</b>	<b>32.6</b>

Note: Affiliate loans not included

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. Ohio Valley has reasonable penetration among individuals of different income (including low- and moderate-income) levels and businesses of different sizes.

Borrower distribution is reasonable in all three AAs, and penetration among businesses of different sizes is reasonable in Nonmetropolitan Ohio.

### Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. Ohio Valley's geographic distribution of loans reflects a reasonable dispersion with a moderate level of lending gaps.

Geographic distribution is reasonable in all three AAs. A low level of lending gaps was identified in Nonmetropolitan Ohio, a moderate level in Huntington-Ashland, and no lending gaps in Nonmetropolitan West Virginia.

Ohio Valley has a loan program, Rent Buster, targeted at borrowers who can afford a mortgage but may not have the resources for a substantial down payment that is required for a traditional mortgage or secondary market financing. Rent Buster is designed to help individuals with a good credit history to purchase a home with no money down. Rent Buster is an in-house, proprietary lending program. While there are no income requirements, bank management explained this program tends to help lower-income borrowers and translates to less paperwork, lower fees (no FHA insurance or PMI required), and faster service for the home buyer. The maximum loan amount is \$150,000. During the evaluation period, Ohio Valley originated eight Rent Buster loans, and six of these loans were originated to LMI borrowers in Nonmetropolitan Ohio (83.3%) and Huntington-Ashland AA (16.7%). This loan program is considered responsive to helping serve credit needs of LMI individuals and areas, particularly because cost-burdened renters may have a difficult time saving enough to make a sufficient down payment to purchase a home.

### **Response to Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

Ohio Valley's performance relative to the community development test is rated Outstanding.

Ohio Valley's community development performance demonstrates an excellent responsiveness to community development needs of its AA through community development loans, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Ohio Valley's community development activities primarily help to revitalize and stabilize LMI communities focusing on infrastructure improvements, small business entrepreneurship, and initiatives to encourage tourism which are essential for Appalachian community development. Community development activities also supported affordable housing initiatives and wraparound services to LMI individuals and families. Additionally, Ohio Valley maintained its levels of community development lending and qualified investments and substantially increased its small dollar donations since the previous evaluation.

Ohio Valley's community development performance demonstrates an excellent responsiveness to community development needs in Ohio and Huntington-Ashland and adequate responsiveness in West Virginia.

### *Community Development Lending*

Ohio Valley originated or renewed seven community development loans totaling \$4.5 million during this evaluation period. The following table shows the total number of community development loans by purpose, number and dollar amount.

<b>Purpose of CD Loan</b>	<b>#</b>	<b>\$</b>
Revitalization/Stabilization	2	\$2,669,678
Affordable Housing	1	\$935,400
Economic Development	2	\$790,000
Services to LMI	2	\$95,000
<b>Total</b>	<b>7</b>	<b>\$4,490,078</b>

These community development loans helped revitalize/stabilize moderate-income geographies, support affordable housing and economic initiatives, and provide community organizations with needed funding to continue providing services targeted to LMI individuals and families in its AAs.

The largest concentration of community development loans by dollar amount was in the Huntington-Ashland AA, accounting for 59.5% of bank-wide community development lending. The remaining 40.5% of community development lending occurred in Nonmetropolitan Ohio. There was no community development lending in Nonmetropolitan West Virginia.

### *Community Development Investments*

Ohio Valley had \$5.4 million in qualified community development investments, donations, and grants during the evaluation period, with 94.1% by dollar amount benefiting the Huntington-Ashland AA, followed by Nonmetropolitan Ohio (5.1%) and Nonmetropolitan West Virginia (0.8%), respectively.

Qualified investments consisted of new municipal bond worth \$5.0 million benefiting the Huntington-Ashland AA and two Federal Home Loan Bank (FHLB) Welcome Home grants totaling \$40,000 benefiting LMI first-time homebuyers in the Huntington-Ashland AA and Nonmetropolitan Ohio.

Ohio Valley made 79 small dollar donations totaling \$313,546 to 59 organizations during this evaluation period. The following table shows the total number of qualified donations by purpose, number and dollar amount.

Purpose of Donations	#	\$
Services to LMI	61	\$155,296
Economic Development	8	\$96,250
Affordable Housing	5	\$15,300
Revitalization/Stabilization	5	\$46,700
<b>Total</b>	<b>79</b>	<b>\$313,546</b>
<i>Total includes donations that benefit broader regional area</i>		

Most contributions supported organizations that provide wraparound services targeted to LMI individuals and families and support economic development initiatives.

Because Ohio Valley was responsive to community development needs in its AAs, consideration was given to five donations totaling \$7,825 that benefited broader regional areas outside the bank's delineated AAs in Nonmetropolitan Ohio and the Huntington-Ashland AA.

The largest concentration of qualified donations by dollar amount benefited Nonmetropolitan Ohio, accounting for 76.7% of qualified donations. The remaining 12.5% benefited Nonmetropolitan West Virginia and 10.8% benefited the Huntington-Ashland AA.

### *Community Development Services*

The following table shows the total number of services, organizations, and employees by purpose.

Purpose of CD Service	# Services	# Organizations	# Employees
Services to LMI	35	22	9
Economic Development	17	10	6
<b>Total</b>	<b>52</b>	<b>32</b>	<b>15</b>
<i>Total includes services that benefit broader statewide and regional areas</i>			

Bank officers and employees worked with a variety of community service organizations, throughout their AA during the evaluation period. Most of Ohio Valley's community development services are provided through serving on boards and committees followed by providing technical assistance. Ohio Valley also provides financial literacy training to LMI individuals and students.

Because Ohio Valley was responsive to community development needs in its AAs, consideration was given to five community development services at the institution level (9.6%) that benefited the broader regional area, including the bank's AAs. A senior vice president serves as a board member and loan committee member for an organization that works with banks as an alternative funding source for Appalachian small businesses and small farms. This same employee also serves as a board member for the council that helps develop new and existing businesses and farms in the Appalachian region. Consideration was also given to three community development services that benefited broader statewide West Virginia (5.8%).

The largest concentration of community development services benefited Nonmetropolitan Ohio, accounting for 51.9% of total community development services. The remaining 28.8% benefited Nonmetropolitan West Virginia and 3.8% benefited Huntington-Ashland AA.

Community development services included the following:

Board and Committee Memberships – Ohio Valley's officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as board directors, loan committee members, or treasurers.

Technical Assistance – Employees provided technical assistance which included program development and fundraising.

Financial Education – Ohio Valley has two full-time employees whose job is dedicated to management of the bank's financial literacy program. The bank's financial literacy program consists of several age-appropriate programs used in conjunction with the local school systems and community organizations to promote financial literacy and smart personal banking. Ohio Valley provides a virtual classroom on its website – a space where parents and kids can learn together with interactive lessons on a variety of financial topics. The space offers several free downloadable aides and four virtual classes. The bank's primary programs include:

- OVB Classroom Adventures (in credit and savings)
  - Through a partnership with The Centsables, Ohio Valley offers superhero-themed lessons that teach the importance of making smart choices with money to students in local elementary schools. These sessions are set to coincide with the American Bankers Association's Get Smart About Credit and Teach Children to Save campaigns.

- OVB BANKit
  - Ohio Valley developed this program that places a banker and occasionally a guest speaker in a high school classroom for one day each month for the entire school year. Students invest with mock money choosing among several different financial instruments. During each session the banker facilitates a discussion with the students about their current standings, investment strategies, and banking. The other half of the session is dedicated to an in-depth discussion (e.g., cost of credit, budgeting, identify theft, interest, investing, etc.) topic.
- OVB Boot Camp
  - Ohio Valley developed a multi-day financial literacy workshop for 4-H members in the participating counties. The boot camp consists of lessons on the basics of banking and a mock money management game. At the end of the game, all accounts are liquidated, and the participants use the play money at an auction for real prizes.

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

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with 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.



**MULTISTATE METROPOLITAN AREA**  
*(Full-scope Review)*

**CRA RATING for Huntington-Ashland WV-KY-OH MSA:<sup>3</sup> Outstanding**

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income).
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

**SCOPE OF EXAMINATION**

The period and products evaluated in the Huntington-Ashland AA are consistent with the overall scope described in the Scope of Examination section of this evaluation. Ohio Valley's performance in the Huntington-Ashland AA was evaluated using full-scope examination procedures.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE  
HUNTINGTON-ASHLAND WV-KY-OH MSA#26580**

The Huntington-Ashland AA consists of the entirety of Cabell County, West Virginia and Lawrence County, Ohio and excludes Putnam and Wayne counties in West Virginia; and Boyd, Carter, and Greenup counties in Kentucky. Cabell County is in southwestern West Virginia and contiguous to Lawrence County in Ohio along the Ohio River in the Appalachian Region of Ohio and West Virginia. Ohio Valley added Lawrence County to the AA in August 2022 when it opened the branch in Ironton, Ohio. The Census Bureau released new size and population data from the 2020

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis. See Appendix A for an AA map and Appendix B for additional demographic data.

<b>Income Tract Designations</b>	
<b>Assessment Area: Huntington-Ashland</b>	
<b>Tract Income Level</b>	<b>2022-2023</b>
Low	6
Moderate	12
Middle	25
Upper	9
Unknown	0
<b>Total</b>	<b>52</b>

- Since the previous evaluation, the AA gained one low-, six moderate-, 15 middle-, two upper- and lost an unknown-income tract(s) since the previous evaluation.
- As of June 30, 2023, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, ranked Ohio Valley 12<sup>th</sup> among 16 financial institutions operating in the AA with a 2.8% market share. JP Morgan Chase, National Association, ranked first and holds a 16.5% market share. Truist Bank ranked second, and City National Bank of West Virginia ranked third with 11.9% and 11.7% of market share. By comparison, Ohio Valley ranked 20<sup>th</sup> among 25 financial institutions operating in the MSA with a 1.4% market share. Deposit activity in the Huntington-Ashland AA accounted for 9.5% of Ohio Valley's deposits.
- The 2023 HMDA Peer Market data indicates Ohio Valley ranked 10<sup>th</sup> out of 160 HMDA reporters in the AA and originated 65 loans. First ranked City National Bank of West Virginia originated 261 loans and second ranked Movement Mortgage; LLC originated 161 loans. In 2022 Ohio Valley originated 98 loans.
- Ohio Valley maintains three branches with ATMs in the Huntington-Ashland AA. Ohio Valley has two branches in middle-income tracts in Ironton, Ohio (Lawrence County) and Barboursville, West Virginia (Cabell County) and one branch in an upper-income tract<sup>4</sup> in Milton (Cabell County).
- The Barboursville and Milton branches offer extended and weekend hours and drive-thru services. The Ironton branch offers extended hours of service.
- Ohio Valley also maintains a stand-alone ATM in a Sunoco Food Mart in an upper-income tract in Huntington (Cabell County). Since the previous evaluation, Ohio Valley closed three stand-alone ATMs in a moderate-, middle-, and upper-income tract in Cabell County.

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<sup>4</sup> Milton branch – was in middle-income tract in previous evaluation

Ohio Valley also closed a stand-alone ATM in an upper-income tract in Putnam County, which is outside the bank's delineated AA in the Huntington-Ashland MSA.

## Community Contact

An interview was conducted with a community contact as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The contact was a representative from an economic development corporation. The contact stated the area faces economic challenges, including high poverty and unemployment rates, along with aging infrastructure. The aged infrastructure limits the area's ability to attract businesses and develop a skilled workforce. The contact indicated there are opportunities for financial institutions to partner with various community stakeholders to help finance affordable housing and downtown revitalization projects. The contact stated there is a need to support small businesses through microloan programs that help startups and small businesses overcome financial hurdles. The contact said there are opportunities for financial institutions to support workforce development by giving grants and/or providing technical assistance and financial literacy training for entrepreneurs and LMI individuals.

Population Change			
Assessment Area: Huntington-Ashland MSA			
Area	2020 Population	2023 Population	Percent Change
Lawrence County, OH	58,240	56,118	-3.6%
Cabell County, WV	94,350	92,082	-2.4%
<b>Assessment Area</b>	<b>152,590</b>	<b>148,200</b>	<b>-2.9%</b>
<b>Huntington-Ashland, WV-KY-OH MSA</b>	<b>375,706</b>	<b>368,194</b>	<b>-2.0%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,785,935</b>	<b>-0.1%</b>
<b>West Virginia</b>	<b>1,793,716</b>	<b>1,770,071</b>	<b>-1.3%</b>
Source: 2019-2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 the AA experienced a 2.9% loss in population, compared to Ohio which experienced a 0.1% and West Virginia which experienced a 1.3% loss in population. Lawrence County experienced the largest loss in population at 3.6% during this period.
- 79.6% of the AA population was 18 years of age or older, the legal age to enter a contract.
- 18.8% of the population in the AA was 65 or older, compared to 16.9% in Ohio and 20.1% in West Virginia.
- 27.4% of the AA's population in the AA reside in LMI tracts.
- According to Census data, Huntington (Cabell County) is the most populous city in the AA

and the second largest city in West Virginia with 45,325 residents in 2023; population decreased by 3.2% since 2020.<sup>5</sup> By comparison, Ironton is the most populous city in Lawrence County with 10,187 residents in 2023; population decreased by 3.7% since 2020.<sup>6</sup>

**Borrower Income Levels**  
**Huntington-Ashland, WV-KY-OH MSA**

FFIEC Estimated Median Family Income	% Change	Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
<b>2022</b>	<b>\$68,000</b>	0	-	\$33,999	\$34,000	-	\$54,399	\$54,400	-	\$81,599	\$81,600	-	& above
<b>2023</b>	<b>\$73,700</b>	0	-	\$36,849	\$36,850	-	\$58,959	\$58,960	-	\$88,439	\$88,440	-	& above

- The 2023 median family income (MFI) in MSA was \$73,700, it increased by 8.4% since 2022.
- The 2020 MFI in the MSA was \$61,976, which represents an 18.9% increase from 2020 to 2023.
- Ohio's minimum wage increased on January 1, 2024, to \$10.45<sup>7</sup> per hour or \$21,736 annually, from \$10.10 per hour or \$21,008 annually, which is a 3.5% increase from 2023.
- West Virginia's minimum wage is \$8.75<sup>8</sup> per hour or \$18,200 annually and has not increased since 2016.
- The Federal minimum wage is \$7.25<sup>9</sup> per hour or \$15,080 annually and has not increased since 2009.

Poverty Rates		
Assessment Area: Huntington-Ashland MSA		
Area	2022	2023
Lawrence County, OH	17.1%	16.9%
Cabell County, WV	19.8%	19.8%
<b>Ohio</b>	<b>12.6%</b>	<b>13.2%</b>
<b>West Virginia</b>	<b>17.4%</b>	<b>16.4%</b>
Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis		

<sup>5</sup> [U.S. Census – QuickFacts \(Huntington\)](#)

<sup>6</sup> [U.S. Census – QuickFacts \(Ironton\)](#)

<sup>7</sup> [Ohio Minimum Wage](#)

<sup>8</sup> [West Virginia Minimum Wage](#)

<sup>9</sup> [The Federal Minimum Wage](#)

- Poverty rates in Lawrence County and Cabell County were higher than poverty rates in Ohio and West Virginia in 2022 and 2023. Counties in this AA are in the Appalachian Region of Ohio and West Virginia, which historically have higher poverty rates compared to non-Appalachian counties in these states. West Virginia is the only state completely within the Appalachian Region.
- Of the 37,301 families in the AA, 41.5% of families are designated as LMI with 14.7% families living below the poverty level, compared to 13.6% of families living below the poverty level in the MSA.
- Supplemental Nutrition Assistance Program (SNAP)<sup>10</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

<b>SNAP Recipients</b>		
<b>Assessment Area: Huntington-Ashland MSA</b>		
<b>Area</b>	<b>2020</b>	<b>2023</b>
Lawrence County, OH	21.9%	19.9%
Cabell County, WV	18.5%	18.7%
<b>Ohio</b>	<b>12.3%</b>	<b>11.9%</b>
<b>West Virginia</b>	<b>17.0%</b>	<b>16.6%</b>
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- Lawrence County had the highest percentage of SNAP recipients, and its percentage of SNAP recipients was significantly higher than SNAP recipients in Ohio. Cabell County also had a higher percentage of SNAP recipients compared to SNAP recipients in West Virginia.
- The percentage of SNAP recipients did not correspond with poverty rates, since Cabell County had the highest percentage of individuals below the poverty level in 2020 and 2023. However, the percentage of SNAP recipients and poverty rates were consistently higher in the AA compared to state levels during this period.

<sup>10</sup>[FRED Economic Data - SNAP](#)

Housing Cost Change						
Assessment Area: Huntington-Ashland MSA						
Area	Median Housing Value			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Lawrence County, OH	\$107,700	\$135,600	25.9%	\$726	\$830	14.3%
Cabell County, WV	\$126,900	\$156,100	23.0%	\$752	\$877	16.6%
<b>Ohio</b>	<b>\$151,400</b>	<b>\$199,299</b>	<b>31.6%</b>	<b>\$825</b>	<b>\$988</b>	<b>19.8%</b>
<b>West Virginia</b>	<b>\$123,200</b>	<b>\$155,600</b>	<b>26.3%</b>	<b>\$732</b>	<b>\$850</b>	<b>16.1%</b>
Source: 2019-2023 U.S. Census Bureau: American Community Survey						
2018-2022 U.S. Census Bureau: American Community Survey						

- Between 2020 to 2023, median housing values increased in Lawrence County and Cabell County by 25.9% and 23.0%, respectively. MSA MFI (18.9%) did not keep pace with home price growth during this period.
- Based on 2020 Census data, the affordability ratio<sup>11</sup> was 36.4 in the AA, compared to 38.4 in Ohio and 39.0 in West Virginia. Housing was generally less affordable across the AA than in other parts of Ohio and West Virginia.
- Between 2020 and 2023, median gross rents increased in Lawrence County and Cabell County by 14.3% and 16.6%, respectively. MSA MFI generally kept pace with median gross rents during this period.
- According to 2020 Census data, 47.8% of all renters across the AA have rental costs greater than 30.0% of income, compared to 40.9% and 38.7% of renters across Ohio and West Virginia, respectively. However, the increase in median gross rents indicates the need for more affordable housing in the MSA.
- According to HUD's 2025 Fair Market Rent (FMR) data,<sup>12</sup> the average rent for a two-bedroom unit in the MSA is \$971, which is a 3.5% increase from 2024.
- According to the National Low Income Housing Coalition,<sup>13</sup> full-time workers must earn at least \$20.81 per hour or \$43,284 annually to afford a two-bedroom apartment with an average rent of \$1,082/month in Ohio, which is more than double Ohio's minimum wage. In Ohio, a minimum-wage earner would need to work 80 hours per week to afford a two-bedroom apartment.

