

PUBLIC DISCLOSURE

October 6, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Virginia Bank of Tidewater

05511980

555 Main Street

Norfolk, Virginia 23510

Federal Reserve Bank of Richmond

P. O. Box 27622

Richmond, Virginia 23261

NOTE: 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.

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each Federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of First Virginia Bank of Tidewater, Norfolk, Virginia, prepared by The Federal Reserve Bank of Richmond, the institution's supervisory agency, as of October 6, 1997. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 228.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

First Virginia Bank of Tidewater primarily serves its assessment areas through direct lending, and a majority of the bank's loans were originated within its trade areas. The distribution of lending throughout the market is considered reasonable, and loans have been extended to customers of different income levels and to businesses of varying sizes. Participation in qualified community development investments has been good. The institution provides a full range of products and services to help meet the needs of local residents.

The following table indicates the performance level of First Virginia Bank of Tidewater with respect to the lending, investment, and service tests.

<u>First Virginia Bank of Tidewater</u>			
PERFORMANCE			
LEVELS	PERFORMANCE TESTS		
	LENDING TEST *	INVESTMENT TEST	SERVICE TEST
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

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

DESCRIPTION OF INSTITUTION:

First Virginia Bank of Tidewater is headquartered in Norfolk, Virginia, and operates 35 offices serving the southeastern portion of Virginia. This community encompasses the majority of the Hampton Roads area and the southern segment of the Eastern Shore. The institution is a subsidiary of First Virginia Banks, Inc., a multibank holding company located in the City of Falls Church, Virginia. As of September 30, 1997, the bank had \$483 million in assets of which 59% were loans and 31% were securities. The loan portfolio, as of September 30, 1997, was comprised of 50% real estate secured (including consumer and business), 43% consumer, 5% commercial/agricultural, and 2% other. The bank's previous CRA rating was satisfactory.

The bank serves two assessment areas. One of the assessment areas is located within the Norfolk-Virginia Beach-Newport News Metropolitan Statistical Area (MSA) and includes the Cities of Chesapeake, Norfolk, Portsmouth, Suffolk, and Virginia Beach, Virginia. The other assessment area is located on the Commonwealth's Eastern Shore and encompasses Accomack and Northampton Counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank offers a variety of credit products and serves its assessment areas primarily through direct lending. During a five-quarter period ending September 1997, the quarterly average loan-to-deposit ratio for all banks headquartered in metropolitan areas of Virginia and of similar asset size to First Virginia Bank of Tidewater ranged from 72% to 75%. The bank's average loan-to-deposit ratio for the previous five quarters is 70% and is considered reasonable given the institution's size, locations, and financial capacity. Since June 30, 1996, total loans have decreased by 1% while total deposits have grown by 3%.

As identified in the CRA Public File, a full range of credit products is offered including consumer, small business, commercial, residential mortgage, home improvement, residential construction, and agricultural loans. Long-term mortgages and Government sponsored real estate loans are offered through the bank's two mortgage affiliates, First Virginia Mortgage Company (FVMC) and First General Mortgage Company (FGMC).

The following chart depicts the bank's lending activity from January 1, 1996, through June 30, 1997, by number, dollar amount, and percentage for the types of loans listed. The table includes loan activity reported for CRA purposes, as well as data reported for the Home Mortgage Disclosure Act (HMDA). The figures also include loans within the bank's assessment areas made by affiliates.

First Virginia Bank of Tidewater Loan Originations/Purchases 1-1-96 through 6-30-97				
Description	Total Loans	Percent of Lending	Total Dollar Amount (000s)	Percent of Lending
Small Business/Small Farm*	397	5%	\$25,250	16%
HMDA*	784	9%	\$28,947	18%
Motor Vehicle	5,506	64%	\$81,264	52%
Other Consumer Secured	961	11%	\$12,134	8%
Other Consumer Unsecured	730	8%	\$2,750	2%
Home Equity	252	3%	\$6,601	4%
Totals	8,630	100%	\$156,946	100%

* The institution is required to collect information about these types of loans.

