



Office of the  
Comptroller of the Currency  
Washington, DC 20219

**SMALL BANK**

## **PUBLIC DISCLOSURE**

August 31, 2020

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

Tecumseh Federal Bank  
Charter Number 705275

160 North 4th St.  
Tecumseh, NE 68450

Office of the Comptroller of the Currency

13710 FNB Parkway, Suite 110  
Omaha, NE 68154-5298

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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	4
State Rating.....	5
State of Nebraska.....	5
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

Tecumseh Federal Bank's (TFB/Bank) lending performance reflects a satisfactory response to the needs of its assessment area (AA). The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable when compared to similarly situated banks.
- Management originated a majority of the loans to customers inside the bank's AA.
- The distribution of loans to geographies of different income levels is reasonable compared to AA demographics.
- The distribution of loans among borrowers of different income levels is reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition and credit needs of the AA, the LTD ratio is reasonable.

TFB's average quarterly LTD was 77.1 percent for the previous twelve quarters, from March 31, 2017 to December 31, 2019. The LTD ratio ranged from a quarterly low of 69.9 percent to a quarterly high of 81.3 percent. We compared TFB's average LTD ratio to the average LTD ratio of other community banks operating in the bank's AA. The average quarterly LTD ratio for competitor banks was 81.3 percent for the twelve quarters from March 31, 2017 to December 31, 2019. The ratio ranged from an average quarterly low of 42.5 percent to an average quarterly high of 109.2 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 83 percent of its loans by number inside the bank's AAs during the evaluation period. This analysis is performed at the bank level rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$ (000s)				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	16	80	4	20	20	1,631	55	1,350	45	2,981
Consumer	17	85	3	15	20	266	84	52	16	318
Total	33	83	7	17	40	1,897	58	1,402	42	3,299

## Description of Institution

TFB is a \$49 million mutual thrift in Tecumseh, Nebraska. As a traditional thrift, TFB's primary focus is mortgage loans for the construction, purchase, refinance, and improvement of 1-4 family dwellings. As of June 30, 2020, the bank reported gross loans of \$28.7 million and tier 1 capital of \$10.6 million. Gross loans represented 58 percent of total assets. TFB did not merge with or acquire any banking institution during the evaluation period.

The bank's AA is not in a metropolitan statistical area (MSA) or a metropolitan division (MD) area. TFB operates in one AA consisting of 25 contiguous census tracts (CTs) across eight counties in Nebraska: Gage, Jefferson, Johnson, Nemaha, Otoe, Pawnee, Richardson, and Thayer. The bank operates a single branch and one automated teller machine (ATM) in Johnson County. All eight counties are in southeast Nebraska and include the towns of Beatrice, Nebraska City, and Auburn. The AA contains zero low-income CTs, two moderate-income CTs, 18 middle-income CTs, and five upper-income CTs. According to the 2015 ACS U.S. Census, the population of the AA is 73,537, with a median income of \$61,457. The agricultural, forestry, and fishing sector represents 17 percent of businesses, while 83 percent are non-farm businesses. The two biggest sectors for non-farm businesses are services at 33 percent and retail trade at 12 percent. Approximately 71 percent of businesses employ less than five employees, with 81 percent earning less than \$1 million in revenue.

The last CRA examination occurred in 2016, with a Public Disclosure report date of May 31, 2016. TFB received a "Satisfactory" rating at that examination. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated TFB under the Small Bank CRA examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The lending test covers TFB's performance from January 1, 2017 to December 31, 2019. The lending test evaluated home mortgage and consumer loans, as these loan types were determined to be the primary loan products during the evaluation period by percentage of dollar amount and by percentage of number. To evaluate the lending performance, we selected 20 loans per primary product type and used that information in the lending analysis. The following table summarizes the percentage of loan originations by loan type over the evaluation period.

Loan Originations		
Loan Types	% By Dollar	% By Number
Home Mortgage / Residential	55.0	21.1
Consumer	11.3	45.2
Agricultural	27.3	21.9
Commercial	6.4	11.8
Total	100.0	100.0

Source: Bank-provided loan origination reports; 2017-2019.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A: Scope of Examination for a list of full- and limited-scope AAs.

## **Ratings**

The bank's overall rating is based on the bank's one AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

### **State of Nebraska**

#### **CRA rating for the State of Nebraska: Satisfactory**

#### **The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- TFB originated a majority of the loans to customers inside the bank's AA.
- The distribution of loans to geographies of different income levels is reasonable compared to AA demographics.
- The distribution of loans among borrowers of different income level is reasonable.

#### **Description of Institution's Operations in Nebraska**

TFB's focus is consistent with the traditional thrift model. The bank operates with one office and one ATM outside the bank office and has no holding company. There have been no changes in the bank's offices or ATMs since the prior CRA examination. The bank uses agents to originate loans throughout the state of Nebraska. The AA is rural, with lending opportunities primarily centered around agricultural production. As a thrift, the institution is restricted in the types of loans and the volume of loans they can originate and hold. Management has increased lending in agricultural production over the past several years. In addition to mortgage loans, the bank offers non-residential real estate mortgage products, commercial non-mortgage, and consumer loans. There continues to be a need for small dollar consumer and installment loans. As of June 30, 2019, TFB ranks 24th in deposits in its AA at \$35.6 million, representing 1.48 percent of total market share. All the bank's deposits are within the AA. Competition is strong, with a mix of local and regional banks in the local market.

We interviewed one community contact to gain additional insight of the AA. The contact indicated that the overall economic condition in the area is stagnant, as COVID-19 has negatively impacted the local community and agricultural commodity prices have remained compressed. The contact concluded that financial institutions in the area meet the credit needs of the community.