<sup>11</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>12</sup> [HUD's Fair Market Rent \(FMR\) - FY2025](#)

<sup>13</sup> [National Low Income Housing Coalition \(NLIHC\) - Ohio](#)

- According to the National Low Income Housing Coalition,<sup>14</sup> full-time workers must earn at least \$18.46 per hour or \$38,396 annually to afford a two-bedroom apartment with an average rent of \$960/month in West Virginia, which is more than double West Virginia's minimum wage. In West Virginia, a minimum-wage earner would need to work 84 hours per week to afford a two-bedroom apartment.
- Nationwide rents continue to increase and are generally rising faster than wages. The national average rent is \$1,670 for a two-bedroom home, requiring workers to earn a minimum wage of \$32.21 per hour or \$67,000 annually.<sup>15</sup>
- There are 73,878 housing units in the AA, of which 55.8% are owner-occupied units, 28.8% are rental units and 15.4% are vacant. Only 8.4% of total housing units are in low-income tracts, and 18.0% of these housing units are owner-occupied and 82.0% are either rental or vacant. Only 16.5% of total housing units are in moderate-income tracts, and 45.1% of these housing units are owner-occupied and 54.9% are either rental or vacant. With 44.2% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in LMI tracts.
- The median age of housing stock in the AA is 57 years old with 23.0% of housing being built prior to 1950. The median age of housing stock in LMI tracts is 61 years old. The age of housing stock across the county demonstrates a potential need for home improvement lending.

Housing Cost Burden						
Assessment Area: Huntington-Ashland MSA						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Lawrence County, OH	62.1%	31.4%	19.5%	69.9%	37.9%	38.9%
Cabell County, WV	53.4%	26.6%	15.4%	71.1%	58.4%	50.1%
<b>Assessment Area</b>	<b>57.2%</b>	<b>28.4%</b>	<b>17.0%</b>	<b>70.8%</b>	<b>51.2%</b>	<b>46.7%</b>
<b>Huntington-Ashland, WV-KY-OH MSA</b>	<b>52.1%</b>	<b>21.7%</b>	<b>15.0%</b>	<b>63.6%</b>	<b>43.1%</b>	<b>39.6%</b>
<b>Ohio</b>	<b>60.4%</b>	<b>27.2%</b>	<b>16.1%</b>	<b>71.7%</b>	<b>27.0%</b>	<b>38.6%</b>
<b>West Virginia</b>	<b>48.2%</b>	<b>18.9%</b>	<b>13.9%</b>	<b>63.6%</b>	<b>34.3%</b>	<b>37.9%</b>
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

- 57.2% of low-income homeowners and 70.8% of low-income renters in the AA are cost burdened, compared to 28.4% of moderate-income homeowners and 51.2% of moderate-income renters in the AA.
- This data shows the cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.

<sup>14</sup>[NLIHC – West Virginia](#)

<sup>15</sup>[NLIHC – Housing Wage for a Two-Bedroom](#)

- Cost-burdened renters may have a difficult time saving enough money to make sufficient downpayment to purchase a home or otherwise afford increasing rents.
- There is a growing disparity between median family incomes and escalating housing and rental costs, leading to increased financial strain on residents in Lawrence and Cabell counties.

<b>Unemployment Rates</b>		
<b>Assessment Area: Huntington-Ashland MSA</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Lawrence County, OH	4.6%	4.1%
Cabell County, WV	3.6%	3.7%
<b>Assessment Area</b>	<b>4.0%</b>	<b>3.8%</b>
<b>Huntington-Ashland WV-KY-OH MSA</b>	<b>4.4%</b>	<b>4.4%</b>
<b>Ohio</b>	<b>4.0%</b>	<b>3.5%</b>
<b>West Virginia</b>	<b>3.9%</b>	<b>3.9%</b>
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>		

- Between 2022 and 2023, unemployment rates fell slightly in the AA. Unemployment rates in Lawrence County were higher than the unemployment rates in Ohio during this period. In Cabell County, the unemployment rate is slightly less than the unemployment rate in West Virginia.
- As reported by the Ohio Office of Research:<sup>16</sup>
  - Land use in Lawrence County is primarily rural with less than 10.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
  - The leading industries are education and health services; trade, transportation and utilities; local government; manufacturing, and construction, respectively.
  - The average private sector wage in Lawrence County was \$818/week which indicates employed persons cannot afford the median rent of \$830.
- Major employers include Liebert Corporation, McGinnis Inc., Engines Inc., Walmart, ResCare, Lowe's, Amazon, Dollar Tree Stores, Inc., Advanced Auto Parts, Inc., and UberEATS.<sup>17</sup>
- As reported by Data USA:<sup>18</sup>
  - Cabell County is primarily urban, while West Virginia is predominately a rural state.

<sup>16</sup> [Ohio County Trends](#)

<sup>17</sup> [Ohio Economic Profile](#)

<sup>18</sup> [Data USA - Employment by Industries in Cabell County, WV](#)



- The leading industries in Cabell County are health care and social assistance, retail trade, educational services, and accommodation and food services, respectively.
- The average private sector wage in Cabell County was \$1,112/week which indicates employed persons can afford the median rent of \$877.
- Major employers in Cabell County include Cabell County Schools, Cabell Huntington Hospital, St. Mary's Medical Center, Marshall University, Huntington Steel and Supply Company, and Hirschbach Motor Lines Trucking Company.<sup>19</sup>
- According to Ohio Broadband,<sup>20</sup> 21.0% of households in Lawrence County do not have access to the minimum bandwidth needed for basic internet activity.
- According to Broadband Now West Virginia,<sup>21</sup> only 4.3% of households do not have access to the minimum bandwidth needed for basic internet activity.
- Internet connectivity is more prevalent in Cabell County, compared to Lawrence County. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>19</sup>[Huntington Chamber of Commerce](#)

<sup>20</sup> [Broadband Ohio Profile - Lawrence County](#)

<sup>21</sup> [Broadband Now West Virginia](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HUNTINGTON-ASHLAND WV-KY-OH MSA #26580

### LENDING TEST

The lending test performance in the Huntington-Ashland MSA is Satisfactory.

Borrower distribution received more weight than geographic distribution in this AA based on the higher percentage of LMI families compared to LMI geographies. HMDA lending received the most weight, followed by consumer and home equity lending, respectively.

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

Ohio Valley's lending penetration among borrowers of different income (including low- and moderate-income) levels in Huntington-Ashland AA is considered reasonable. Borrower distribution for HMDA, consumer, and home equity lending is reasonable. See Appendix D for HMDA-reportable lending data.

#### ***HMDA Lending***

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family loans. Ohio Valley's performance was compared to the percentage of families (proxy) and aggregate lending performance.

During the evaluation period Ohio Valley originated 103 HMDA loans totaling \$26.3 million, and 17.5% were originated to borrowers with unknown-income designations. The bank originated 18.4% of loans to borrowers with unknown incomes, compared to aggregate lending performance at 13.7% in 2022. The bank originated 16.9% of loans to borrowers with unknown incomes, compared to aggregate lending performance at 14.5% in 2023.

Ohio Valley originated five (4.9%) HMDA loans to low-income borrowers, which was significantly below proxy at 25.0%. The bank's performance at 5.3% was below aggregate lending performance at 7.5% in 2022 and at 4.6% was below aggregate lending performance at 8.3% in 2023.

Ohio Valley originated 14 (13.6%) HMDA loans to moderate-income borrowers, which was slightly below at 16.5%. The bank's performance at 13.2% was below aggregate lending performance at 19.9% in 2022 and at 13.8% was below aggregate lending performance at 21.9% in 2023.

Considering these factors along with the increase in home prices, high percentage of low-income cost burdened renters, and poverty rates, borrower distribution of HMDA lending to LMI borrowers is reasonable.

### Consumer Lending

Consumer loans are comprised of motor vehicles, other secured, and other unsecured loans.

During the evaluation period Ohio Valley originated 184 consumer loans totaling \$3.8 million, and 0.5% was made to a borrower with unknown income designation. Ohio Valley's performance was compared to the households by income (proxy).

#### Borrower Distribution of Consumer Loans

Assessment Area: Huntington-Ashland MSA

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	38	20.7%	396	10.2%	29.3%
Moderate	45	24.5%	824	21.2%	16.3%
Middle	41	22.3%	956	24.6%	16.3%
Upper	59	32.1%	1,714	44.0%	38.1%
Unknown	1	0.5%	1	0.0%	
<b>Total</b>	<b>184</b>	<b>100.0%</b>	<b>3,892</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 38 (20.7%) consumer loans to low-income borrowers, which was below proxy at 29.3%. Ohio Valley originated 45 (24.5%) consumer loans to moderate-income borrowers, which exceeded proxy at 16.3%.

Considering access to transportation is essential for improving upward social mobility for lower-income individuals and communities and access to small dollar loans for unexpected expenses, borrower distribution of consumer loans to low-income borrowers is reasonable and excellent to moderate-income borrowers.

### Home Equity Lending

Ohio Valley originated 44 home equity loans totaling \$5.0 million. Ohio Valley's performance was compared to the percentage of families (proxy).

#### Borrower Distribution of Home Equity Loans

Assessment Area: Huntington-Ashland MSA

Borrower Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	5	11.4%	203	4.1%	25.0%
Moderate	4	9.1%	215	4.3%	16.5%
Middle	11	25.0%	1,344	26.8%	20.9%
Upper	24	54.5%	3,247	64.8%	37.7%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>5,009</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated five (11.4%) home equity loans to low-income borrowers, which was significantly below proxy at 25.0%. Ohio Valley originated four (9.1%) home equity loans to moderate-income borrowers, which was below proxy at 16.5%. Considering LMI homeowners may be burdened by high housing costs, which can impact their ability to accrue sufficient equity, borrower distribution of home equity loans to LMI borrowers is reasonable.

### Geographic Distribution of Loans

Ohio Valley's geographic distribution reflects a reasonable dispersion of loans in the Huntington-Ashland AA. The geographic distribution of HMDA, consumer, and home equity lending is reasonable. Ohio Valley has a moderate level of lending gaps.

	Huntington Ashland MSA - 2022				Huntington Ashland MSA - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	6	5	1	16.7%	6	2	4	66.7%
Moderate	12	10	2	16.7%	12	1	11	91.7%
Middle	25	10	15	60.0%	25	0	25	100.0%
Upper	9	5	4	44.4%	9	0	9	100.0%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
Total	52	30	22	42.3%	52	3	49	94.2%

Ohio Valley penetrated 68.3% of its total tracts during the evaluation period, which is a moderate level of lending gaps. During the evaluation period, Ohio Valley penetrated 41.7% of low-income tracts, which is a substantial level of lending gaps and 54.2% of moderate-income tracts, which is a significant level of gaps. Ohio Valley has a minimal presence in this competitive market with only three branches and a 1.4% market share of deposits. While LMI tracts comprise nearly 35.0% of total tracts in the AA, Ohio Valley has no branches in these tracts.

### *HMDA Lending*

During the evaluation period Ohio Valley originated 103 HMDA-reportable loans totaling \$26.3 million. Ohio Valley's performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending performance. See Appendix D for HMDA-reportable lending data.

Ohio Valley originated three (2.9%) HMDA loans in low-income tracts, which exceeded proxy at 2.7%. The bank's performance at 2.6% in low-income tracts was slightly below aggregate lending performance at 3.4% in 2022. The bank's performance at 3.1% in low-income tracts exceeded aggregate lending performance at 2.8% in 2023.

Ohio Valley originated 14 (13.6%) HMDA loans in moderate-income tracts, which was slightly below proxy at 16.5%. The bank's performance at 7.9% in moderate-income tracts was below aggregate lending performance at 14.9% in 2022. The bank's performance at 16.9% in moderate-income tracts exceeded aggregate lending performance at 15.6% in 2023.

Geographic distribution of HMDA loans in low-income tracts is excellent and reasonable in moderate-income tracts.

### Consumer Lending

During the evaluation period Ohio Valley originated 184 consumer loans totaling \$3.8 million. Ohio Valley's performance was compared to the percentage of households by tract income (proxy).

**Geographic Distribution of Consumer Loans**  
Assessment Area: Huntington-Ashland MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	6	3.3%	73	1.9%	7.1%
Moderate	33	17.9%	697	17.9%	19.7%
Middle	113	61.4%	2,474	63.6%	56.0%
Upper	32	17.4%	647	16.6%	17.2%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>184</b>	<b>100%</b>	<b>3,892</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated six (3.3%) consumer loans in low-income tracts, which was significantly below the proxy at 7.1% and 33 (17.9%) consumer loans in moderate-income tracts, which was slightly below proxy at 19.7%. Geographic distribution of consumer loans in LMI tracts is reasonable considering the higher poverty rates in these tracts.

### Home Equity Lending

Ohio Valley originated 44 home equity loans totaling \$5.0 million. Ohio Valley's performance was compared to the percentage of owner-occupied units (proxy).

### Geographic Distribution of Home Equity Loans

Assessment Area: Huntington-Ashland MSA

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	2.7%
Moderate	5	11.4%	425	8.5%	16.5%
Middle	30	68.2%	2,963	59.2%	61.5%
Upper	9	20.5%	1,621	32.4%	19.3%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>44</b>	<b>100%</b>	<b>5,009</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated no home equity loans in low-income tracts, compared to proxy at 2.7%. Ohio Valley originated five (11.4%) home equity loans in moderate-income tracts, which was below proxy at 16.5%. Geographic distribution of home equity loans in low-income tracts is poor and reasonable in moderate-income tracts.

### COMMUNITY DEVELOPMENT TEST

The community development test performance in the Huntington-Ashland MSA is Outstanding.

Ohio Valley community development performance demonstrates an excellent responsiveness to community development needs in the Huntington-Ashland AA, particularly through community development loans and qualified investments considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Ohio Valley's community development activities primarily help revitalize and stabilize LMI communities through rehabilitating an underutilized historic building and improving infrastructure. Community development activities also support affordable housing and healthcare services in a medically underserved area. The community contact expressed the need for financial institutions to improve aged infrastructure in order to attract businesses and develop a skilled workforce and finance downtown revitalization and affordable housing projects. Ohio Valley's community development activities are responsive to these expressed needs.

### *Community Development Lending*

Ohio Valley originated two community development loans totaling approximately \$2.7 million that provided financing to a nonprofit performing arts center to continue renovations of its historic building in downtown Huntington. This renovation is a \$30.0 million multi-phase, multi-year project. This project received funds from the Federal Historic Preservation Tax Incentives program which encourages investment in the rehabilitation and re-use of historic buildings. The restoration is expected to serve as an economic driver and revitalize this low-income area.

### *Community Development Investments*

Qualified community development investments consist of a qualified investment, grant, and small dollar donations totaling approximately \$5.0 million.

Ohio Valley obtained a new municipal bond worth \$5.0 million. Bond proceeds will be used to finance improvement costs of the existing public sanitary sewer system. These infrastructure improvements benefit LMI areas in Huntington and help revitalize/stabilize these areas.

Ohio Valley distributed a FHLB Welcome Home grant totaling \$20,000 to an LMI homebuyer. The grant is designed to make homeownership more affordable. The money can be used for down payment or closing cost assistance.

The following table shows the total number of qualified donations by purpose, number, and dollar amount.

<b>Purpose of Donations</b>	<b>#</b>	<b>\$</b>
Services to LMI	7	\$15,600
Economic Development	1	\$2,500
<b>Total</b>	<b>8</b>	<b>\$18,100</b>
<i>Total includes donations that benefit broader regional area</i>		

#### Services to LMI

- Two donations totaling \$13,500 to a children's hospital that cares for patients regardless of their ability to pay. The hospital provides an inordinate share of healthcare services to LMI children in need.
- A donation totaling \$1,500 to a regional food bank that helps LMI people struggling with



food insecurity.

- Two donations totaling \$200 to support two group homes offering LMI adolescents and developmentally disabled individuals supportive living environments and programs to overcome challenges and develop life skills.

#### Economic Development

- A donation totaling \$2,500 to a municipality to support economic development initiatives to attract and retain small businesses.

Because Ohio Valley was responsive to community development needs in the AA, consideration was given to two donations totaling \$400 that benefited the broader regional area in the MSA. These donations supported a group home offering LMI adolescent girls, programs to overcome challenges and develop life skills.

#### *Community Development Services*

During the evaluation period, one employee assisted one organization and provided two services as shown in the table below.

Purpose of CD Service	# Services	# Organizations	# Employees
Economic Development	2	1	1
Total	2	1	1

#### Boards/Committees and Technical Expertise

- This employee served as a board member on the Chamber of Commerce that focuses on economic development initiatives at the regional level and provided technical assistance in areas of interest to members (e.g., networking, sponsorships, leadership programs, and helping businesses do business).