As illustrated above, consumer purpose loans, exclusive of HMDA reported loans, accounted for 86% of the number of originations and purchases. HMDA reportable loans accounted for approximately 18% of the total dollar amount extended during this time period. Included in the HMDA loan figures are Federal Housing Administration (FHA) Title I Home Improvement loans. These loans are regularly extended by the institution and primarily benefit low- and moderate-income residents by offering extended repayment terms and either minimal or no equity in the borrower's primary dwelling. In 1996, 61 FHA Title I Home Improvement loans totaling \$610,959 were originated. The institution's lending activity is considered flexible and responsive to assessment area credit needs.

A variety of flexible and innovative mortgage products is originated by FVMC, including Government sponsored loans. From January 1, 1996, through June 30, 1997, FVMC originated 25 Federal Housing Administration (FHA) loans and 18 Veterans Administration (VA) loans totaling \$3.6 million within the bank's two assessment areas.

Assessment Area Concentration

The institution's concentration of lending from January 1, 1996, through June 30, 1997, is represented in the following table by number and dollar amounts. This chart represents the lending activity of the bank (exclusive of affiliate lending) within the metropolitan and nonmetropolitan assessment areas.

Comparison of Credit Extended Inside and Outside of Assessment Areas

	Small Business/Farm*		Consumer		HMDA		Total	
	Inside	Outside	Inside	Outside	Inside	Outside	Inside	Outside
Number of Loans	345	31	5,869	1,418	650	31	6,864	1,480
Percentage of Loans	92%	8%	81%	19%	95%	5%	82%	18%
Amount of Loans (000's)	\$21,663	\$1,947	\$82,031	\$18,190	\$19,032	\$1,287	\$122,726	\$21,424
Percentage of Amount	92%	8%	82%	18%	94%	6%	85%	15%

As depicted above, a majority of the number (82%) and dollar amounts (85%) of total loans have been provided to area residents. The percentage of loans made in the assessment areas is considered responsive to community credit needs.

The geographic distribution of loans is addressed later in this evaluation and is considered adequate. The banks lending to low- and moderate-income individuals and businesses with revenues less than \$1 million is also discussed and is considered reasonable.

The overall rating of the institution under the lending test is low satisfactory.

INVESTMENT TEST

The institution's level of responding to community development needs through its investment activities is rated high satisfactory. Qualified investments promoting affordable housing were noted, as were several qualified donations.

SERVICE TEST

The overall rating of the institution under the service test is high satisfactory. Delivery systems, including ATMs, and branch locations are considered readily accessible, and the hours of operation are convenient to all portions of the assessment area. The banks participation in community development services is considered reasonable.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS AND REGULATIONS

No credit practices inconsistent with the substantive provisions of the fair housing and fair lending laws and regulations were identified. Technical violations of the Home Mortgage Disclosure Act's Regulation C were noted. Adequate policies, procedures, and training programs have been developed to support nondiscrimination in lending activities.

METROPOLITAN ASSESSMENT AREAS

(for each metropolitan area with some or all assessment areas reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CITIES OF CHESAPEAKE, NORFOLK, PORTSMOUTH, SUFFOLK, AND VIRGINIA BEACH, VIRGINIA:

As previously stated, the bank serves two assessment areas. The first assessment area contains 30 branch locations and encompasses the Cities of Chesapeake, Norfolk, Portsmouth, Suffolk, and Virginia Beach, Virginia. These cities are included in the Norfolk-Virginia Beach-Newport News Metropolitan Statistical Area (MSA) and consist of 236 census tracts. Thirty-eight of these census tracts are considered low-income tracts, 50 are moderate-income, 91 are middle-income, and 57 are upper-income areas. According to 1990 census data, this assessment area has a population of 962,322 and a median housing value of \$85,903. The owner-occupancy rate for the market is 89% which is slightly higher than that for the MSA (88%) and for metropolitan portions of the Commonwealth of Virginia (80%). The 1997 median family income for the MSA is \$43,600.