## Nebraska non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Nebraska Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	8.0	72.0	20.0	0.0
Population by Geography	73,537	0.0	4.4	73.7	21.9	0.0
Housing Units by Geography	35,720	0.0	5.5	74.9	19.7	0.0
Owner-Occupied Units by Geography	22,928	0.0	4.5	72.9	22.6	0.0
Occupied Rental Units by Geography	8,244	0.0	6.6	79.4	14.0	0.0
Vacant Units by Geography	4,548	0.0	8.3	76.3	15.4	0.0
Businesses by Geography	5,601	0.0	5.5	74.4	20.1	0.0
Farms by Geography	1,181	0.0	4.7	63.7	31.7	0.0
Family Distribution by Income Level	19,848	18.4	18.2	23.6	39.8	0.0
Household Distribution by Income Level	31,172	24.7	16.8	18.8	39.6	0.0
Median Family Income Non-MSAs - NE		\$61,457	Median Housing Value			\$95,007
			Median Gross Rent			\$583
			Families Below Poverty Level			7.8%
Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

## Scope of Evaluation in Nebraska

The bank operates in one AA in the State of Nebraska. A full scope review was performed for the Nebraska Non-MSA AA.

## LENDING TEST

The bank's performance under the Lending Test in Nebraska is rated Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nebraska Non-MSA AA is good.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

## Home Mortgage Loans

Refer to Table O in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to CTs of different income levels is reasonable. TFB originated 5.0 percent of home mortgage loans in moderate-income CTs, which account for 4.5 percent of owner-occupied housing units in the AA. The largest loan penetration is to middle-income CTs at 90.0 percent. This category represents the largest volume of owner-occupied housing units in the AA at 72.9 percent. The remaining five percent of loan penetration is to upper-income CTs, which represents 22.6 of the owner-occupied housing units in the AA.

### ***Consumer Loans***

Refer to Table U in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to CTs of different income levels is poor. TFB did not originate any loans in moderate-income CTs, which is below the demographic comparator of 5.1 percent of households in moderate-income CTs. TFB originated 90.0 percent of consumer loans to middle-income CTs, which represent 74.6 percent of households in the AA.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is reasonable. TFB originated 15 percent of home mortgage loans to low-income borrowers in the AA compared to 18.4 percent of families in the AA who are low income. This compares favorably to the aggregate data of 11.3 percent. TFB originated 15 percent of home mortgage loans to moderate-income borrowers in the AA compared to 18.2 percent of families in the AA who are moderate income. This compares reasonably to the aggregate data of 20.6 percent. We relied more heavily on aggregate data as our analysis showed it is more advantageous for low-income individuals to rent rather than purchase a home.

### ***Consumer Loans***

Refer to Table V in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is excellent. TFB originated 40 percent of consumer loans to low-income borrowers in the AA, significantly exceeding the demographic comparator of 24.7 percent of households. TFB originated 10 percent of loans to moderate-income borrowers in the AA, which account for 16.8 percent of households in the AA.

### **Responses to Complaints**

There were no complaints relating to the bank's CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage and consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Nebraska		
Nebraska Non-MSA AA	Full-scope	The AA includes: Gage, Jefferson, Johnson, Nemaha, Otoe, Pawnee, Richardson, and Thayer County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: Tecumseh Federal Bank	
Overall Bank:	Lending Test Rating
Tecumseh Federal Bank	Satisfactory
State:	
Nebraska	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** 2017-19

Assessment Area:	Total Home Mortgage Loans \$(000)			Low-Income Tracts				Moderate-Income Tracts				Middle-Income Tracts				Upper-Income Tracts				Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans
Nebraska Non-MSA AA	20	1,956	100.0	0.0	0.0	0.0	4.5	5.0	2.8	72.9	90.0	69.4	22.6	5.0	27.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>1,956</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>4.5</b>	<b>5.0</b>	<b>2.8</b>	<b>72.9</b>	<b>90.0</b>	<b>69.4</b>	<b>22.6</b>	<b>5.0</b>	<b>27.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2017-19

Assessment Area:	Total Home Mortgage Loans \$(000)			Low-Income Borrowers				Moderate-Income Borrowers				Middle-Income Borrowers				Upper-Income Borrowers				Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Nebraska Non-MSA AA	20	1,956	100.0	18.4	15.0	11.3	18.2	15.0	20.6	23.6	20.0	21.0	20.0	31.5	0.0	0.0	15.6	0.0	0.0	0.0	0.0	0.0	15.6
<b>Total</b>	<b>20</b>	<b>1,956</b>	<b>100.0</b>	<b>18.4</b>	<b>15.0</b>	<b>11.3</b>	<b>18.2</b>	<b>15.0</b>	<b>20.6</b>	<b>23.6</b>	<b>20.0</b>	<b>21.0</b>	<b>20.0</b>	<b>31.5</b>	<b>0.0</b>	<b>0.0</b>	<b>15.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.6</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data  
Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-19	
Assessment Area:	Total Consumer Loans \$(000)			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Nebraska Non-MSA AA	20	277	100.0	0.0	0.0	5.1	0.0	74.6	90.0	20.3	10.0	0.0	0.0
Total	20	277	100.0	0.0	0.0	5.1	0.0	74.6	90.0	20.3	10.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-19	
Assessment Area:	Total Consumer Loans \$(000)			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available- Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
	20	277	100.0	24.7	40.0	10.0	16.8	10.0	18.8	10.0	39.6	40.0	0.0
Nebraska Non-MSA AA	20	277	100.0	24.7	40.0	10.0	16.8	10.0	18.8	10.0	39.6	40.0	0.0
Total	20	277	100.0	24.7	40.0	10.0	16.8	10.0	18.8	10.0	39.6	40.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0													