#### Financial Literacy

- Ironton High School (Lawrence County) was added to the OVB Bankit for the 2023-2024 academic year, and 83.0% of students are eligible for the free- or reduced-lunch program.

## STATE OF OHIO

### CRA RATING for State of Ohio<sup>22</sup>: Outstanding

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA; and,
- The bank's community development performance demonstrates an excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

A full-scope review was conducted for Nonmetropolitan Ohio, which represents Ohio Valley's entire banking operations for Ohio. The time period and products evaluated for this AA is consistent with the scope discussed in the Scope of Examination section of this report.

Lending in Ohio accounted for 66.8% of Ohio Valley's total lending activity, and deposits accounted for 77.8% of Ohio Valley's total deposits. As of June 30, 2023, Ohio Valley ranked 42<sup>nd</sup> among 199 insured institutions and had a deposit market share of 0.2% in Ohio.

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<sup>22</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

**NONMETROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN OHIO**

Nonmetropolitan Ohio consists of the entireties of Gallia, Jackson, Meigs, Pike, and Vinton counties along the Ohio River in the Appalachian Region of Ohio. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis. See Appendix A for an AA map and Appendix B for additional demographic data.

<b>Income Tract Designations</b>	
<b>Assessment Area: Nonmetropolitan Ohio</b>	
<b>Income Tract Level</b>	<b>2022-2023</b>
Low	0
Moderate	7
Middle	22
Upper	2
Unknown	0
<b>Total</b>	<b>31</b>

- Since the previous evaluation, the AA lost one low-income tract and gained one moderate and two upper-income tracts. There were no changes to the number of middle- or unknown-income tracts.
- Distressed and underserved middle-income geographies are designated by the agencies<sup>23</sup> in accordance with interagency CRA regulations. The designations continue to reflect local economic conditions, including unemployment, poverty, and population change. The criteria for designating these areas are available on the Federal Financial Institutions Examination Council's (FFIEC) website.<sup>24</sup> Four middle-income tracts in Meigs County were designated as distressed due to poverty and unemployment in 2023.
- As of June 30, 2023, the FDIC Deposit Market Share Report, ranked Ohio Valley first among nine insured institutions in Ohio with a deposit market share of 38.3%. The Farmers Bank and Savings Company and Wesbanco Bank, Inc. ranked second and third and hold an 11.7%

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<sup>23</sup> The Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of the Comptroller

<sup>24</sup> [FFIEC – Distressed or Underserved nonmetropolitan middle-income geographies](#)

and 10.9% market share, respectively

- The 2023 HMDA Peer Market data indicates Ohio Valley ranks second out of 163 HMDA reporters in the AA and originated 143 loans. First ranked Vinton County National Bank originated 151 loans and third ranked Atomic Credit Union originated 121 loans. In 2022 Ohio Valley originated 175 loans.
- Ohio Valley maintains its main office with an ATM, eight branches with ATMs, and one drive-through-only branch with an ATM in Nonmetropolitan Ohio. Ohio Valley's main office, drive-thru only branch, and six branches are in middle-income tracts.<sup>25</sup> Of these, the main office, drive-thru only branch, and two branches are in Gallipolis and one branch are in Rio Grande (Gallia County); and three branches are in Jackson, Oak Hill, and Wellston (Jackson County). The remaining two branches are in upper-income tracts in Gallipolis (Gallia County) and Waverly (Pike County).<sup>26</sup>
- The main office does not offer extended, weekend, or drive-thru services. The branch in a Walmart (upper-income tract) offers extended and weekend hours, and the branch in a hospital (middle-income tract) only offers extended service hours. The remaining branches offer extended, weekend, and drive-thru services.
- The bank has not closed any branches since the previous evaluation. However, in June 2023 Ohio Valley relocated a branch with an ATM and drive-up ATM in Waverly (Pike County) to an existing branch less than one mile away (upper-income tract).
- Ohio Valley maintains 18 stand-alone ATMs in a restaurant, courthouse, justice center, health clinic, grocery stores, Walmart, and gas stations. Five of the stand-alone ATMs are in moderate-income tracts in Jackson County. The remaining 13 stand-alone ATMs are in middle-income tracts in Gallia, Jackson, and Meigs counties. Since the previous evaluation, Ohio Valley closed a stand-alone ATM in a drug store in Waverly in an upper-income tract (Pike County).

## Community Contact

An interview was conducted with a community contact as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The interview was conducted with a representative from a chamber of commerce. The contact stated the community is primarily rural and economically distressed with high poverty and unemployment rates, partly because of the closure of several large employers in the region. The contact indicated there is limited access to capital for

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<sup>25</sup> The main office, drive-thru only branch, and Rio Grande branch were in moderate-income tracts in previous evaluation

<sup>26</sup> Two branches in upper-income tracts were in middle-income tracts in previous evaluation

small businesses and startups and a lack of broadband and infrastructure improvements, which limits economic growth opportunities. The area also has an increasing need for workforce development, affordable housing, and services for an aging population. The contact indicated there are opportunities for financial institutions to sponsor financial planning workshops for entrepreneurs and support Volunteer Income Tax Assistance (VITA) services to help LMI residents access tax credits and refunds. There is a significant need for job readiness programs, especially to attract and retain young workers and small dollar lending making it easier for small businesses to secure affordable financing. The contact believes local financial institutions are actively engaged in the community.

Population Change			
Assessment Area: Nonmetropolitan Ohio			
Area	2020 Population	2023 Population	Percent Change
Gallia County	29,220	28,986	-4.4%
Jackson County	32,653	32,606	-0.6%
Meigs County	22,210	21,767	-5.4%
Pike County	27,088	27,001	-4.6%
Vinton County	12,800	12,474	-3.3%
<b>Assessment Area</b>	<b>123,971</b>	<b>122,834</b>	<b>-3.5%</b>
<b>Ohio</b>	<b>11,799,448</b>	<b>11,785,935</b>	<b>-0.1%</b>
Source: 2019-2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 the AA experienced a 3.5% loss in population, compared to Ohio which experienced a 0.1% loss in population.
- 60.0% of the AA population was 18 years of age or older, the legal age to enter a contract.
- 18.4% of the population in the AA was 65 or older, compared to 16.8% in Ohio.
- 20.8% of the AA's population reside in the AA moderate tracts.
- Jackson (Jackson County) is the most populous city in the AA with a population of 6,206, according to 2023 Census data. Jackson experienced only a 0.7% decrease in population since 2020. By contrast, McArthur (Vinton County) had a population of 1,732, according to 2023 Census data. McArthur experienced a 3.1% decrease in population since 2020.

**Borrower Income Levels  
Nonmetropolitan Ohio**

FFIEC Estimated Median Family Income	% Change	Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
<b>2022</b>	<b>\$74,900</b>	0	-	\$37,449	\$37,450	-	\$59,919	\$59,920	-	\$89,879	\$89,880	-	& above
<b>2023</b>	<b>\$79,500</b>	6.1%		\$39,749	\$39,750	-	\$63,599	\$63,600	-	\$95,399	\$95,400	-	& above

- The 2023 median family income (MFI) in Nonmetropolitan Ohio was \$79,500, representing a 6.1% increase since 2022.
- The 2020 MFI in Nonmetropolitan Ohio was \$58,733, which represents a 35.4% increase from 2020 to 2023.
- Ohio's minimum wage increased on January 1, 2024, to \$10.45<sup>2</sup> per hour or \$21,736 annually, from \$10.10 per hour or \$21,008 annually, which is a 3.47% increase from 2023.
- The Federal minimum is \$7.25<sup>3</sup> per hour or \$15,080 annually and has not increased since 2009.

<b>Poverty Rates</b>		
<b>Assessment Area: Nonmetropolitan Ohio</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Gallia County	20.0%	14.8%
Jackson County	17.4%	17.7%
Meigs County	18.3%	22.0%
Pike County	19.5%	19.9%
Jackson County	18.8%	16.7%
<b>Ohio</b>	<b>12.6%</b>	<b>13.2%</b>
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- Meigs and Pike counties had the highest poverty rates in the AA between 2022 and 2023. The counties in this AA have some of the highest poverty rates in Ohio; however, these counties are in the Appalachian Region of Ohio, which historically has higher poverty rates compared to non-Appalachian areas of the state.
- According to the Appalachian Regional Commission (ARC):<sup>27</sup>
  - Appalachian rural counties tend to have older, less diverse, and declining population than rural counties in the rest of the U.S. While improvements have been

<sup>27</sup> [Appalachian Regional Commission](#)

made in key economic factors such as poverty, per capita income, and high school graduation rates, Appalachia still lags the rest of the nation. For the region to recover from economic disruptions, address the substance abuse crisis, and attract additional investment, more work is needed.

- According to ARC's economic classification system for Appalachian counties, distressed counties are the most economically depressed counties in the nation, and at-risk counties are at risk of becoming economically distressed. ARC considers Gallia, Jackson, and Pike counties to be At-Risk, while Meigs and Vinton County are considered Distressed.
- Poverty rates in Appalachia Ohio are consistently higher than statewide rates. Meigs, Pike, Vinton, Gallia, and Jackson are considered among the poorest counties in Ohio ranking as second, fourth, sixth, 10<sup>th</sup>, and 11<sup>th</sup> poorest in the state in 2023.<sup>28</sup>
- Of the 33,856 families in the AA, 44.4% of families are designated as LMI with 12.9% families living below the poverty level, compared to 13.2% of families living below the poverty level in Ohio.
- SNAP<sup>29</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Recipients		
Assessment Area: Nonmetropolitan Ohio		
Area	2020	2023
Gallia County	22.9%	19.4%
Jackson County	19.7%	17.6%
Meigs County	21.5%	19.0%
Pike County	25.9%	23.2%
Vinton County	23.5%	25.2%
<b>Ohio</b>	<b>12.3%</b>	<b>11.9%</b>
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- The percentage of SNAP recipients was significantly higher across the AA compared to the percentage of SNAP recipients in Ohio, with Pike and Vinton counties having the highest percentage of SNAP recipients.

<sup>28</sup> [USDA Economic Research Service-County-level Data Sets Ohio Poverty](#)

<sup>29</sup> [FRED Economic Data - SNAP](#)

- By comparison, Meigs and Pike counties had the highest percentage of individuals below the poverty level. While the percentage of SNAP recipients was consistently higher than poverty rates in 2020 and 2023, the percentage of SNAP recipients and poverty rates were consistently higher in the AA compared to state levels during this period.
- According to the Appalachian Learning Initiative (APPLI)<sup>30</sup> nearly one out of six (16.5%) residents living in Ohio's Appalachian Region relies on SNAP benefits compared to the state (11.9%).

Housing Cost Change						
Assessment Area: Nonmetropolitan Ohio						
Area	Median Housing Value			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Gallia County	\$118,400	\$135,000	14.0%	\$694	\$798	15.0%
Jackson County	\$105,600	\$140,400	33.0%	\$693	\$773	11.5%
Meigs County	\$92,500	\$113,400	22.6%	\$632	\$704	11.4%
Pike County	\$119,900	\$148,500	23.9%	\$726	\$833	14.7%
Vinton County	\$94,800	\$131,700	38.9%	\$606	\$663	9.4%
<b>Ohio</b>	<b>\$151,400</b>	<b>\$199,299</b>	<b>31.6%</b>	<b>\$825</b>	<b>\$988</b>	<b>19.8%</b>
Source: 2019-2023 U.S. Census Bureau: American Community Survey						
2018-2022 U.S. Census Bureau: American Community Survey						

- Median housing values increased in the AA from 2020 to 2023 by 26.4%. MFI (35.4%) kept pace with home price growth during this period.
- Based on 2020 Census data, the affordability ratio<sup>31</sup> was 43.1 in the AA, compared to 38.4 in Ohio. Housing was generally more affordable across the AA than in other parts of Ohio.
- Median gross rents in the AA from 2020 to 2023 increased 12.4%. MFI kept pace with median gross rents during this period.
- According to 2020 Census data, 19.5% of all renters across the AA have rental costs greater than 30.0% of income, compared to 38.7% of renters across the state. However, the increase in median gross rents indicates the need for more affordable housing in the AA.
- According to HUD's 2025 FMR data,<sup>32</sup> the average rent for a two-bedroom unit in Nonmetropolitan Ohio is \$884, an 2.8% increase from 2024.
- With Ohio's minimum wage at \$10.45, renters across Ohio can only afford \$543 in monthly rent. The typical minimum wage worker cannot afford rent for a FMR two-bedroom

<sup>30</sup> [Appalachian Learning Initiative \(APPLI\)](#)

<sup>31</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>32</sup> [HUD's FMR – FY2025](#)



apartment or would have to work 83 hours to afford a modest two-bedroom apartment in Nonmetropolitan Ohio.

- According to the National Low Income Housing Coalition,<sup>33</sup> full-time workers must earn at least \$20.81 per hour or \$43,284 annually to afford a two-bedroom apartment with an average rent of \$1,082/month in Ohio, which is more than double Ohio's minimum wage. In Ohio, a minimum-wage earner would need to work 80 hours per week to afford a two-bedroom apartment.
- Nationwide rents continue to increase and are generally rising faster than wages. The national average rent is \$1,670 for a two-bedroom home, requiring workers to earn a minimum wage of \$32.21 per hour or \$67,000 annually.<sup>34</sup>
- There are 59,252 housing units in the AA, of which 61.3% are owner-occupied units, 22.5% are rental units, and 16.2% are vacant. Also, 21.9% of total housing units are in moderate-income tracts, of which 63.7% are owner-occupied and 36.3% are either rental or vacant. With 38.7% of housing units across the AA being either rental or vacant, there may be limited opportunities to originate mortgage loans.
- The median age of housing stock in the AA is 46 years old with 18.4% of housing built prior to 1950. The age of housing stock demonstrates a potential need for home improvement lending and refinance or home improvement loans to remove lead-based paint that was commonly used in houses and apartments built before 1978.<sup>35</sup>

Housing Cost Burden						
Assessment Area: Nonmetropolitan Ohio						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Gallia County	58.1%	24.5%	18.1%	73.8%	14.0%	36.7%
Jackson County	59.7%	20.7%	16.9%	57.0%	19.2%	32.4%
Meigs County	52.8%	14.0%	17.4%	49.8%	38.0%	36.2%
Pike County	50.1%	16.7%	17.7%	58.7%	32.2%	35.6%
Vinton County	49.4%	11.0%	13.8%	64.3%	13.4%	35.9%
<b>Assessment Area</b>	<b>54.6%</b>	<b>18.4%</b>	<b>17.1%</b>	<b>60.1%</b>	<b>23.1%</b>	<b>35.2%</b>
<b>Ohio</b>	<b>60.4%</b>	<b>27.2%</b>	<b>16.1%</b>	<b>71.7%</b>	<b>27.0%</b>	<b>38.6%</b>

*Cost Burden is housing cost that equals 30 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- 54.6% of low-income homeowners and 60.1% of low-income renters in the AA are cost burdened, compared to 18.4% of moderate-income homeowners and 35.2% of moderate-income renters in the county.

<sup>33</sup>[NLIHC - Ohio](#)

<sup>34</sup>[NLIHC – Housing Wage for a Two-Bedroom](#)

<sup>35</sup>[Ohio Department of Health – Lead Program](#)

- This data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient downpayment to purchase a home or otherwise afford increasing rents.
- There is a growing disparity between median family incomes and escalating housing and rental costs, leading to increased financial strain on residents in Nonmetropolitan Ohio.

<b>Unemployment Rates</b>		
<b>Assessment Area: Nonmetropolitan Ohio</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Gallia County	4.7%	4.3%
Jackson County	5.0%	4.6%
Meigs County	5.9%	5.4%
Pike County	5.1%	4.6%
Vinton County	5.0%	4.8%
<b>Assessment Area</b>	<b>5.1%</b>	<b>4.7%</b>
<b>Ohio</b>	<b>4.0%</b>	<b>3.5%</b>
<i>Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics</i>		

- The unemployment rate in the AA area is slightly higher than the unemployment rate in Ohio. The unemployment rate in rural Appalachia is higher than in rural non-Appalachian regions. The lack of nearby employment opportunities and low education levels are linked to unemployment in Appalachia.
- As reported by the Ohio Office of Research:<sup>36</sup>
  - Average land use across the AA is primarily rural with less than 7.0% available for urban (i.e., residential, commercial, industrial, or recreational) development.
  - The leading industries are manufacturing, educational services, health care and social assistance, retail trade and accommodation and food services.
  - The average private sector weekly wage in the AA was \$850 or \$44,200 annually, which indicates employed persons can afford the average median rent of \$833.
- According to the Gallia County Economic Development<sup>37</sup> major employers in the AA include Holzer Health System, General Mills, Bellisio Foods, Ohio Valley Electric Corporation (OVEC), Toyota, Masco Corporation, Family Dollar Services, USEC Inc, Werner Enterprises, Ohio Valley Bank, the University of Rio Grande and Rio Grande Community College.

<sup>36</sup> [Ohio County Trends](#)

<sup>37</sup> [Gallia County Economic Development Major Employers](#)

- On average 86.8% of the populated area and 61.0% of households do not have access to the minimum bandwidth needed for basic internet activity.<sup>38</sup> Specifically, in Vinton County 98.0% of the populated area and 80.0% of households do not have sufficient access.<sup>39</sup> Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>38</sup> [Broadband Ohio – Availability Gaps](#)

<sup>39</sup> [Vinton County Broadband Profile](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN OHIO

### LENDING TEST

The lending test performance in Ohio is Satisfactory.

Borrower distribution received more weight than geographic distribution in this AA based on the higher percentage of LMI families compared to LMI geographies. HMDA lending received the most weight, followed by consumer, home equity, and small business lending, respectively. This is the only AA with enough volume to conduct a meaningful analysis of small business lending.