The following table provides demographics for the metropolitan assessment area by the income level of families and the percentage of population living in census tracts of varying income levels. The percentage of owner-occupied housing units by income level of census tract is also shown.

Demographics for Assessment Area

	Low- Income	Moderate- Income	Middle- Income	Upper- Income	Total
Percentage of Area Families by Income Level	19%	19%	24%	38%	100%
Percentage of Population Residing in Census Tracts by Income Level of Tract	10%	18%	44%	28%	100%
Percentage of Owner-Occupied Housing Units by Income Level of Tract	3%	11%	49%	37%	100%

Despite recent spending reductions, local military installations remain major employers in the area. The region is home to numerous military facilities, including the Oceana Naval Air Station, Fort Story Army Base, Dam Neck Fleet Combat Training Center, and Little Creek Naval Installation. The local economy is additionally supported by retail, tourism, and convention activity. The area also attracts a large number of developers for both residential and multifamily structures, as well as commercial and industrial facilities. The unemployment rate for the Norfolk-Virginia Beach-Newport News MSA is 5.1%. By comparison, the jobless rate for the Commonwealth is 4.3%.

A community contact was made to further assist in evaluating the bank's CRA performance. According to the contact, the community would benefit from additional small business and commercial development lending options.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CITIES OF CHESAPEAKE, NORFOLK, PORTSMOUTH, SUFFOLK, AND VIRGINIA BEACH, VIRGINIA:

LENDING TEST

Geographic Distribution of Loans

The geographic distribution of loans is reflected in the following tables. The tables represent the institutions lending within the metropolitan assessment area according to the income level of census tract. These loans were originated from January 1, 1996, through June 30, 1997.

Distribution of Small Business/Farm Loans by Income Level of Census Tract
(Includes Affiliate Lending)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Loans	5	36	80	82	203
Percentage of Total Loans	3%	18%	39%	40%	100%
Total Amount of Loans (000s)	\$222	\$3,372	\$8,919	\$6,979	\$19,492
Percentage of Total Loans	1%	17%	46%	36%	100%

Distribution of Consumer Loans by Income Level of Census Tract
(Includes Affiliate Lending)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Loans	87	519	2,760	2,080	5,446
Percentage of Total Loans	2%	10%	50%	38%	100%
Total Amount of Loans (000's)	\$1,096	\$6,366	\$38,082	\$30,573	\$76,117
Percentage of Total Loans	2%	8%	50%	40%	100%

Distribution of HMDA Loans by Income Level of Census Tract
(Includes Affiliate Lending)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Loans	14	69	349	208	640
Percentage of Total Loans	2%	11%	55%	32%	100%
Total Amount of Loans (000's)	\$392	\$1,892	\$11,741	\$8,501	\$22,526
Percentage of Total Loans	2%	8%	52%	38%	100%

Overall, 12% (730/6,289) of the banks loans within the assessment area were extended to individuals and businesses located in low- and moderate-income census tracts. This level of lending is lower than the percentage of the population (28%) residing in low- and moderate-income geographies. The volume of HMDA loans in low- and moderate-income tracts was slightly below the percentage of owner-occupied units in such tracts (14%).

Several of the moderate-income geographies in the assessment area are located within, or in close proximity to, four military installations. Large credit unions that have traditionally served military personnel operate within such tracts and throughout the assessment area. Competition from these credit unions may have contributed to the low volume of bank lending within low- and moderate-income census tracts. Given the local competition and economic conditions, as well as the size and locations of the institution, the banks overall loan distribution within the assessment area is considered adequate.

Borrowers' Profile

The following charts illustrate the distribution of consumer, HMDA, and small business/farm loans extended in the metropolitan assessment area by income level of the borrower or to businesses of different sizes. These loans were originated from January 1, 1996, through June 30, 1997.

Distribution of Consumer Loans by Income Level of Borrower
(Includes Affiliate Loans)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Consumer Loans	575	1,136	1,578	2,053	5,342
Percentage of Total Loans	11%	21%	30%	38%	100%
Total Amount of Consumer Loans (000's)	\$5,288	\$13,595	\$22,160	\$34,772	\$75,815
Percentage of Total Amount	7%	18%	29%	46%	100%

Distribution of HMDA Loans by Income Level of Borrower
(Includes Affiliate Loans)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Consumer Loans	36	117	169	291	613
Percentage of Total Loans	6%	19%	28%	47%	100%
Total Amount of Consumer Loans (000's)	\$815	\$3,258	\$5,026	\$12,264	\$21,363
Percentage of Total Amount	4%	15%	24%	57%	100%

As depicted in the previous tables, the percentage of consumer loans (32%) and HMDA loans (25%) extended to low- and moderate-income borrowers is somewhat less than the percentage of such families (38%) in the assessment area.

Distribution of Lending by Loan Amount and Size of Business or Farm
(Includes Affiliate Lending)

	\$0 - \$100,000		> \$100,000 - \$250,000		> \$250,000		Total	
Total Revenues ≤ \$1 Million	128	72%	17	9%	9	5%	154	86%
Total Revenues > \$1 Million	14	7%	5	3%	6	4%	25	14%
Totals	142	79%	22	12%	15	9%	179	100%

As illustrated above, 86% (154/179) of the small business/farm loans in the assessment area were provided to businesses with revenues of \$1 million or less. Furthermore, 72% of small business/farm loans were to borrowers with revenues not exceeding \$1 million and for an amount of \$100,000 or less. This level of lending demonstrates the bank's willingness to meet the credit needs of local small businesses.

The distribution of loans to borrowers of different income levels and to businesses of different sizes is considered satisfactory relative to the estimated demand for these loan types, using area demographics as a proxy.

Community Development Loans

To the extent the bank may have originated any community development loans, such financing has been reported as small business or HMDA loans.

INVESTMENT TEST

The bank has purchased six Virginia Housing Development Authority (VHDA) bonds totaling \$3.1 million. The VHDA is a self-supporting, independent agency of the Commonwealth that serves as a public mortgage lending institution. The purpose of the Authority is to facilitate the housing needs of low- and moderate-income individuals and families. Bond proceeds are used to finance single-family and multi-family mortgages throughout Virginia, including the bank's assessment areas.

In addition, contributions totaling \$5,250 have been provided to several organizations that primarily serve low- and moderate-income residents of the metropolitan assessment area. The institutions' level of qualified investments is considered good.

SERVICE TEST

Accessibility of Delivery Systems

Delivery systems are accessible to all portions of the assessment area. Twenty-five Automated Teller Machines (ATMs) are located in the metropolitan assessment area. These ATM locations provide local residents with 24-hour nationwide network access. Four (15%) of the metropolitan ATMs are located within low- and moderate-income census tracts. Telephone services are also provided to area consumers. A loan by telephone line is available to potential borrowers from 7:30 a.m. to 8:00 p.m., Monday through Friday, and a 24-hour telephone information line is available to all customers.

Branch Locations and Hours of Operation

First Virginia Bank of Tidewater has 30 metropolitan offices of which six (20%) are located in low- and moderate-income census tracts. Additionally, branch locations and business hours are considered convenient and meet the needs of the assessment area. While most branch offices are open Monday through Friday until 6:00 p.m., several branches offer Saturday hours, and some offices provide extended evening hours until 7:00 p.m. One branch office has been closed since the previous evaluation. A branch closing policy has been adopted as required by the Federal Deposit Insurance Corporation Improvement Act of 1991.