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

Ohio Valley's lending penetration among borrowers of different income (including low- and moderate-income) levels in Nonmetropolitan Ohio is considered reasonable. Borrower distribution is excellent for consumer lending and reasonable HMDA, home equity, and small business lending. See Appendix D for HMDA-reportable lending data.

#### ***HMDA Lending***

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family loans. Ohio Valley's performance was compared to the percentage of families (proxy) and aggregate lending performance.

During the evaluation period Ohio Valley originated 318 HMDA-reportable loans totaling \$53.1 million, and 36 (11.3%) were originated to borrowers with unknown-income designations. The bank originated 11.4% of loans to borrowers with unknown incomes, compared to aggregate lending performance at 17.5% in 2022. The bank originated 11.2% of loans to borrowers with unknown incomes, compared to aggregate lending performance at 16.3% in 2023.

Ohio Valley originated 27 (8.5%) HMDA loans to low-income borrowers, which was significantly below proxy at 24.8%. The bank's performance at 10.3% exceeded aggregate lending performance at 9.2% in 2022 and at 6.3% was comparable to aggregate lending performance at 6.7% in 2023.

Ohio Valley originated 50 (15.7%) HMDA loans to moderate-income borrowers, which was slightly below proxy at 19.6%. The bank's performance at 17.7% was slightly below aggregate lending

performance at 22.0% in 2022 and at 13.3% fell below aggregate lending performance at 22.6% in 2023.

Considering these factors along with the high percentage of low-income, cost burdened renters and poverty rates, borrower distribution of HMDA lending to LMI borrowers is reasonable.

### Consumer Lending

Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans.

During the evaluation period Ohio Valley originated 982 consumer loans totaling \$18.7 million. Ohio Valley's performance was compared to the percentage of households by income (proxy).

#### Borrower Distribution of Consumer Loans

Assessment Area: Nonmetropolitan OH

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	223	22.7%	2,571	13.7%	28.0%
Moderate	284	28.9%	4,243	22.7%	17.7%
Middle	242	24.6%	4,709	25.2%	18.4%
Upper	228	23.2%	7,167	38.3%	35.9%
Unknown	5	0.5%	29	0.2%	
<b>Total</b>	<b>982</b>	<b>100.0%</b>	<b>18,719</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 223 (22.7%) consumer loans to low-income borrowers, which was below proxy at 28.0%. Ohio Valley originated 284 (28.9%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 17.7%.

Considering access to transportation is essential for improving upward social mobility for lower-income individuals and communities and access to small dollar loans, borrower distribution low-income borrowers is reasonable and excellent to moderate-income borrowers.

### Home Equity Lending

Ohio Valley originated 110 home equity loans totaling \$8.2 million. Ohio Valley's performance was compared to the percentage of families (proxy).

#### Borrower Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan OH

Borrower Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	7	6.4%	445	5.4%	24.8%
Moderate	25	22.7%	1,243	15.1%	19.6%
Middle	26	23.6%	2,299	27.9%	21.5%
Upper	52	47.3%	4,256	51.6%	34.1%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>110</b>	<b>100.0%</b>	<b>8,242</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated seven (6.4%) home equity loans to low-income borrowers, which was significantly below proxy at 24.8%. Ohio Valley originated 25 (22.7%) home equity loans to moderate-income borrowers, which exceeded proxy at 19.6%. Borrower distribution of home equity loans to low-income borrowers is poor and excellent to moderate-income borrowers.

### Small Business Lending

Ohio Valley originated 36 loans totaling \$4.5 million to businesses of different sizes, of which 16.7% were extended to businesses with unknown revenue. Ohio Valley's performance was compared to the percentage of total businesses (proxy).

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Nonmetropolitan OH

		Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	19	52.8%	2,469	55.5%	89.9%
	Over \$1 Million	11	30.6%	1,495	33.6%	6.7%
	<i>Total Rev. available</i>	30	83.3%	3,964	89.2%	96.7%
	Rev. Not Known	6	16.7%	482	10.8%	3.3%
	<i>Total</i>	36	100%	4,446	100%	100%
Loan Size	\$100,000 or Less	24	66.7%	1,235	27.8%	
	\$100,001 - \$250,000	7	19.4%	1,314	29.6%	
	\$250,001 - \$1 Million	5	13.9%	1,897	42.7%	
	<i>Total</i>	36	100%	4,446	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	14	73.7%	799	32.4%	
	\$100,001 - \$250,000	3	15.8%	676	27.4%	
	\$250,001 - \$1 Million	2	10.5%	994	40.3%	
	<i>Total</i>	19	100%	2,469	100%	

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 19 (52.8%) small business loans totaling \$2.5 million to businesses with revenues of \$1.0 million or less, compared to the percentage of small businesses at 89.9%. While this is a poor distribution, Ohio Valley originated 31 (86.1%) small dollar loans in amounts of \$250,000 or less. Ohio Valley's willingness to lend in smaller amounts exhibits a good responsiveness to credit needs of small businesses in the AA, since small dollar loans tend to represent amounts typically requested by small businesses. Therefore, the distribution of businesses of different sizes is reasonable.

### Geographic Distribution of Loans

Ohio Valley's geographic distribution reflects a reasonable dispersion of loans in Nonmetropolitan Ohio, considering the limited number of LMI tracts and high percentage of rental/vacant units across the AA, in addition to higher poverty rates in moderate-income tracts. The geographic distribution of HMDA and home equity lending is poor, consumer lending is reasonable, and small business lending is excellent. Ohio Valley has a low level of lending gaps.

	Nonmetropolitan OH - 2022				Nonmetropolitan OH - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	7	1	6	85.7%	7	0	7	100.0%
Middle	22	0	22	100.0%	22	0	22	100.0%
Upper	2	0	2	100.0%	2	0	2	100.0%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
<b>Total</b>	<b>31</b>	<b>1</b>	<b>30</b>	<b>96.8%</b>	<b>31</b>	<b>0</b>	<b>31</b>	<b>100.0%</b>

Ohio Valley penetrated 98.4% of its total tracts during the evaluation period, which is a low level of lending gaps. Ohio Valley penetrated 100.0% of moderate-income tracts. The penetration rate reflects Ohio Valley's major presence in this market.

### *HMDA Lending*

During the evaluation period Ohio Valley originated 318 HMDA-reportable loans totaling \$53.1 million. Ohio Valley's performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending performance. See Appendix D for HMDA-reportable lending data.

Ohio Valley originated 30 (9.4%) HMDA loans in moderate-income tracts, which was significantly below proxy at 22.7%. The bank's performance at 9.7% was significantly below aggregate lending performance at 20.2% in 2022 and at 9.1% was significantly below aggregate lending performance at 21.6% in 2023. Geographic distribution of HMDA loans in moderate-income tracts is poor.

### *Consumer Lending*

During the evaluation period Ohio Valley originated 982 consumer loans totaling \$18.7 million. Ohio Valley's performance was compared to the percentage of households (proxy).



### Geographic Distribution of Consumer Loans

Assessment Area: Nonmetropolitan OH

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	132	13.4%	2,099	11.2%	22.1%
Middle	786	80.0%	15,026	80.3%	72.9%
Upper	64	6.5%	1,594	8.5%	5.0%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	982	100%	18,719	100%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 132 (13.4%) consumer loans in moderate-income tracts, which was below proxy at 22.1%. Considering poverty levels in moderate-income tracts, geographic distribution of consumer loans is reasonable.

### Home Equity Lending

Ohio Valley originated 110 home equity loans totaling \$8.2 million. Ohio Valley performance was compared to the percentage of owner-occupied units (proxy).

### Geographic Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan OH

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	9	8.2%	755	9.2%	22.7%
Middle	90	81.8%	6,789	82.4%	72.7%
Upper	11	10.0%	698	8.5%	4.5%
Unknown	0	0.0%	0	0.0%	0.0%
<b>Total</b>	<b>110</b>	<b>100%</b>	<b>8,242</b>	<b>100%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated nine (8.2%) home equity loans in moderate-income tracts, which was significantly below proxy at 22.7%. Geographic distribution of home equity loans in moderate-income tracts is poor.

#### *Small Business Lending*

Ohio Valley originated 36 small business loans of \$1.0 million or less, totaling \$4.4 million. Ohio Valley's performance was compared to the percentage of total businesses (proxy).

### Geographic Distribution of Small Business Loans

Assessment Area: Nonmetropolitan OH

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%
	Moderate	7	19.4%	872	19.6%	17.2%
	Middle	26	72.2%	3,037	68.3%	73.3%
	Upper	3	8.3%	537	12.1%	9.5%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>	36	100%	4,446	100%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated seven (19.4%) small business loans in moderate-income tracts, which exceeded proxy at 17.2%. Geographic distribution of small business loans in moderate-income tracts is excellent, especially considering the limited number of businesses in these tracts.

### COMMUNITY DEVELOPMENT TEST

The community development test performance in Ohio is Outstanding.

Ohio Valley community development performance demonstrates an excellent responsiveness to community development needs in Nonmetropolitan Ohio through community development loans, qualified investments, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Ohio Valley's community development activities primarily support affordable housing, economic development, and services to LMI individuals. The community contact expressed the need for more financial assistance to promote initiatives to attract and retain small businesses, address all aspects of affordable housing, and support wraparound services for LMI individuals and families. Ohio Valley's community development activities are responsive to these expressed needs.

### *Community Development Lending*

Ohio Valley originated five community development loans totaling approximately \$1.8 million. The following table shows the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	\$
Affordable Housing	1	\$935,400
Economic Development	2	\$790,000
Services to LMI	2	\$95,000
<b>Total</b>	<b>5</b>	<b>\$1,820,400</b>

#### Affordable Housing

- One loan totaling \$935,400 to nonprofit to construct a 13-unit group home for LMI individuals with disabilities. The units are intended for long-term occupancy.

#### Economic Development

- One loan totaling \$440,000 to a developer to purchase and redevelop an underutilized building and property. The building will serve as a new headquarters and training facility for an anchor tenant and have space to house other tenants. The renovation will allow the anchor tenant (small business) to create at least 10 permanent jobs for LMI workers. This is a multi-phase redevelopment project that receives funding through a public-private partnership.
- A working capital loan totaling \$350,000 to an agricultural society to educate young people and promote future careers in the agriculture industry (i.e., youth development and education program for small family farming).

#### Services to LMI

- Two loans totaling \$95,000 to provide interim operating capital to a nonprofit emergency shelter that primarily serves LMI victims of domestic violence. These loans allow the shelter to continue providing services.

### *Community Development Investments*

Qualified community development investments consist of a grant and small dollar donations totaling approximately \$271,246.

Ohio Valley distributed a FHLB Welcome Home grant totaling \$20,000 to an LMI first-time

homebuyer. The grant money can be used for down payment or closing cost assistance. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Donations	#	\$
Services to LMI	47	\$105,496
Economic Development	5	\$83,750
Affordable Housing	5	\$15,300
Revitalization/Stabilization	5	\$46,700
<b>Total</b>	<b>62</b>	<b>\$251,246</b>
<i>Total includes donations that benefit broader regional area</i>		

Impactful donations include:

Services to LMI

- Six donations totaling \$63,500 to three community foundations that provide wraparound services to LMI individuals in three Appalachian counties.
- Two donations totaling \$10,500 to an outreach center that provides food, clothing, and furniture and other necessities to LMI individuals and families in need.
- A donation totaling \$5,000 to a nonprofit that provides before and after school care for infants, toddlers, preschool, and school-aged children in LMI and distressed middle-income communities.

Economic Development

- Five donations totaling \$83,750 to two economic development agencies promote initiatives to attract and retain small businesses and provide workforce development skills.

Affordable Housing

- A donation totaling \$10,000 to a large nonprofit that builds and advocates for all aspects of affordable housing.

Revitalization/Stabilization

- A donation totaling \$45,000 to a county to make infrastructure improvements to sewer system that serves LMI communities.

Because Ohio Valley was responsive to community development needs in the AA, consideration was given to three donations totaling \$7,425 that benefited the broader regional area in a contiguous county. These donations supported affordable housing, a countywide food pantry that serves a distressed middle-income area, and a county services provider that offers protective and wraparound services to LMI children in need in a distressed middle-income area.

### *Community Development Services*

During the evaluation period, eight employees assisted 14 organizations and provided 27 community development services throughout the AA, as shown in the table below.

Purpose of CD Service	# Services	# Organizations	# Employees*
Services to LMI	22	10	4
Economic Development	5	4	4
<b>Total</b>	<b>27</b>	<b>14</b>	<b>8</b>
<i>*Some employees provide more than one service</i>			

### Board/Committees

- Employee serves as board member of a local health system that serves a distressed middle-income community. The employee works to obtain meaningful philanthropy to ensure the hospital's ability to serve patients.
- Employee serves as board member of a county homeless committee that advocates for resources and implementing strategies to address the issue.
- Two employees serve as board members for two local school districts with majority LMI student bodies to review expenditures and fund career and technical education programs.
- An employee serves as treasurer for local chamber of commerce that works to attract and retain small businesses in the area.
- An employee serves on board of an economic development corporation that works to attract and retain small businesses to the county.
- An employee serves on board of community investment corporation that works to encourage and promote industrial, economic, and commercial development in the county.

### Financial Literacy

- OVB Adventure in Savings – an employee taught approximately 40 fourth grade students (majority eligible for free- and reduced-lunch program).
- An employee presented two budgeting workshops primarily targeted at LMI parents and children.
- An employee discussed banking basics and the importance of budgeting to senior students (majority eligible for free- and reduced-lunch program).
- An employee discussed financial literacy and different careers in banking to students at an evening community outreach event (majority eligible for free- and reduced-lunch program).
- An employee discussed common financial scams targeting older adults and tips to protect them from being scammed to LMI seniors at a local senior center.

- An employee spoke at a career fair to middle school students about careers in banking (majority eligible for free- and reduced-lunch program).
- An employee spoke at a children's summer job program about several aspects of financial literacy (e.g., budgeting, managing debt, tracking personal spending, etc. – majority eligible for free- and reduced-lunch program).

## STATE OF WEST VIRGINIA

### CRA RATING for State of West Virginia<sup>40</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors and criteria contributing to this rating include:

- The distribution of loans to borrowers reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income);
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA; and,
- The bank's community development performance demonstrates an adequate responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

## SCOPE OF EXAMINATION

A full-scope review was conducted for Nonmetropolitan West Virginia, which represents Ohio Valley's entire banking operations for West Virginia. The time period and products evaluated for this AA is consistent with the scope discussed in the Scope of Examination section of this report.

Lending in West Virginia accounted for 17.5% of Ohio Valley's total lending activity, and deposits accounted for 12.6% of Ohio Valley's total deposits. As of June 30, 2023, Ohio Valley ranked 34<sup>th</sup> among 67 insured institutions and had a deposit market share of 0.5% in West Virginia.

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<sup>40</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.



**NONMETROPOLITAN AREA**  
*(Full-scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN  
NONMETROPOLITAN WEST VIRGINIA**

Nonmetropolitan West Virginia consists of the entirety of Mason County, which is in the western portion of the state along the Ohio River in the Appalachian Region of West Virginia. The Census Bureau released new size and population data from the 2020 Census on August 12, 2021. Due to these changes, this AA was comprised of the following tracts for this analysis. See Appendix A for an AA map and Appendix B for additional demographic data.

<b>Income Tract Designations</b>	
<b>Assessment Area: Nonmetropolitan West Virginia</b>	
<b>Income Tract Level</b>	
Low	0
Moderate	1
Middle	5
Upper	1
Unknown	0
<b>Total</b>	<b>7</b>

- Since the previous evaluation, the AA gained a moderate- and upper-income tract and lost a middle-income tract since the previous evaluation. There were no changes to the number of low- or unknown-income tracts.
- As of June 30, 2023, the FDIC Deposit Market Share Report, ranks Ohio Valley first among four institutions operating in the AA with a 33.7% market share. City National Bank of West Virginia ranks second and holds a 24.3% market share, followed by Peoples Bank of Marietta which holds 21.4% market share. Deposits in Nonmetropolitan West Virginia account for 12.6% of Ohio Valley total deposits.
- The 2023 HMDA Peer Market data indicates Ohio Valley ranks second out of 56 HMDA reporters in the AA and originated 46 loans. First ranked City National Bank of West Virginia originated 52 loans, and third ranked Peoples Bank of Marietta originated 29 loans. In 2022 Ohio Valley originated 38 loans.
- Ohio Valley maintains two branches with ATMs and a drive-thru only branch with an ATM in Nonmetropolitan West Virginia. Ohio Valley has a branch in Mason in a moderate-

income tract<sup>41</sup> and two branches in Point Pleasant in middle-income tracts. All three branches offer extended, weekend, and drive-thru services.

- No branches have opened or closed in Nonmetropolitan West Virginia since the previous evaluation.
- Ohio Valley also maintains two stand-alone ATMs in Point Pleasant in middle-income tracts in a courthouse and hospital. In April 2022 Ohio Valley closed a stand-alone ATM in a drug store in Point Pleasant in a middle-income tract.

## Community Contact

A community contact interview was conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The representative was with an emergency food assistance program. The contact stated this is an economically distressed Appalachian community facing high poverty, food insecurity, and unemployment rates. The community has a growing senior population and limited access to fresh produce and grocery stores. There are also significant barriers to reliable transportation, healthcare, and internet access in many parts of the county. The contact indicated there are plenty of opportunities for local financial institutions to become more involved in the community. While bank employees volunteer, there is a critical need for grants and other funding streams to provide emergency assistance to residents in need and address challenges like predatory lending, lack of job creation, and much-needed infrastructure improvements, which if neglected will deter economic growth. The contact stated rural communities are often overlooked by financial institutions for sustained investments.

Population Change			
Assessment Area: Nonmetropolitan West Virginia			
Area	2020 Population	2023 Population	Percent Change
Mason County	25,453	24,765	-2.7%
<b>West Virginia</b>	<b>1,793,716</b>	<b>1,770,071</b>	<b>-1.3%</b>
Source: 2019-2023 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- From 2020 through 2023 Mason County experienced a 2.7% loss in population, compared to West Virginia which experienced a 1.3% loss in population.
- 61.3% of the AA population was 18 years of age or older, the legal age to enter into a contract.

<sup>41</sup> The branch in the moderate-income tract was in a middle-income tract in previous evaluation

- 21.9% of the population in the AA was 65 or older, compared to 20.0% in West Virginia.
- 12.2% of the AA's population reside in the AA moderate tracts.
- Point Pleasant is the most populous city in Mason County with 3,803 residents in 2024; population decreased by 1.4% since 2020. By comparison, Mason has 818 residents in 2024; population decreased by 1.0% since 2020.<sup>42</sup>

**Borrower Income Levels  
Nonmetropolitan West Virginia**

FFIEC Estimated Median Family Income		% Change	Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
<b>2022</b>	<b>\$59,300</b>		0	- \$29,649	\$29,650	- \$47,439	\$47,440	- \$71,159	\$71,160	- & above
<b>2023</b>	<b>\$64,200</b>	8.3%	0	- \$32,099	\$32,100	- \$51,359	\$51,360	- \$77,039	\$77,040	- & above

- The 2023 MFI in Nonmetropolitan West Virginia was \$64,200, it increased by 8.3% since 2022.
- The 2020 MFI in Nonmetropolitan West Virginia was \$53,058, which represents a 21.0% increase from 2020 to 2023.
- West Virginia's minimum wage is \$8.75<sup>43</sup> per hour or \$18,200 annually and has not increased since 2016.
- The Federal minimum wage is \$7.25<sup>44</sup> per hour or \$15,080 annually and has not increased since 2009.

<b>Poverty Rates</b>		
<b>Assessment Area: Nonmetropolitan West Virginia</b>		
<b>Area</b>	<b>2022</b>	<b>2023</b>
Mason County	16.3%	17.9%
<b>West Virginia</b>	<b>17.4%</b>	<b>16.4%</b>
<i>Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis</i>		

- Poverty rates in Mason County were less than West Virginia's overall poverty rate in 2022 and higher than the state's overall poverty rate in 2023. However, poverty rates in West

<sup>42</sup> [World Population Review – Mason County Cities](#)

<sup>43</sup> [West Virginia Minimum Wage](#)

<sup>44</sup> [The Federal Minimum Wage](#)

Virginia are generally higher compared to non-Appalachian states; the poverty rate in 2023 in West Virginia was 5.3 percentage points higher than the national poverty rate of 11.1%.<sup>45</sup>

- Of the 7,609 families in the AA, 33.3% of families are designated as LMI with 11.5% of families living below the poverty level, compared to 12.3% of families living below the poverty level in West Virginia.
- SNAP<sup>46</sup> helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Recipients		
Assessment Area: Nonmetropolitan West Virginia		
Area	2022	2023
Mason County	19.5%	21.2%
<b>West Virginia</b>	<b>17.0%</b>	<b>16.6%</b>
Source: Federal Reserve Economic Data (FRED)   Federal Reserve Bank of St. Louis		

- The percentage of SNAP recipients in Mason County was significantly higher than the percentage of individuals below the poverty level in 2022 and 2023.
- The percentage of SNAP recipients was consistently higher in Mason County compared to state levels during this period.

Housing Cost Change						
Assessment Area: Nonmetropolitan West Virginia						
Area	Median Housing Value			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Mason County	\$100,167	\$127,400	27.2%	\$577	\$654	13.3%
<b>West Virginia</b>	<b>\$123,200</b>	<b>\$155,600</b>	<b>26.3%</b>	<b>\$732</b>	<b>\$850</b>	<b>16.1%</b>
Source: 2019-2023 U.S. Census Bureau: American Community Survey						
2018-2022 U.S. Census Bureau: American Community Survey						

- Median housing values increased in Mason County from 2020 to 2023 by 27.2%. MFI in the county (21.0%) did not keep pace with home price growth during this period.

<sup>45</sup> [Poverty in the U.S. – 2023 U.S. Census Data](#)

<sup>46</sup> [FRED Economic Data - SNAP](#)

- Based on 2020 Census data, the affordability ratio<sup>47</sup> was 51.3 in Mason County, compared to 39.0 in West Virginia. Housing was more affordable in the AA than in other parts of West Virginia.
- Between 2020 to 2023, median gross rents increased by 13.3%. MFI kept pace with median gross rents during this period.
- According to 2020 Census data, 19.5% of all renters across the AA have rental costs greater than 30.0% of income, compared to 38.7% of renters across the state. However, the increase in median gross rents indicates the need for more affordable housing in the AA.
- According to HUD's 2025 FMR data,<sup>48</sup> the average rent for a two-bedroom unit in Mason County is \$852, an 3.8% decrease from 2024.
- According to the National Low Income Housing Coalition,<sup>49</sup> full-time workers must earn at least \$18.46 per hour or \$38,396 annually to afford a two-bedroom apartment with an average rent of \$960/month in West Virginia, which is more than double West Virginia's minimum wage. In West Virginia, a minimum-wage earner would need to work 84 hours per week to afford a two-bedroom apartment.
- Nationwide rents continue to increase and are generally rising faster than wages. The national average rent is \$1,670 for a two-bedroom home, requiring workers to earn a minimum wage of \$32.21 per hour or \$67,000 annually.<sup>50</sup>
- There are 13,079 housing units in Mason County, of which 66.9% are owner-occupied units, 14.1% are rental units and 19.0% are vacant. Housing units in Mason primarily consist of single-family (71.6%) units, followed by mobile homes (23.3%) and multi-family units (3.2%).
- 11.0% of total housing units are in moderate-income tracts, and 9.2% of these units are owner-occupied and 43.8% are either rental or vacant. With 33.1% of housing units across the AA and 43.8% in moderate-income tracts being either rental or vacant, there may be limited opportunities to originate mortgage loans, particularly in moderate-income tracts.
- The median age of housing stock in Mason County is 49 years old with 14.9% of housing built prior to 1950. The age of housing stock across the county demonstrates a potential need for home improvement lending.

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<sup>47</sup> The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

<sup>48</sup> [HUD's Fair Market Rent \(FMR\) - FY2025](#)

<sup>49</sup> [NLIHC – West Virginia](#)

<sup>50</sup> [NLIHC – Housing Wage for a Two-Bedroom](#)

Housing Cost Burden						
Assessment Area: Nonmetropolitan West Virginia						
Area	Cost Burden - Owners			Cost Burden - Renters		
	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Mason County	50.4%	15.9%	15.4%	40.8%	17.5%	20.9%
<b>West Virginia</b>	<b>48.2%</b>	<b>18.9%</b>	<b>13.9%</b>	<b>63.6%</b>	<b>34.3%</b>	<b>37.9%</b>

*Cost Burden is housing cost that equals 30 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- 50.4% of low-income homeowners and 40.8% of low-income renters in Mason County are cost burdened, compared to 15.9% of moderate-income homeowners and 17.5% of moderate-income renters in the county.
- This data shows housing cost burden disproportionately affects low-income homeowners and renters compared to moderate income homeowners and renters.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient downpayment to purchase a home or afford increasing rents.
- There is a growing disparity between median family incomes and escalating housing and rental costs, leading to increased financial strain on residents in Mason County.

Unemployment Rates		
Assessment Area: Nonmetropolitan West Virginia		
Area	2022	2023
Mason County	4.4%	4.6%
<b>West Virginia</b>	<b>3.9%</b>	<b>3.9%</b>

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

- As reported by Data USA:<sup>51</sup>
  - The leading industries in Mason County are educational services, health care and social assistance, retail trade, and manufacturing.
  - The average private sector weekly wage in the AA was \$1,017 or \$52,884 annually, which indicates employed persons can afford the average median rent of \$654.
- According to the Mason County Development Authority,<sup>52</sup> major employers include Mountain Health Network, Walmart, APG Polytech, Appalachian Power, Bob's Market and Greenhouse, Mason County School District, Pleasant Valley Hospital, Rubberlite Inc., and Toyota Motors.

<sup>51</sup> [Data USA - Mason County](#)

<sup>52</sup> [Mason County's Top Employers](#)

- According to BroadbandNow,<sup>53</sup> 75.7% of households in Mason County have access to minimum bandwidth needed for basic internet activity. Nationally, those with access to a broadband-enabled computer are employed at a higher rate in urban and rural counties.

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<sup>53</sup> [BroadBandNow WV](#)

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN WEST VIRGINIA

### LENDING TEST

The lending test performance in West Virginia is Satisfactory.

Borrower distribution received more weight than geographic distribution in this AA based on the higher percentage of LMI families compared to LMI geographies. HMDA lending received the most weight, followed by consumer and home equity lending, respectively.

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

Ohio Valley's lending penetration among borrowers of different income (including low- and moderate-income) levels in Nonmetropolitan West Virginia is considered reasonable. Borrower distribution is reasonable for HMDA and home equity lending and excellent for consumer lending. See Appendix D for HMDA-reportable lending data.

#### ***HMDA Lending***

Ohio Valley's performance was compared to the percentage of families (proxy) and aggregate of all lenders.

During the evaluation period, Ohio Valley originated 84 HMDA-reportable loans totaling \$13.9 million, and eight (9.5%) were originated to borrowers with unknown-income designations. The bank originated four (10.5%) loans to borrowers with unknown incomes, compared to aggregate of all lenders at 14.0% in 2022. The bank originated four (8.7%) loans to borrowers with unknown incomes, compared to the aggregate of all lenders at 12.6% in 2023.

Ohio Valley originated four (4.8%) HMDA loans to low-income borrowers, which was significantly below proxy at 17.7%. The bank's performance at 7.9% exceeded aggregate lending performance at 7.7% in 2022 and at 2.2% was significantly below aggregate lending performance at 7.1% in 2023.

Ohio Valley originated 12 (14.3%) HMDA loans to moderate-income borrowers, which was slightly below proxy at 15.6%. The bank's performance at 18.4% was comparable to lending performance at 18.6% in 2022 and at 10.9% fell below aggregate lending performance at 17.1% in 2023.



Considering these factors along with the high percentage of low-income cost burdened renters and poverty rates, borrower distribution of HMDA lending to low-income borrowers is poor and reasonable to moderate-income borrowers.

### Consumer Lending

During the evaluation period Ohio Valley originated 268 consumer loans totaling \$5.2 million. Ohio Valley's performance was compared to the households by income (proxy).

### Borrower Distribution of Consumer Loans

Assessment Area: Nonmetropolitan WV

Household Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households by Household Income
	#	%	\$ (000s)	\$ %	%
Low	52	19.4%	914	17.4%	21.0%
Moderate	71	26.5%	1,097	20.9%	14.0%
Middle	74	27.6%	1,325	25.3%	15.4%
Upper	71	26.5%	1,907	36.4%	49.6%
Unknown	0	0.0%	0	0.0%	
<b>Total</b>	<b>268</b>	<b>100.0%</b>	<b>5,243</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 52 (19.4%) consumer loans to low-income borrowers, which was comparable to proxy at 21.0%. Ohio Valley originated 71 (26.5%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 14.0%.

Considering access to transportation is essential for improving upward social mobility for lower-income individuals and communities and access to small dollar loans, borrower distribution of consumer loans to low-income borrowers is reasonable and excellent to moderate-income borrowers.

### Home Equity Lending

Ohio Valley originated 23 home equity loans totaling \$1.1 million. Ohio Valley's performance was compared to the percentage of families (proxy).

#### Borrower Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan WV

Borrower Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Families by Family Income
	#	%	\$ (000s)	\$ %	%
Low	1	4.3%	25	2.2%	17.7%
Moderate	6	26.1%	416	37.2%	15.6%
Middle	4	17.4%	177	15.8%	22.2%
Upper	12	52.2%	500	44.8%	44.6%
Unknown	0	0.0%	0	0.0%	
Total	23	100.0%	1,117	100.0%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated one (4.3%) home equity loan to a low-income borrower, which was significantly below proxy at 17.7%. Ohio Valley originated six (26.1%) home equity loans to moderate-income borrowers, which exceeded proxy at 15.6%. Borrower distribution of home equity loans to low-income borrowers is poor and excellent to moderate-income borrowers.

### Geographic Distribution of Loans

Ohio Valley's geographic distribution reflects a reasonable dispersion of loans in Nonmetropolitan West Virginia. The geographic distribution of HMDA lending is excellent, and consumer and home equity lending are reasonable. Ohio Valley has no lending gaps.

	Nonmetropolitan WV - 2022				Nonmetropolitan WV - 2023			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	1	0	1	100.0%	1	0	1	100.0%
Middle	5	0	5	100.0%	5	0	5	100.0%
Upper	1	0	1	100.0%	1	0	1	100.0%
Unknown	0	0	0	No Tracts	0	0	0	No Tracts
<b>Total</b>	<b>7</b>	<b>0</b>	<b>7</b>	<b>100.0%</b>	<b>7</b>	<b>0</b>	<b>7</b>	<b>100.0%</b>

Ohio Valley penetrated 100.0% of its tracts during the evaluation period.

### *HMDA Lending*

During the evaluation period, Ohio Valley originated 84 HMDA loans totaling \$13.9 million. Ohio Valley performance was compared to the percentage of owner-occupied units (proxy) and aggregate of all lenders. See Appendix D for HMDA-reportable lending data.

Ohio Valley originated 10 (11.9%) HMDA loans in moderate-income tracts, which exceeded proxy at 9.2%. The bank's performance at 13.2% exceeded aggregate lending performance at 9.6% in 2022 and at 10.9% significantly exceeded aggregate lending performance at 6.5% in 2023. Geographic distribution of HMDA loans in moderate-income tracts is excellent.

### *Consumer Lending*

During the evaluation period Ohio Valley originated 268 consumer loans totaling \$5.2 million. Ohio Valley's performance was compared to the percentage of households (proxy).

### Geographic Distribution of Consumer Loans

Assessment Area: Nonmetropolitan WV

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	18	6.7%	270	5.1%	9.5%
Middle	201	75.0%	4,022	76.7%	70.3%
Upper	49	18.3%	950	18.1%	20.1%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	268	100%	5,243	100%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated 18 (6.7%) consumer loans in moderate-income tracts, which were below the proxy at 9.5%. Considering poverty levels in moderate-income tracts, geographic distribution of consumer loans in moderate-income tracts is reasonable.

### Home Equity Lending

Ohio Valley originated seven home equity loans totaling \$1.1 million. Ohio Valley 's performance was compared to the percentage of owner-occupied units (proxy).

### Geographic Distribution of Home Equity Loans

Assessment Area: Nonmetropolitan WV

Tract Income Levels	Bank Lending & Demographic Data				
	2023				
	Count		Dollar		Owner Occupied Units
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	2	8.7%	61	5.5%	9.2%
Middle	19	82.6%	933	83.5%	69.7%
Upper	2	8.7%	123	11.0%	21.1%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	23	100%	1,117	100%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

Ohio Valley originated two (8.7%) home equity loans in moderate-income tracts, which was comparable to proxy at 9.2%. Geographic distribution of home equity loans in moderate-income tracts is reasonable.

### COMMUNITY DEVELOPMENT TEST

The community development test performance in West Virginia is Satisfactory.

Ohio Valley community development performance demonstrates adequate responsiveness to community development needs in Nonmetropolitan West Virginia through small dollar donations and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

#### *Community Development Lending*

There was no community development lending in Nonmetropolitan West Virginia.

#### *Community Development Investments*

Qualified community development investments consist of small dollar donations totaling \$44,100. The following table shows the total number of qualified donations by purpose, number, and dollar amount.

Purpose of Donations	#	\$
Services to LMI	6	\$29,100
Economic Development	3	\$15,000
<b>Total</b>	<b>9</b>	<b>\$44,100</b>

#### Services to LMI

- Three donations totaling \$16,100 to three community foundations that provide wraparound services to LMI individuals in three counties.
- A \$12,000 donation to a medical clinic that serves medically underserved individuals.
- A donation totaling \$500 to an area food pantry.
- A donation totaling \$500 to a scholarship fund to help LMI high school students with academic expenses.

#### Economic Development

- Three donations totaling \$15,000 to a development authority the promote the expansion of businesses and industrial activity in the county.

#### *Community Development Services*

During the evaluation period, four employees assisted nine organizations and provided 18 community development services throughout the AA, as shown in the table below.

Purpose of CD Service	# Services	# Organizations	# Employees
Services to LMI	12	7	3
Economic Development	6	2	1
<b>Total</b>	<b>18</b>	<b>9</b>	<b>4</b>
<i>*Some employees provide more than one service</i>			
<i>Total includes services that benefit broader statewide area</i>			

#### Board/Committees and Technical Expertise

- Employee serves as board member of a local nonprofit that provides wraparound services to LMI individuals and families.
- An employee serves as a board member of a foundation that raises funds for post-secondary education scholarships for individuals seeking degrees in various medical disciplines. The majority of students are primarily LMI, and the county is a medically underserved area that has a lack of medical professionals.

- An employee serves as a board member for a local nonprofit that raises funds to help LMI children and families, especially during the holidays. The employee also provides technical assistance in the form of fundraising.
- An employee serves on board of an economic development authority that works to attract and retain small businesses to the county.