Community Development Services

Bank personnel provide technical assistance to community development organizations. Specifically, the chief executive officer served on the Norfolk Redevelopment and Housing Authority assisting in the procurement of a Government grant and establishment of the "Norfolk Works" program. This program assists low- and moderate-income individuals with employment opportunities. Bank personnel also routinely provide credit counseling and other assistance to many low- and moderate-income individuals in applying for and understanding credit. Furthermore, the bank provides social security check cashing for noncustomers at no charge. The institution's provision of community development services is considered appropriate.

NONMETROPOLITAN STATEWIDE AREAS

(if some or all of the assessment areas within the nonmetropolitan statewide area were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COUNTIES OF ACCOMACK AND NORTHAMPTON, VIRGINIA:

The bank's second assessment area includes the nonmetropolitan Counties of Accomack and Northampton, Virginia. Five branches are located within this community. The assessment area consists of 12 block numbering areas (BNAs) of which 11 are populated.

Of the populated geographies, four are moderate-income and seven are middle-income. There are no upper-income BNAs and no populated low-income geographies within the assessment area. According to 1990 census data, this market has a population of 44,764 and a median housing value of approximately \$50,791. The owner-occupancy rate for the assessment areas is 58%, which is lower than the 65% rate for the nonmetropolitan portions of the Commonwealth. The 1997 median family income for nonmetropolitan areas within Virginia is \$34,800.

The following table provides demographics for the assessment area by the income level of families and the percentage of population living in BNAs of varying income levels. The percentage of owner-occupied housing units by geography is also provided.

Nonmetropolitan Assessment Area

	Low- Income	Moderate- Income	Middle- Income	Upper- Income	Total
Percentage of Area Families by Income Level	27%	20%	22%	31%	100%
Percentage of Population Residing in BNAs by Income Level of BNA	0%	37%	63%	0%	100%
Percentage of Owner-Occupied Housing Units by Income Level of BNA	0%	34%	66%	0%	100%

This is predominantly a rural area. The economies of the two counties are supported by industries such as fishing, agriculture, and local government. Additionally, many residents commute to the Norfolk-Virginia Beach-Newport News MSA for a variety of employment opportunities. The recent unemployment rates for Accomack and Northampton Counties are 9.1% and 8.1%, respectively. The area's unemployment rates are significantly higher than the Commonwealth's rate of 4.3%, primarily due to the decline of the fishing industry and the seasonal nature of local employment opportunities.

A recent community contact was made to further assist in evaluating the bank's CRA performance. According to the contact, the community would benefit from additional small business and commercial development lending options.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COUNTIES OF ACCOMACK AND NORTHAMPTON, VIRGINIA:

LENDING TEST

Geographic Distribution of Loans

The geographic distribution of small business/farm, consumer, and HMDA loans is reflected in the following tables. The tables represent the institutions lending within the nonmetropolitan assessment area according to income level of the geography.

As previously mentioned, there are no upper-income and no populated low-income BNAs in the assessment area. These loans were originated from January 1, 1996, through June 30, 1997.

Distribution of Small Business/Farm Loans by Income Level of BNA
(Includes Affiliate Lending)

	Moderate-Income	Middle-Income	Total
Total Number of Loans	41	99	140
Percentage of Total Loans	29%	71%	100%
Total Amount of Loans (000's)	\$821	\$2,236	\$3,057
Percentage of Total Loans	27%	73%	100%

Distribution of Consumer Loans by Income Level of BNA
(Includes Affiliate Lending)

	Moderate-Income	Middle-Income	Total
Total Number of Loans	193	476	669
Percentage of Total Loans	29%	71%	100%
Total Amount of Loans (000's)	\$2,256	\$6,027	\$8,283
Percentage of Total Loans	27%	73%	100%

Distribution of HMDA Loans by Income Level of BNA
(Includes Affiliate Lending)

	Moderate-Income	Middle-Income	Total
Total Number of Loans	32	81	113
Percentage of Total Loans	28%	72%	100%
Total Amount of Loans (000's)	\$1,197	\$3,936	\$5,133
Percentage of Total Loans	23%	77%	100%

Overall, 29% (266/922) of the banks loans originated within the assessment area were extended to individuals and businesses located in moderate-income BNAs. This level of lending is somewhat lower than the percentage of the population (37%) residing in moderate-income geographies. The percentage of HMDA lending (28%) in moderate-income BNAs is also below the percentage of owner-occupied units in such BNAs (34%). Given the local economic conditions and the size and location of the institution, the banks overall loan distribution is considered adequate.