Financial Literacy

- An employee spoke at a youth expo about several aspects of financial literacy (e.g., budgeting, managing debt, tracking personal spending, etc. – majority LMI).
- An employee participated in four separate multi-day financial literacy 4-H sponsored boot camps consisting of lessons on the basics of banking and a mock money management game. At least 34 students attended (majority LMI).

Because Ohio Valley was responsive to community development needs in the AA, consideration was given to community development service that benefits the broader statewide area. An employee serves as a board member of an economic development organization that promotes West Virginia as a prime location for the polymer industry.

## APPENDICES

### Appendix A – Scope of Examination Tables

Scope of Examination			
<b>TIME PERIOD REVIEWED</b>	Lending Test: January 1, 2022 – December 31, 2023  Community Development Test: March 1, 2022 – March 31, 2025		
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
Ohio Valley Bank Company, Gallipolis, Ohio			HMDA – home purchase, refinance, home improvement, multi-family, other lines of credit HELOCs Consumer – motor vehicle, other secured, other unsecured Small Business
Ohio Valley Bank has no affiliate relationships subject to examination.			

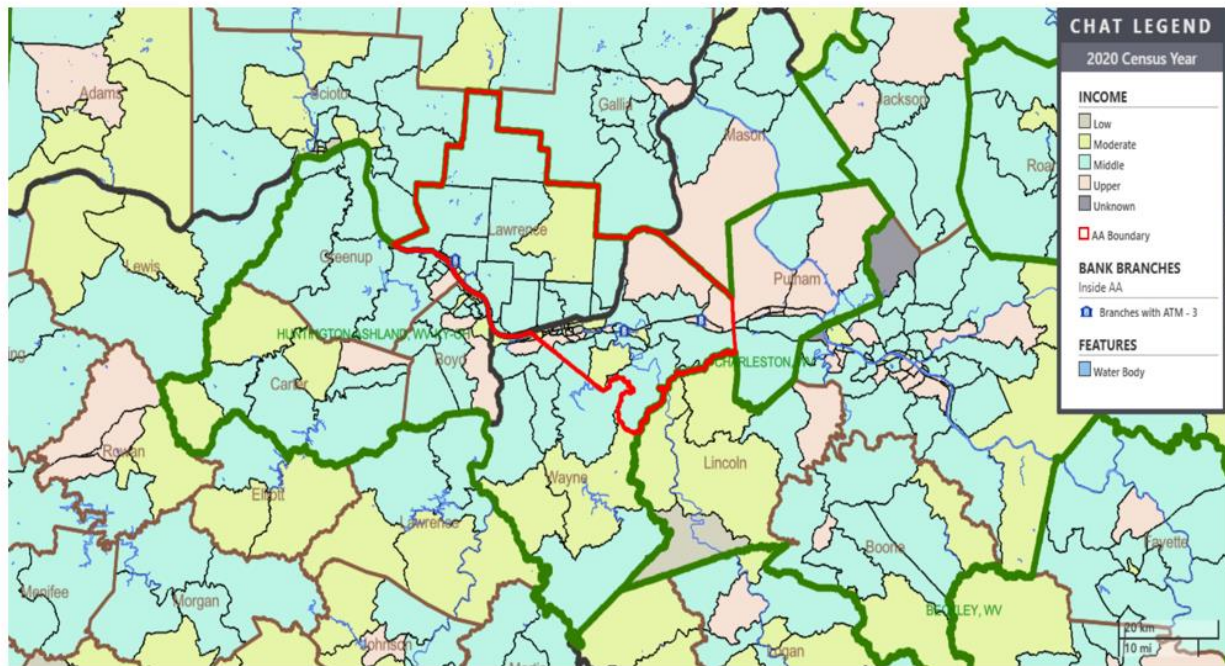


There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

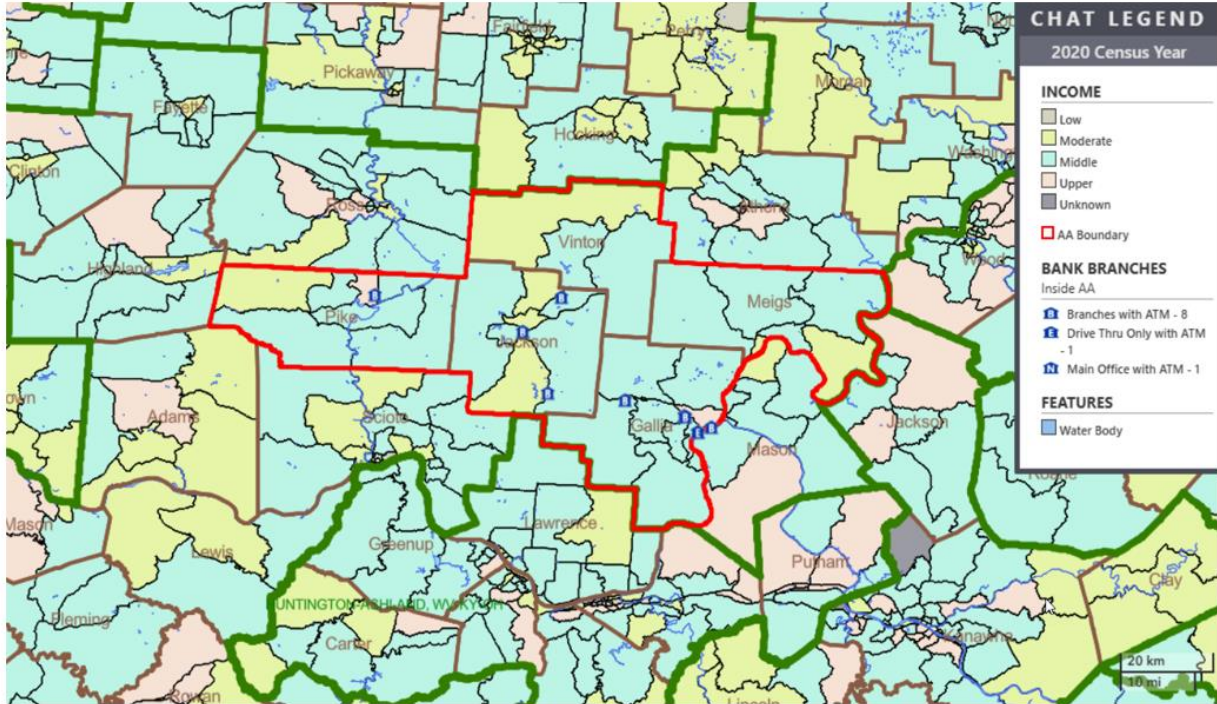
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<b>MULTI-STATE</b> Huntington-Ashland WV-KY-OH	Full-scope review	None	N/A
<b>OHIO</b> Nonmetropolitan Ohio	Full-scope review	None	N/A
<b>WEST VIRGINIA</b> Nonmetropolitan West Virginia	Full-scope review	None	N/A

## Appendix B – Assessment Area Maps

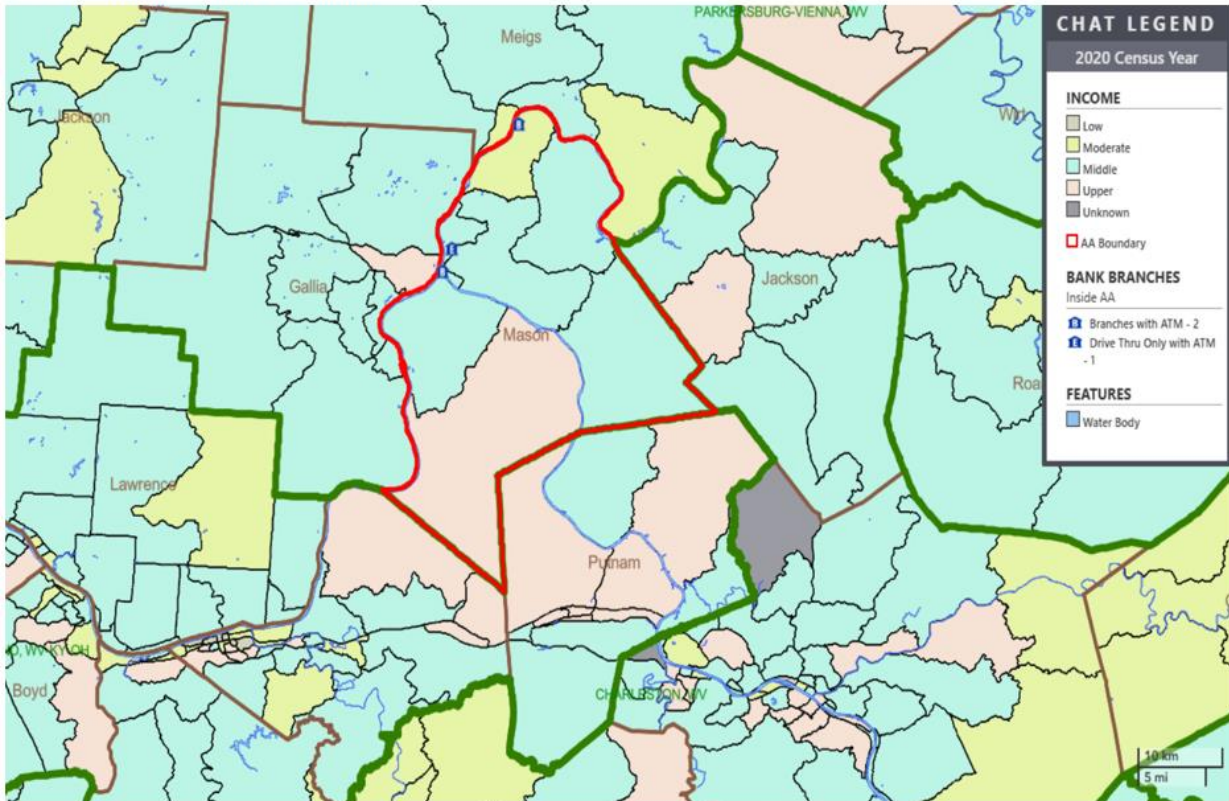
2022-2023 Huntington-Ashland WV-KY-OH MSA



2022-2023 Nonmetropolitan Ohio



2022-2023 Nonmetropolitan West Virginia





## Appendix C – Demographic Tables

### Combined Demographics Report

Assessment Area: Huntington–Ashland WV-KY-OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	11.5%	1,512	4.1%	619	40.9%	9,323	25.0%
Moderate-income	12	23.1%	6,538	17.5%	1,395	21.3%	6,150	16.5%
Middle-income	25	48.1%	23,070	61.8%	2,935	12.7%	7,784	20.9%
Upper-income	9	17.3%	6,181	16.6%	518	8.4%	14,044	37.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	37,301	100.0%	5,467	14.7%	37,301	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,177	1,109	2.7%	18.0%	3,349	54.2%	1,719	27.8%
Moderate-income	15,100	6,803	16.5%	45.1%	5,503	36.4%	2,794	18.5%
Middle-income	40,246	25,371	61.5%	63.0%	9,635	23.9%	5,240	13.0%
Upper-income	12,355	7,941	19.3%	64.3%	2,793	22.6%	1,621	13.1%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	73,878	41,224	100.0%	55.8%	21,280	28.8%	11,374	15.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	830	18.2%	697	17.2%	123	27.8%	10	14.3%
Moderate-income	951	20.8%	826	20.4%	109	24.7%	16	22.9%
Middle-income	2,150	47.1%	1,972	48.7%	139	31.4%	39	55.7%
Upper-income	631	13.8%	555	13.7%	71	16.1%	5	7.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,562	100.0%	4,050	100.0%	442	100.0%	70	100.0%
	Percentage of Total Businesses:		88.8%			9.7%		1.5%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	11	13.6%	11	13.6%	0	0.0%	0	0.0%
Middle-income	60	74.1%	60	74.1%	0	0.0%	0	0.0%
Upper-income	10	12.3%	10	12.3%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	81	100.0%	81	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:		100.0%			0.0%		0.0%

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

### Combined Demographics Report

Assessment Area: Nonmetropolitan OH

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	8,385	24.8%
Moderate-income	7	22.6%	7,404	21.9%	1,197	16.2%	6,650	19.6%
Middle-income	22	71.0%	24,942	73.7%	3,107	12.5%	7,272	21.5%
Upper-income	2	6.5%	1,510	4.5%	69	4.6%	11,549	34.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	33,856	100.0%	4,373	12.9%	33,856	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	12,953	8,250	22.7%	63.7%	2,736	21.1%	1,967	15.2%
Middle-income	43,415	26,430	72.7%	60.9%	9,779	22.5%	7,206	16.6%
Upper-income	2,884	1,652	4.5%	57.3%	831	28.8%	401	13.9%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	59,252	36,332	100.0%	61.3%	13,346	22.5%	9,574	16.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	617	17.2%	559	17.3%	31	12.8%	27	22.5%
Middle-income	2,631	73.3%	2,369	73.4%	174	71.9%	88	73.3%
Upper-income	341	9.5%	299	9.3%	37	15.3%	5	4.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,589	100.0%	3,227	100.0%	242	100.0%	120	100.0%
	Percentage of Total Businesses:		89.9%		6.7%		3.3%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	59	23.0%	58	22.8%	1	50.0%	0	0.0%
Middle-income	191	74.3%	189	74.4%	1	50.0%	1	100.0%
Upper-income	7	2.7%	7	2.8%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	257	100.0%	254	100.0%	2	100.0%	1	100.0%
	Percentage of Total Farms:		98.8%		0.8%		0.4%	

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

### Combined Demographics Report

#### Assessment Area: Nonmetropolitan WV

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	1,343	17.7%
Moderate-income	1	14.3%	596	7.8%	124	20.8%	1,188	15.6%
Middle-income	5	71.4%	5,395	70.9%	622	11.5%	1,688	22.2%
Upper-income	1	14.3%	1,618	21.3%	128	7.9%	3,390	44.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	7,609	100.0%	874	11.5%	7,609	100.0%
	Housing units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	1,433	805	9.2%	56.2%	206	14.4%	422	29.4%
Middle-income	9,039	6,100	69.7%	67.5%	1,351	14.9%	1,588	17.6%
Upper-income	2,607	1,844	21.1%	70.7%	287	11.0%	476	18.3%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	13,079	8,749	100.0%	66.9%	1,844	14.1%	2,486	19.0%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	44	7.7%	40	7.7%	2	5.9%	2	12.5%
Middle-income	442	77.5%	402	77.3%	27	79.4%	13	81.3%
Upper-income	84	14.7%	78	15.0%	5	14.7%	1	6.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	570	100.0%	520	100.0%	34	100.0%	16	100.0%
	Percentage of Total Businesses:		91.2%			6.0%		2.8%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	3	5.3%	3	5.3%	0	0.0%	0	0.0%
Middle-income	25	43.9%	25	43.9%	0	0.0%	0	0.0%
Upper-income	29	50.9%	29	50.9%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	57	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:		100.0%			0.0%		0.0%

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

## Appendix D – Lending Tables

### HMDA Lending Tables

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Huntington-Ashland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$(000s)	\$%	%		#								%	%	\$(000s)	\$%	\$%
HOME PURCHASE	Low	4	5.3%	317	2.1%	25.0%	2	7.4%	7.4%	134	2.5%	3.7%	2	4.1%	7.4%	183	1.8%	3.6%
	Moderate	9	11.8%	1,140	7.5%	16.5%	3	11.1%	22.2%	406	7.7%	15.8%	6	12.2%	23.1%	734	7.4%	16.2%
	Middle	12	15.8%	1,537	10.5%	20.9%	6	22.2%	22.5%	805	15.3%	21.4%	6	12.2%	21.8%	792	8.0%	20.4%
	Upper	42	55.3%	10,965	72.2%	37.7%	13	48.1%	33.8%	3,520	66.8%	45.9%	29	59.2%	30.8%	7,445	75.1%	42.8%
	Unknown	9	11.8%	1,159	7.6%	0.0%	3	11.1%	14.1%	402	7.6%	13.3%	6	12.2%	16.9%	757	7.6%	17.0%
	Total	76	100%	15,178	100%	100.0%	27	100%	100%	5,267	100%	100%	49	100%	100%	9,911	100%	100%
REFINANCE	Low	1	7.7%	80	3.8%	25.0%	0	0.0%	7.7%	0	0.0%	4.2%	1	12.5%	13.3%	80	6.9%	7.6%
	Moderate	4	30.8%	284	13.4%	16.5%	2	40.0%	19.1%	169	17.8%	13.3%	2	25.0%	21.8%	115	9.9%	16.5%
	Middle	2	15.4%	171	8.1%	20.9%	0	0.0%	23.5%	0	0.0%	19.7%	2	25.0%	23.0%	171	14.7%	21.3%
	Upper	4	30.8%	935	44.3%	37.7%	2	40.0%	38.9%	659	69.4%	49.8%	2	25.0%	32.0%	276	23.8%	41.7%
	Unknown	2	15.4%	642	30.4%	0.0%	1	20.0%	10.7%	122	12.8%	13.1%	1	12.5%	9.9%	520	44.8%	12.9%
	Total	13	100%	2,112	100%	100.0%	5	100%	100%	950	100%	100%	8	100%	100%	1,162	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.0%	0	0.0%	6.2%	0	0.0%	4.7%	0	0.0%	4.2%	0	0.0%	4.4%
	Moderate	1	16.7%	111	13.0%	16.5%	0	0.0%	14.2%	0	0.0%	11.5%	1	33.3%	18.5%	111	23.6%	9.3%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	23.1%	0	0.0%	20.7%	0	0.0%	23.1%	0	0.0%	20.9%
	Upper	4	66.7%	507	59.2%	37.7%	2	66.7%	51.1%	147	38.1%	55.9%	2	66.7%	52.8%	360	76.4%	64.1%
	Unknown	1	16.7%	239	27.9%	0.0%	1	33.3%	5.3%	239	61.9%	7.3%	0	0.0%	1.4%	0	0.0%	1.2%
	Total	6	100%	857	100%	100.0%	3	100%	100%	386	100%	100%	3	100%	100%	471	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	2.2%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	37.7%	0	0.0%	2.2%	0	0.0%	1.2%	0	0.0%	9.1%	0	0.0%	1.7%
	Unknown	6	100.0%	7,917	100.0%	0.0%	2	100.0%	95.6%	5,110	100.0%	98.4%	4	100.0%	90.9%	2,807	100.0%	98.3%
	Total	6	100%	7,917	100%	100.0%	2	100%	100%	5,110	100%	100%	4	100%	100%	2,807	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.0%	0	0.0%	7.7%	0	0.0%	4.2%	0	0.0%	11.0%	0	0.0%	6.2%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	17.3%	0	0.0%	15.2%	0	0.0%	14.0%	0	0.0%	9.6%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	20.2%	0	0.0%	18.3%	0	0.0%	31.0%	0	0.0%	26.4%
	Upper	0	0.0%	0	0.0%	37.7%	0	0.0%	53.8%	0	0.0%	61.1%	0	0.0%	42.0%	0	0.0%	52.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.0%	0	0.0%	1.2%	0	0.0%	2.0%	0	0.0%	5.5%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

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



Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Huntington-Ashland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%									%	\$(000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	25.0%	0	0.0%	18.9%	0	0.0%	14.1%	0	0.0%	8.8%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	13.2%	0	0.0%	6.3%	0	0.0%	28.8%	0	0.0%	21.3%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	15.1%	0	0.0%	8.9%	0	0.0%	25.0%	0	0.0%	23.2%
	Upper	2	100.0%	266	100.0%	37.7%	1	100.0%	50.9%	200	100.0%	68.5%	1	100.0%	32.5%	66	100.0%	28.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.9%	0	0.0%	2.1%	0	0.0%	5.0%	0	0.0%	22.6%
	Total	2	100%	266	100%	100.0%	1	100%	100%	200	100%	100%	1	100%	100%	66	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	9.1%	0	0.0%	17.4%
	Middle	0	0.0%	0	0.0%	20.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	37.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	90.9%	0	0.0%	82.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	5	4.9%	397	1.5%	25.0%	2	5.3%	7.5%	134	1.1%	3.6%	3	4.6%	8.3%	263	1.8%	3.9%
	Moderate	14	13.6%	1,535	5.8%	16.5%	5	13.2%	19.9%	575	4.8%	13.5%	9	13.8%	21.9%	960	6.7%	14.3%
	Middle	14	13.6%	1,768	6.7%	20.9%	6	15.8%	22.2%	805	6.8%	19.0%	8	12.3%	22.2%	963	6.7%	18.7%
	Upper	52	50.5%	12,673	48.1%	37.7%	18	47.4%	36.8%	4,526	38.0%	43.8%	34	52.3%	33.1%	8,147	56.5%	39.2%
	Unknown	18	17.5%	9,957	37.8%	0.0%	7	18.4%	13.7%	5,873	49.3%	20.1%	11	16.9%	14.5%	4,084	28.3%	23.9%
	Total	103	100%	26,330	100%	100.0%	38	100%	100%	11,913	100%	100%	65	100%	100%	14,417	100%	100%

Originations & Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Huntington-Ashland MSA

PRODUCT TYPE		Bank Lending & Demographic Data						Bank & Aggregate Lending											
		2022, 2023						2022						2023					
		Tract Income Levels		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar	
Count				Dollar		Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg					
#	%			\$ (000s)	\$ %										#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	2	2.6%	236	1.6%	2.7%	0	0.0%	3.7%	0	0.0%	2.1%	2	4.1%	2.5%	236	2.4%	1.3%	
	Moderate	14	18.4%	2,110	13.9%	16.5%	3	11.1%	15.5%	456	8.7%	12.3%	11	22.4%	16.4%	1,654	16.7%	13.5%	
	Middle	45	59.2%	9,963	65.6%	61.5%	18	66.7%	60.3%	3,823	72.6%	63.1%	27	55.1%	59.9%	6,140	62.0%	63.2%	
	Upper	15	19.7%	2,869	18.9%	19.3%	6	22.2%	20.5%	988	18.8%	22.5%	9	18.4%	21.2%	1,881	19.0%	22.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	76	100%	15,178	100%	100.0%	27	100%	100%	5,267	100%	100%	49	100%	100%	9,911	100%	100%	
REFINANCE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	2.8%	0	0.0%	2.2%	0	0.0%	3.4%	0	0.0%	2.3%	
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	14.6%	0	0.0%	12.2%	0	0.0%	15.4%	0	0.0%	13.6%	
	Middle	12	32.3%	1,990	94.2%	61.5%	4	80.0%	64.2%	828	87.2%	66.4%	8	100.0%	60.7%	1,162	100.0%	64.0%	
	Upper	1	7.7%	122	5.8%	19.3%	1	20.0%	18.4%	122	12.8%	19.1%	0	0.0%	20.5%	0	0.0%	20.1%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	13	100%	2,112	100%	100.0%	5	100%	100%	950	100%	100%	8	100%	100%	1,162	100%	100%	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	1.8%	0	0.0%	1.5%	0	0.0%	2.3%	0	0.0%	1.1%	
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	10.2%	0	0.0%	10.6%	0	0.0%	12.5%	0	0.0%	11.8%	
	Middle	5	83.3%	557	65.0%	61.5%	3	100.0%	67.6%	386	100.0%	66.6%	2	66.7%	70.4%	171	36.3%	71.0%	
	Upper	1	16.7%	300	35.0%	19.3%	0	0.0%	20.4%	0	0.0%	21.3%	1	33.3%	14.8%	300	63.7%	16.1%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	6	100%	857	100%	100.0%	3	100%	100%	386	100%	100%	3	100%	100%	471	100%	100%	
MULTI FAMILY	Low	1	16.7%	4,875	61.6%	28.3%	1	50.0%	22.2%	4,875	95.4%	28.9%	0	0.0%	12.1%	0	0.0%	6.7%	
	Moderate	0	0.0%	0	0.0%	22.5%	0	0.0%	22.2%	0	0.0%	14.1%	0	0.0%	30.3%	0	0.0%	27.2%	
	Middle	5	83.3%	3,042	38.4%	33.7%	1	50.0%	44.4%	235	4.6%	47.8%	4	100.0%	45.5%	2,807	100.0%	29.5%	
	Upper	0	0.0%	0	0.0%	15.4%	0	0.0%	11.1%	0	0.0%	9.2%	0	0.0%	12.1%	0	0.0%	36.6%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	6	100%	7,917	100%	100.0%	2	100%	100%	5,110	100%	100%	4	100%	100%	2,807	100%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	16.3%	0	0.0%	14.8%	0	0.0%	11.0%	0	0.0%	8.7%	
	Middle	0	0.0%	0	0.0%	61.5%	0	0.0%	62.5%	0	0.0%	66.6%	0	0.0%	62.0%	0	0.0%	65.8%	
	Upper	0	0.0%	0	0.0%	19.3%	0	0.0%	21.2%	0	0.0%	18.5%	0	0.0%	27.0%	0	0.0%	25.5%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Huntington-Ashland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$( 000s)	\$ %	#	%	%									\$( 000s)	\$ %	\$ %	#
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	3.8%	0	0.0%	2.7%	0	0.0%	6.3%	0	0.0%	5.2%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	9.4%	0	0.0%	7.4%	0	0.0%	8.8%	0	0.0%	6.1%
	Middle	2	100.0%	266	100.0%	61.5%	1	100.0%	69.8%	200	100.0%	74.6%	1	100.0%	72.5%	66	100.0%	80.0%
	Upper	0	0.0%	0	0.0%	19.3%	0	0.0%	17.0%	0	0.0%	15.3%	0	0.0%	12.5%	0	0.0%	8.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	266	100%	100.0%	1	100%	100%	200	100%	100%	1	100%	100%	66	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	9.1%	0	0.0%	6.7%
	Moderate	0	0.0%	0	0.0%	16.5%	0	0.0%	22.7%	0	0.0%	9.8%	0	0.0%	9.1%	0	0.0%	6.8%
	Middle	0	0.0%	0	0.0%	61.5%	0	0.0%	59.1%	0	0.0%	67.4%	0	0.0%	54.5%	0	0.0%	64.8%
	Upper	0	0.0%	0	0.0%	19.3%	0	0.0%	18.2%	0	0.0%	22.8%	0	0.0%	27.3%	0	0.0%	21.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	3	2.9%	5,111	19.4%	2.7%	1	2.6%	3.4%	4,875	40.9%	4.3%	2	3.1%	2.8%	236	1.6%	2.0%
	Moderate	14	13.6%	2,110	8.0%	16.5%	3	7.9%	14.9%	456	3.8%	12.3%	11	16.9%	15.6%	1,654	11.5%	14.6%
	Middle	69	67.0%	15,818	60.1%	61.5%	27	71.1%	61.9%	5,472	45.9%	63.0%	42	64.6%	61.3%	10,346	71.8%	60.6%
	Upper	17	16.5%	3,291	12.5%	19.3%	7	18.4%	19.7%	1,110	9.3%	20.4%	10	15.4%	20.3%	2,181	15.1%	22.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	103	100%	26,330	100%	100.0%	38	100%	100%	11,913	100%	100%	65	100%	100%	14,417	100%	100%

Originations & Purchases

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

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan OH

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank				Families by Family Income	Count			Dollar		Count			Dollar			
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
#	%	#	%	\$(000s)	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	
HOME PURCHASE	Low	16	7.7%	1,377	3.7%	24.8%	10	9.6%	8.4%	803	4.7%	4.8%	6	5.7%	6.1%	574	2.8%	3.4%
	Moderate	33	15.8%	3,846	10.3%	19.6%	20	19.2%	23.1%	2,300	13.6%	17.8%	13	12.4%	23.0%	1,546	7.6%	17.1%
	Middle	54	25.8%	8,399	22.5%	21.5%	26	25.0%	21.3%	3,808	22.5%	21.0%	28	26.7%	25.2%	4,591	22.5%	23.8%
	Upper	80	38.3%	19,200	51.5%	34.1%	33	31.7%	25.9%	8,188	48.3%	36.1%	47	44.8%	25.7%	11,012	54.1%	34.9%
	Unknown	26	12.4%	4,487	12.0%	0.0%	15	14.4%	21.2%	1,843	10.9%	20.3%	11	10.5%	20.1%	2,644	13.0%	20.7%
	Total	209	100%	37,309	100%	100.0%	104	100%	100%	16,942	100%	100%	105	100%	100%	20,367	100%	100%
REFINANCE	Low	8	10.5%	631	6.3%	24.8%	6	11.3%	11.2%	487	6.9%	7.2%	2	8.7%	6.6%	144	4.8%	3.4%
	Moderate	12	15.8%	1,130	11.3%	19.6%	9	17.0%	22.5%	861	12.3%	18.3%	3	13.0%	22.8%	269	9.0%	18.6%
	Middle	21	27.6%	2,529	25.3%	21.5%	15	28.3%	25.1%	1,888	26.9%	24.0%	6	26.1%	25.9%	641	21.4%	23.9%
	Upper	31	40.8%	5,221	52.2%	34.1%	21	39.6%	30.9%	3,511	50.1%	39.3%	10	43.5%	32.6%	1,710	57.1%	40.3%
	Unknown	4	5.3%	494	4.9%	0.0%	2	3.8%	10.4%	261	3.7%	11.2%	2	8.7%	12.1%	233	7.8%	13.9%
	Total	76	100%	10,005	100%	100.0%	53	100%	100%	7,008	100%	100%	23	100%	100%	2,997	100%	100%
HOME IMPROVEMENT	Low	2	16.7%	110	11.1%	24.8%	1	10.0%	9.3%	40	5.1%	7.9%	1	50.0%	10.2%	70	32.6%	6.5%
	Moderate	1	8.3%	50	5.0%	19.6%	1	10.0%	18.5%	50	6.4%	14.1%	0	0.0%	18.6%	0	0.0%	12.7%
	Middle	3	25.0%	237	23.9%	21.5%	3	30.0%	25.2%	237	30.5%	24.7%	0	0.0%	31.1%	0	0.0%	31.8%
	Upper	5	41.7%	526	53.0%	34.1%	4	40.0%	42.4%	381	49.0%	49.9%	1	50.0%	37.1%	145	67.4%	39.9%
	Unknown	1	8.3%	70	7.0%	0.0%	1	10.0%	4.6%	70	9.0%	3.4%	0	0.0%	3.0%	0	0.0%	9.2%
	Total	12	100%	993	100%	100.0%	10	100%	100%	778	100%	100%	2	100%	100%	215	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	24.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	1	20.0%	366	13.2%	34.1%	0	0.0%	0.0%	0	0.0%	0.0%	1	33.3%	16.7%	366	31.4%	11.3%
	Unknown	4	80.0%	2,406	86.8%	0.0%	2	100.0%	100.0%	1,605	100.0%	100.0%	2	66.7%	83.3%	801	68.6%	88.7%
	Total	5	100%	2,772	100%	100.0%	2	100%	100%	1,605	100%	100%	3	100%	100%	1,167	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	24.8%	0	0.0%	8.7%	0	0.0%	4.9%	0	0.0%	4.6%	0	0.0%	3.5%
	Moderate	0	0.0%	0	0.0%	19.6%	0	0.0%	17.4%	0	0.0%	11.5%	0	0.0%	26.2%	0	0.0%	21.2%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	28.3%	0	0.0%	25.5%	0	0.0%	29.2%	0	0.0%	29.0%
	Upper	0	0.0%	0	0.0%	34.1%	0	0.0%	45.7%	0	0.0%	58.1%	0	0.0%	32.3%	0	0.0%	38.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	7.7%	0	0.0%	8.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

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

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan OH

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %										#	%	%	\$(000s)
OTHER PURPOSE CLOSED/EXEMPT	Low	1	6.3%	100	4.9%	24.8%	1	16.7%	12.7%	100	10.6%	9.2%	0	0.0%	12.7%	0	0.0%	6.2%
	Moderate	4	25.0%	413	20.2%	19.6%	1	16.7%	18.3%	128	13.5%	17.1%	3	30.0%	25.3%	285	25.9%	20.0%
	Middle	5	31.3%	515	25.1%	21.5%	1	16.7%	23.9%	282	29.8%	28.9%	4	40.0%	34.2%	233	21.1%	24.4%
	Upper	5	31.3%	976	47.6%	34.1%	3	50.0%	40.8%	437	46.1%	41.6%	2	20.0%	25.3%	539	48.9%	48.2%
	Unknown	1	6.3%	45	2.2%	0.0%	0	0.0%	4.2%	0	0.0%	3.1%	1	10.0%	2.5%	45	4.1%	1.3%
	Total	16	100%	2,049	100%	100.0%	6	100%	100%	947	100%	100%	10	100%	100%	1,102	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	24.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	34.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	27	8.5%	2,218	4.2%	24.8%	18	10.3%	9.2%	1,430	5.2%	5.4%	9	6.3%	6.7%	788	3.0%	3.6%
	Moderate	50	15.7%	5,439	10.2%	19.6%	31	17.7%	22.0%	3,339	12.2%	17.0%	19	13.3%	22.6%	2,100	8.1%	17.1%
	Middle	83	26.1%	11,680	22.0%	21.5%	45	25.7%	22.5%	6,215	22.8%	21.1%	38	26.6%	26.3%	5,465	21.1%	24.0%
	Upper	122	38.4%	26,289	49.5%	34.1%	61	34.9%	28.8%	12,517	45.9%	36.0%	61	42.7%	28.1%	13,772	53.3%	36.1%
	Unknown	36	11.3%	7,502	14.1%	0.0%	20	11.4%	17.5%	3,779	13.9%	20.5%	16	11.2%	16.3%	3,723	14.4%	19.3%
	Total	318	100%	53,128	100%	100.0%	175	100%	100%	27,280	100%	100%	143	100%	100%	25,848	100%	100%

Originations & Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan OH

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending														
		2022, 2023					2022						2023								
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar					
		Count		Dollar			Bank	Agg	%	Bank		Agg	Bank	Agg	%	Bank		Agg			
#	%	\$ (000s)	\$ %	%	#	%				%	\$ (000s)					\$ %	\$ %		#	%	%
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	17	8.1%	2,667	7.1%	22.7%	9	8.7%	20.7%	880	5.2%	21.1%	8	7.6%	21.2%	1,787	8.8%	21.8%			
	Middle	176	84.2%	32,482	87.1%	72.7%	85	81.7%	72.2%	15,026	88.7%	71.7%	91	86.7%	74.2%	17,456	85.7%	73.5%			
	Upper	16	7.7%	2,160	5.8%	4.5%	10	9.6%	7.0%	1,036	6.1%	7.1%	6	5.7%	4.6%	1,124	5.5%	4.7%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	209	100%	37,309	100%	100.0%	104	100%	100%	16,942	100%	100%	105	100%	100%	20,367	100%	100%			
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	7	9.2%	790	7.9%	22.7%	5	9.4%	19.9%	533	7.6%	20.2%	2	8.7%	22.5%	257	8.6%	25.8%			
	Middle	60	78.9%	8,031	80.3%	72.7%	42	79.2%	75.6%	5,695	81.3%	74.2%	18	78.3%	74.9%	2,336	77.9%	71.3%			
	Upper	9	11.8%	1,184	11.8%	4.5%	6	11.3%	4.5%	780	11.1%	5.6%	3	13.0%	2.6%	404	13.5%	2.8%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	76	100%	10,005	100%	100.0%	53	100%	100%	7,008	100%	100%	23	100%	100%	2,397	100%	100%			
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	16.7%	304	30.6%	22.7%	2	20.0%	21.2%	304	39.1%	22.4%	0	0.0%	21.6%	0	0.0%	21.1%			
	Middle	9	75.0%	632	63.6%	72.7%	7	70.0%	74.8%	417	53.6%	73.2%	2	100.0%	73.7%	215	100.0%	74.7%			
	Upper	1	8.3%	57	5.7%	4.5%	1	10.0%	4.0%	57	7.3%	4.4%	0	0.0%	4.8%	0	0.0%	4.2%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	12	100%	993	100%	100.0%	10	100%	100%	778	100%	100%	2	100%	100%	215	100%	100%			
MULTI-FAMILY	Low	0	0.0%	Multi-Family Units			0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	40.0%	1,345	48.5%	16.9%	1	50.0%	33.3%	645	40.2%	8.1%	1	33.3%	16.7%	700	60.0%	21.7%			
	Middle	3	60.0%	1,427	51.5%	80.2%	1	50.0%	66.7%	960	59.8%	91.9%	2	66.7%	83.3%	467	40.0%	78.3%			
	Upper	0	0.0%	0	0.0%	2.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	5	100%	2,772	100%	100.0%	2	100%	100%	1,605	100%	100%	3	100%	100%	1,167	100%	100%			
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	22.7%	0	0.0%	21.7%	0	0.0%	19.8%	0	0.0%	18.5%	0	0.0%	17.1%			
	Middle	0	0.0%	0	0.0%	72.7%	0	0.0%	73.9%	0	0.0%	70.8%	0	0.0%	78.5%	0	0.0%	80.0%			
	Upper	0	0.0%	0	0.0%	4.5%	0	0.0%	4.3%	0	0.0%	9.3%	0	0.0%	3.1%	0	0.0%	3.0%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%			