Borrowers' Profile

The following charts illustrate the distribution of consumer, HMDA, and small business/farm loans extended in the nonmetropolitan assessment area by income level of the borrower and to businesses of different sizes. This information includes loan originations from January 1, 1996, through June 30, 1997.

Distribution of Consumer Loans by Income Level of Borrower
(Includes Affiliate Lending)

	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Total
Total Number of Consumer Loans	76	152	193	234	655
Percentage of Total Loans	12%	23%	29%	36%	100%
Total Amount of Loans (000's)	\$497	\$1,510	\$2,347	\$3,891	\$8,245
Percentage of Total Amount	6%	18%	29%	47%	100%

Distribution of HMDA Loans by Income Level of Borrower
(Includes Affiliate Lending)

	Low- Income	Moderate- Income	Middle- Income	Upper- Income	Total
Total Number of Consumer Loans	13	19	30	42	104
Percentage of Total Loans	13%	18%	29%	40%	100%
Total Amount of Loans (000's)	\$218	\$338	\$1,142	\$3,006	\$4,704
Percentage of Total Amount	5%	7%	24%	64%	100%

As depicted in the previous tables, the percentage of consumer loans (35%) and HMDA loans (31%) extended to low- and moderate-income borrowers is somewhat less than the percentage of such families (47%) in the assessment area.

Distribution of Lending by Loan Amount and Size of Business or Farm
(Includes Affiliate Lending)

	\$0 - \$100,000		> \$100,000 - \$250,000		> \$250,000		Total	
Total Revenues ≤ \$1 Million	129	94%	4	3%	1	1%	134	98%
Total Revenues > \$1 Million	3	2%	0	0%	0	0%	3	2%
Totals	132	96%	4	3%	1	1%	137	100%

As illustrated above, 98% (134/137) of the small business/farm loans in the assessment area were provided to businesses with revenues of \$1 million or less. Furthermore, 94% small business/farm loans were to borrowers with revenues not exceeding \$1 million and for an amount of \$100,000 or less. This level of lending demonstrates the bank's willingness to meet the credit needs of local small businesses.

The distribution of loans to borrowers of different income levels and to businesses of different sizes is considered satisfactory relative to the estimated demand for these loan types, using area demographics as a proxy.

Community Development Loans

To the extent the bank may have originated any community development loans, such financing has been reported as small business or HMDA loans.

INVESTMENT TEST

As previously stated, the bank holds VHDA bonds. VHDA bond proceeds are used to finance affordable single-family and multi-family mortgages throughout Virginia, including the bank's assessment areas. A contribution for \$175 was also provided to the Eastern Shore Housing Authority. Overall, the institutions level of qualified investments within this community is considered reasonable.

SERVICE TEST

Accessibility of Delivery Systems

Delivery systems are accessible to all portions of the assessment area. Three ATMs are included within the nonmetropolitan assessment area. These ATM locations provide local residents with 24-hour nationwide network access. Telephone and mail banking services are also available to provide customers with 24-hour accessibility.

Branch Locations and Hours of Operation

The institution operates five nonmetropolitan offices, all of which are located in middle-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. All branch offices are open Monday through Friday until 6:00 p.m. Three branches offer Saturday hours, and one branch is open on Sunday. No offices have been closed since the previous evaluation, and the required FDICIA branch closing policy has been adopted.

Community Development Services

Bank personnel routinely provide credit counseling and other assistance to many low- and moderate-income individuals in applying for and understanding credit. The bank also provides social security check cashing for noncustomers at no charge. The institutions provision of community development services is considered appropriate.