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan OH

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank		Dollar		Owner Occupied Units	Count		Dollar			Count		Dollar		
		Count	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%
	Moderate	2	12.5%	173	8.4%	22.7%	0	0.0%	16.9%	0	0.0%	19.9%	2	20.0%	26.6%	17.3%
	Middle	13	81.3%	1,594	77.8%	72.7%	5	83.3%	78.9%	665	70.2%	74.7%	8	80.0%	69.6%	92.9%
	Upper	1	6.3%	282	13.8%	4.5%	1	16.7%	4.2%	282	29.8%	5.4%	0	0.0%	3.8%	0
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0
	Total	16	100%	2,049	100%	100.0%	6	100%	100%	947	100%	100%	10	100%	100%	1,102
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	22.7%	0	0.0%	3.7%	0	0.0%	5.1%	0	0.0%	40.0%	0
	Middle	0	0.0%	0	0.0%	72.7%	0	0.0%	85.2%	0	0.0%	82.7%	0	0.0%	60.0%	0
	Upper	0	0.0%	0	0.0%	4.5%	0	0.0%	11.1%	0	0.0%	12.2%	0	0.0%	0.0%	0
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	30	9.4%	5,279	9.9%	22.7%	17	9.7%	20.2%	2,362	8.7%	20.3%	13	9.1%	21.6%	2,917
	Middle	261	82.1%	44,166	83.1%	72.7%	140	80.0%	73.7%	22,763	83.4%	73.2%	121	84.6%	74.2%	21,403
	Upper	27	8.5%	3,683	6.9%	4.5%	18	10.3%	6.0%	2,155	7.9%	6.4%	9	6.3%	4.2%	1,528
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0
	Total	318	100%	53,128	100%	100.0%	175	100%	100%	27,280	100%	100%	143	100%	100%	25,948

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

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan WV

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank		Dollar		Families by Family Income	Count		Dollar			Count		Dollar		
		Count	%	\$ (000s)	%		#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%
HOME PURCHASE	Low	3	4.4%	97	0.8%	17.7%	2	7.1%	5.0%	61	1.3%	2.0%	1	2.5%	5.2%	2.3%
	Moderate	9	13.2%	868	7.4%	15.6%	6	21.4%	19.4%	609	12.9%	12.6%	3	7.5%	14.6%	8.5%
	Middle	12	17.6%	1,763	15.0%	22.2%	4	14.3%	23.7%	655	13.8%	20.9%	8	20.0%	22.5%	16.8%
	Upper	37	54.4%	8,241	70.1%	44.6%	13	46.4%	33.8%	3,114	65.8%	44.0%	24	60.0%	41.8%	53.1%
	Unknown	7	10.3%	779	6.6%	0.0%	3	10.7%	18.0%	294	6.2%	20.5%	4	10.0%	16.0%	17.4%
	Total	68	100%	11,748	100%	100.0%	28	100%	100%	4,733	100%	100%	40	100%	100%	100%
REFINANCE	Low	1	6.7%	72	3.4%	17.7%	1	11.1%	11.1%	72	5.8%	6.7%	0	0.0%	10.5%	3.6%
	Moderate	3	20.0%	268	12.5%	15.6%	1	11.1%	19.3%	154	12.4%	14.0%	2	33.3%	23.7%	12.0%
	Middle	2	13.3%	55	2.6%	22.2%	2	22.2%	18.5%	55	4.4%	14.8%	0	0.0%	18.4%	14.6%
	Upper	8	53.3%	1,363	63.5%	44.6%	4	44.4%	44.4%	573	46.1%	52.2%	4	66.7%	40.8%	51.7%
	Unknown	1	6.7%	389	18.1%	0.0%	1	11.1%	6.7%	389	31.3%	12.2%	0	0.0%	6.6%	18.1%
	Total	15	100%	2,147	100%	100.0%	9	100%	100%	1,243	100%	100%	6	100%	100%	100%
HOME IMPROVEMENT	Low	0	0.00%	0	0.00%	17.7%	0	0.00%	9.5%	0	0.00%	1.9%	0	0.00%	3.7%	4.8%
	Moderate	0	0.00%	0	0.00%	15.6%	0	0.00%	14.3%	0	0.00%	11.1%	0	0.00%	22.2%	11.1%
	Middle	0	0.00%	0	0.00%	22.2%	0	0.00%	23.8%	0	0.00%	19.4%	0	0.00%	22.2%	18.5%
	Upper	0	0.00%	0	0.00%	44.6%	0	0.00%	42.9%	0	0.00%	57.8%	0	0.00%	44.4%	53.4%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	9.5%	0	0.00%	9.7%	0	0.00%	7.4%	12.2%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	100%
MULTI FAMILY	Low	0	0.00%	0	0.00%	17.7%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0.00%
	Moderate	0	0.00%	0	0.00%	15.6%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0.00%
	Middle	0	0.00%	0	0.00%	22.2%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0.00%
	Upper	0	0.00%	0	0.00%	44.6%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0.00%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	100.0%	0	0.00%	100.0%	0	0.00%	0.00%	0.00%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	0.00%	0.00%
OTHER PURPOSE LOC	Low	0	0.00%	0	0.00%	17.7%	0	0.00%	23.1%	0	0.00%	14.2%	0	0.00%	30.0%	13.2%
	Moderate	0	0.00%	0	0.00%	15.6%	0	0.00%	7.7%	0	0.00%	5.2%	0	0.00%	20.0%	8.2%
	Middle	0	0.00%	0	0.00%	22.2%	0	0.00%	30.8%	0	0.00%	18.9%	0	0.00%	0.0%	0.0%
	Upper	0	0.00%	0	0.00%	44.6%	0	0.00%	38.5%	0	0.00%	61.6%	0	0.00%	50.0%	78.6%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0.0%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	100%

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



Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan WV

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022					2023						
		Bank		Dollar		Families by Family Income	Count			Dollar			Count			Dollar		
		Count						Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	17.7%	0	0.0%	14.3%	0	0.0%	15.1%	0	0.00%	8.3%	0	0.00%	0.9%
	Moderate	0	0.0%	0	0.0%	15.6%	0	0.0%	14.3%	0	0.0%	9.5%	0	0.00%	8.3%	0	0.00%	4.5%
	Middle	1	100.0%	23	100.0%	22.2%	1	100.0%	14.3%	23	100.0%	3.4%	0	0.00%	41.7%	0	0.00%	58.6%
	Upper	0	0.0%	0	0.0%	44.6%	0	0.0%	57.1%	0	0.0%	72.1%	0	0.00%	41.7%	0	0.00%	36.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Total	1	100%	23	100%	100.0%	1	100%	100%	23	100%	100%	0	0.00%	100%	0	0.00%	100%
PURPOSE NOT APPLICABLE	Low	0	0.00%	0	0.00%	17.7%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Moderate	0	0.00%	0	0.00%	15.6%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Middle	0	0.00%	0	0.00%	22.2%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Upper	0	0.00%	0	0.00%	44.6%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	100.0%	0	0.00%	100.0%	0	0.00%	100.0%	0	0.00%	100.0%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%
HMDA TOTALS	Low	4	4.8%	169	1.2%	17.7%	3	7.9%	7.7%	133	2.2%	3.4%	1	2.2%	7.1%	36	0.5%	2.7%
	Moderate	12	14.3%	1,136	8.2%	15.6%	7	18.4%	18.6%	763	12.7%	12.6%	5	10.9%	17.1%	373	4.7%	9.0%
	Middle	15	17.9%	1,841	13.2%	22.2%	7	18.4%	22.1%	733	12.2%	19.0%	8	17.4%	21.5%	1,108	14.0%	18.5%
	Upper	45	53.6%	9,604	69.0%	44.6%	17	44.7%	37.6%	3,687	61.5%	46.0%	28	60.9%	41.8%	5,317	74.7%	52.6%
	Unknown	8	9.5%	1,168	8.4%	0.0%	4	10.5%	14.0%	683	11.4%	19.1%	4	8.7%	12.6%	485	6.1%	17.3%
	Total	84	100%	13,918	100%	100.0%	38	100%	100%	5,999	100%	100%	46	100%	100%	7,919	100%	100%

Originations & Purchases

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

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: Nonmetropolitan WV

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	9	13.2%	1,145	9.7%	9.2%	4	14.3%	9.0%	379	8.0%	8.9%	5	12.5%	7.5%	766	10.9%	5.4%
	Middle	49	72.1%	7,926	67.5%	69.7%	19	67.9%	76.6%	3,094	65.4%	72.4%	30	75.0%	76.5%	4,832	68.9%	76.6%
	Upper	10	14.7%	2,677	22.8%	21.1%	5	17.9%	14.4%	1,260	26.6%	18.8%	5	12.5%	16.0%	1,417	20.2%	18.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	68	100%	11,748	100%	100.0%	28	100%	100%	4,733	100%	100%	40	100%	100%	7,015	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	9.2%	0	0.0%	10.4%	0	0.0%	15.0%	0	0.0%	6.6%	0	0.0%	2.6%
	Middle	15	100.0%	2,147	100.0%	69.7%	9	100.0%	74.1%	1,243	100.0%	68.6%	6	100.0%	82.9%	904	100.0%	71.3%
	Upper	0	0.0%	0	0.0%	21.1%	0	0.0%	15.6%	0	0.0%	16.5%	0	0.0%	10.5%	0	0.0%	26.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	15	100%	2,147	100%	100.0%	9	100%	100%	1,243	100%	100%	6	100%	100%	904	100%	100%
HOME IMPROVEMENT	Low	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Moderate	0	0.00%	0	0.00%	9.2%	0	0.00%	14.3%	0	0.00%	23.6%	0	0.00%	3.7%	0	0.00%	0.9%
	Middle	0	0.00%	0	0.00%	69.7%	0	0.00%	66.7%	0	0.00%	57.5%	0	0.00%	85.2%	0	0.00%	88.6%
	Upper	0	0.00%	0	0.00%	21.1%	0	0.00%	19.0%	0	0.00%	18.9%	0	0.00%	11.1%	0	0.00%	10.5%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0	0.00%	0.00%
	Moderate	0	0.00%	0	0.00%	8.6%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0	0.00%	0.00%
	Middle	0	0.00%	0	0.00%	91.4%	0	0.00%	100.0%	0	0.00%	100.0%	0	0.00%	0.00%	0	0.00%	0.00%
	Upper	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0	0.00%	0.00%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.00%	0	0.00%	0.00%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	0.00%	0	0.00%	0.00%
OTHER PURPOSE LOC	Low	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Moderate	0	0.00%	0	0.00%	9.2%	0	0.00%	7.7%	0	0.00%	6.1%	0	0.00%	0.0%	0	0.00%	0.0%
	Middle	0	0.00%	0	0.00%	69.7%	0	0.00%	76.9%	0	0.00%	89.2%	0	0.00%	100.0%	0	0.00%	100.0%
	Upper	0	0.00%	0	0.00%	21.1%	0	0.00%	15.4%	0	0.00%	4.7%	0	0.00%	0.0%	0	0.00%	0.0%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%

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

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: Nonmetropolitan WV

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2022, 2023					2022						2023					
		Bank		Owner Occupied Units	Count		Dollar		Count	Agg	Bank	Agg	Count		Dollar		Agg	
		#	%		\$ (000s)	%	#	%					\$ (000s)	%	#	%		\$ (000s)
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Moderate	1	100.0%	23	100.0%	9.2%	1	100.0%	14.3%	23	100.0%	3.4%	0	0.00%	0.0%	0	0.00%	0.0%
	Middle	0	0.0%	0	0.0%	69.7%	0	0.0%	42.9%	0	0.0%	42.1%	0	0.00%	100.0%	0	0.00%	100.0%
	Upper	0	0.0%	0	0.0%	21.1%	0	0.0%	42.9%	0	0.0%	54.5%	0	0.00%	0.0%	0	0.00%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Total	1	100%	23	100%	100.0%	1	100%	100%	23	100%	100%	0	0.00%	100%	0	0.00%	100%
PURPOSE NOT APPLICABLE	Low	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Moderate	0	0.00%	0	0.00%	9.2%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Middle	0	0.00%	0	0.00%	69.7%	0	0.00%	50.0%	0	0.00%	94.7%	0	0.00%	50.0%	0	0.00%	21.6%
	Upper	0	0.00%	0	0.00%	21.1%	0	0.00%	50.0%	0	0.00%	5.3%	0	0.00%	50.0%	0	0.00%	78.4%
	Unknown	0	0.00%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%	0	0.00%	0.0%
	Total	0	0.00%	0	0.00%	100.0%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%	0	0.00%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	10	11.9%	1,168	8.4%	9.2%	5	13.2%	9.6%	402	6.7%	10.2%	5	10.9%	6.5%	766	9.7%	4.6%
	Middle	64	76.2%	10,073	72.4%	69.7%	28	73.7%	74.8%	4,337	72.3%	71.6%	36	78.3%	80.0%	5,736	72.4%	76.5%
	Upper	10	11.9%	2,677	19.2%	21.1%	5	13.2%	15.5%	1,260	21.0%	18.2%	5	10.9%	13.5%	1,417	17.9%	19.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	84	100%	13,918	100%	100.0%	38	100%	100%	5,999	100%	100%	46	100%	100%	7,919	100%	100%

Originations & Purchases  
Based on 2023 FHLB/Census Data; 2016-2020 AL's data

## Small Business Lending Tables

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Huntington-Ashland MSA

		Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	6	75.0%	737	50.3%	88.8%
	Over \$1 Million	1	12.5%	429	29.3%	9.7%
	Total Rev. available	7	87.5%	1,166	79.5%	98.5%
	Rev. Not Known	1	12.5%	300	20.5%	1.5%
	Total	8	100%	1,466	100%	100%
Loan Size	\$100,000 or Less	5	62.5%	218	14.9%	
	\$100,001 - \$250,000	0	0.0%	0	0.0%	
	\$250,001 - \$1 Million	3	37.5%	1,249	85.2%	
	Total	8	100%	1,466	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	83.3%	218	29.6%	
	\$100,001 - \$250,000	0	0.0%	0	0.0%	
	\$250,001 - \$1 Million	1	16.7%	520	70.6%	
	Total	6	100%	737	100%	

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Small Business Loans

Assessment Area: Huntington-Ashland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data						
		2023						
		Count				Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%		
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	18.2%		
	Moderate	1	12.5%	30	2.0%	20.8%		
	Middle	4	50.0%	670	45.7%	47.1%		
	Upper	3	37.5%	766	52.3%	13.8%		
	Unknown	0	0.0%	0	0.0%	0.0%		
	Total	8	100%	1,466	100%	100.0%		

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Nonmetropolitan WV

		Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	0	0.0%	0	0.0%	91.2%
	Over \$1 Million	1	25.0%	321	33.2%	6.0%
	Total Rev. available	1	25.0%	321	33.2%	97.2%
	Rev. Not Known	3	75.0%	645	66.8%	2.8%
	Total	4	100%	966	100%	100%
Loan Size	\$100,000 or Less	1	25.0%	49	5.1%	
	\$100,001 - \$250,000	1	25.0%	196	20.3%	
	\$250,001 - \$1 Million	2	50.0%	721	74.6%	
	Total	4	100%	966	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%	
	\$100,001 - \$250,000	0	0.0%	0	0.0%	
	\$250,001 - \$1 Million	0	0.0%	0	0.0%	
	Total	0	0.0%	0	0.0%	

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

### Geographic Distribution of Small Business Loans

Assessment Area: Nonmetropolitan WV

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2023				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%
	Moderate	1	25.0%	321	33.2%	7.7%
	Middle	1	25.0%	196	20.3%	77.5%
	Upper	2	50.0%	449	46.5%	14.7%
	Unknown	0	0.0%	0	0.0%	0.0%
	Total	4	100%	966	100%	100.0%

Originations & Purchases

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

Percentages may not total 100 percent due to rounding

## Appendix E – Glossary of Terms

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include 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 and withdrawn).

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

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

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

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

**Market share:** The number of loans originated and purchased by the institution as a percentage of 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 an 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 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 geography.

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

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

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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



**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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